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SPONSORED PROJECTS AND GRANTS ADMINISTRATION

BEST PRACTICES

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107.1 Best Practice: Subawards and Subcontracts Process

Effective: [5/12/08]
Last Revision: [9/17/09]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To clarify the College’s position and preferences on grant subcontracts and subawards

BEST PRACTICE:
1. The Sponsored Research Group shall avoid, whenever possible, pursuit of grant funding which requires that the College enter into subawards and/or subcontracts as the prime/lead institution.

2. In the circumstance that a Dickinson Principal Investigator (PI) wishes to pursue external grant funding as a consequence of his/her entering into a collaborative research partnership with a colleague at another (non-Dickinson) institution, Sponsored Research Group will:
   a. endeavor to ensure that any funding acquired will result in separate award instruments for each collaborating institution, or – failing that –
   b. endeavor to ensure that Dickinson will serve as a subrecipient, subawardee or subcontractor under a prime award to the non-Dickinson institution.

3. Dickinson as Prime/lead institution on a proposal including one or more institutions functioning as subawardee(s).
   In the circumstance that a Dickinson Principal Investigator’s (PI) proposal *must* include subawards with other institutions, the following documents must be collected from subaward partners prior to proposal submission. Such documents are required by the college to verify the commitment(s) of other institutions, and are required for submission as part of the proposal. Such documents shall include:
   a. “Letter of Intent to Enter into a Subaward Agreement,” signed by the subaward institution’s Authorized Organization Representative (AOR). This letter must contain:
      i. Title of the Project, and funder to which the proposal will be submitted
      ii. Name of person(s) who will be that subaward institution’s Principal Investigator/Project Director(s)
      iii. Dollar amount of the subaward
   b. Itemized budget and justification following the funding agent’s guidelines
   c. PI/Co-PI curriculum vita
   d. Information on PI/Co-PI’s current and pending grants, and time/effort commitments on each.
   e. Scope of Work (if not included as part of Dickinson’s proposal)

4. Dickinson as Prime/lead institution on a proposal including one or more institutions, organizations, persons, or corporate entities functioning as Subcontractor(s).

   In the circumstance that a Dickinson Principal Investigator’s (PI) proposal *must* include subcontracts or consulting agreements with other persons or institutions, the following documents must be collected from subcontractors or consultants.

   I. Prior to Proposal Submission: Such documents are required by the college to verify the commitment(s) of other organizations/consultants, and required for submission as part of the proposal. Such documents shall include.
   a. “Letter of Intent to Enter into a Subcontract Agreement,” signed by the subcontracting organization’s Authorized Organization Representative (AOR). This letter must contain:
      i. Title of the Project, and funder to which the proposal will be submitted
ii. Name of person(s) who will be that subcontracting organization’s Project Director(s) or Consultant
iii. Dollar amount of the contract and the basis for the costs proposed

b. Itemized budget
c. Consultant curriculum vita and/or other information from a subcontractor indicating their expertise and capacity to successfully undertake and complete the tasks as proposed in the Scope of Work.
d. Formal Scope of Work
e. In addition to the collection of these documents, the Corporate, Foundation and Government Support Office will verify prior to proposal submission the debarred status of subcontractors or consultants through the System for Award Management (SAM) Search Records function.

II. Prior to Issuance of a Subawardee/Subcontractor contract document (Risk Review):
Documents from the subawardee/subcontractor must be received by the college to allow Dickinson to verify the commitment(s) of other organizations/consultants prior to issuance of a subaward or subcontract. Such documents and processes shall include those listed regulations in OMB Uniform Guidance 2 CFR 200.331.

5. Dickinson as Subawardee or Subcontractor to another institution functioning as Prime/Lead institution.
In the circumstance that a Dickinson Principal Investigator’s (PI) proposal is included as a subaward with other institutions, the following documents shall be provided to Prime/Lead institution prior to proposal submission. Such documents are generally required by the Prime/Lead institution to verify the commitment(s) of Dickinson College, and are required for submission as part of the proposal. Such documents shall include:
   a. “Letter of Intent to Enter into a Subaward Agreement,” signed by the subaward institution’s Authorized Organization Representative (AOR). This letter must contain:
      i. Title of the Project, and funder to which the proposal will be submitted
      ii. Name of person(s) who will be that subaward institution’s Principal Investigator/Project Director(s)
      iii. Dollar amount of the subaward
   b. Itemized budget and justification following the funding agent’s guidelines
   c. PI/Co-PI curriculum vita
   d. Information on PI/Co-PI’s current and pending grants, and time/effort commitments on each.
   e. Scope of Work (if not included as part of Dickinson’s proposal)

Dickinson’s cognizant Sponsored Project Office (SRO) managing either pre-award or post-award functions on the particular proposed project shall also acquire written documentation from the Prime/Lead institution regarding the details of the subaward reimbursement process and/or procedures. Such written documentation shall be received from the Prime/Lead institution before the proposal is submitted.

The source of this document is Sponsored Projects Group
108.1 Best Practice: Meetings between PI and SPG
Effective: [5/12/08]
Last Revision: [5/12/08]
Responsible Office: Sponsored Projects Group

PURPOSE: To describe the conditions for, and content of, meetings with PI at the beginning of a newly funded grant project.

BEST PRACTICE:

1) Ideally, SPG personnel will meet face-to-face with the Principal Investigator(s) or Project Director(s) after a grant award notification is received, and as a grant account is being set up by Financial Operations. Conditions under which meeting by telephone, or email are acceptable include:
   • The PI is well acquainted with procedures from prior grants
   • The PI is off-campus

2) This meeting will be initiated by the Financial Operations Grant Accounting staff.

3) Those meeting with the PI/PD will include:
   • Financial Operations Grants Accountant
   • The person in the CFR office who shepherded the pre-award proposal preparation and/or electronically submitted the proposal

4) Others who may, on a case-by-case basis, be requested to attend this meeting may include (minimally):
   • Grant Project Manager – for large complex grants
   • Academic Departmental Chair
   • Departmental VP
   • VP for Finance
   • Staff Associates
   • Co-PIs, others involved with the grant

5) The content of this meeting will include:
   • Discussions of PI responsibilities, and discussion of various rules and regulations pertinent to the particular grant, including (minimally):
     o Fly America Rules
     o Purchase of alcohol and other unallowable costs as described under Circular A-21
     o Debarment Certification requirements
     o Conflict of interest requirements
     o Bid requirements for equipment purchases
     o Review requirements related to the mandated Ethical Conduct of Research program.
   • Cost-sharing and tracking requirements
   • In-house purchasing, including (minimally)
     o Assignment of FOAPAL
     o In house purchasing processes (P-Card, etc)
   • Contacts for administrative assistance regarding
     o Summer student housing and board arrangement
   • Export regulations if overseas travel is funded by the grant
   • Payment of stipends and honoraria for faculty and students and associated forms
   • Processes for requesting grant extensions, cost transfers
   • Financial and Narrative Report Requirements and due dates
• Subaward processes and procedures, if any, i.e. subrecipients to be monitored, etc.
• Other items pertinent to the particular grant being set-up, i.e.

The source of this document is Sponsored Projects Group
112.1 Best Practice: Prior Approvals
Effective: [1/21/09]
Last Revision: [5/14/2013]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

DEFINITION:
This best practice describes the review and approval of all administrative changes to grant awards, in advance of those changes. These changes include:

- expenditure of project funds for items that, under the applicable cost principles, normally require prior agency approval (See Note A)
- one-time extension of a grant period (See Note B)
- incurring of project costs prior to the beginning date of an award (See Note C)
- budget revisions that involve the transfer of funds among budget categories (See Note D)

PURPOSE:
The purpose of this best practice is to ensure that:

- all grant actions and expenditures are consistent with the terms and conditions of the award, as well as with the policies of the agency and the grantee;
- any changes that may be made do NOT constitute a change in the scope of the project, and,
- any deviation from the budget approved by the granting agency is necessary and reasonable for the accomplishment of project objectives and is allowable under the applicable federal cost principles.

BEST PRACTICE dictates that:

- the procedure for review of proposed changes must be in writing (See GP – 1 Prior Approval Form)
- proposed changes must be reviewed by the Director of Grant Administration (a level beyond the project director)
- whenever changes are approved, Dickinson College will retain documentation of the approval for three years following the submission of the final financial report.
- the Director of Grant Administration will ensure that the revised project budgets are updated in the financial system after the budget request and approval process is complete.
- requests for approvals may be declined by the same individuals authorized to approve requests, for a number of reasons, including, but not limited to:
  - grant actions and expenditures are not consistent with the terms and conditions of the award, as well as with the policies of the agency and the grantee;
  - requested changes may constitute a non-approved change in the scope of the project,
  - deviations from the budget approved by the granting agency are not necessary and reasonable for the accomplishment of project objectives and are disallowed under federal cost principles as noted in Note A below, and elsewhere.
  - Requests for grant period extensions do not meet the requirements as stated in Note B, below.

