

Externally Sponsored Projects

Useful and Important Information for CHSS Faculty



Roles and Responsibilities

- Many offices and personnel are involved in sponsored research
 - Principal Investigator(s)
 - Department Administrators and Office Managers
 - Dean's Office
 - Central Offices <u>Faculty Research Resources</u> Mason website that provides links to a variety of resources and offices supporting research
 - Research Integrity and Assurance
 - Office of Sponsored Programs
 - Office of Research Computing
 - Qualtrics Survey Tool
 - Environmental Health and Safety
 - Office of Technology Transfer
 - Office of Entrepreneurship and Innovation
 - Mason Enterprise Centers
 - Libraries



Dean's Office Research Support

Associate Dean for Research

Michele Schwietz

Associate Director,
Research
Development
Brooke Gowl

CHSS Research Website

Finance and HR Office

Director, Finance and Research Operations

Janice Cohen

Associate Director,
Post Award
Services

Olga Shchepina

Grants Analyst (vacant)



Research Services

Mike Laskofski Associate VP

Research Integrity and Assurance

Becky Hartley Assistant VP

Contracts

Eileen Gallagher Director

Financial Management and Compliance

Angie Railey Associate Director

Research Administration

Pat Sperry Associate Director

Proposal & Award Management

Maggie Ewell Associate Director

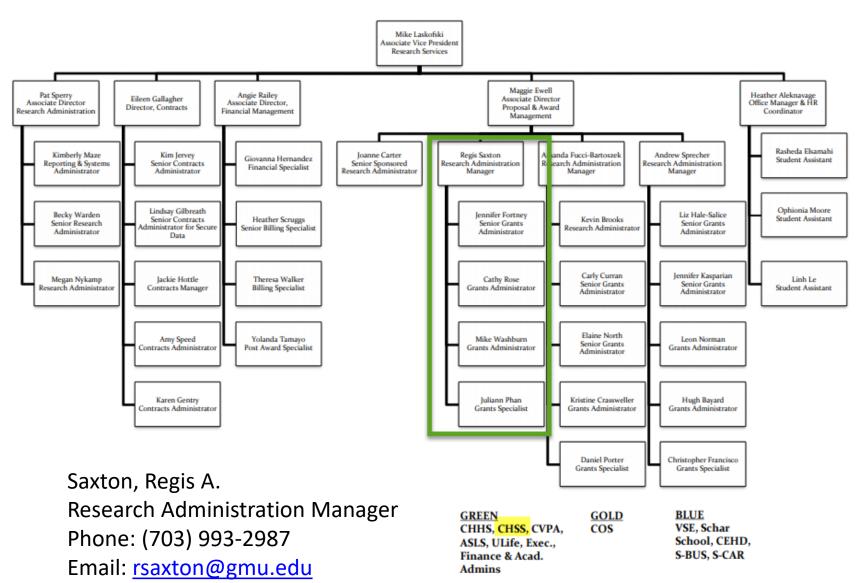
Animal Care and Use Conflict of Interest (COI) Export Control and Secure Research Human Subjects (IRB) Misconduct in Research and Scholarship Responsible Conduct of Research (RCR)

Award Negotiation NDAs, MTAs and other unfunded agreements Subcontract Negotiation Cost Compliance
Audit Support
Subrecipient Monitoring
Financial Reporting
Invoicing
Cash Management
Payroll Certification
Cost Share Tracking
Award Closeout

Training Local Unit Outreach Post Award Support Systems Support Research Reporting Proposal Submission Award Review Award Setup Award Modifications Cost Monitoring Academic Unit Support



Office of Sponsored Programs



Life Cycle of a Sponsored Project

Funding Opportunities

Proposal Development and Submission

Award Negotiation and Acceptance

Award Negotiation and Acceptance

Reporting and Billing

Closeout

Funding Opportunities

- CHSS Funding Sources website: https://chss.gmu.edu/research/funding-sources
- RDIA Research Development Funding Opportunities website: https://oriagmu2.wpengine.com/topics-of-interest/research-development/funding-opportunities/
- Contact the CHSS Associate Dean for Research or the Associate Director of Research Development

