

BOSTON COLLEGE  
PRINCIPAL INVESTIGATOR'S  
HANDBOOK

August 2002



# TABLE OF CONTENTS

## Section I – Introduction

Preface	2
Overview	3
Sponsored Projects - Basic Considerations	3
Principal Investigators	4
Organization of Sponsored Projects	4

## Section II - Pre-Award Activities

A. Funding Sources	8
1. Identifying Sources of Funds	
2. Pre-proposal Activities	
a. Initial Contact with Sponsor	
b. Application Guidelines	
B. Proposal Preparation	10
1. Preliminary Inquiries	
2. Proposal Guidelines	
3. Suggested Format	
a. Title and Cover Page	
b. Abstract or Project Summary	
c. Introduction	
d. Project Goals and Objectives	
e. Plan of Action, Methods, Design	
f. Bibliography	
g. Curriculum Vitae	
h. Required Reviews (Human Subjects, Animals)	
i. Budget	
1. Direct Costs	
a. Salaries and Wages	
b. Fringe Benefits	
c. Consultants	
d. Equipment	
e. Materials and Supplies	
f. Travel Costs	
g. Subcontracts	
h. Other Direct Costs	

2. Indirect Costs	
3. Cost-sharing/Matching Funds	
4. Miscellaneous Proposal Information	
a. Active and Pending Support	
b. Appendices	
c. Facilities and Equipment	
d. Information and Technology Support	
C. Proposal Submission Process	16
1. University Review and Approval	
2. Signatures and Authorizations	
3. Required Copies of the Proposal	
4. Sponsor Deadlines	
5. Multiple Submissions	
D. Sponsor Proposal Review	17
1. Types of Review	
2. Obtaining Reviewers' Comments	
E. Negotiation and Acceptance of Sponsored Agreements	18

### **Section III - Post-Award Activities**

A. Award Administration	21
1. Introduction	
2. Establishing an Account	
3. Subcontracting	
B. Expenditure Processing	21
1. Office of Contracts and Grants (Controller's Office)	
2. Indirect Costs	
3. Payment of an Expenditure	
4. Consultants	
5. Travel Policy	
a. General Policy	
b. Contract and Grant Travel	
c. Foreign Travel	
d. Travel Management Program	

6. Equipment	
7. Procurement	
8. Property Management	
9. Interpreting Monthly Accounting Reports	
a. Sample Monthly Accounting Report	
10. Personnel	
a. Personnel Action Forms	
b. Time and Effort Report	
11. Cost Transfers	
12. Financial Reports	
13. Audit	
<b>C. Administrative Procedures</b>	<b>26</b>
1. Project Management	
2. Post-Award Administration	
a. Rebudgeting	
b. No-cost extensions	
c. Change in Key Project Personnel	
d. Change in the Statement of Work	
e. Extra Compensation	
f. Equipment	
g. Foreign Travel	
h. Stipend and Tuition Remission	
i. Carryover of Funds	
j. Subcontracts/Subagreements	
<b>D. Reporting Requirements</b>	<b>28</b>
1. Interim Program/Progress Reports	
2. Interim/Final Financial Reports	
3. Final Technical Reports	
4. Closeout Documents	
<b>Section IV - Miscellaneous</b>	
A. Intellectual Property	30
B. Internal Grant Programs	30
C. Sponsored Projects - Related Policies and Guidelines	31

## **Appendices**

Appendix A - Proposal Transmittal Form

Appendix B - Prior Approval Form

# **SECTION I**

## **INTRODUCTION**

## PREFACE

The mission of the Office for Sponsored Projects (OSP) is to provide excellent service to those members of the University community involved in the application for and administration of sponsored projects, to support the University's goal to increase the level of sponsored project funding, and to protect the University's interests and comply with the sponsored project requirements to which the University and sponsors may agree.

Over the past decade, Boston College has seen a dramatic expansion in the area of sponsored projects. The increased external funding of faculty activities is a reflection of the University's dynamic growth and development as a major educational institution. This *Sponsored Projects Handbook* is designed to introduce faculty and administrators to the process of obtaining funding for and administering sponsored projects. It also serves as an introductory guide to the policies and procedures that govern interactions with external funding organizations. It is *not* intended as a comprehensive source of information. Rather, our purpose is to provide general guidance for all phases of sponsored projects; i.e., searching for funding sources, proposal submission, negotiation of award documents, award administration, and award close-out.

The *Handbook* is a collaborative effort with the Office of Contracts and Grants, and the contributions of John Krieg (Assistant Controller) and Fred Crompt (Manager, Contracts and Grants) are gratefully acknowledged. Within OSP, Joanne Scibilia (Associate Director), Susan Hoban (Assistant Director for Awards Administration), Peter Herrick (Assistant Director for Program Development), and Joanne Bryson (Administrative Coordinator) each had a significant role in contributing various sections to the *Handbook*.

The *Handbook* has been prepared to accommodate inevitable changes in the sponsored projects environment. It is our intent to update the *Handbook* every two to three years as necessary. As you use it in the course of performing or administering sponsored projects, we would appreciate any comments or suggestions you would care to make in order to make the *Handbook* as useful as possible.

John Carfora, Director  
Office for Sponsored Projects

Michael A. Smyer  
Associate Vice President for Research

August 2002

## OVERVIEW

The Office for Sponsored Projects' (OSP) responsibilities relate to sponsored projects in which members of the University community participate. In performing its functions, OSP works closely with faculty, department chairs and administrators, as well as a number of other University administrative offices. It is also the prime contact point for sponsors and subcontractors on the business related issues involved in sponsored projects. This *Handbook* describes the procedures OSP, faculty, and administrative staff should follow in carrying out sponsored projects at the University.

### SPONSORED PROJECTS - BASIC CONSIDERATIONS

While OSP's name indicates that it has administrative responsibilities related to the conduct of *research* at Boston College, it is actually involved with **all sponsored projects**. Sponsored projects fall within several general functional categories. Examples of those categories are: research, training, curriculum development, public services, fellowships, art exhibitions, and equipment awards.

Sponsors of those activities 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.

OSP does not involve itself with gifts or other unrestricted funds that fall within the purview of the Development Office. The following definition of a sponsored project is pertinent to clarifying the distinction between the types of funding handled by OSP and the Development Office<sup>1</sup>:

"Sponsored projects are research, training, or instructional projects involving funds, materials, other forms of compensation, or exchanges of in-kind efforts from sources external to Boston College under awards or agreements which contain *any one of the following criteria*:

- The award or agreement binds the University to a scope of work that is specified to a substantial level of detail. This would, for example, include funding that is dedicated to an investigator's particular research project, a grant to a department under which seed money for particular projects would be distributed, and the training of graduate students on specific projects. It would not include funding that provides general research support to a department or an individual.
- 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."

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<sup>1</sup> This definition is quoted from a joint statement broadly distributed in September 1993 by the Office for Sponsored Projects and the Development Office entitled "Where to Go For Help in Obtaining External Funds: A Brief Guide for Members of the Faculty and Administration."

## **PRINCIPAL INVESTIGATORS**

The Principal Investigator (PI) 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 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 University policy and procedures. Other PI 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 may contribute to the project, including University employees, consultants, and subcontractors, on a timely basis. The PI must ensure they are in compliance with the University time and effort reporting system.

Since, in a legal sense, sponsored projects are actually agreements between a sponsor and the University, and in order for the University to fulfill its responsibilities under sponsored agreements, it is necessary for the PI to have an appropriate appointment at the University. In July 1993, the following guidelines were distributed by which the qualifications for PI status are established.

- a. Regular term faculty of the following ranks: Professor, Associate Professor, Assistant Professor, and Instructor.
- b. Full-time research staff in research institutes or departments as may be specifically approved in writing by the appropriate Dean or academic administrator to whom they report.
- c. Retired, adjunct and visiting faculty and others on an exceptional basis, provided that space is available and each sponsored project is approved in writing by the Department Chair, Dean, and Academic Vice President.
- d. Individuals whose appointments fall within item "c" above may serve as Co-Principal Investigators (Co-PI) with the approval of the appropriate Dean, provided another Co-PI is named to the project who falls within item "a" above. During the life of the project, if the regular term faculty Co-PI is unable to oversee the project to its completion, another regular term faculty Co-PI must be named and approval of the sponsor must be sought immediately.

Questions concerning the foregoing guidelines may be addressed to the Director, Office for Sponsored Programs. The Academic Vice President has assigned OSP the responsibility for ensuring compliance with these guidelines.

## **ORGANIZATION OF SPONSORED PROJECTS**

To assist Boston College faculty and staff in the identification and administration of sponsored research support, the Office for Sponsored Programs works with a number of other University offices to provide timely and effective service. The general responsibility for administering sponsored projects is distributed as follows:

### **Office for Sponsored Projects**

The OSP staff assists faculty in finding sources of external funding for their projects, provides advice in the development of proposals in order that they meet potential sponsor requirements, reviews and approves proposals for submission to sponsors, negotiates the terms and conditions of funding awards, establishes sponsored project accounts, assists in making post-award budget changes, interacts with sponsors in post-award administration, prepares various administrative reports to sponsors, coordinates the submission of patent applications, coordinates the university's efforts in most sponsor-initiated compliance requirements, and has primary University signature authority for proposals and secondary

signature authority for funding awards. In addition, OSP administers the Research Expense Grant program on behalf of the University Research Council. Other activities are noted below in the description of OSP's interaction with others.