NOTES

Note A. Allowable Costs
The allowability of costs and cost allocation methods for work performed under a grant shall be determined in accordance with the applicable federal cost principles and the terms and conditions of the grant award.
OMB Uniform Guidance 2 CFR 200- sets forth the federal cost principles that apply to grantees. The grant award will specify the cost principles that apply to the grant. Copies of the cost principles may be obtained from the Director of Grants Administration.

Note B. Grant Period and Extensions
The grant period is the span of time designated in the grant award during which the grantee has the authority to obligate grant funds and undertake project activities. The Sponsored Research Group may authorize a one-time extension of the expiration date established in the initial grant award if additional time is required to complete the original scope of the project with the funds already made available. Requirements are:

- Only one extension allowed
- Extension shall not exceed 12 months
- Extension must be made prior to the original expiration date
- Notify the agency’s Office of Grant Management in writing of the new expiration date at least 10 days before the grant is scheduled to expire, providing justification for the new extension period.
- Neither the Principal Investigator nor the College’s authority to extend a grant may be exercised merely for using the unliquidated balance of project funds.

If an extension longer that 12 months is desired, or a second extension is necessary:

- A written extension request must be submitted to the agency’s Office of Grant Management prior to the end of the grant period. The request shall be signed by the institutional grant administrator and shall include a detailed justification for the extension, an estimate of the unexpended grant funds, and a plan of work for the activities that will be undertaken during the requested extension period.

Note C. Pre-Award Costs
Grantees may approve project costs incurred within the 90 calendar day period immediately preceding the beginning date of the grant. Requests for pre-award costs for periods exceeding 90 calendar days must be signed by the institutional grant administrator and submitted to the agency’s Office of Grant Management. Pre-award expenditures are made at the College’s risk and the College's authority to approve such costs does not impose an obligation on the federal agency in the event an award is not made or is made for an amount that is less than the College anticipated.

Note D. Budget Revisions
The project budget is the schedule of anticipated project expenditures that is approved by the awarding agency for carrying out the purposes of the grant. When the College or third parties support a portion of the project costs, the project budget includes the nonfederal as well as the federal share of project expenses.

The College shall obtain prior written approval from the awarding agency whenever a budget revision is necessary because of:

- the transfer to a third party (by subgranting, contracting, or other means) of any work under a grant;

  NOTE: Agency approval is not required for third-party transfers that were described in the approved project plan, or for the purchase of supplies, materials, or general support services.
- the addition of costs that are specifically disallowed by the terms and conditions of the grant award;
- the transfer of funds from stipends or training allowances to other budget categories; or
- changes in the scope or objectives of the project
122.1 Best Practice: Cost Sharing and In-Kind Matching Requirements for Sponsored Projects
Effective: 10/29/08
Last Revision: [date]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To clarify the College’s accounting procedures for Cost Share and In-Kind Matching.

BEST PRACTICE:
1. A Cost Share FOAPAL related to the grant FOAPAL will be established by the Sponsored Project Group to track all cost sharing related to the award. The Cost Share FOAPAL will have the same FUND as the award, but will use the Cost Share ORG (602600).

2. All cost share expenditures will be directly charged to the Cost Share FOPAL whenever possible.

3. When a percentage of effort is used to meet Cost Share requirements, the Sponsored Project Group will confirm effort with the applicable individuals and make the necessary journal entries in the general ledger to reflect the cost of the faculty effort.

4. All Cost Share effort will be re-confirmed by the individual during the annual Effort Reporting Certification.

5. Funding to cover the Cost Share expense will be transferred in to the Cost Share FOAPAL from the funding source: departmental budget(s), discretionary funds, grant matching funds, etc.)

6. If the cost share is from In-Kind matching, every effort will be made by the PI and the SPG to document in the hard copy files, the services or in-kind match provided (documentation may include certification letter from donating organization or individual, receipt, etc.)

7. PI’s and other participants whose salaries have been used as part of a cost-share calculation on a proposal will be informed of the requirement to sign Time/Effort certifications at certain times for proper administration and documentation of the grant. This notice will be given to the above participants during the pre-award process, and at the post-grant award stage when the grant is set up for administration and implementation.

The source of this document is Sponsored Projects Group.
001.0 Best Practice: Sponsored Projects Group Meetings
Effective: [8/20/08]
Last Revision: [5/14/2013]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe the establishment of regular meetings to help achieve compliance on active grants and sponsored projects.

BEST PRACTICE:
- SPG meets at least quarterly (preferably on a monthly basis) during the year to a) conduct intensive top-to-bottom reviews of all current grants under administration, b) ensure proper implementation of administrative procedures and policies, c) ensure compliance with current policy, and d) evaluate and ensure that policies are up-to-date, effective and in compliance with various and changing regulations.

- SPG reserves the option to meet in addition, on an ad-hoc basis, if situations warrant.

- SPG prepares an agenda and keeps minutes of each meeting. Agenda items at SPG meetings include, but are not limited to:
  - Review of prior “open business” and agenda items
  - Review of financial state of current/active grants activity
  - Review of grant narrative and financial reports due
  - Review of Grants Matching Accounts budgets
  - Review of Faculty salary and release times supported by grants
  - Upcoming grant proposals where input will be required
  - Decisions or news regarding policy changes and/or revisions, and new policies.
  - Other issues, as necessary/appropriate.

- SPG meetings require attendance by SPG ex-officio members, including:
  - Associate Provost for Academic Resources
  - Director of Global and Sponsored Projects Accounting
  - Director of Corporate and Foundation Relations
  - Sr. Associate Director of Corporate and Foundation Relations
  - Associate Director of Corporate and Foundation Relations
  - Assistant Director of Corporate and Foundation Relations
  - Assistant Director of Global and Sponsored Projects Accounting
  - Global and Sponsored Projects Accounting Associate

- SPG meetings request the attendance of other non-SPG members, including:
  - Administrative Assistant, Corporate and Foundation Relations Office
  - Administrative Assistant and Gift Recorder, Development Administrative Services

- SPG will maintain an organizational chart (as Best Practice 001.1) for the purpose of identifying individuals in SPG. This chart will be updated as members cycle on or off the Group.

The source of this document is Sponsored Projects Group.
Organizational Chart indicating those performing Corporate, Foundation and Sponsored Projects Administration (Pre- and Post-Award)

(Green indicates Sponsored Projects Group)
002.0 Best Practice: Billing Procedures for Student Wage (Stipend) and Indirect
Effective: 2/18/09
Last Revision: [date]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE:
To describe how SPG bills grants regarding indirect, student salaries and other costs.

BEST PRACTICE: (See NSF new GPG)
- SPG bills indirect (F&A) costs to a particular grant at the rate prevailing at the time at which the proposal is awarded.
- Payment (and billing) of student stipends is made at the prevailing college (R&D) rates rather than the rates listed (or projected) at the time of proposal submission.

The source of this document is Sponsored Projects Group.
003.0 Best Practice: Procedures for Projecting Costs on Multi-year Projects
Effective: 2/18/09
Last Revision: [5-29-2015]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE:
To describe the process for projecting costs on multi-year project budgets.

BEST PRACTICE:

• **Faculty salaries** are projected for future years at current base salary plus **three percent (3%) per year**. Three percent per year has proven to be an adequate “rule of thumb” increase to estimate future faculty salary step raises plus cost of living increases. For example:
  - Year proposal is submitted: equals the base year e.g. $10,000.
  - Year one of project (in following year) equals $10,300
  - Year two of project equals $10,609
  - Year three of project equals $10,927

• **Student wages/(stipends)** for summer and academic year research and research assistantships funded by external grants are set at the same rates awarded by the All-College Research and Development (R&D) Committee. Student wages on multi-year grants will be budgeted at the rates for those years (if known), or will be budgeted at projected rates posted on the CFR/(or SPG) website.

• **Student Room and Board Costs** for summer research and research assistantships funded by external grants are set at the same rates awarded by the All-College Research and Development (R&D) Committee. These rates are set by Financial Operations. Student room and board rates for multi-year grants will be budgeted at the rates for those years (if known), or projected for future years at current base rates plus 3.5 percent (3.5%) per year. This percentage per year has proven to be an adequate “rule of thumb” increase. These projected rates are posted on the CFR/(or SPG) website.

The source of this document is Sponsored Projects Group.
004.0 Best Practice: Procedures for Assessing F&A Costs on Non-Salary Projects
Effective: 3/30/09
Last Revision: [8-6-2015]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE:
To describe how the College assesses Facilities and Administrative (F&A) costs on projects which do not involve salary or stipend, and/or for which an F&A rate is not specified.