- PI: Submits a Request for Proposal Assignment https://ospproposal.gmu.edu/Default.aspx
 - Prepare technical proposal, budget, budget justification and other documents required for submission
 - Consult department administrator/office manager for specific budget questions
 - Work with department chair/Dean's office regarding cost share/match
 - Submit Conflict of Interest Disclosure
 - Follow University deadlines for document submission (4 days prior to sponsor deadline)
- OSP: Assigns a Grants Administrator
 - Provides assistance in proposal preparation
 - Ensures proposal compliance with sponsor and Mason policies
 - Institutional certifications/compliance and sponsor specific forms
 - Proposal submission and routing for formal approvals



- Dean's Office (Research Development and Research Operations Finance)
- Research Development and Consultation
 - Identify funding opportunities and strategies, connecting researchers with mutual interests
 - Coordinate and encourage networking, communication and sponsor engagement
 - Provide proposal development resources
- Proposal Development
 - Review sponsor guidelines and create a proposal-writing work plan
 - Provide feedback on proposal narratives
 - Assist with drafting or secure supporting documentation
- Community and Outreach
 - Create events and programs to advance and recognize CHSS research, scholarship and creative works
 - Nurture a sense of scholarly community and collaboration within CHSS and across the university



- Dean's Office (Research Development and Research Operations Finance)
 - Approves all proposal budgets and justifications
 - Assists with budgeting questions
 - Works with PIs/departments and approves cost share/match
 - Coordinates with the Office of Sponsored Programs

- Federal Agency Resources
 - National Science Foundation
 - <u>Social, Behavioral and Economic Sciences (SME)</u> (https://www.nsf.gov/dir/index.jsp?org=SBE)
 - Proposal & Award Policies & Procedures Guide
 (https://www.nsf.gov/pubs/policydocs/pappg20_1/index.jsp)
 - National Institutes of Health
 - Institutes at NIH (https://www.nih.gov/institutes-nih)
 - Application Guide (https://grants.nih.gov/grants/how-to-apply-application-guide.html)
 - <u>Sample applications</u> from National Institute of Allergy and Infectious Diseases (https://www.niaid.nih.gov/grants-contracts/sample-applications)
 - NIH Report (https://report.nih.gov/)
 - NIH Reporter (https://projectreporter.nih.gov/reporter.cfm)
 - National Endowment for the Humanities
 - Divisions and Offices (https://www.neh.gov/divisions-offices)
 - NEH's Application Review Process (https://www.neh.gov/grants/application-process)



Budget and Budget Justification

- Be sure your budget and budget justification are supported by your project narrative.
- Ask for the amount of money you need to execute the project.
 - Asking for less will not impress reviewers and, if your application is awarded, could result in inadequate funds for executing the project.
 - Be sure to justify every item requested. Reviewers can always say no, but they cannot say yes to something you did not request.
- OSP website with some guidance for <u>Budget Preparation</u>

Types of things for which to budget

- Key Personnel
 - PI Salary & Course buyouts
 - Co-investigators
- Other Personnel
 - Postdocs
 - Grad students
 - Undergrad students
- Fringe Benefits (OSP budget template automatically calculates)
- Equipment
 - Nonexpendable, tangible personal property
 - Having a useful life of more than one year
 - An acquisition cost of \$5,000 or more per unit
 - Budgeted cost is based either on past expenditure history or vendor quotes
 - Laptops and similar items are not equipment (budgeted under Supplies and Other Direct costs)



Types of things for which to budget

- Travel
 - May occur for data collection, collaboration, training, or to disseminate project results at professional meetings
 - Amounts budgeted are based on estimated airfare, lodging and per diem, registration fees, and incidentals
 - Funding opportunity guidelines may specify travel allowability or restrictions
- Animal care costs
- Human subjects compensation
- Supplies and other direct costs
 - Include specific research costs and/or lab supplies, computer hardware and software, publication or abstract-submission costs, transcription, etc.
 - At Mason items such as telecom (cell phones, hotspots), printing, postage and general office supplies are only allowed as a project expense if the expense is specific to the project and easily identifiable