### **Office of Contracts and Grants**

The Office of Contracts and Grants approves expenditures and coordinates among University administrative offices, the Office for Sponsored Programs, and Principal Investigators all accounting and fiscal matters relating to sponsored projects. Contracts and Grants is responsible for preparing and submitting all financial reports, including billing, required by the sponsoring agency. The Office of Contracts and Grants also coordinates all audits performed by the University's independent auditors, Federal agencies, and other sponsoring agencies, as well as prepares and negotiates the Federal indirect cost rates and fringe benefit rates.

### **Department Administrators**

Administrators located in academic departments assist faculty in the process of submitting proposals. They are the prime locus of responsibility for day-to-day administrative support for sponsored projects. Included in the latter are such functions as properly charging expenses to sponsored project accounts, purchasing supplies and materials, and coordinating personnel matters to ensure that faculty and graduate students' efforts are properly recorded and allocated to sponsored project accounts.

### **Graduate Program Directors**

OSP also assists graduate students in seeking funds to assist them in their research projects. This is done primarily through the auspices of the Graduate Program Directors in each school or academic department. This is done to ensure that the funding is sought is consistent with each academic units preferences. It also assist Graduate program Directors in maintaining currency with the graduate students' interests in their school or department. Graduate students seeking external funds should first visit their school's or department's Graduate Program Director. In addition, OSP can provide assistance in informing students how to perform funding searching using the SPIN system available through the OSP webpage.

**OSP also interacts with a number of other administrative offices and University committees. A brief description of these interactions follows:**

### **University Research Council**

This body is composed of a faculty representative from many of the academic departments in the Arts and Sciences and each professional school. It is chaired by the Associate Vice President for Research. The Director of OSP participates in Council meetings as Executive Secretary to the Council. The Council oversees the Research Incentive Grant program, provides advice to the University administration on research and other project issues, aids in the interpretation of sponsored project policies, and is generally concerned with issues revolving around the role research plays at the University.

### **Committee on Animal Care**

This committee includes as its members representatives from the academic departments in which research on animals is performed, a consulting veterinarian, and a representative member of the surrounding community. It reviews and approves protocols submitted by faculty who wish to use animals in their research, conducts inspections of the animal care facility, and makes recommendations to the University administration on changes and improvements that may be necessary in order to provide optimal and humane care of the animals in the facility. The Director of OSP participates in the committee's meetings, has general oversight responsibilities for the animal care facility, coordinates periodic reports to the Federal government, and provides administrative support for the committee's activities.

## **Biosafety Committee**

This committee oversees the use of hazardous biological agents in research and approves the use of such materials in specific projects. It is composed of faculty representatives, a member of the Environmental Health and Safety Office, and representatives from the surrounding community. A member of the OSP staff attends each meeting of the Biosafety Committee in an advisory capacity.

## **Institutional Review Board (IRB)**

This body is also known as the "Human Subjects Committee." The committee is composed of faculty members from various departments. Its prime responsibility is to review and approve protocols submitted by faculty who intend to use humans as subjects in their research. The Associate Director of OSP is the administrative coordinator for the committee and is the person responsible for overseeing and implementing policies (institutional and Federal) related to the use of humans in research projects (see page 40 for additional information).

## **Environmental Health and Safety Office**

OSP interacts with this office to the extent necessary to implement policies and procedures related to sponsored projects and the requirements sponsors may place on awards they fund at Boston College.

## **Radiation Safety Committee**

This committee oversees the use of radioactive materials in the conduct of research at the University. It also approves research protocols submitted by faculty members who wish to use radioactive materials in their work. Its members include faculty representatives, a member of the Environmental Health and Safety Office, and a representative from OSP.

## **Development Office: Corporate and Foundation Relations**

In addition to the foregoing, OSP works closely with the Development Office in finding sources of funding for activities of interest to members of the faculty and the University community. While it was noted above (see Overview), that the two offices had worked on defining their particular areas of responsibilities, it is also recognized that there are many situations that require the expertise both offices can provide. Members of OSP and the Development Office frequently consult jointly with faculty on finding appropriate sources of funding and review proposals collaboratively in appropriate situations. OSP and the Development Office jointly authored and widely disseminated a statement entitled *Where to Go for Help to Obtain External Funding: A Brief Guide for Members of the Faculty and Administration*. This document is very useful and can be obtained from either office.

**SECTION II**

**PRE - AWARD ACTIVITIES**

## A. Funding Sources

### 1. Identifying Sources of Funds

#### a. Proposal Development Services

The Office for Sponsored Programs (OSP) offers a seminar series each semester on Essentials of Grant Development. The goal of the series is to introduce the skills necessary for achieving success in grant development. Registration, deadlines, and schedules are announced to all faculty well in advance of the programs. In addition, OSP provides individual one-on-one consultation in identifying funding sources, reviewing proposal drafts, editing, and assisting faculty in the revision/resubmission of previously unfunded proposals.

#### b. Sponsor Identification

To provide additional help to faculty in locating funding sources for their research, OSP provides the following services: Sponsored Project Reference Library, a web-based database of funding sources, and an electronic notification service.

##### (1) OSP Reference Library

OSP maintains an up-to-date funding reference library. Materials in the Reference Library include many publications from both the private and public sectors listing funding sources for sponsored projects. In addition, there are a number of useful guidebooks on how to prepare effective proposals. The library is available to all Boston College faculty, staff, and students and is located in McGuinn Hall Room 600. The OSP Reference library is open Monday-Friday from 9:00 a.m. to 4:30 p.m.

##### (2) SPIN Database

OSP maintains a computer database, "SPIN" [Sponsored Program Information Network], which provides the capacity to search over 5,000 sources of information about funding sources in both the public and private sectors. Faculty, staff, and graduate students who would like to use this service may access it through the OSP webpage (<http://www.bc.edu/research/osp>).

##### (3) External Funding Sources

Many federal and nonfederal funding programs are hyperlinked on the OSP webpage. Faculty are able to have funding announcements emailed to them directly through the InfoOffice Smarts Database. If you are interested in taking advantage of this resource, please contact either Stephen Erickson or Peter Herrick at OSP.

#### c. [Office of Corporate and Foundation Relations](#)

The Office of Corporate and Foundation Relations in the Development Office maintains a library of funding sources for faculty research projects. Most of the opportunities listed are in the category of individual support and are for fellowships, travel grants, and residential fellowships. Further information may be obtained in the Corporation and Foundation Resource Center located in More Hall 220. Office hours are Monday-Friday, 9 a.m. to 5 p.m.

#### d. [O'Neill Library](#)

The O'Neill Library contains a number of valuable resources in both print and on-line formats to assist faculty in identifying sponsored project support. Of most immediate interest is a free

guide, *Grants for Faculty Research: A Bibliography*, which contains a complete listing of the directories, on-line databases, periodicals, and guides available in the library to assist in sponsor identification. Copies of the bibliography are available at the Reference Desk in O'Neill Library and in the OSP Reference Library.

## 2. Pre-Proposal Activities

### a. Initial Contact With Sponsors

Funding agencies have varying requirements for making initial contacts regarding funding of sponsored projects. OSP maintains current guidelines of numerous public and private funding sources, as well as listings of the name, title, address and telephone numbers for current program officers and other representatives of funding agencies who are the initial point of contact for faculty wishing to discuss the scope of their project. These guidelines frequently specify the exact requirements regarding the appropriate means of initial contact (e.g., by letter, telephone or brief pre-proposal).

Once these guidelines are understood, faculty should feel free to contact funding officers directly to discuss the scope of individual projects. In this way faculty can ask potential sponsors the kind of questions that will assist them in submitting the most competitive proposal possible. The sponsors' officers can, in turn, give valuable guidance and assistance to the faculty member in preparing the proposal according to the requirements of their organizations. Faculty should be sure to discuss contacts with corporations or private foundations in advance of proposal submission with the Development Office, More Hall.

In addition, OSP will assist faculty on specific issues regarding the submission of proposals. The OSP staff is familiar with sponsor policies and can clarify key questions or problems well in advance of the proposal submission deadline. As a result, faculty are encouraged to notify OSP as soon as possible about their intention to submit a proposal to an external sponsor.

### b. Application Guidelines

Faculty should be sure to acquire the most recent version of sponsor guidelines, either from the OSP website, the sponsor's website, or directly from the sponsor.. Care should be taken to closely follow application guidelines in preparing the proposal. Sponsors frequently spell out the requirements for their applications in very specific terms. **These organizations can and do return proposals without a review if they do not conform to the directions given in the application guidelines supplied by them.** In particular, faculty should pay careful attention to all of the following in preparing the proposal:

- (1) page length and margins of the proposal;
- (2) specifications on the typeface size and line-spacing (i.e., single or double spacing);
- (3) limitations placed on the length of resumes or other appendix materials;
- (4) the deadline date for submission of the proposal:
  - date of delivery at the agency
  - date by which proposal must be stamped with official U. S. Postal Service postmark;
- (5) specific number of copies of proposal to be submitted;
- (6) certifications or assurances to be sent with proposal.

Any questions about the application process, required certifications, budgets, and other issues related to the submission process should be referred to OSP as soon as possible in the preparation of the proposal.

## **B. Proposal Preparation**

When faculty have identified appropriate funding sources, it is advisable to contact the sponsor directly to be sure that the proposed research topic is within the current scope of interests. This is very important in dealing with both public and private funding sources since direct contact with the sponsor may also help to answer questions about the project that may not be addressed in the printed materials.