DEFINITION:
The College’s agreements with DHHS calculate F&A rates which are calculated on wages and fees, excluding benefits. This is different than some institutions where their F&A rate is based on total direct costs. Therefore, on proposals where there is no wage or stipend line in the budget, F&A cannot be calculated.

BEST PRACTICE:
• The College strives, according to Strategic Plans, to recover reasonable F&A at full rate(s) whenever possible.
• When projects, agreements and/or contracts a) do not involve salary or wages, and b) allow F&A recovery as an allowable expense under the specific program guidelines:
  o F&A will be calculated and budgeted at ten percent (10%) of modified total direct costs. Modified total direct costs:
    ▪ *exclude* capital expenses, renovation, purchases of large expense equipment.
    ▪ *include* personnel and program costs.

The source of this document is Sponsored Projects Group.
005.0 Best Practice: Procedures for Pre-Award PI Certifications
Effective: 8/20/08
Last Revision: 8-6-2015
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe who collects which required forms, and when.

BEST PRACTICE:
- Debarment certifications
  - These certifications are collected from the PI by the cognizant college grant officer in the Pre-Award Process prior to proposal submission, as specified by policy.
  - Re-certifications are also collected from the PI by the cognizant college grant officer annually at the point when annual reports are processed by the PI and/or received by the SPG Office.
  - Original debarments are archived, as specified by policy, and are archived electronically in shared server space.
  - Debarment certification checks are performed by checking EPLS when those forms are received.
  - Debarment certification checks via EPLS are performed annually for the following:
    - Dickinson College Senior Staff
    - Dickinson Board of Trustees

- Project Approval/Notification Forms
  - These forms are collected from the PI by the cognizant college grant officer in the Pre-Award Process prior to proposal submission, as specified by policy.
  - These forms are circulated by the PI, or by the cognizant grant officer after the PI has signed form and the included FCOI certification.
  - Original Project Approval/Notifications are archived, as specified by policy.

- Financial Conflict of Interest Certification (on “Grant Clearance” - Project Approval/Notification form)
  - These certifications are collected from the PI by the cognizant college grant officer in the Pre-Award Process prior to proposal submission, as specified by policy.
  - Re-certifications are also collected from the PI by the cognizant college grant officer annually at the point when annual reports are processed by the PI and/or received by the SPG Office.
  - Original Project Approval/Notifications are archived, as specified by policy.

- NIH PI Assurances
  - These assurances are collected from the PI by the cognizant college grant officer at the time of report submission as specified by policy. Original NIH PI Assurances are archived, as specified by policy.

The source of this document is Sponsored Projects Group.
006.0 Best Practice: Grant Matching Account Purposes and Management
Effective: 4/30/2009
Last Revision: [8-6-2015]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe the uses and management of the college’s “Grant Matching Account” (GMA).

DEFINITION:

1) The Grant Matching Account is funded by the college annual budget to support grant activities for which cost sharing (grant-matching) is: a) specified by the granting agency, and/or b) a necessary or useful condition for producing a grant award. The GMA is used to support not only institutional projects, but also faculty research projects.

2) The uses of the GMA are determined and specifically approved on a case-by-case by the Provost and Dean of the College (or the Associate Provost in lieu of the Provost). The GMA has been used variously to support the costs of student research, equipment, unfunded grant expenses, grant expense overruns, and other costs, but ultimately the decision on how to spend the funds rests solely with the Provost and Dean.

BEST PRACTICE:

1) For institutional or faculty research project budgets requiring additional support from GMA, the SPG office will make a formal request to the Provost and Dean via email for approval. This request will be made to offset planned expenditures on the proposed grant *prior* to budget and proposal submission. That request may include (but is not limited to):
   - Itemized cost per year i.e. student room, board, stipend, faculty stipend, equipment
   - Total project costs
   - Clearly stated reason why the GMA is being recommended for that purpose.

2) Documentation regarding decline or approval is saved in electronic and/or hardcopy files for the particular project.

3) Dollar information and any descriptive information is entered on GMA spreadsheets

4) Notice of this new allocation to GMA is made to the Associate Provost, Grants Management, and other SPG officers so the balance of the GMA is not exceeded in any particular year.

5) When the grant is approved, the above information is forwarded to Grants and Sponsored Projects (GaSP) for the purpose of setting up cost-sharing accounts.

6) The GMA and any new information relating thereto is a standard agenda item for monthly grant meetings.

The source of this document is Sponsored Projects Group.
007.0 Best Practice: Media Relations and Notification of New Grants
Effective: [date]
Last Revision: [date]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe how information on new grant awards is conveyed to internal media and other offices.

BEST PRACTICE:

1) Sponsored Projects Group, upon receipt of notification of a new grant award, first determines if there are any conditions imposed by the granting agency regarding the release of information to press sources. If there are conditions, these conditions are conveyed to Dickinson’s Media Relations office, and noted on any documentation that may be distributed internally.

2) A project abstract is forwarded to Media Relations and other interested parties on campus, in addition to contact information for the PI, who may be contacted for additional information. Other interested parties include:
   
   Development Stewardship Office

The source of this document is Sponsored Projects Group
008.0 Best Practice: Collection of Reports from PIs

Effective: 2/10/2010
Last Revision: [date]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe the process used to ensure that student-research information is entered into institutional databases.

BEST PRACTICE:

1) Sponsored Projects Group will collect all final and annual reports from PIs as they are submitted, regardless of the way the report is submitted: electronic or hardcopy.

2) These reports are saved in electronic and hardcopy files, and then transmitted to those persons managing the various databases, which include student presentations, co-authored papers, project abstracts, summaries and comments from the student(s) involved in the research.

The source of this document is Sponsored Projects Group.
PURPOSE: To describe how SPG pre-award staff arrive at cost rates for a) off-campus travel (including room and board), meetings, and conferences, b) room/board costs for consultants and others for on-campus projects, and c) other occasions where projects require the use of per-diem rates.

BEST PRACTICE:

1) Sponsored Projects Group determines cost rates for proposals including travel using the latest Federal maximum per-diem rates and regulations published on GSA webpages.

2) All travel to/from external venues are calculated using the 75% per diem rate for first day/last day, per Federal per diem regulations.

*Note: Although we project federal maximum per diem rates on the proposal, we will not reimburse those costs at per diem rates – we will only reimburse actual expenses.

The source of this document is Sponsored Projects Group.
010.0 Best Practice: Debarment Collection and EPLS Checks

Effective: [7/21/08]
Last Revision: [8-6-2015]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe how SPG pre-award staff collect debarment certifications and conduct debarment certification checks.

BEST PRACTICE:

1) SPG pre-award staffers:
   • collect debarment certifications from PI’s (and others in federal/state proposals to be paid from grant funds) at the point of proposal submission
   • inform administrative associate at point of award when debarments need to be collected, from whom, and the dates of the grant (multi-year(s)).
   • inform administrative associate if there are any consultants that need debarments and which year of the grant there are different consultants so they can be pinged by our dept on an annual basis

2) Debarment certifications will be collected from consultants and others retained by the project/cognizant PI, and by SPG pre-award staff.

3) Debarment certifications will be collected from faculty members who receive federal or state-sponsored fellowships and elect to have fellowships administered through the college.

4) Debarment certifications will be collected annually on multi-year projects from PI’s (and others in federal/state proposals to be paid from grant funds).

5) SPG Administrative Associate maintains records of debarments received, and follows-up with SPG staffer who oversees the grant so that the appropriate PIs are informed that they need to submit debarment certificates by the designated date.

6) SPG Financial Operations Staffers retain original debarment certifications.

7) Verifications of debarment certifications through the Excluded Parties List System (EPLS) on SAM.gov are conducted by the SPG Administrative Associate when they are received. If no certification is received from the PI, verification of status will be checked through EPLS regardless, to assure that the PI is not currently debarred. This process can be initiated through an email from the SPG staffer to the SPG Administrative Associate requesting the EPLS search. A hard copy of this email will be filed by the SPG AA highlighting the EPLS search results. If the previously requested Debarment Cert. is received after the SPG-initiated EPLS search is conducted, the Debarment Cert. and the hard copy email will be filed together.

8) EPLS checks of College Trustees and Senior Officers are conducted on an annual basis and/or when new staff or Trustees are added.

9) Discrepancies revealed through the verification process are immediately reported to College Legal Counsel, and others, as appropriate.

The source of this document is Sponsored Projects Group.
011.0 Best Practice: Banner: Prospects, Contacts data entry
Effective: [7/22/08]
Last Revision: [date]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe how SPG pre-award staff manages prospects and contacts in Banner.

BEST PRACTICE:

1) Prospect Proposal Forms are prepared and processed for all proposals that have been submitted except for proposals with no dollar amount. Those will be entered as Letters of Inquiry (LOIs).

2) Contact Reports are entered for all proposals except for fed/State government proposals.