Types of things for which to budget

- Contractors/Subrecipients
 - The justification for these services will be included in the proposal
 - Contractor
 - An entity whose purpose is to provide goods and/or services
 - Not responsible for research results
 - Consultants/contractors are vendors
 - Has a procurement relationship
 - Subrecipient
 - Someone who may serve as a co-investigator
 - Performance is measured in relation to project objectives
 - Has responsibility for programmatic decision making
 - Uses funds to carry out a program for a public purpose as opposed to providing goods or services for the benefit of the pass-through entity
 - OSP can assist with making determinations of contractor/consultant versus subrecipient in the proposal preparation stage
 - OSP website about <u>Subawards and Subrecipients</u>

Facilities and Administration Costs (a.k.a. IDC, indirect costs)

- Mason has a federally negotiated F&A Cost Rate Agreement with the Office of Naval Research
- The rate is applied to the modified total direct costs (MTDC) such as
 - Salaries, wages and fringe benefits
 - Materials, supplies, services, and travel
 - Subrecipients (up to \$25,000 for each subrecipient regardless of period covered by the agreement)
- MTDC excludes
 - Equipment and capital expenditures
 - Tuition, SGHI, and Fellowships
 - Participant support
 - Rental costs of off-site facilities
 - The portion of each subrecipient award in excess of \$25,000
- It is University policy to collect full F&A on a sponsored program unless the sponsor has published a policy on F&A that restricts or forbids it



Recovered Facilities and Administrative (F&A) funds help support the expenses the institution incurs in the support of the University's research.

- F&A expenses cannot be identified readily and specifically to a sponsored project or institutional activity
- Examples of F&A/Indirect costs
 - Administrative staff salaries and fringe
 - Operation & maintenance costs (e.g. electricity)
 - Office telephones, printers, supplies
 - Books and postage
 - Professional membership dues
- Indirect expenses can only be charged to externally sponsored research when
 - The project has characteristics that make it one of "different purpose and circumstance"
 - The cost can be specifically identified with the project with a high degree of accuracy
 - The cost is identified in the budget and approved by the sponsor
 - A Cost Accounting Form is required for federal awards during proposal preparation
- Current F&A Rates



Distribution of Recovered F&A

Facilities and Administrative (F&A) funds recovered on sponsored projects are distributed according to university policy. To reward excellence and incentivize growth, the university developed a new distribution strategy as of 2/14/19:

Baseline Distributions: F&A expenses recovered from the unit *up to the FY 2016-2017* baseline for that unit will be distributed in the usual format:

- 30% of recovered F&A is allocated to the CFO's office up to a cap of \$3.4M;
- 35% of recovered F&A is allocated to the Provost's office; and,
- 35% of the recovered F&A is allocated to the academic unit.

Above Baseline Distributions: F&A expenses recovered *above the FY 2016-2017* baseline for that academic unit will be distributed as follows:

- 80% of the recovered F&A expenses above the baseline is allocated to the academic unit; and
- 20% of the recovered F&A expenses above the baseline is allocated to the VPR's office.



Distribution of Recovered F&A

As result of the updated guidance, CHSS put in place this guidance:

- The 35% academic unit F&A distribution remains as before:
 - o PIs/Co-PIs @ 10.5%
 - Department/Center @ 7% (split equally)
 - o College @ 17.5%.
- When more than one PI is involved, the distribution among the PIs and units is calculated using a multiplier, which is newly based on the "Intellectual Contribution" of each PI/Co-PI as determined by the researchers.
- Administrative exception: For multi-college projects, there may be times when the
 intellectual contribution model does not cover the administrative costs to house the
 project. The Dean's Office may request exceptions to the intellectual contribution
 model.