### **1. Preliminary Inquiries**

Whenever possible, faculty should contact the funding agency directly. The purpose of this initial contact is to confirm the common areas of interest of the sponsor and the faculty. These inquiries can take the form of phone conversations or written correspondence. Inquiries should address the following basic questions:

- What you intend to do;
- Why you want to do it;
- How you will do it;
- What you estimate the project will cost;
- When and where you will do it;
- Who you are and what your qualifications are;
- Who will benefit from this work.

Under special circumstances, having exhausted other means of support, some limited funds are available from OSP to assist faculty with partial travel support to sponsors to discuss proposal development. These funds must be requested by memorandum or email to the Director. The request needs to include the purpose of the meeting, the name of the person being visited, the dates of travel, and the amount requested.

### **2. Proposal Guidelines**

In preparing proposals for submission to external sponsors, faculty, staff, and graduate students should pay careful attention to the directions and information available in the program application materials provided by the sponsor. These application packages are often referred to by one of the following:

- *RFP -- Request for Proposals*
- *RFA -- Request for Application*
- *application booklet*
- *program brochure or guidelines*

**Whatever the sponsor provides in these instructions should be followed exactly. Page limits, typeface size and other restrictions are taken seriously by sponsoring organizations.** Often sponsors request a preliminary or shorter proposal (3-5 pages) before asking for a complete final proposal. Take the same care and effort with pre-proposals as you would with the final proposal. The OSP staff will assist in proposal review and explanation of proposal preparation

requirements. OSP should be contacted as soon as you know you will be submitting a proposal. With large numbers of faculty developing proposals, the importance of notifying OSP as soon as possible of upcoming deadlines for your projects cannot be over-emphasized.

### 3. Suggested Format

Please keep in mind the four C's of a well written proposal:

- Clear
- Concise
- Complete
- Correct

In the absence of specific directions from the sponsoring agency, you may use the following format to organize your proposal:

#### a. Title and Cover Page

Most sponsors require applicants to fill out an official cover page for the proposal. Contact OSP to obtain specific institutional information such as Federal ID number, Congressional district, etc. The cover page must be signed by an institutional officer, usually the Director of OSP.

In the absence of an official sponsor cover page, applicants should include a cover letter on Boston College stationery addressed to the sponsoring organization specifying:

- the title of project
- a brief summary of the project
- amount requested
- address, phone number, e-mail, and fax number of the principal investigator
- signature block for principal investigator
- signature block for Director, Office for Sponsored Programs
- address, phone number, e-mail, and fax number of the Director of OSP

#### b. Abstract or Project Summary

Sponsors often request a brief summary or abstract of the overall proposed project. Be sure to follow sponsor guidelines on length of this abstract.

In the absence of specific guidelines or forms, it is often useful to include a brief abstract of **no more than one single-spaced page** summarizing the project purpose, methodology, costs, and timetable. Be sure to include your name, institution, and the title of the project on the abstract page.

#### c. Introduction

The Introduction answers the questions of why you are applying, what you are asking for, and who you are as principal investigator. In writing the introduction try to show how your project interests align with the interests of the sponsor. Read over the sponsor guidelines and follow the directions/advice about explaining your project.

#### d. Project Goals and Objectives

Goals and objectives are not the same and should be dealt with separately. The goal of your project is what you hope to accomplish as a result of the entire project. Your objectives are statements of precise outcomes that can be measured as project accomplishments. Properly written objectives should be specific, measurable, and time bound. Unless specifically requested by the sponsor, do *not* include milestone activities.

e. Background and Significance

Some sponsors require, and others prefer, to see a short section describing the background of the issue or phenomenon to be studied as well as a clear statement on why the scope of the research will make a significant contribution to the field. This may not be required by all sponsors, but it does help justify sponsor funding decisions.

f. Plan of Action, Methods, Design

This section of the proposal answers three important questions: (1) when you are going to do the project, (2) where the project will be performed, and (3) how you will accomplish each aspect of the work. The plan or methods section will be the longest section of the technical narrative and will present a description of the work to be done in accomplishing the project objectives. It should account for all activities and individuals to be involved in the project. This section of the proposal often includes a time chart or flow chart showing the order of activities to take place.

g. Bibliography

In writing the proposal, you should also show that you are familiar with the literature on the subject you are investigating. Follow the sponsor guidelines in providing a bibliography of materials relevant to the proposal you are submitting. Also, check to see if the bibliography is part of the overall page limitations or in addition to those page limits.

h. Curriculum vitae

Include curriculum vitae for yourself and all key members of the proposed project. Be sure to follow sponsor guidelines on format and length of vitae and be sure your curriculum vitae is completely updated. Unless otherwise specified, curriculum vitae should be included at the end of the proposal narrative.

i. Required Reviews (human subjects, animals)

The proposal should specifically state procedures to be followed in the use of human subjects and animals in the project. Adherence to Federal regulations is required. Projects which involve the use of human subjects and/or animals **must** be reviewed and approved by the respective institutional committee.

j. Budget

This section of your proposal answers the following questions: (1) how much the project will cost, and (2) what are the specific cost categories. Accuracy and detail are essential in this section. Be sure to show all costs related to the project. Keep in mind that sponsors will support costs that are reasonable and justified in a budget description. Be careful to follow guidelines completely.

**You should provide a draft of the budget to OSP as soon as possible in your proposal preparation process.**

Elements of most budgets include the following: Direct Costs, Indirect Costs, and, *when required*, Cost Sharing.

(1) Direct Costs

(a) Salaries and Wages:

The time and effort of all personnel should be included in your budget. Proposed salaries must be in accordance with University approved rates. The University neither pays nor accounts for faculty and professional time by labor hours. Budgets must, therefore, be expressed in terms of percentage of effort or person-months. For faculty, that rate is the amount approved for the nine-month academic year. Contact OSP for assistance in determining faculty buy-out time and summer salary.

(b) Fringe Benefits:

Fringe benefits include such items as health insurance, retirement benefits, and federal withholdings. Consult OSP for the current rates. You can find the current rates on the OSP webpage at <http://www.bc.edu/research/osp/profile>

(c) Consultants:

Consultants provide technical expertise for a limited duration necessary for the conduct of the sponsored project. Consultants are temporary arrangements with external companies or individuals (see page 21 for additional information on consultant arrangements). Contact OSP for guidance on the use of consultants and approved contractual rates. While OSP does not write, negotiate, or administer consulting agreements, a sample is available on the [OSP webpage](#). Written agreements with consultants are *strongly* encouraged.

(d) Equipment:

Equipment critical to carrying out the project should be listed with a catalogue price or accurate estimate of the cost of each item listed. Equipment is defined as an item costing more than \$1,000 and having a useful life of one year or more.

(e) Materials and Supplies:

Expendable equipment (less than \$1,000) and supplies should be listed in this section. Each item should be listed and carefully justified in terms of need.

(f) Travel:

Travel costs include meals, lodging, airfare, and ground transportation.

(g) Subcontracts:

A subcontract agreement between Boston College and an external organization is appropriate when a significant portion of the research will be performed at another institution. Contact OSP for guidance in including subcontract costs in proposed budgets.

(h) Other Direct Costs:

These are additional items such as publication costs, equipment maintenance, human subject fees, postage, reproduction, and telephone.

(2) Facilities and Administrative (a.k.a. Indirect) Costs

These are costs that are not readily identifiable with individual projects. These costs must be included in all budgets as a percent of total direct costs. Consult the OSP webpage (<http://www.bc.edu/research/osp/profile/>) for the current indirect cost rate for your project and to understand how this cost should be included in your budget estimation. If a sponsor has a written policy, the University will accept that policy in determining the level of F&A costs that are included in the budget.

(3) Cost Sharing/Matching Funds

Some sponsors require that the University contribute a certain portion of funding to the overall cost of a project or the purchase of a piece of equipment. It is the University's practice not to propose cost-sharing unless the sponsor requires it and not to cost-share in excess of the sponsor's stated requirements. Waivers may be requested in writing to the Associate Vice President for Research, and they must be justified on a case-by-case basis. Contributions of university resources may come from in-kind (non-cash) or cash contributions and must be approved by the appropriate Boston College Dean, the Associate Vice President for Research, and the Office of the Academic Vice President. **For this reason, be sure to obtain written authorization for cost sharing before writing or submitting a proposal requiring this kind of commitment by the University.** See the Proposal Transmittal Form (see Appendix) for specific requirements.

(4) Miscellaneous Proposal Information

(a) Active and Pending Grant Support

Many sponsors request applicants to supply information on both active and pending support. Faculty should include a complete list of current sponsored projects including: (1) project titles, (2) funding sources, (3) duration of projects, and (4) total approved budgets. This information should be included in the appropriate spaces on required application forms or, in the absence of any required form, typed neatly on a separate numbered page in the appendix to the proposal.

Faculty should also list the same information about pending applications. This is particularly important on Federal programs where possible sources of support may come from different funding agencies. Private foundations often want to see where an applicant has submitted an application for support.

(b) Appendices

Appendices in your proposal should be clearly labeled and provide supportive information that relates directly to the proposed project. The use of appendices and any restrictions on number of pages in proposals is specifically limited by most sponsors. For this reason, it is essential to consult the sponsor's proposal preparation guidelines. Be sure to note whether or not the page limitation on the overall proposal length also includes the pages in the appendices.

(c) Facilities and Equipment

Information pertaining to resources available to the PI for the conduct of the project should be described in detail. Examples of such resources include: lab space, equipment, library resources, and University computer systems.