The source of this document is Sponsored Projects Group.
012.0 Best Practice: Administrative “Pass-Through” Grants
Effective: [1/21/09]
Last Revision: [DATE]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To clarify the College’s position and best practices on “pass-through” grants.

DEFINITION: So-called “pass-through grants” are those which are awarded to Dickinson College and therefore administered by Dickinson, but 100 percent of the funding is “passed-through” to other non-Dickinson entities (e.g., businesses, non-profits, etc.,) for use in project implementation.

BEST PRACTICE:
1. The Sponsored Research Group shall avoid, whenever possible, pursuit of grant funding which requires that the College serve as an administrative agent on a project implemented by a non-College entity, for the following reasons:
   a. Dickinson projects must be headed by Principal Investigators (PIs) meeting specified eligibility criteria stated in Policy XIV-A-6 Principal Investigator Eligibility. These criteria do not allow non-Dickinson PIs on Dickinson projects.
   b. As administrative agent on any such project(s), Dickinson would have financial, implementation, and compliance oversight responsibilities, but would have no control over such duties whatsoever.

2. Any exceptions to this best practice must be subject to:
   a. A careful identification and analysis of the inherent risks to the College if the project were undertaken. This determination must be made by Senior Dickinson Staff.
   b. A determination that the project is not only in the interest of the College, but that such interest is so substantial that it dramatically overwhelms any various risks involved. This identification and analysis must be made by Senior Dickinson Staff.
   c. Involvement of a member of the Senior Dickinson Staff as the responsible Principal Investigator/Project Director (PI/PD) on the project who will assume full and active administrative oversight responsibilities.
   d. Official authorization (in writing) by all Senior Dickinson Staff.
   e. The preparation and signing of a formal contract between Dickinson and the non-Dickinson entity to which the funds will be passed. Such contracts will be subject to provisions in policies pertaining to Negotiation of Awards, Subawards, and Subcontracts.

The source of this document is Sponsored Projects Group.
013.0 Best Practice: Closeout Spending Prior to Grant Termination
Effective: [1/21/09]
Last Revision: [DATE]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To clarify the College’s position and best practices on PI spending for equipment and other associated items within 90 days prior to the termination of the grant.

BEST PRACTICE:

- The College shall review for approval any request for spending for project equipment and other associated items made within 90 days of the termination of the grant.
- In general, equipment purchases (and other items, regardless of cost, which will have a usage life beyond the termination of the grant) shall not be allowed.
- Typical non-equipment project expenses, i.e. student stipends, room and board, supplies, travel, etc., required for the successful completion of the project before the termination, generally *shall* be allowed but may be subject to review by SPG.

The source of this document is Sponsored Projects Group
014.0 Best Practice: PI Status for Newly Hired Faculty
Effective: 10/2/2010
Last Revision: [DATE]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To clarify the College’s position and best practices on the allowability of newly hired faculty serving as PIs and/or applying for grants through Dickinson.

BEST PRACTICE:

- Newly hired faculty may apply for sponsored project grants under the following conditions, all of which must be met:
  - the prospective PI must have a signed contract with the College
  - the commitment for the grant will not start until after the faculty member is officially in residence on campus and undertaking their teaching and other responsibilities as outlined in the Faculty Handbook.
- Newly hired faculty must abide by the same policies as other PIs regarding certifications, internal grant approvals, and other policies detailed in policies documents.

The source of this document is Sponsored Projects Group
015.0 Best Practice: Course Reassigned Time: Budgeting Costs and F&A
Effective: [08-6-2015]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To clarify the College’s position and best practices on the allowability of charging F&A (indirect) and benefits on course reassigned times

BEST PRACTICE:

- For purposes of proposal budget development, the cost of one standard release time is $4,6500 (as of the date of this document).
- The cost of the release time is excluded from any benefits calculation.
- The cost of the release time is included as part of any combined salary and wage figure that is used as a base for F&A/indirect cost calculation. This inclusion of release time in the base rate is standard regardless of whether the proposal in question is:
  - a federal grant in which F&A costs are limited to a certain percentage of combined wages and salaries excluding benefits, or
  - a non-federal grant, in which a Modified Total Direct Cost (MTDC) rate is applied to recover indirect costs (see Best Practice: Procedures for Assessing Indirect Costs on Non-Salary Projects).
- When the grant-funded activity occurs, the release time funds are charged out to the faculty salary pool to offset the cost of hiring of replacements/adjuncts.

The source of this document is Sponsored Projects Group
016.0 Best Practice: NIH/DHHS Principal Investigator Assurance Certification
Effective: 8/8/08
Last Revision: [DATE]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To clarify the College’s requirements and best practices on the NIH/DHHS Principal Investigator Assurance Certification required by NIH.

DEFINITION: Because of changes in electronic document submissions through NIH’s eRA Commons, the principal investigator’s (PI) original signature on 1) grant applications, 2) progress reports, and 3) prior approval requests has been replaced with an institutional compliance requirement. The change, which becomes effective for submission/receipt dates on or after May 10, 2006, requires the applicant organization to secure and retain written, signed assurances from the PI and provide it upon request to NIH. [Link](http://grants.nih.gov/grants/guide/notice-files/NOT-OD-06-058.html). The NIH/DHHS Principal Investigator Assurance Certification is Dickinson’s response to NIH’s requirements.

BEST PRACTICE:
- The completion of the NIH/DHHS Principal investigator Assurance Certification form is required of all PI’s seeking support from NIH and other DHHS funding sources.
- Such PI’s must file a signed, dated copy of this document with the C&FR office when all the following events occur:
  - Submission of a new grant proposal via NIH eRA Commons
  - Submission of a grant report via eRA Commons
  - Request of a grant extension or modification through eRA Commons
  - If multiple PIs are proposed on an application, the institution must maintain an assurance for all named PIs.
- The Corporate and Foundation Relations Office will retain copies of all such documents for audit purposes and/or in the event that NIH requires Dickinson to produce such documentation.

The source of this document is Sponsored Projects Group
PURPOSE: To clarify the College’s requirements and best practices on retaining documents for proposal submission and reporting that contain original signatures.

DEFINITION: Because of changes in a) submission of proposals and other documents from hardcopy to electronic submission systems such as Grants.Gov, NSF’s Fastlane, et al., and b) C&FR proposal and report document retention and storage, i.e. from hardcopy files to electronic files, a best practice on retention of such documents containing original and/or electronic signatures is necessary.

Such documents include, but are not limited to:
- Grant Clearance/Notification Form (103.1F) signed by institutional officers. This includes any email or other electronic form of approval.
- annual NSF RUI Certifications signed by the Provost
- Debarment Certification Forms (104.1F) signed by Principal Investigators and/or Project Director(s) and others to be supported by Federal funding
- NIH Assurance Form (001.1F) signed by the Principal Investigator(s) and or Project Director(s)

BEST PRACTICE:
1. The Corporate and Foundation Relations Office will retain copies of all such documents for internal and external audit purposes and/or in the event that Dickinson is required to produce such documentation.
2. Copies shall be electronically scanned and stored in electronic format (presently *PDF), and archived in document folders which will reside on the College’s electronic data storage network
3. Original hardcopies shall *not* be saved in hardcopy files, with the exception of:
   a. Debarment Certification Forms (104.1F)
   b. NIH Assurance Form (001.1F)
4. The Debarment Certification Forms (104.1F) and NIH Assurance Form (001.1F) shall be saved in hardcopy files by Global and Sponsored Projects (GaSP) accounting for the purposes of audit, should one be necessary or required.

The source of this document is Sponsored Projects Group
018.0 Best Practice: Subrecipient Monitoring
Effective: 11/18/2011
Last Revision: [8-6-2015]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe the best practice for the monitoring of programmatic and financial activities of the College’s subrecipients on federal, state, local and other grants and awards, to ensure that:

- Awards are used for authorized purposes in compliance with laws, regulations and provisions of the Prime
- Performance goals are achieved

DEFINITION: A subrecipient is the legal entity to which a subaward is made and which is accountable to the College for the use of the funds provided in carrying out a portion of the College’s programmatic effort under a sponsored project.

A subaward or subgrant is an award of financial support from a prime awardee to a qualified organization for the performance of a substantive portion of the program funded under the prime award. Vendors are not considered subrecipients.