Award Negotiation and Acceptance

OSP:

- Institutional acceptance of awards (reviews for compliance, negotiates as needed, and holds signature authority)
- Prepares NDAs, MOUs, Teaming Agreements (subcontracts) as required
- Notifies PI and Dean's office of pending award
 - Initial notice of award (via email) will indicate required compliance actions (i.e. human subjects IRB approval, revised budge, export control)
- Fully executed award notice (via email)
 - Includes OSP comments on special conditions in email
 - Includes sponsor award document, approved budget, PI Report Guide (using financial systems)

PI:

- If a notification of award is sent directly to PI without inclusion of OSP, be sure to notify Dean's Office (Finance) and/or OSP Team Manager
- Prepare and submit protocols (human subjects, animal subjects, hazardous material) – full execution is dependent on meeting compliance requirements
- Work with RDIA office regarding export controls if required
- Complete and return PI Finance Access Request Form



Award Management

- PI: primary responsibility for accomplishing the technical/programmatic goals of the project while also complying with the financial and administrative policies and regulations associated with the award
 - Approval of expenditures
 - Monitor and oversee subrecipients
 - Review and approve reconciliations
 - Complete technical reports and other deliverables as required
 - Review and approve payroll certifications (federal awards)
- Department Admins:
 - Processing expenditures (labor and purchasing goods/services)
 - Reconcile sponsored awards
 - Forecast project budgets, monitor project spending
- Dean's Office (Finance)
 - Financial compliance oversight (liaison with OSP and departments)
 - Assist departments/PIs with project financial management
 - Review and approve externally sponsored expenditures
 - Provide guidance on research policies and procedures
 - Training (CHSS staff internal)

Award Management – Approval of Expenditures

What can be directly charged to an externally sponsored project?

- **1. Allowable** cost is allowable under the provisions of Uniform Guidance, the terms and conditions of the specific award/sponsor, and Mason
- 2. Allocable the cost can be associated to the project with a high degree of accuracy
- **3. Reasonable** the cost reflects what a "prudent person" would pay in similar circumstances
- **4. Consistent** the cost is treated the same across the University or other similar circumstances

Award Management - Labor

- Faculty effort is processed through funding change forms (FCFs)
- Part-time/temporary positions (GRAs, wages, summer research) are processed through Electronic Personnel Action Forms (EPAFs)
- Communication with department administrator is key
- Provide sufficient notice to ensure all hiring actions can be completed before employee work actually begins
- Payroll schedules and deadlines are important
- Payroll Certification
 - Certification of labor charges (and cost sharing) that is required on all federal awards (annual and at closeout)
 - Charges are reasonable in relation to the work performed
 - Reports must be reviewed and approved by PI
 - Reports not certified within 60 days will result in salary charges moved to a non-sponsored funding source

Guidelines for Charging Faculty Salary to Sponsored Projects
CHSS Academic Year and Summer Effort on Grants



Award Management – Goods and Services

- Sponsored projects often have budget restrictions review awarded budget and award terms and conditions
- All expenditures must have PI approval and must comply with institutional procurement policies and procedures
- Communication with department admin on project needs is key
- Types of expenditures:

Tuition/SGHI Human Subject Incentives

Travel Lab Supplies

Participant Payments Consultants

Subcontract Invoices

Typical unallowable expenses:

Telephones Printing/Copying

Postage General office supplies

Food & Beverage Books

Parking Facilities

Professional Membership Dues



Award Management – Reconciliation

Reconciliation – a systematic review of Banner financial activity to verify that all charges and credits are accurate and appropriate, to include identifying expected transactions that have not yet occurred.

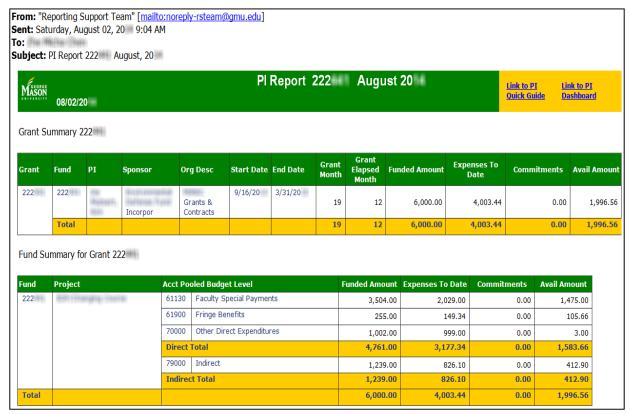
- Confirm expenditures do not exceed available award budget and are within the period of performance
- Ensure expenditures are appropriate according to the approved budget and are intended for the purpose of the project
- Ensure appropriate account codes are used
- Ensure appropriate source documentation is maintained
- Confirm no missing expenditures/credits
- Identify and correct errors in a timely manner
- Monthly reconciliations are encouraged, bi-monthly are required
- Must be fully completed within 60 days of the last month reconciled
- Corrections must be completed within 90 days of expense posting