(d) Information Technology Support (added 11/00)

All sponsored project proposals with a significant information technology component are to be reviewed by Information Technology (IT) early in the proposal preparation process. This review ensures that proper technical support will be planned and provided. Specifically, the review enables IT to assist faculty and research staff in:

- identifying ways in which technology can further research aims;
- ensuring that proposed computing uses take advantage of state-of-the-art technology;
- ensuring that the costs of significant information technology components are identified and accurately estimated;
- determining any permanent funding that may be required from University sources to support significant information technology components following the end of a sponsored project funding period; and,
- identifying any acquisition and/or ongoing expenses, including those related to moving, storage, space requirements, and other special conditions, associated with the significant information technology components of gifts proffered by private sources in support of Boston College.

During the IT consultation, the responsible individual and the Director of Academic and Research Services, or his or her designee, are to review the significant information technology components of the sponsored projects proposal to ensure that:

- all aspects of the significant information technology components, including their configuration, are identified;
- the level of IT support required during and after the sponsored project funding period is determined;
- possible external sources of support are identified by IT if support is unavailable on campus;
- IT architecture standards are met; and
- all costs included in the proposal are identified and accurate.

"Significant information technology components" are defined as computing hardware, software, and services that require IT technical support services, connection to the network, or the purchase of nonstandard hardware or software.

For additional information, please reference policy 1-600-150, Information Technology -- Review Of Sponsored Projects And Gifts From Private Sources, in the Boston College Policies And Procedures Manual.

(e) Institutional Overview

An institutional overview may be found on the [OSP website](#). This statement provide a brief history of the University as well a description of its major facilities and resources.

## **C. Proposal Submission Process**

### **1. University Review and Approval**

It is required that OSP review all sponsored project proposals prior to the submission to the funding agency. A complete copy of the proposal should be submitted to OSP at least three (3) working days prior to the submission of the proposal. OSP reviews the proposal to assure that it complies with federal regulations and University policies and procedures, and that the proposal adheres to the requirements/guidelines of the funding agency. The three days requested by OSP provides sufficient time to ensure that all other University approvals are in order and that there is sufficient time to make any needed changes to the proposal. It is the responsibility of both the PI and OSP to assure that all proposals are complete and accurate.

### **2. Signature and Authorizations**

Proposals must be accompanied by OSP's Proposal Transmittal Form. That form is available from OSP in paper form, via email, or on the OSP website under [Forms](#). That form specifies the approval requirements for a number of items, some of which are:

- faculty buy-out (release time)
- additional space for the project
- use of animals in the project
- use of human subjects in the project
- use of hazardous materials
- cost-sharing (allocation of University funds)

The Transmittal Form also requires general information regarding the proposal, such as type of project, Principal Investigator's name, Principal Investigator's department, title of project, agency, period of project and anticipated costs (both direct and indirect) of the project. The Principal Investigator needs to provide this form to OSP with the appropriate signatures already obtained at the time that the proposal is being submitted for review. The Transmittal Form provides instructions as to when the various signatures are required (see Appendix).

### **3. Required Copies of the Proposal**

OSP requires a complete copy of the proposal to retain in its files. The number of copies necessary for the submission to sponsors is often noted in the sponsor's guidelines. The number of copies varies with each sponsor. If it is not stated in the guidelines, OSP will obtain that information and provide it to the Principal Investigator.

### **4. Sponsor Deadlines**

Deadline dates are strictly enforced by the sponsor. Sponsors require that the proposal either be (1) postmarked by the deadline date or (2) received by the sponsor by the deadline date. Sponsors rarely make any exceptions. If the proposal does not meet the deadline requirements it will be returned to the Principal Investigator. OSP can provide the Principal Investigator with the deadline dates upon request or the Principal Investigator can find them in the sponsors' websites listed on the OSP webpage (<http://www.bc.edu/research/osp>).

## 5. **Multiple Submissions**

Identical proposals may be submitted to more than one sponsor at a time *provided* each sponsor is advised that this has occurred. Each sponsor should be given the name of the other recipients of the proposal and the amount of funds requested. In instances where all sponsors are given the same total project budget, it should be specified as to how much of the total budget is being requested of each individual sponsor and for what purpose those funds will be used.

**It should be noted, however, that careful attention must be paid to the restrictions some sponsors have on the submission of identical proposals to other sponsors, including some (e.g., NIH) that prohibit multiple submissions).**

## **D. Sponsor Proposal Review**

### 1. **Types of Review**

In evaluating proposals submitted for funding, sponsors utilize several different kinds of evaluation procedures depending on the kind of organization and the policies and procedures governing their operations. Some of the more common kinds of sponsor review procedures are discussed below.

#### a. Peer Review

Many public sector organizations like the National Science Foundation, the National Institutes of Health, and the National Endowment for the Humanities use peer reviewers selected from faculty across the country who are acknowledged experts in the subject area. These agencies send copies of the proposal to the faculty reviewers for independent evaluation and scoring. The results of these reviews are then rank ordered and a determination is made on how many can be funded based on the basis of the sponsor's total allocated funds. Faculty members should ask to see the results of these evaluations. Should one's proposal be rejected, the evaluations are extremely valuable in reviewing the original proposal and learning how the proposal can be strengthened for submission in the next funding cycle. OSP staff can assist faculty in the revision and resubmission of these proposals.

#### b. Non-Peer Review

Many private sponsor organizations use their own Board of Directors or an internal review committee to evaluate proposals. These sponsors do not use a peer review system but do publish extensive guidelines on the criteria used to evaluate proposal submissions. Sometimes these sponsors will release a summation of comments or suggestions on why a particular project was not funded. These summary comments can be helpful in revising and resubmitting to the sponsor. However, these sponsors will usually only honor written requests for the release of this information.

#### c. Private Foundations

Private foundations' funding decisions are often significantly affected by the reputation of the applying institution, the reputation of the faculty member, or the previous experience the foundation has had with a particular researcher or officer of the institution. OSP staff and staff from the Office of Corporate and Foundation Relations, Development, can assist faculty in approaching these organizations for feedback about funding decisions.

#### d. Military Reviews

Reviews of proposals submitted to the Department of Defense agencies (Army, Navy, and Air Force) are evaluated in a number of different ways varying from individual approval by the administrative head of the agency to extensive reviews by a board of peers. Faculty applying to these agencies should contact the program officer in the agency to understand the review process for that particular agency. Faculty should then contact the individuals responsible for programmatic decisions within these agencies to understand the evaluation process for that agency.

## 2. **Obtaining Reviewers' Comments**

Faculty members who wish to obtain peer reviewers' comments should contact the program officer of that sponsor directly. Many public agencies will provide reviewer comments with the letter of notification of the results of the review. These reviews present the comments without identification of the individual reviewers. These agencies will usually provide the name, address, and phone number of the person to contact to obtain these reviews, as well as a time limit during which this request must be made. The OSP staff will assist faculty in reviewing these comments and in making suggestions for revising the proposal for resubmission to the same agency or to another possible external sponsor.

## **E. Negotiation and Acceptance of Sponsored Agreements**

### 1. **Negotiation**

OSP, in conjunction with the Principal Investigator (PI), is responsible for reviewing all terms and conditions of an award prior to acceptance by the University. OSP is responsible for assuring that sponsor requirements are compatible with University sponsored project policies, consistent with government-wide regulations applicable to universities and reflect the understandings agreed upon prior to the award. OSP has the prime responsibility for resolving any differences between the University and sponsor with regard to terms and conditions of new awards as well as modifications or amendments to existing awards.

### 2. **Award Acceptance**

When an award document is received, OSP immediately informs the Principal Investigator (PI) of the award. The PI plays a significant role in the negotiations of a sponsored project. OSP will advise the PI that the award document is being reviewed to assure that the required terms and conditions are in accordance with University policies and procedures. OSP seeks the input of the PI concerning any troublesome provisions. In reviewing the terms and conditions of an award, OSP is concerned with protecting the rights of the PI and the University and assuring the feasibility of administering the award and conducting the research.

Some major concerns in reviewing the terms and conditions include: rebudgeting restrictions, mandatory prior approval on certain transactions, ability to extend the term of the award, unreasonable reporting requirements, appropriate payment terms, and restrictions on patents and publishing. OSP, in collaboration with the PI, will determine the appropriateness of the terms and conditions and suggest alternatives to be negotiated with the sponsor.

The terms and conditions of the award are not finalized until the PI approves them. Once approved, the award document is signed by the authorized individual of the University, indicating acceptance, and returned to the sponsor to be fully-executed. **The individuals authorized to sign sponsored agreements on behalf of the University are the Financial Vice President and the Director for Sponsored Programs.**

**SECTION III**

**POST-AWARD ACTIVITIES**

## **A. Award Administration**

### **1. Introduction**

OSP in collaboration with the PI is responsible for administering all sponsored projects awarded to the University. This includes monitoring budget transactions, verifying and enforcing sponsor terms and conditions, processing administrative reports, preparing and overseeing subcontracts and implementing changes mandated by both Federal and private agencies. The Office of Contracts and Grants is responsible for monitoring expenditures to ensure compliance with the University Policies and Procedures and sponsored requirements. Contracts and Grants is also responsible for the distribution and interpretation of financial accounting information such as monthly budget reports and monthly time and effort reports.

### **2. Establishing an Account**

Once an award has been accepted by the University, it is the responsibility of OSP to establish an account for the award. Each award is assigned a Ledger 5 account number. Ledger 5 is restricted solely for sponsored projects.