BEST PRACTICE:
The College shall perform the following stewardship activities with regard to subrecipients of its sponsored awards:

At time of Proposal the Corporate & Foundation Relations Office will work in conjunction with the Principal Investigator and the Sponsored Programs Accounting Office to obtain:

1. Subrecipient statement of work, letter of intent, budget, and budget justification
2. Cost Sharing commitment
3. Other cost/rate certifications
4. Assurances that RCR training will be conducted if the subcontractor will involve undergraduate students.
5. Determination of acceptable OMB 2 CFR 200 Subpart F Audit (Subpart F)

Before work begins:
1. Obtain an acceptable Subpart F audit. Review reports for subrecipients expending $500,000 or more in Federal awards during a fiscal year. This can be performed with reports filed with the single audit clearinghouse or by obtaining an annual certification by the subrecipients for compliance with Subpart F.
   a. Where findings exist, ascertain that the Dickinson College award is not affected.
   b. Review the corrective action cited by subrecipients in response to their audit findings is timely and appropriate.
2. Obtain evidence of approved F&A and Fringe Benefit rates
3. Verify that subrecipient is not debarred or suspended
4. Obtain sole source justification if needed
5. Obtain a fully-executed subaward which includes Prime Award information (Agency name, Prime award name and number, award period, CFDA # if applicable), and requirements imposed by the prime granting agency and the pass-through entity.

During the subaward the Principal Investigator (PI) and Sponsored Programs Office shall:
1. Ensure compliance with the policy for Subrecipient Monitoring.
2. Ensure subrecipients comply with the technical provisions of the subaward (work, reports, etc)
3. Monitor award to ensure that costs are appropriate, approved and accumulated accurately in the accounting system
4. Ensure all required subrecipient programmatic reporting is current and timely.
5. Approve all subrecipient invoices for payment based on appropriate awareness of work performed.
6. Keep detailed records of communications regarding unsatisfactory performance by the subrecipient.
7. Approve all changes to the subaward.

In the event that there are Audit Findings on the Subrecipient’s Subpart F Audit
1. SPG will require a corrective action plan from the subrecipient
2. SPG will require documentation that the plan was implemented by the subrecipient
3. In the case of material findings, i.e. loss of equipment, a site visit will be conducted.
4. In the case of immaterial findings, a letter from the Subrecipient’s Office of Sponsored Research or Finance office noting that changes have been (or will be) effected will be secured.

The source of this document is Sponsored Projects Group
019.0 Best Practice: Transfer of Grant-Funded Equipment
Effective: 2/17/2012
Last Revision: [DATE]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe the best practice for the disposal of equipment funded by grant-funded projects, both federal and non-federally sponsored.

DEFINITION: Equipment is an item with a unit cost of $5,000 or more, and a useful life of one year or more. This includes:

1. equipment acquired with *federal or other governmental* funds, which are subject to policies and procedures set forth in OMB Uniform Guidance 2 CFR 200 and Sponsored Project Policy 152 “Property Standards – Acquisition and Management”
2. equipment acquired by non-federal, yet sponsored grants to the institution

BEST PRACTICE “A”: Transfer of research equipment brought to Dickinson by faculty through a sponsored project grant.

1. Transfer or disposal of equipment during the term of the sponsored project shall be guided by the regulations of OMB Uniform Guidance and by the policies, processes and procedures outlined by the granting agency, e.g. NIH or NSF.
   a. NIH (see Administrative Requirements-Management Systems and Procedures-Property Management System Standards).
      A change of grantee organization may involve the transfer of equipment purchased with grant funds. The transfer may be accomplished as part of the original grantee's relinquishment of the grant; otherwise, NIH reserves the right to transfer title to equipment to the new organization.
   b. NSF (see http://www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/aag_2.jsp#IIB2h)
      II.B.2.h. (v) Equipment Transfers. Equipment purchased with NSF funds for use in a specific project should remain available for use for the duration of the project. PI/PDs who are in the midst of projects that included funding for equipment and who will continue the project at a new organization with NSF support should be able to arrange with their original organization to have the equipment transferred with them. Shipping costs for such equipment may be charged to the original or transferred grant as an allowable cost. Budgets should not include funds to "buy" equipment that had been previously obtained with Federal funds.

2. Transfer or disposal of equipment after the sponsored project term has expired.
   a. Such equipment shall be considered the property of Dickinson College.
   b. When a departing faculty member requests release of such research equipment the College will consider the release the other institution concerned on an individual basis and in accord with the following guidelines:
      i. The equipment is critical to the investigator's research, and
      ii. The equipment will not or cannot be supplied by the institution to which he or she is going, and
      iii. The equipment is not critical to faculty research at Dickinson, and
iv. The conditions under which the equipment or funds used to purchase it were secured do not preclude disposal or transfer. “Critical” equipment is defined as equipment essential to research personally conducted or directed by the faculty member. The individual requesting the equipment has the responsibility for demonstrating to the College her/his need for that equipment for the continuation of his or her personal research.

v. The transfer or disposal of the equipment is otherwise deemed advantageous to Dickinson College.

c. If all the above conditions are met, a transfer of the equipment will be effected by

i. a signed agreement (see “Equipment Transfer Acknowledgement Agreement”) between Dickinson and the donating institution. This agreement will be retained for audit purposes by the Sponsored Projects Group.

ii. The cost(s) involved in such transfer shall be undertaken by the receiving institution if possible.

iii. Arrangement of shipping shall be the responsibility of the departing faculty member.

iv. Financial Operations will be responsible for removing the equipment from the physical assets register of the college

BEST PRACTICE “B”: Transfer of research equipment brought to Dickinson by faculty through a non-sponsored grant.

When a departing faculty member requests release of certain research equipment brought to Dickinson through a personal, non-sponsored research grant or fellowship made directly to the individual, such equipment will be not be considered the property of the College. The departing faculty member will be considered the owner of the equipment and therefore fully responsible for its transfer and/or disposal and any associated costs.

The source of this document is Sponsored Projects Group
020.0 Best Practice: NIH PubMed Central Requirements
Effective: 5/26/10
Last Revision: [DATE]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To clarify the College’s requirements and best practices regarding required electronic dissemination of NIH PI publications through NIH’s PubMed Central on-line system.

DEFINITION: All NIH awards are pursuant to the authority of 42 USC 241 42 CFR 52 and are subject to the requirements of this statute and regulation and of other referenced, incorporated or terms and conditions attached to the grant award document. According to the standard terms in NIH awards:

Acceptance of this award including the “Terms and Conditions” is acknowledged by the grantee when funds are drawn down or otherwise obtained from the grant payment system. Award recipients are required to comply with the NIH Public Access Policy. This includes submission to PubMed Central (PMC), upon acceptance for publication, an electronic version of a final peer-reviewed, manuscript resulting from research supported in whole or in part, with direct costs from National Institutes of Health. The author's final peer-reviewed manuscript is defined as the final version accepted for journal publication, and includes all modifications from the publishing peer review process. For additional information, please visit http://publicaccess.nih.gov/

BEST PRACTICE:
- All NIH PIs will be required and responsible for posting final peer-reviewed journal manuscripts that arise from NIH funds to the digital archive PubMed Central upon acceptance for publication. According to NIH policy, such papers should be posted and accessible to the public on PubMed Central no later than 12 months after publication.
- The Corporate and Foundation Relations Office will remind PIs who receive NIH funding about this responsibility when their award is made.

The source of this document is Sponsored Projects Group
021.0 Best Practice: Recent Graduates (Alumni) Collaborators on Sponsored Projects  
Effective: 11/11/10  
Last Revision: 2/17/2012  
Responsible Office: Sponsored Projects Group  
Approval: Sponsored Projects Group  

PURPOSE: To clarify the College’s best practices regarding the allowability of recent Dickinson graduates to collaborating in a student-faculty or otherwise collaborative relationship on sponsored projects.  

DEFINITION: Although certain sponsoring agencies, e.g. NSF, have no specific guidelines disallowing the hiring of recent graduates as “students” on a sponsored project, Dickinson considers all graduates - whether their graduation is recent or not – to be *alumni* – and not students of the college.  

BEST PRACTICE:  
- In principle, Dickinson prefers to reserve collaborative research funding opportunities for *current* students rather than alumni. Unemployment benefits for recent alumni (if applied for by the recent alumnus at the conclusion of their work) represent an unfunded cost that the College must bear. Accordingly, faculty Principal Investigators should be discouraged from attempting to hire recent alumni as “student collaborators,” and recent graduates should be discouraged from submitting requests to serve as “student” collaborators on sponsored grants after they have graduated.  
- Recent graduates *will* be allowed to serve as “student collaborators” on sponsored projects if ALL of the following conditions are met:  
  - The sponsoring agent does not prohibit the expenditures of funds on person(s) with alumni status, AND  
  - The PI and/or GaSP have verified the above with supporting official documentation and/or in writing with the sponsoring agent’s program officer and/or grants and contracts office, AND  
  - Student collaboration was envisioned and budgeted in the original funded grant, AND  
  - The research experience to be provided to the recent graduate is critical to that alumnus’ entrance to graduate programs, AND  
  - The research collaboration as proposed by the Principal Investigator is required of that specific recent graduate for one or more of the following reasons:  
    - The recent graduate has worked on this specific project during their time at Dickinson,  
    - The recent graduate has knowledge specific to the successful completion of the PI’s project  
  - If the project is *not* an NSF-Research Experiences for Undergraduates (REU), ostensibly because once graduated, the former student no longer fits NSF’s criterion of being an “undergraduate.”  
- Recent graduates will be allowed to serve as “student collaborators” on other non-federal sponsored grants, i.e. Beckman, if the original grant provided for mentored, or other collaborative research at Dickinson after graduation.  
- Recent graduates fulfilling the conditions above and therefore allowed to serve as research collaborators, shall be hired under the following conditions listed below unless such conditions are superceded by current Dickinson Human Resources Policies:
Such persons are no longer considered “students” according to policies set by the Student Employment Office. ([http://www.dickinson.edu/uploadedFiles/about/offices/financial-operations/content/student-employment/Student%20Employment%20Handbook%20for%20Students.pdf](http://www.dickinson.edu/uploadedFiles/about/offices/financial-operations/content/student-employment/Student%20Employment%20Handbook%20for%20Students.pdf)

All employment processes will be coordinated with the Dickinson College Human Resources Office.