<u>University Policy 2114: Reconciling Department and Sponsored Fund</u>
Accounting Records



Award Management – PI Reports

- Summarized financial snapshot of award
- PIs will have access and can run reports at any time
- System automatically generates monthly summary report sent via email to PI





Award Management

Cost Transfers – transfer of an expense to a federal award for a transaction previously recorded elsewhere

- Must be processed within 119 days of original transaction
- OSP approval required if more than 120 days
- Administrative oversight is not an appropriate extenuating circumstance for transfers exceeding 120 days

Best Practices

- Expenditures are charged to the appropriate project initially
- PI and Department Admins review and monitor the project on a regular basis
 - Expenditures charged are appropriate
 - Errors are identified in a timely manner
 - Appropriate corrective actions are taken in a timely manner

Award Management – Post Award Modifications

Circumstances may arise that warrant the need for post award modifications that require sponsor approval. Examples: no-cost extensions, PI changes and transfers, budget revisions, and changes in scope of work.

PI:

- Recognize the need for a post award modification
- Inform Department Admin and/or Dean's Office (Finance)
- Email OSP Green Team Manager when post award modification need is identified

OSP:

- Works with PI, administrators and Dean's Office to coordinate post award modifications
- Will inform PI/department if a formal Request for Assignment is necessary
- Submits official request for all post award modifications to sponsor

Dean's Office

- Assists PI/department with questions regarding post award modification needs
- Works with OSP and department on submitting and preparing requests to OSP

Billing/Reporting and Closeout

OSP:

- Primary responsibility for billing, financial reporting and closeout documentation
- Closeout notices are emailed and indicate final reporting deadlines

PI:

- Responsibility for submitting technical/progress reports (final copies should also be sent to OSP)
- Work with department admin to verify all expenses have posted, project is not overspent
- o Receives 30-60-90 day closeout report via email automatically from PI Reports
- All open commitments must be closed and subcontract closeout completed

Dean's Office

- Department admins receive monthly emails identifying projects within 30-60 90 days of closeout
- Works with OSP and department on any billing issues/clearing overspent

University Research Policies

https://universitypolicy.gmu.edu/university-policies/research/

Research

- · 4001 Conflict of Interests
- · 4002 Copyright in University Works
- · 4003 Patenting University Inventions
- · 4004 Occupational Health and Safety Program for Animal Care and Use Personnel
- · 4005 Cost Transfer Policy
- · 4006 Sponsored Programs Administration
- · 4007 Misconduct in Research and Scholarship
- 4008 Private Sector Funding for George Mason University
- · 4009 Subrecipient Monitoring Policy
- · 4011 Ownership and Maintenance of Research Records
- · 4012 Principal Investigators
- 4013 Fixed Price Agreements
- 4015 Payroll Certification on Federally Sponsored Projects
- 4016 Cost Sharing
- · 4017 Research Involving Human Subjects
- · 4018 Postdoctoral Research Fellows
- 4019 Research-Extended Appointment Policy
- 4020 NSF Awards Harassment Policy



CHSS Research Policies

https://chss.gmu.edu/research/sponsored-research-policies

Academic Year and Summer Effort on Grants

<u>Procedures - Research-Extended Appointments and Summer Pay Exception</u>

<u>Forms - Research-Extended Appointment Request</u>

Forms - Summer Pay Exception Request

CHSS Salary Cap Administration Policy

CHSS Teaching Load Standards

CHSS Startup Policy

 CHSS F&A policy is currently in draft form and will be posted when formally approved



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