The account is set-up in accordance with the approved budget and the sponsor's specified terms and conditions. The account has subcodes which reflect the cost categories of the approved budget. These subcodes are defined by the University's accounting system.

OSP sends a letter to the Principal Investigator (PI) informing him/her of the Ledger 5 account number, the subcodes (cost categories) and budget period. OSP informs the PI of the specified terms and conditions and reporting requirements and provides the PI with a fully-executed copy of the award agreement. It is the responsibility of the PI to ensure that the funds are expended in accordance with the award agreement. The PI is required to submit to OSP a written request and justification for any deviations to the approved budget and/or exceptions/changes to the terms and conditions. It is the responsibility of OSP to contact the funding agency relative to the PI's requests and clarify any questions raised.

### **3. Subcontracting**

OSP, in coordination with the PI, is responsible for preparing and overseeing subcontracts as approved in the sponsored project award and issued by the University to other organizations. In general, the subcontractor is subject to the same terms and conditions of the award as is the University. Therefore, the subcontract agreement prepared by OSP contains specific terms and conditions, an approved budget and a statement of work. The subcontract is reviewed and approved by the PI. To be binding, the subcontract must be signed by the authorized official of the University and the subcontractor. When the agreement is fully-executed, OSP issues a purchase order by which payment is made to the subcontractor per submission of an invoice to OSP and verbal approval by the PI. Extensions and changes to the subcontracts are made by OSP based on the approval of the primary sponsor.

## **B. Expenditure Processing**

### **1. Office of Contracts and Grants (Controller's Office)**

The Office of Contracts and Grants is responsible for monitoring the financial activity on contracts and grants to ensure compliance with University policies and procedures and sponsor requirements. The Office accomplishes this by reviewing all check requisitions, purchase orders, payroll requisitions, cost transfers and financial reports. The Office coordinates all audits within the contracts and grants area performed by the University's independent auditors, Federal agencies and other sponsoring

agencies. The Office of Contracts and Grants is also responsible for the preparation and negotiation of the Federal indirect cost rates and fringe benefit rates.

## 2. **Facilities and Administrative (a.k.a. Indirect) Costs**

Indirect Costs are costs that are incurred for common or joint objectives. Therefore, these costs cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity. They are most commonly expressed in terms of an indirect cost rate applied as a percentage of direct costs in a sponsored project budget. The indirect cost components are classified under two major cost categories: Facilities and Administration. Facilities costs include depreciation, interest on debt associated with certain buildings, equipment and capital improvements, operations and maintenance (physical plant) expenses and library expenses. Administration costs include the costs associated with general University administration and expenses, departmental administration, sponsored projects administration, student administration and services, and all other types of expenditures not listed specifically under Facilities.

The indirect cost rate is prepared by the Office of Contracts and Grants and is negotiated with and approved by the University cognizant Federal agency.

The Office for Sponsored Programs must be contacted for the indirect cost rate applicable to your specific contract or grant and to determine how this rate should be included within your proposal.

## 3. **Payment of an Expenditure**

The financial accounting system, in conjunction with the University's on-line requisition system (U-BUY), provides a reasonable basis for sponsored project accounting according to the federal grant management requirement.

In order to expedite the payment of check requisitions on UBUY, please forward all original receipts or invoices to the Office of Contracts and Grants, not Accounts Payable. Send all invoices relating to purchase orders to the Purchasing Department for invoice matching, not to the Office of Contracts and Grants.

The Office of Contracts and Grants will review all expenditures charged to sponsored projects to determine the allowable costs within sponsor guidelines, as well as to verify that sufficient funds are available and that the budget per line item is maintained. However, it is the responsibility of the PI to ensure that purchases are allowable within the grant guidelines. The Office of Contracts and Grants also reviews invoices in accordance with the sponsor's cost policies (e.g., the cost principles found in OMB Circular A-21). Items which are not allowed include, but are not limited to: entertainment, alcoholic beverages, promotional items, advertising, club dues, and legal fees. Questions concerning allowable costs should be directed to the Office for Sponsored Programs.

No expenditure payment will be approved prior to receipt of the official award notification of funding by the sponsor. Restricted account numbers are not set up on the general ledger until the award has been accepted by the University.

## 4. **Consultants**

This is intended to outline the procedures to be followed when paying an individual for independent/consultant services.

Before attempting to pay someone for work performed, it must be decided whether the individual is indeed a consultant or if he/she should be paid as an employee. The most important criterion is that the nature of the work performed is unique, that is, not offered at Boston College and not performed for a sustained period of time. The detailed I.R.S. guidelines can be obtained from the Office of Contracts and Grants.

If it is decided that the individual is a consultant, the following documentation is required:

- a. A signed invoice from the consultant which must include the consultant's full name, home address and social security number, a brief description of work performed, hours or days worked, rate of pay, and total amount due. This invoice must be submitted with each request for payment.
- b. A signed memo from the Principal Investigator of the sponsored project to be charged (the PI is ultimately responsible for any and all expenditures). This memo must contain a description of work performed, how the work relates to the project, how the work benefits the project, and the total to be paid. This memo must be submitted prior to the first request for payment.

This documentation is necessary in order to provide a record for the I.R.S. showing that the individual qualifies as a consultant and to support the payment of the individual as a consultant using sponsored project funds.

Please be advised that each consultant situation is reviewed individually. In some cases additional documentation may be required.

If you have any questions regarding the procedures outlined above, please contact the Office of Contracts and Grants.

## 5. **Travel Policy**

**This Section is under construction. Questions on the application of the University's travel policy should be addressed to either John Krieg ([kriegj@bc.edu](mailto:kriegj@bc.edu), 2-4852) or Fred Crompt ([crompt@bc.edu](mailto:crompt@bc.edu), 2-3373) in the Controller's Office.**

## 6. **Equipment**

Equipment purchased with sponsored project funds is defined as having a unit cost of \$1,000 or more and a useful life of greater than one year.

Equipment to be purchased with Federal funds must be approved by the sponsor in advance and listed in the proposal. If you wish to purchase equipment not listed in the proposal, you must receive prior approval through the Office for Sponsored Programs.

The purchase of general purpose equipment (for example, office equipment and furnishings, reproduction and printing equipment, or computers) is allowable only if the equipment is primarily used to carry out project activities and the purchase has been approved by the sponsor.

## 7. **Procurement**

When purchasing any individual items (goods or services) with a unit cost of \$1,000 or more and/or all orders totaling \$5,000 or more, the Principal Investigator needs to provide written bidding or sole source documentation to the Purchasing Department and the Office of Contracts and Grants.

This documentation must be received and considered by Purchasing prior to commitment of an order.

The Purchasing Department is responsible for managing the bidding process for most of the goods and services required by University departments. Within its scope of operation, Purchasing handles

the qualification of potential bidders, the solicitation and analysis of bids, and the awarding of business to vendors. It is important, therefore, that each PI communicate their needs and plans for major purchases (as defined above) to the Purchasing department as early as possible so there will be reasonable time to accomplish the bidding procedure.

Purchasing documentation will help to ensure that the acquisition of goods and services are done in a competitive, fair, and timely manner.

## 8. **Property Management**

University policy guidelines require that all non-expendable property having an acquisition cost of \$1,000 or more and having a useful life greater than one year is subject to property control. Property control includes the maintenance of property records, the tagging of equipment items, and periodic physical inventories (at least every two years).

A representative from the Office of Contracts and Grants will physically tag and inventory all equipment items with the assistance of the PI. The PI is held responsible for the location of the equipment as well as the maintenance.

The information on record, which is necessary for the maintenance of the property inventory file, is as follows:

- Purchase order number
- Boston College account number(s)
- Description of item
- Manufacturer
- Cost
- Building and room location
- Model and serial numbers
- Workstation number if applicable
- Acquisition date

## 9. **Interpreting Monthly Accounting Reports**

**This Section is under construction. Questions on interpreting monthly accounting reports should be addressed to either John Krieg ([kriegj@bc.edu](mailto:kriegj@bc.edu), 2-4852) or Fred Crompt ([crompt@bc.edu](mailto:crompt@bc.edu), 2-3373) in the Controller's Office.**

## 10. **Personnel**

**This Section is under construction. Questions on the application of the University's personnel policies should be addressed to either John Krieg ([kriegj@bc.edu](mailto:kriegj@bc.edu), 2-4852) or Fred Crompt ([crompt@bc.edu](mailto:crompt@bc.edu), 2-3373) in the Controller's Office.**

## 11. **Cost Transfers**

Cost transfers are occasionally needed to correct errors in original charges. There are instances, however, where cost transfers can be avoided simply by reviewing the original charge to see that it is

set up correctly. Directly charging the appropriate program (account) initially results in fewer cost transfer requests.

There is the potential of audit disallowance on cost transfers which are poorly documented and/or not completed in a timely fashion. Recent audit reports raise serious questions concerning cost transfers within externally funded programs. Some of the problems with cost transfers (as noted in those reports) are:

- a. They are not done in timely fashion (in some cases months after the original charges have been recorded in the grantee's accounting records).
- b. They are not supported by documentation which adequately explains why the transfers were made.
- c. They are not certified by the principal investigator, project director, or other responsible program official of the grantee organization.

When requesting a cost transfer through the Office of Contracts and Grants, written documentation, signed by the PI, must be provided that includes the reason for the transfer, the account originally charged, as well as the purchase order or check requisition number. All cost transfers that take place more than 90 days after the original charge must be supported by written justification for the lateness of the transfer, as well as the documentation discussed above.

