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Dickinson

Pocket Compliance Guide for

Sponsored Projects

Prepared for Dickinson College Faculty by the Sponsored Projects Office

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The Principal Investigator is ultimately responsible for ALL aspects of the sponsored project – both the scholarly activity and proper fiscal administration. Working with the PI to support the PI's role, the College is responsible for establishing administrative systems and processes.

GRANTS MANAGEMENT BEST PRACTICES

The Principal Investigator (PI) coordinates proposal submission, project planning, operation, and closeout activities with the Sponsored Projects Office (SPO), and Sponsored Projects Accounting (SPA).

1. Project Planning/Proposal Submission
In this phase, the PI must:
- Be aware of important College, sponsor or other project related due dates requiring attention.
- Working with SPO and SPA, develop a proposal development plan that includes sufficient time for necessary review and approval from such areas IRB, IACUC, IBC, one's Department, and College Senior Staff.
- When proposing a new project, determine that the level of effort required to complete the project can be met relative to existing effort commitments.
- Recognize that their signature on submitted proposals demonstrates that they have a responsibility to the sponsoring agency.
- Recognize that administrative requirements placed on sponsored program administrators are part of their responsibility, as well.
- Secure the signatures of Dept. Chair(s) who approve the proposal for submission.

2. Award/Account Set-Up/Documentation
The following information should be maintained for each award during the lifetime of the project:

- Notice of Award/Award letter or document: requirements such as a) whether project changes are allowable, b) the project deliverables, c) whether remaining balances must be returned to the sponsor or carried over to future years, d) program income.
- Account information Summary: Review the summary of account information to ensure that it accurately captures pertinent information such as the award start and end dates, total award amount, the account number, and special award terms and conditions.
- Communications: Correspondence among Dickinson, the project sponsor, and other appropriate parties (e.g., subrecipients) related to the award.
- Expenditures Documentation: Documentation of expenditures applied to the award that demonstrates that all expenditures have been appropriately authorized by the PI and that they are allowable, allocable, and reasonable.
- Financial Accounting: Documentation of spending patterns and commitments to monitor potential overspending or underspending.

3. Operations
- Develop and use a grant checklist that lists important grant dates and activities such as due dates for periodic and final progress reports, technical reports, and competitive renewals.
- SPA periodically reconciles award expenditures for review and verification by the PI.
- PI is aware of the funds available to support the sponsored project.
- PI prepares and maintains adequate documentation of project changes for review and approval by SPO. Note that some changes require prior approval from the sponsoring agency such as a) changes in key personnel, b) the absence of PI from the project for more than 3 months, c) significant reduction in PI effort, and/or d) changes in the scope or direction of project.

4. Award Close-Out

When a sponsored project ends, certain administrative actions are required to ensure an orderly closing of the grant or contract. While these requirements vary by sponsor, the following are necessary for most projects:

- Final Progress (technical) Report
- Final Financial Report (including cost-sharing)

Some reports will also require the following:
- Final Report of Inventions
- Final Inventory of Equipment

At least 3 months prior to expiration of the budget period, the PI and SPA should carefully review the project's financial status. All necessary adjustments (e.g., journal entries, payroll reallocations) should be made during the course of the budget period and must be made before the end of the adjustment period (typically 60 days before budget period end date). Important considerations include:

- Ensuring completeness, accuracy and allowability of all categories of direct costs before the close of the budget period.
- Planning for updates to the payroll and procurement systems to ensure a smooth transition of financial activities to a new fund number or funding source during the closeout phase.

EFFORT REPORTING

All institutional grantees receiving federal funds must maintain an acceptable effort reporting system that allows responsible individuals to reasonably certify the portion of total effort expended in support of each project. Dickinson certifies effort for all individuals who work on sponsored projects.

- Effort reports should be completed using reasonable estimates of actual effort, not payroll distributions. Dickinson uses payroll distributions to initially estimate effort, but these distributions must be changed if the distribution differs from the actual effort expended.

- Effort reports must include all College compensated activities but not activities for which the individual is paid from sources outside the College, such as outside consulting work.
- Effort reports must total 100%, regardless of the number of hours worked or the appointment status of the individual.
- Effort reports must be completed by the individual whose effort is being reported OR by a responsible person with access to reliable documentation about how effort has been expended.
- It is important to keep in mind that some sponsored projects set caps on the salary that can be paid from the award.

DIRECT COSTS

Sponsored Project Policies describe the general requirements for charging project expenditures directly to sponsored projects. Some types of costs can never be charged to federal awards while others can only be charged in certain circumstances. In general:

- Direct costs must be specifically identified with a particular project.
- Direct costs must be allocable, or charged in proportion to their benefit to a project.
- Direct costs must be reasonable, reflecting the conservative actions of a "prudent person."
- Direct costs must be allowable, and not explicitly prohibited by law, regulation, policy, or the award terms.
- Direct costs must be charged in a timely manner – cost transfers must be processed when an error is discovered or within 90 days of month end.
- Direct costs cannot include costs normally charged as indirect costs such as administrative and clerical salaries or office supplies. However, College policies and sponsors may in certain circumstances, permit the direct charging of these costs. Refer to Sponsored Projects policies in the Campus Policies Manual.

COST SHARING

- Cost sharing refers to the portion of project costs that are not funded by the award;

cost sharing cannot generally be funded by a Federal award.
- If cost sharing is required in the notice of the award, it must be provided – and the cost sharing must have been authorized by Dickinson.
- Unallowable costs cannot be included in committed cost sharing.
- Costs used to provide a direct benefit to one project cannot also be considered cost sharing on a second project (double counting).

RECORDS RETENTION

- Records and documents related to sponsored agreements at Dickinson must be maintained in accordance with Dickinson's Records Retention Schedule.

RESPONSIBLE AND ETHICAL CONDUCT OF RESEARCH

Dickinson's commitment to our research faculty and sponsors includes adopting procedures for education research personnel and promoting appropriate and responsible conduct of research. Building on Federal guidelines, Dickinson has outlined policies in thirteen areas for compliance that encompass:

- Data acquisition, management, sharing, and ownership
- Materials, their ownership, and material transfer agreements
- Intellectual property
- Authorship and publication practices
- Peer review
- Mentor/trainee responsibilities and collaborative science
- Human subjects
- Research involving animals
- Environmental safety: radiation, chemicals, and microbial agents
- Research misconduct
- Conflicts of interest
- Preparing grant proposals
- Research administration: financial and personnel management

Policies related to the responsible conduct of research can be found in the Campus Policies Manual.