Such persons may be hired as “casual employees” of the College, and will be paid on an hourly, rather than on a stipend basis.

Weekly hourly rates for services rendered shall be based on an R&D-funded student-collaborator’s weekly stipend/40 hours.

Benefits, if applicable, will be charged to the grant account at the normal rates.

The source of this document is Sponsored Projects Group
022.0 Best Practice: Proposals involving approved IRB, IACUC and IBC protocols
Effective: 11/11/10
Last Revision: [DATE]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe the College’s best practices regarding pre-award congruency checks for proposals which involve research protocols approved by the college’s compliance committees (IRB, IACUC, IBC)

DEFINITION: Congruency checks are those which compare consistency in the content, language, methodology, detail and intent of research plans involving animal, human subjects or other research involving recombinant DNA between two documents a) outgoing proposals, and b) the protocols formally approved by compliance committees. The goal is to ensure that what is proposed to funders is precisely the same as that which has been approved by the appropriate compliance committee.

IACUC: Institutional Animal Care and Use Committee
IRB: Institutional Review Board for the Protection of Human Subjects in Research
IBC: Institutional Biosafety Committee

BEST PRACTICE:
• The proposal pre-award officer involved in submitting such faculty and other sponsored project proposals shall seek the verification of congruency from both the following persons:
  o The Institutional Administrator for the specific committee which has approved a protocol
  o The Chair of the specific committee which has approved a protocol, or her/his designee from the compliance committee
• Verification of congruency shall be documented by an email from at least the Chair of the specific compliance committee. That email shall be saved with other proposal clearance documentation.

The source of this document is Sponsored Projects Group
023.0 Best Practice: Managing Financial Conflicts of Interest (FCOI)
Effective: 11/11/10
Last Revision: 10/01/2015
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe the College’s best practices on managing financial conflict of interest (FCOI) information, training and findings.

DEFINITION: The definitions of a financial conflict of interest are noted in College policies. In general, a conflict of interest exists when the College determines that a significant financial interest could directly and significantly affect the design, conduct, or reporting of the research sponsored by federal sources, or the conduct of the Investigator’s institutional responsibilities (42 CFR 50.605). The practices below follow the Public Health Service (PHS) rules [http://www.gpo.gov/fdsys/pkg/FR-2011-08-25/pdf/2011-21633.pdf](http://www.gpo.gov/fdsys/pkg/FR-2011-08-25/pdf/2011-21633.pdf) as revised in 2011. See also DHHS Financial Conflict of Interest website and view the side-by-side comparison table.

BEST PRACTICES:

1. **FCOI Training Requirements for PIs**
   - Each Principal Investigator must complete training prior to engaging in research related to any PHS- or other federally-funded grant or contract and at least every four years, and immediately under the designated circumstances:
     - College FCOI policies change in a manner that affects Investigator requirements
     - An Investigator is new to an Institution, or
     - The College finds an Investigator noncompliant with College’s FCOI policy or management plan.

2. **FCOI Training Program**
   - Sponsored Projects will conduct training when new proposals are submitted for institutional approval
     - All Investigators submitting grant proposals to federal agencies will be provided POLICY XIV-C: Conflict of Interest in Research Policy for review.
     - All Investigators will be provided instructions on how to access and complete the Collaborative Institutional Training Initiative’s (CITI) Conflict of Interest mini-course.
     - The Sponsored Projects Group will be available to address any questions Investigators may have about POLICY XIV-C or the CITI Conflict of Interest mini-course.
     - The Investigator Financial Disclosure certification statement (page two of 103.1 F, Grant Clearance Form) will need to be signed prior to proposal submission.
     - If a financial conflict of interest exists, a Significant Financial Disclosure form and accompanying materials must be submitted to the Sponsored Projects Office by the Investigator prior to receiving campus endorsements and before the proposal is submitted.
     - If a significant financial interest develops during the term of the grant, the Investigator will need to disclose this interest and submit a Significant Financial Disclosure form immediately.
     - Upon the fourth year, determined by the date listed on the original signed Investigator Financial Disclosure certification statement, if the grant remains active,
Investigators must review again POLICY XIV-C, take the CITI Conflict of Interest Refresher course, and sign a new Investigator Financial Disclosure certification statement.

- Global and Sponsored Projects (GaSP) will add discussion of FCOI requirements with the PI at the time that new grant awards are “set up” for administrative implementation and oversight.
- Sponsored Projects will track FCOI compliance in the same fashion as Debarment Certifications are tracked.

3. Collaborators/sub-recipients/subcontractors and FCOIs
   - Collaborators/sub-recipients/subcontractors from other institutions must either:
     - Comply with the College’s FCOI Training Program (described above) and sign the Investigator Financial Disclosure certification statement; or
     - Provide certification that their respective institutions are in compliance with Federal policies regarding Investigator significant financial interest disclosure and that their portion of the project is in compliance with their institutional policies.

4. Reporting of FCOIs
   When FCOIs are reported in pre-award, the appropriate funding agency will be notified. The NIH’s guidelines for reporting will be followed for other funding agencies, and include the following information, as follows:

   **INITIAL REPORT**
   - Grant/Contract number
   - Project Director/Principal Investigator (PD/PI) or Contact PD/PI
   - Name of Investigator with FCOI
   - Name of the entity with which the Investigator has a FCOI
   - Nature of FCOI, e.g., equity, consulting fees, travel reimbursement, honoraria
   - Value of the financial interest: $0-4,999; $5K-9,999; $10K-19,999; amounts between $20K-$100K by increments of $20K; amounts above $100K by increments of $50K or statement that a value cannot be readily determined.
   - A description how the financial interest relates to PHS-funded research and the basis for the Institution’s determination that the financial interest conflicts with such research
   - Key elements of the Institution’s management plan
   - Whether FCOI was managed, reduced, or eliminated

   **ANNUAL REPORT**
   - Grant/Contract number
   - Project Director/Principal Investigator (PD/PI) or Contact PD/PI
   - Name of Investigator with FCOI
   - Name of the entity with which the Investigator has a FCOI
   - Status of the FCOI
   - Changes to the management plan

5. PI Non-compliance with FCOI Regulations
   The College is required to conduct a retrospective review in those cases of non-compliance with the regulation. The report will address the impact of the bias on the research project and the actions the Institution has taken, or will take, to eliminate or mitigate the effect of the bias.
   - PHS (NIH) grants: In the case of a PHS award the college is not required to report the review to the PHS Awarding Component. The college is required to notify the
PHS Awarding Component promptly and submit a report to the PHS Awarding Component only in cases where bias is found.

- NSF and other Federal grants: In the absence of FCOI requirements posted by specific agencies, PHS guidelines will be followed.

6. **Public Access to FCOI Information**
   Information available concerning identified FCOIs held by senior/key personnel will be made publicly accessible:
   - via a Web site
   - via a written response to any requestor within five business days of a request, and update such information as specified in the rule.

The source of this document is Sponsored Projects Group
024.0 Best Practice: Data Management Plans and Management of Sharing the Products of Research
Effective: 1/18/2011
Last Revision: 5/11/2012
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe how the College complies with regulations regarding a) the development of data management plans and b) management of sharing the products of research as required by the National Science Foundation (NSF) and other federal agencies.

BACKGROUND: All Principal Investigators who submit grant proposals to the NSF and other federal agencies must comply with guidelines (see NSF Policy effective Jan 2011) regarding the dissemination and sharing of research results.

DEFINITIONS:
A Data Management Plan (DMP), according to NSF is “a supplementary document of no more than two pages …[which] … should describe how the proposal will conform to NSF policy on the dissemination and sharing of research results.” Each NSF Directorate, Office, Division, Program, or other NSF units will have their own solicitation-specific instructions and DMP requirements.