## 12. **Financial Reports**

Financial reports (including final financial close-out reports) which are required by the sponsor on sponsored programs are the responsibility of the Office of Contracts and Grants. The objective of the Office of Contracts and Grants is to ensure that the financial reports submitted by Boston College to sponsors are presented fairly, timely, and contain complete and reliable information. Financial reports are generally due within 90 calendar days of the end of each budget period. It is the responsibility of the PI to ensure that all transactions for the budget period are completed and expensed against the sponsored project account by the end of each budget period. Any balance not obligated on a sponsored program will be returned to the sponsor unless the sponsor has authorized that the unexpended funds may be retained by the University or carried over for use in continuing years of the project.

## 13. **Audit**

Federal awards are subject to annual audits by the University's independent auditors as dictated by the Office of Management and Budget Circular A-133. This audit is performed to ensure that the University is managing its Federal awards in compliance with applicable laws and regulations. The audit includes tests of internal control systems affecting all Federal awards as well as tests of individual transactions. The results of the audit are reported to the Federal Government (Department of Health and Human Services).

In addition to the annual audit, the University is occasionally subject to audits of individual awards. These audits are typically conducted by the sponsoring agency.

# **C. Administrative Procedures**

## 1. **Project Management**

Project management involves maintaining accountability for post-award transactions as well as assuring compliance with applicable sponsor rules, regulations and/or terms and conditions of award. Sponsored project accounts are set up in accordance with the budget approved by the sponsor. The statement of work must be carried out in accordance with the approved proposal. Varying degrees of flexibility are provided by the sponsors with regard to budget revisions, allowable expenditures and changes in the statement of work. In some instances, prior approval by the sponsor is required.

Principal Investigators are responsible for assuring compliance with sponsor's requirements. OSP and the Office of Contracts and Grants are responsible for overseeing sponsored project activities and for providing guidance and assistance to the PI and to the departmental administrators in fulfilling their responsibilities to the sponsor. The following provides information pertinent to managing sponsored projects after an award has been made.

## 2. **Post-Award Administration**

There are frequently changes that occur in the conduct of sponsored projects that require prior approval. In many cases, sponsors require that approval be obtained from them. Some Federal sponsoring agencies, under what is frequently termed the "expanded authorities," have delegated approval rights to the University. The PI should review and use [OSP's Prior Approval Form](#) for those approval requests that fall within the federal expanded authorities. A complete listing of the agencies and types of changes delegated to the University can be found on the form.

The following items are the changes that occur most frequently in the conduct of sponsored projects. The explanation for each item pertains to situations in which the University has *not* been delegated approval authority. In all instances, regardless of whether or not the approval may be obtained within the University, approvals should be obtained by the PI **before** the actual expenditure is incurred. Questions about particular transactions should be directed to OSP.

### a. Rebudgeting

Many sponsors place restrictions on the use of project funds. In this regard, some budget revisions (i.e., transfer of funds from one category to another) require the prior approval of the sponsor. Requests for these budget revisions should be submitted to OSP with proper justification well in advance of when they are needed. This will allow OSP sufficient time to obtain the necessary approval from the sponsor and make the revision.

### b. No-Cost Extensions

No-cost extensions are requests to extend the termination date of a project without additional funds. In instances where additional time is required to complete the project, a request should be submitted to OSP with an explanation of the work-related need for the time extension and how available funds will be used. The request should be submitted at least 30 days before the scheduled termination date. **As a general rule, no-cost extensions cannot be approved after the termination date.**

### c. Change in Key Project Personnel

Changing a Principal Investigator must be approved by the sponsor. Requests must be submitted through OSP and be supported by an explanation for the change and approval of the Department Chairperson.

### d. Change in the Statement of Work

Changes which significantly redirect the original statement of work must be approved by the sponsor. Such changes should be discussed with the sponsor's program officer and documented

in a letter to the sponsor. Written requests to the sponsor must be submitted through OSP and the Department Chairperson in advance of implementing changes.

e. Extra Compensation

Salary charges to sponsored projects are allowable at the approved University base salary rate. Extra compensation over and above the approved base salary rate is not allowed except in unusual cases where there is consultation across departmental lines or is performed at a remote location and the work performed is in addition to regular departmental responsibilities. Such consulting arrangements must be specifically provided for in the award agreement and are approved in writing by the sponsor and appropriate dean.

f. Equipment

When equipment is included in the proposed budget and approved by the sponsor, prior approval for purchase is not required. When equipment is not included in the approved budget or there is a change in what is to be purchased or the cost of the equipment exceeds the amount budgeted, prior approval must be coordinated through OSP in advance of the purchase. Some sponsors require that they retain approval rights, while some have delegated the approval right to grantees, and others have no approval requirements at all. Advance consultation with OSP will prevent any misunderstandings in this regard. When approval is required, requests for approval must include a justification for need. Some sponsors prohibit the purchase of equipment within the last six months of the project period.

g. Foreign Travel

Sponsor terms and conditions must be followed with regard to foreign travel. Many sponsors require prior approval for foreign travel whether or not it is included in the approved budget. Such requests should be submitted with a detailed justification to OSP to be forwarded to the sponsor. Requests for foreign travel should be made PRIOR to taking the trip and at least 30 days in advance (N.B. some sponsors require up to 90 days prior notice).

h. Stipends and Tuition Remission

Any changes in proposed stipend and/or tuition remission require written prior approval by the sponsor. Requests for changes must be submitted to OSP with justification and approval of the appropriate dean.

i. Carryover of Funds

Sponsors have varying policies regarding the disposition of unspent funds at the end of the budget period. As a general rule, at least 45 days prior to the end of the budget period where it appears that there will be residual funds, the PI should contact OSP to determine appropriate procedures.

j. Subcontracts/Subagreements

Subcontracts/subagreements that were not included in the proposal often require the sponsor's approval prior to executing a formal agreement and commencing work. The choice of a particular subcontractor must be documented with regard to the subcontractor's qualifications to perform the work and the project's need for such services.

## **D. Reporting Requirements**

#### 1. Interim Program/Progress Reports

The Principal Investigator is responsible for submitting interim program/progress reports to the sponsor within the specified time frame and format indicated by the sponsor in the award document.

#### 2. Interim/Final Financial Reports

The Office of Contracts and Grants is responsible for responding to all requests for financial reports on sponsored projects, as well as submitting those reports required under the terms of the award.

#### 3. Final Technical Reports

Upon termination of the project, the PI is responsible for submitting the final Technical Report to the sponsor within the time frame specified. Failure to submit this report in a timely manner could jeopardize future funding by the sponsor. A copy of the Final Report should be submitted to OSP.

#### 4. Closeout Documents

Many sponsors require that other administrative reports are submitted to officially closeout an award. OSP, in conjunction with the Office of Contracts and Grants, is responsible for submission of these reports.

**SECTION IV**

**MISCELLANEOUS**

## A. Intellectual Property

The assignment of rights to intellectual property developed under sponsored projects is governed by the University's [Intellectual Property Policy](#) and [Policy on the Ownership of Software](#). Patents, copyrights, and the sharing of royalties accrued from patents and certain copyrights are covered by the *Intellectual Property Policy*. Under certain circumstances sponsored projects result in the development of computer software. A separate policy was written to govern the ownership of that software because software ownership can present unique considerations and concerns.

The [University Research and Projects Policy](#) and [Materials Transfer Policy](#) also contain provisions directly related to the development of intellectual property. Those policies were written to preserve the individual investigator's rights of academic freedom in the conduct of sponsored projects to the maximum extent possible.

Boston College is required by federal law and regulation to obtain the written agreement to its patent policy of all those individuals working on federally funded sponsored projects. Like most universities, Boston College has decided to require such an agreement on all sponsored projects irrespective of funding source. There are two reasons for that decision. First, the core principles governing the conduct of sponsored projects are the same no matter who provides the funds. Second, applying the policy to all sponsored projects achieves a desirable level of consistency and equity in the application of University policy to all investigators. The Agreement on Intellectual Property needs only to be signed once as it is kept on file at OSP and pertains to all sponsored projects accepted by the University on behalf of the investigators in the future. **In order to preserve the investigator's future rights, the University will not execute any agreement unless OSP has been assured that the investigator agrees to the terms and conditions of the agreement.**

The University's technology transfer program is in transition. In 1999, the University executed a contract with Massachusetts Biomedical Initiatives (MBI) for the purpose of providing expert review of invention disclosures, assistance in licensing and marketing, and for general advice and consultation on matters pertaining to intellectual property. Since the execution of the agreement with MBI, invention disclosures and patent applications have risen in number. The goal of the program has been to increase invention awareness amongst faculty and to facilitate the disclosure of inventions disclosures and patent applications. Invention disclosures, using the Invention Disclosure Form, should be sent to the Director, Office for Sponsored Programs.

## B. Internal Grant Programs

### 1. [Research Expense Grants](#)

The purpose of the REG program is to defray the smaller expenses of doing research, such as supplies, printing, travel to professional conferences, and payment to student assistants. Two competitions are held annually (summer - fall, and winter - spring). The maximum amount for a single Research Expense Grant is \$1,500. These grants are administered through the Office for Sponsored Programs.

### 2. Research Incentive Grants

Fifteen Research Incentive Grants, awarded in amounts of up to \$15,000, are available annually on a competitive basis, with nine intended primarily for non-tenured faculty to assist them in establishing their research program. Purposes for which grant funds may be used include, but are not limited to, salary, equipment, travel, supplies, and computer time that directly contribute to the success of the proposal. These grants are administered through the Office of the Dean of the Graduate School of Arts and Sciences.