Sharing the Products of Research. According to NSF “Investigators are expected to share with other researchers, at no more than incremental cost and within a reasonable time, the primary data, samples, physical collections and other supporting materials created or gathered in the course of work under NSF grants.”

BEST PRACTICE:
1. The Principal Investigator will develop the Data Management Plan for the proposed project using the applicable guidelines:
   a. program solicitation-specific guidelines
   b. NSF Directorate-specific guidelines
   c. general NSF Grant Proposal Guide guidelines

2. Once developed, the Principal Investigator will forward the Data Management Plan to the Office of Corporate, Foundation and Government Support (CF&GS) and to a Library & Information Services liaison who will provide estimates of costs associated with the implementation of the Data Management Plan. These costs should be added to the grant budget if allowable (these costs are allowable through NSF).

3. At the time of award, project information will be accessible on the CF&GS public Web site and interested parties will be able to request a copy of the relevant Data Management Plans. After project data is collected, analyzed and organized by the Principal Investigator—as described in the Data Management Plan—interested parties will be directed to the appropriate repository for purposes of dissemination.

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The source of this document is Sponsored Projects Group
025.0 Best Practice: Acknowledgement of Federal Funding (Stevens Amendment)
Effective: [4/1/13]
Last Revision: [ ]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

DEFINITION: This law (Public Law 100.463, Section 8136), also known as the Stevens Amendment, is intended to give the federal government public credit for federally funded programs and projects. It requires federal grant recipients to include funding information on all publications related to projects that use federal funds, including statements, press releases, signs at construction sites, requests for proposals, bid solicitations, and other documents that describe projects or programs funded in whole or in part with federal money.

The Stevens Amendment, reaffirmed annually in Federal Consolidated Appropriations Acts states:
"When issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, all grantees receiving Federal funds included in this Act, including but not limited to State and local governments and recipients of Federal research grants, shall clearly state: (1) the percentage of the total costs of the program or project which will be financed with Federal money; (2) the dollar amount of Federal funds for the project or program; and (3) percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources." [http://grants.nih.gov/grants/guide/notice-files/NOT-OD-12-034.html]

This law applies to grants and cooperative agreements and may apply to subawards. It does not apply to contracts or subcontracts. Academic publications (peer-reviewed journals, presentations to professional groups) resulting from the project research are not required to include this information.

PURPOSE: To describe how the Sponsored Projects Group ensures that it is compliance with the Stevens Amendment.

BEST PRACTICE: Although no sanctions are specified for noncompliance, failure to comply might be considered a breach of institutional or principal investigator responsibilities and may result in termination, suspension, or debarment. SPG will ensure compliance by:

1. forwarding award and cost sharing information (in accordance with the Stevens Amendment) to Media Relations on all federal grants upon notice of award;
2. including award and cost sharing information on the “30th of the month” reports;
3. including award and cost sharing information to Media Relations on all federal grants upon notice of award so that website information may be complete;
4. communicating regularly the requirements of the Stevens Amendment to Media relations so that mandated information may be noted in print and web press releases, Dickinson Magazine, etc.
5. communicating information to Principal Investigators the requirements of the Stevens Amendment at the time of award, so they may include this information in their communications, as appropriate.

The source of this document is Sponsored Projects Group.
026.0 Best Practice: Management of Responsible Conduct of Research (RCR) Training

Effective: 4-21-2014
Last Revision: [ ]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

DEFINITION:

Training of undergraduates in responsible conduct of research is required by the National Science Foundation (NSF), 1 National Institutes of Health (NIH),2 other federal agencies3, and by the College’s Research and Development (R&D) Committee. The College’s policy on “Training of Undergraduates in Responsible Conduct of Research” describes the requirements surrounding RCR training. (http://www.dickinson.edu/download/downloads/id/2252/training_of_undergraduates_in_responsible_conduct_of_research)

PURPOSE: To describe the processes of the Sponsored Projects Group (and others) to ensure College policies regarding RCR are followed.

BEST PRACTICE:

1. General Notice and Availability:
   The Dickinson RCR policy is made available to students and faculty in a number of ways:
   a. the policy is posted on the Campus Policy Manual (website)
   b. the policy is posted on the Corporate Foundation & Government Support Office website
   c. notice of the RCR training requirement is posted on the Research & Development (R&D) website
   d. notice of the RCR training requirement is posted in the “Research Training Finder” which is accessible through the following websites: R&D, IACUC, IRB, IBC
   e. the requirement to fulfill RCR training is listed on the Grants Clearance Form which requires PIs to sign on all federal grants.

2. Specific Notices of RCR Requirements:
   a. As noted in 1.e above, all Principal Investigators (PIs) employing students on federally supported research are required to sign the grant clearance/notification form.
   b. PIs are reminded of the RCR requirements when the SPG group meets with the PI and “sets up” a new grant in the college’s Banner system.
   c. Students on Federal grants or Dickinson R&D awards during the summer are provided with an award letter which notes the requirement for RCR training and a link to the online training site (CITI).

1 “Certification Regarding Responsible Conduct of Research (RCR): The AOR is required to complete a certification that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research.” http://www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/aag_4.jsp#IVB
2 See NIH policies and requirements on RCR training at: http://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html
3 See the Office of Science and Technology Policy (OSTP)“Federal Policy on Research Misconduct” http://ori.hhs.gov/federal-research-misconduct-policy
The Sponsored Projects Office (SRO) also notifies all faculty mentors and student of the RCR training via email. Included in that email are, a) links to the CITI RCR training site, b) instructions on CITI account setup for individuals, and c) information on which specific RCR course is required per student. The Dickinson RCR policy is also attached to that email.

3. Tracking of CITI RCR training compliance:
   When summer federal and R&D awards are made available to the SRO the following process ensues:
   a. The SRO compiles a spreadsheet with student names, ID’s, faculty mentors, and the appropriate RCR Training course which is required.
   b. The SRO collects and tracks CITI training completion certifications as they are forwarded via email from the CITI system. This process is duplicated by the R&D administrative assistant.
   c. The SRO forwards completion information to the faculty mentor so they will know when their student mentee has undertaken the training, and is available for testing by the mentor.
   d. Reminders are issued by the SRO and the R&D on an as needed basis through the summer to students and their faculty mentors if the CITI RCR training is not being completed.
   e. Per Dickinson’s policy students must sign a certification form indicating that student has received additional RCR training appropriate to discipline and project in the NIH categories of RCR training. NIH certifications of one-on-one faculty training are received and retained by the SRO.

4. Record Keeping and Retention:
   a. All CITI training completion certifications are available on the CITI website, which is managed by the SRO. Those certifications are retained on-line and can be accessed electronically on demand by the SRO.
   b. Any additional RCR training completion certification information is retained by SRO.

5. Public Training Sessions:
   a. On faculty demand, CITI RCR training sessions may be offered by faculty/SRO collaboration.

The source of this document is Sponsored Projects Group.
027.0 Best Practice: Specially Designated Nationals and Blocked Persons List Check

Effective: [03/28/14]
Last Revision: [03/28/14]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe how SPG pre-award staff collect certifications from PIs in federal/state proposals verifying they are not listed on the U.S. Department of the Treasury’s Office of Foreign Assets Control Specially Designated Nationals and Blocked Persons List\(^1\) (SDN List\(^2\)) and conduct checks verifying this information.

BEST PRACTICE:

1) At point of proposal submission, SPG pre-award staffers:
   - collect SDN List certifications (included on debarment certification form) from PIs verifying they are not listed on the SDN List
   - update SDN List tracking spreadsheet (integrated with debarment certification tracking spreadsheet) with information regarding when SDN List certifications need to be collected, from whom, and the proposed dates of the grant (multi-year(s)).
   - verify SDN List status of subcontractors or consultants (no certification form required, as per Best Practice 107.1, item 4)

2) SDN List certifications will be collected from PIs and verified annually on multi-year projects by SPG pre-award staff.

3) SDN List status of subcontractors or consultants will be verified on an annual basis by SPG pre-award staff.

4) SDN List certifications will be collected from faculty members that receive federal-/state-sponsored fellowships and elect to have fellowships administered through the college.

5) SPG pre-award staff maintains records of SDN List certifications received, so that the appropriate PIs are informed when they need to submit SDN List re-certifications by the designated date.

6) SPG pre-award staff retain electronic version of signed SDN List certifications in Grants shared area.

7) Verifications of SDN List certifications through the SDN List are conducted by the SPG pre-award staff when they are received. If no certification is received from the PI, verification of status will be checked through the SDN List regardless, to assure that the PI is not currently listed.

8) Discrepancies revealed through the verification process are immediately reported to College Legal Counsel, and others, as appropriate.

The source of this document is Sponsored Projects Group.

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\(^1\) “As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs." Their assets are blocked and U.S. persons are generally prohibited from dealing with them.” [http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx](http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx)

028.0 Best Practice: eRA Commons User IDs for Undergraduate Students Participating in NIH-Funded Projects
Effective: 10/01/14
Last Revision: [12/10/14]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To clarify the College’s requirements and best practices regarding required eRA Commons User IDs for undergraduate students participating in National Institutes of Health (NIH)-funded projects.

DEFINITION: Every NIH Research Performance Progress Report (RPPR) lacking the eRA Commons User ID for undergraduate students who participate in NIH-funded projects for at least one person month will receive an error. The RPPR will not be accepted by the NIH without the required information pursuant to NIH Notice (NOT-OD-13-097): Extension of eRA Commons User IDs to Individuals in Graduate and Undergraduate Student Project Roles with Measurable Effort on an NIH Annual Progress Report (PHS2590 & RPPR). It is required that undergraduate students complete the following fields associated with their eRA Commons User ID: date of birth, gender, race, ethnicity, disabilities, U.S. citizenship status and country of citizenship. According to NOT-OD-13-097:

Consistent with reporting requirements from the NIH Reform Act of 2006 (P.L. 109-482, “NIH Reform Act”)…[and] the requirement for eRA Commons IDs for students responds to recommendations on the Biomedical Research Workforce from the NIH Advisory Committee to the Director:

The NIH should ensure that all students and postdoctoral researchers supported by the NIH on both research grants and research training grants are identified and the necessary variables are collected to assess the impact of NIH funded experiences on their subsequent careers.

BEST PRACTICE:
• The Sponsored Projects Office will retrieve from the faculty PI names of students who are participating in NIH-funded projects for at least one person month, reminding the PI that NIH reports will not be able to be successfully submitted without their student researchers’ eRA Commons IDs.
• The Sponsored Projects Office will send an explanatory email message to the student researcher(s), informing them that an eRA Commons User ID will be created for them. This message should also provide notice to student researcher(s) that their registration in eRA Commons enables faculty PIs to successfully submit required project reports.
• The Sponsored Projects Office will then create the eRA Commons User ID account.
• The Sponsored Projects Office will send the list of students’ eRA Commons IDs to the PI, reminding the PI to keep them in their records for submission of reports.

The source of this document is Sponsored Projects Group.
029.0 Best Practice: Defining the Student Role in National Science Foundation Projects
Effective: 11/22/16
Updated: [ ]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe the College’s best practice on defining the role of students in National Science Foundation (NSF) projects in order to make the determination of how students are compensated.

BACKGROUND: As presented at the 2016 NSF Fall Grants Conference:
- A student on an NSF project cannot be compensated partially as an employee and a participant.\(^1\)
- The role of the student on the project must be used to determine how the student is compensated.
- Student employees are compensated for services rendered and their level of compensation is tied to the number of hours worked.
- Student participants are compensated separately in an NSF budget.

DEFINITIONS:
- **Student Employees** are those engaged in conducting the research project. They are compensated for services rendered and their level of compensation is tied to the number of hours worked. These students’ stipends are to be budgeted/billed to NSF budget category “B.4 Undergraduate Students.”
- **Student Participants** are those engaged in a NSF-funded conference or NSF-funded training activity related to the project. Their compensation is to be budgeted/billed to NSF budget category “F. Participant Support Costs.”
- **Training.** Responsible Conduct of Research (RCR) training, and other research training required of student employees by Compliance Committees (IBC, IRB, IACUC) overseeing research are not considered to be the specific “NSF-Funded training activities”.

BEST PRACTICE:
1. Sponsored Projects will work with Principal Investigators to determine whether any students will be included in the proposed project.
2. If students will be included in the proposed project, Sponsored Projects will work with Principal Investigators to determine if students will be considered employees or participants.
3. Sponsored Projects will advise Principal Investigators to use clear language in all proposal documentation (project summary, project description, etc.) regarding the employee or participant role of the students.
4. Sponsored Projects will ensure that the role of the students is properly reflected in the budget and budget justification documents.
   a. If students are determined to be employees, their compensation will be budgeted under “other personnel/undergraduate students.”
   b. If students are determined to be participants, associated costs will be budgeted under “participant support costs.”

The source of this document is Sponsored Projects Group

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030.0 Best Practice: Managing Participant Support Costs on NSF proposals.
Defining the Student Role in National Science Foundation Projects
Effective: 7/12/18
Updated: [ ]
Responsible Office: Sponsored Projects Group
Approval: Sponsored Projects Group

PURPOSE: To describe the College’s best practice on managing Participant Support Costs on NSF proposals.

BACKGROUND: Under the Uniform Guidance (200.75), Participant Support Costs means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects. See also BP 029: Defining the Student Role in National Science Foundation Projects

Per NSF.gov: To help defray the costs of participating in a conference or training activity, funds may be proposed for payment of stipends, per diem or subsistence allowances, based on the type and duration of the activity. Such allowances must be reasonable, in conformance with the policy of the proposing organization and limited to the days of attendance at the conference plus the actual travel time required to reach the conference location. Where meals or lodgings are furnished without charge or at a nominal cost (e.g., as part of the registration fee), the per diem or subsistence allowance should be correspondingly reduced. Although local participants may participate in conference meals and coffee breaks, funds may not be proposed to pay per diem or similar expenses for local participants in the conference.

DEFINITIONS:
- **Student Participants** are those engaged in a NSF-funded conference or NSF-funded training activity related to the project. Their compensation is to be budgeted/billed to NSF budget category “F. Participant Support Costs.”
- **Student Employees** are those engaged in conducting the research project. They are compensated for services rendered and their level of compensation is tied to the number of hours worked. These students’ stipends are to be budgeted/billed to NSF budget category “B.4 Undergraduate Students.”
- **Training.** Responsible Conduct of Research (RCR) training, and other research training required of student employees by Compliance Committees (IBC, IRB, IACUC) overseeing research are not considered to be the specific “NSF-Funded training activities”.

BEST PRACTICE:

1. Funds may be requested for the travel costs of participants. If so, the restrictions regarding class of accommodations and use of US-Flag air carriers are applicable. In training activities that involve field trips, costs of transportation of participants are allowable. Indirect costs (F&A) are not allowed on participant support costs.
2. Participant support allowances may not be paid to trainees who are receiving compensation, either directly or indirectly, from other Federal government sources while participating in the project. A non-NSF Federal employee may receive participant support allowances from grant funds provided there is no duplication of funding of items and provided no single item of participant cost is divided between his/her parent agency and NSF grant funds.
3. Funds budgeted for participant support costs may not be reallocated to other budget lines without prior approval from the funding agency.
4. See NSF Participant Support FAQs following.
NSF Participant Support FAQ
Proposal & Award Policy Newsletter May/June 2017

Q: May I include conference speaker fees in the participant support costs section of the budget?
A: No, the participant support category is for the support of participants or trainees only. Speakers and trainers are not considered participants and should not be included in this section of the budget.

Q: We would like to rebudget our NSF award to move funds out of the participant support category. Do we need NSF approval to do this?
A: Yes. While NSF does provide rebudgeting authority for many categories, you must receive the approval of the cognizant NSF program officer to reallocate funds out of the participant support category. You may, however, rebudget funds into this category without prior NSF approval.

Q: How should student employees be budgeted?
A: A student cannot be compensated partially as an employee and as a participant on the same grant. It is up to the proposing organization to determine whether they should be a student employee or a participant based on the role of the student in the project. Student employees are compensated for services rendered and their level of compensation is tied to the number of hours worked. Participant support costs should be used to defray the costs of students participating in a conference or training activity related to the project.

Q: Are costs such as room rental fees, catering, supplies, etc. related to an NSF-sponsored conference considered participant support costs?
A: No, the participant support cost line in the NSF budget should not be used for such costs.

Q: Do participant support costs apply for all participants, or do they only apply for non-awardee organization participants?
A: Participants from the submitting institution and other institution(s) could be considered participants.

Q: May human subjects that are being paid as survey takers be considered participants?
A: No, the participant support section of the budget may not be used to provide incentive payments to research subjects. Human subject payments should be included on line G6 of the NSF budget under “Other Direct Costs,” and indirect costs should be calculated on the payments in accordance with the organization’s federally negotiated indirect cost rate.

Q: We are preparing a Research Experiences for Undergraduate Research (REU) proposal. Is it acceptable to categorize students as both employees and participants if we have made the appropriate determination?
A: No, the REU program is different in that the goal of the program is to provide a practical educational experience for undergraduate students, rather than simply a job. The role of an REU student differs from the role of a student employee because the REU program is aimed at developing the students’ research skills and providing a high-quality mentoring experience. Based on this role, an REU student is considered a participant in a training activity and funds for their support should be included as a stipend in the participant support cost section of the budget.