## C. Sponsored Projects Policies and Guidelines

### 1. [Sponsored Projects Policies and Guidelines](#)

OSP has published *Sponsored Projects Policies and Guidelines*, which may be viewed as a companion volume to this *Handbook*. The following summarizes its contents.

- a. *University Research and Projects Policy*. This policy sets forth the general principles which govern the conduct of research and other projects and determine the criteria for the acceptance of sponsored funding.
- b. *Conflict of Interest Policy Pertaining to Sponsored Projects*. This policy sets forth procedures and guidelines that are to be followed in resolving actual and potential faculty conflicts of interest and commitment pertaining to sponsored projects. This policy applies to all sponsored projects funded by (a) commercial sponsors, (b) those federal agencies having specific conflict of interest requirements, and (c) purchase orders and subcontracts issued by Boston College under its sponsored projects irrespective of the source of funds.
- c. *Research Integrity Policy and Guidelines on Misconduct in Science*. This document sets forth the University's expectations with regard to the integrity of research of all kinds. It describes the responsibilities of research personnel, administrators, and others in the University community, and sets forth the procedures for dealing with instances of alleged misconduct in research. The guidelines apply to the conduct of research (and related activities), presentation or publication of results, the process of applying for funds, and the expenditure or fiscal reporting of the use of project funds.
- d. *Intellectual Property Policy*. This policy pertains to patents and copyrights as may result from work conducted under sponsored agreements. Also included in this policy is the statement on royalty-sharing among the inventor, his or her department, and the administration.
- e. *Agreement on Intellectual Property*. This document sets forth the signatory's agreement to the intellectual property terms accepted on his or her behalf in sponsored agreements. It is agreed by the University that no sponsored agreement will be signed unless the Principal Investigator has been informed of the terms and conditions and accepts them.
- f. *Policy on the Ownership of Software*. This policy addresses the questions of ownership of computer software created by employees of Boston College. It sets forth the general circumstances in which the creators of software and the University are assigned the rights of ownership.
- g. *Policy on Access to and Retention of Project Data*. This policy specifies individual and institutional rights and responsibilities concerning the access to and retention of data developed and/or used in the conduct of a project while an individual is employed by the University. It covers the rights and responsibilities of individual members of the University community, the University, and those external to the University who may have rights of access to the data.
- h. *Materials Transfer Policy*. This policy covers the use of materials and information that a sponsor may wish to provide to faculty members in support of their research or other related activities, and for which the sponsor may desire to place restrictions on the use of such materials and information.

## **APPENDICES**

- i. *Policy on the Use of Human Subjects in Research.* This policy covers the regulatory and procedural environment involving the use of human subjects on research projects. It covers all such projects whether funded by external funds or not.
- j. *Principal Investigator Status.* This memorandum provides guidance on the criteria that determine the eligibility for being named a Principal Investigator on a sponsored project.
- k. *Memorandum on Cost-Sharing.* This memorandum sets forth guidance to faculty on certain considerations that should be taken into account when offering cost-sharing or matching funds in sponsored project proposals.
- m. *Where To Go For Help To Obtain External Funding: A Brief Guide For Members Of The Faculty And Administration.* This document sets forth the definition of a sponsored project and offers guidance on when one should contact the Office for Sponsored Programs and/or the Development Office when seeking assistance in either the search for an appropriate project sponsor or in the submission of a proposal.
- n. *Memorandum on Salary Adjustments to Reflect Reduced Tracking Loads.* The primary purpose of this memorandum is to define the approval requirements for and the process of calculating "buy-out" of faculty time.
- o. *Memorandum on Tuition Support on Externally Funded Projects.* This memorandum sets forth the requirements for requesting tuition support on sponsored project budgets.
- n. *Notice on the Applicability of F&A (Indirect) Cost Rates.* This notice discusses the different F&A

## 2. **Animal Care Manual**

OSP has, in collaboration with the Committee on Animal Care, published the Animal Care Manual. This document sets forth the complete set of policies, procedures, and guidelines that pertain to the use of animals in all projects, sponsored or not, undertaken at the University.

## 3. **Human Subjects/IRB**

The Boston College Institutional Review Board (IRB) is responsible for review and approval of research protocols which involve the use of human subjects. In reviewing research projects, the IRB follows the Department of Health and Human Services Policy for the Protection of Human Research Subjects. While the IRB has authority to review and approve or disapprove research activities involving human subjects, principal investigators have primary responsibility for obtaining informed consent and protecting subjects during their participation in the research.

OSP has responsibility for overseeing and implementing policies related to the use of humans in research. When IRB review is required, principal investigators should submit a description of the project (the research proposal), an explanation of how subjects will be used which identifies any risks associated with their participation, and a consent form to OSP at least three weeks in advance of when IRB approval is required by the funding source. Upon IRB approval, OSP will submit the necessary certification to the funding source.

Additional information on the protection of human subjects, informed consent, and IRB procedures is available from OSP.

# Boston College Office for Sponsored Programs Proposal Transmittal Form

Purpose:             Research     Training     Other

Type:             New     Competitive Continuation\*     Non-competitive Continuation \*  
                      Renewal\*             Supplement\*             Resubmission/Revision  
\*Current BC Project ID: \_\_\_\_\_

Principal Investigator/Project Director: \_\_\_\_\_  
First time PI: yes  no             Phone \_\_\_\_\_ Fax \_\_\_\_\_  
Department/School: \_\_\_\_\_ Bldg. \_\_\_\_\_ Room \_\_\_\_\_  
Department ID No: \_\_\_\_\_  
Proposal Title: \_\_\_\_\_

For Submission to: \_\_\_\_\_

Project Period:    Start Date: \_\_\_\_\_            Termination Date: \_\_\_\_\_

First Year Budget:  
Direct Costs \$ \_\_\_\_\_ F&A Costs \$ \_\_\_\_\_ Total \$ \_\_\_\_\_  
Project Period Budget:  
Direct Costs \$ \_\_\_\_\_ F&A Costs \$ \_\_\_\_\_ Total \$ \_\_\_\_\_

**LIST KEYWORDS ASSOCIATED WITH THIS PROJECT:** \_\_\_\_\_

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**APPROVALS:** As a general rule, all proposals for extramural support of sponsored projects must be processed through the Office for Sponsored Programs (OSP) for approval. OSP approval is contingent upon submission of a fully-executed Proposal Transmittal Form with each proposal. The Proposal Transmittal Form must always be signed by the Principal Investigator and Department Chairperson. In addition, the following approvals are required as specified:

**Dean:** Must approve all proposals involving full or substantial waivers of F&A costs, buy-out of faculty time, cost-sharing for which departmental funds are unavailable, establishing new programs, curricula, or institutes or when space, construction or renovations are being requested.

**Associate Vice President for Research:** Must approve all proposals involving requests for full or substantial waivers of F&A costs, fringe benefits and buy-out of faculty time.

OSP will obtain approval from the Academic Vice President when the proposal includes cost sharing for which University funds are requested and school/departmental funds are unavailable (other than F&A cost waivers), construction or renovation, or creation of new programs. Since these approvals also require the approval of the Department Chair and/or Dean, and will require detailed justification, requests requiring AVP approval must be initiated at the earliest possible time. Principal Investigators are strongly encouraged to discuss requests as soon as it is known that a sponsored project proposal will require AVP approval.

**TIMING OF PROPOSALS:** The complete proposal must be submitted to OSP **three (3) days** in advance of the sponsor's receipt deadline. A complete proposal includes the transmittal form, cover page, budget, narrative text and any other forms required by the sponsor. If any changes are made to the proposal subsequent to obtaining the required approvals which significantly change the scope of the proposal or budget, amend the signed forms or alter proposed University commitments, the changes must be cleared through OSP prior to submission to the sponsor.

Principal Investigator/Project Director: \_\_\_\_\_ Date: \_\_\_\_\_  
Department Chairperson: \_\_\_\_\_ Date: \_\_\_\_\_  
Dean (IF REQUIRED): \_\_\_\_\_ Date: \_\_\_\_\_  
Academic VP or Assoc. VP for Research (IF REQ.): \_\_\_\_\_ Date: \_\_\_\_\_

PLEASE COMPLETE THE FOLLOWING ITEMS

**Cost-Sharing/Matching Commitments:** This Project will [ ]/will not [ ] require allocation of University funds. Cost sharing/matching funds are (please check): Mandatory \_\_\_\_\_ Voluntary \_\_\_\_\_

These additional funds are [ ]/are not [ ] available from the resources of the Principal Investigator's department or school for the project period indicated.

If funds for cost-sharing /matching are **not** available from departmental or school resources, approval is required by the Dean and Academic Vice President. The Associate Vice President for Research must approve total or substantial waivers of F&A costs.

**Contributions received from other sources must be verified by a letter from the contributor.**

**Amount of cost sharing/matching requested:** \$ \_\_\_\_\_

**Please explain the need for University contribution (i.e. tuition, \$10,000; computers, \$5,000):**

**Please identify specific source of funds (i.e. BC dept. account no.):** \_\_\_\_\_

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**Space:** The proposed project will [ ]/will not [ ] require that additional space be made available to the project or that existing space be renovated. Requests for space require written approval of the Dean.

Type of Space needed (check as appropriate): Office [ ] Laboratory [ ] Other (please specify):

Do you have current space that needs renovation or expansion to accommodate this Project?  
Yes [ ] No [ ]

If Yes, please specify proposed location if additional space is requested:

Reason for Additional/Renovated Space (check as appropriate):

Relief of Insufficient Space on Existing Project [ ] (If checked, please explain in Comments section below and include number of individuals using the space).

Space for Additional Personnel [ ] (If checked, please explain in Comments section below and include number of individuals using the space).

Accommodate New Equipment [ ]

Other (please specify):

If the start date of your space needs differs from the start date of your sponsored project, please provide the approximate date when your requested space needs will begin:

Additional Comments:

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**Conflict of Interest:** A New or Competing Renewal proposal to (1) NSF, (2) NIH, (3) another organization submitting a new or renewal application to NSF or NIH, or (4) a commercial concern must be accompanied by a completed Conflict of Interest Disclosure. For non-competing continuation applications to those sponsors, if you completed a disclosure in accordance with the University's Conflict of Interest Policy within the last 12 months for this particular project, has any condition changed such that your answers to any of the questions on the disclosure form would be different from your previous disclosure? No [ ] Yes [ ]. If yes, please complete an updated disclosure and provide it to the Director, Office for Sponsored Programs in a sealed envelope along with your project proposal.

The Principal Investigator must also ensure that others working on the project who are responsible for its design, conduct or reporting will complete conflict of interest disclosures and updates as well.

**Intellectual Property Agreement:** The Principal Investigator is responsible for ensuring that students and other employees working on a project have signed an Intellectual Property Agreement.

In submitting this form to OSP, the Principal Investigator states that all students and other employees working on this project (aside from clerical and support staff) have signed and have on file with OSP an Intellectual Property Agreement in accordance with the University's Intellectual Property Policy.

OSP will, upon request, send the Principal Investigator copies of the Intellectual Property Agreement for each person who may need to sign the Agreement.

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**Buy-Out of Faculty Time:** The project will [ ] / will not [ ] involve a buy-out of faculty time. Requisite arrangements are explained as follows (requires approval signatures of the Dean and the Associate Vice President for Research):

**Specify number of course buyouts or percent effort for each person by year/semester:**

**Specify dollar amount of the buyout for each person by year/semester:**

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**Information Processing Support:** Significant information technology components are defined as computing hardware, software, and services that require Information Technology technical support services, connection to the network, or the purchase of nonstandard hardware or software. Proposals containing significant information technology components require consultation with the IT Director of Academic Research Services (ARS) at the earliest possible time in the proposal process. The Principal Investigator in submitting such a proposal agrees to consult with ARS prior to submission or, in any event, no later than seven (7) days after the proposal has been submitted to the sponsor. Further information can be found in University Policy 1-600-150, Information Technology – Review of Sponsored Projects and Gifts from Private Sources.

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**Budget:** In submitting this form, the Principal Investigator assures the University that the amounts listed in the proposed budget for all listed direct cost items appear to be adequate for the performance of the proposed work.

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**Research Subjects, Materials, and Select Agents:** Please check the following items as appropriate. For those items checked, the required review and approval by the relevant University committee(s) has been or will be obtained as required by the policies of the funding sponsor and the University.

Human Subjects will [ ] / will not [ ] be used in this project. Animals will [ ] / will not [ ] be used in this project.

Hazardous Materials will [ ] / will not [ ] be used in this project. If so, list the materials below.

Radioactive Materials will [ ] / will not [ ] be used in this project. If so, list the materials below.

Select Agents will [ ] / will not [ ] be used in this project.

rDNA and biological agents of a BL rating greater than "1" will [ ] / will not [ ] be used.

If a BL rating greater than "1" will be used, please list under "other" all agents and associated BL ratings. If you are planning to use agents with a BL rating of "2" or greater – or if you have questions – you must contact the University's Office of Environmental Health and Safety (EHS) and the Chair of the University's Institutional Biosafety Committee (IBC).

Research and development exemption under TSCA (Toxic Substance Control Act) will [ ] / will not [ ] apply. A "will not" response means that the compound in question is being used for non-commercial research and development purposes. More information on the Toxic Substance Control Act can be obtained via the following website: <http://www.epa.gov/opptintr/newchems/r&dexemp.htm> The EHS website is: [http://www.bc.edu/bc\\_org/fvp/ehs/](http://www.bc.edu/bc_org/fvp/ehs/)

Please check any items that will be used in or pertain to this project:

- Lasers             Ionizing Radiation     Non-Ionizing Radiation     Electromagnetic Radiation  
 Radio-frequency Radiation                       Linear Accelerators             Personal Protection Equipment  
 Microwaves         Magnetic Fields         Explosive Materials         Carcinogenic Materials  
 Toxic Materials     Other (please specify/attach sheet if necessary:

**OSP Internal Use Only**

Annual Budgets:

	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Tot. Direct						
F&A						
Total						
Fringe Rate						
F&A Rate						

Sponsor Type:

Federal \_\_\_\_\_            State government agency \_\_\_\_\_            Local government agency \_\_\_\_\_  
 Foundation \_\_\_\_\_            Corporation \_\_\_\_\_  
 Nonprofit \_\_\_\_\_    Subcontract under Federal Prime \_\_\_\_\_    Subcontract under non-Federal Prime \_\_\_\_\_

Cost Sharing:

	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Amount						

Type of Cost Sharing:    Tuition Remission \_\_\_\_\_    Salary \_\_\_\_\_    Equipment \_\_\_\_\_  
    Other Direct \_\_\_\_\_            F&A \_\_\_\_\_

Source of Cost Sharing:    PLEASE INDICATE BC ACCOUNT NO.

Department Funds \_\_\_\_\_            University Funds \_\_\_\_\_  
 External Funds \_\_\_\_\_ (letter provided)

Breakdown cost-sharing in comments section.

Comments:

**Boston College  
Office for Sponsored Programs**

***Prior Approval***  
**for**  
**AFOSR, ARO, DOE, NASA, NIH\*, NSF, ONR, USDA**  
**(GRANTS ONLY)**

Principal Investigator(s) \_\_\_\_\_

Grant No. \_\_\_\_\_

Boston College Account No. \_\_\_\_\_

Grant Period: From \_\_\_\_\_ To \_\_\_\_\_

Reason for Requested Approval:

No-Cost Extension [ ] (end date requested: \_\_\_\_\_)

Pre-Award Costs [ ] (anticipated date of award: \_\_\_\_\_)

Explanation/Justification: Please provide a detailed statement as to how the requested action is necessary to the activity supported by this grant.

Signatures and Approvals:

Principal Investigator \_\_\_\_\_ Date \_\_\_\_\_

Department Chair/Designee \_\_\_\_\_ Date \_\_\_\_\_

OSP \_\_\_\_\_ Date \_\_\_\_\_

\*The following NIH award types are included in these approval requirements: "R" series research grants except R41 (Phase 1 STTR) and R43 (Phase 1 SBIR); PO1 program project grants; "K" series career development grants. Other grants may also be included if these requirements and authorities are specifically incorporated in the Notice of Grant Award.

**Federal Grants - Prior Approval Authorizations**

	<b>AFOSR</b>	<b>ARO</b>	<b>DOE</b>	<b>NASA</b>	<b>NIH*</b>	<b>NSF</b>	<b>ONR</b>	<b>USDA</b>
<b>Pre-Award Costs</b>	BC may approve pre-award costs up to 90 days in advance of the effective date of the award. OSP must notify the agency of its approval.							
<b>No-Cost Extension</b>	All extension requests require AFOSR approval.	All extension requests require ARO approval. Requests must be submitted 30-days prior to the expiration date of the grant.	BC may approve one 12 month extension and notify the agency no later than 10 days prior to the extension date. All additional extensions require agency approval.			All extension requests require ONR approval.	See DOE, NASA, NIH, and NSF	
<b>Equipment</b>	See NIH, NSF, ONR, and USDA	ARO must approve equipment purchases of \$5,000 or more.	See NIH, NSF, ONR, and USDA	NASA must approve special purpose equipment purchases of more than \$5,000 and all general purpose equipment.	No approval is required for equipment purchases. Equipment must be necessary for the project and not otherwise available and accessible. In addition, general purpose equipment must be primarily or exclusively used in the active conduct of the research.			
<b>Foreign Travel</b>	See DOE, NASA, NIH, NSF, ONR, and USDA.	Travel not specifically identified in the approved budget must be approved by ARO.	No prior approval is required. All foreign travel must be necessary for the project and conducted in accordance with Federal regulations (e.g. use of American air carriers) and University policy.					
<b>Subcontracts</b>	No prior approval is required.	The agency must approve subcontracts that transfer substantive programmatic effort or substantial programmatic work, if the subcontract is not included in the approved budget.	See ARO, DOE, NIH and NSF. NASA, however, must only approve those subcontracts greater than \$100,000.	The agency must approve subcontracts that transfer substantive programmatic effort or substantial programmatic work, if the subcontract is not included in the approved budget.	No prior approval is required.	See ARO, DOE, NIH and NSF.		
<p><b>These provisions may be superseded by particular award terms and conditions. Please contact OSP concerning any changes not specified in this document.</b></p> <p><b>* The following NIH award types are included in these approval requirements: "R" series research grants except R41 (Phase 1 STTR) and R43 (Phase 1 SBIR); PO1 program project grants; "K" series career development grants. Other grants may also be included if these requirements and authorities are specifically incorporated in the Notice of Grant Award.</b></p>								