

Huston-Tillotson University



Office of Sponsored Programs

POLICY MANUAL

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Mission Statement

The mission of the Office of Sponsored Programs (OSP) is to facilitate grants and sponsored program activities by increasing awareness and competitiveness in the pursuit of external funding. The Office strives to maintain an infrastructure designed to promote the responsible management of external funds. The Office of Sponsored Programs reports to the Provost and VP of Academic Affairs.

The document that follows, *Manual for Sponsored Programs: Policies and Procedures*, provides a construct for planning, implementing, and overseeing sponsored activities.

Preface

Huston-Tillotson University encourages faculty and staff to engage in scholarship, professional development and sponsored program activities in order to maintain vitality in their profession, to provide the best and most up-to-date instruction, to provide training activities, development programs, demonstration projects, and other programs and services to enhance the University and local community. The University promotes acquisition of external support for these endeavors, whether support is needed for research, public service, or instructional activities. The Office of Sponsored Programs strives to be a service-orientated office prepared to assist faculty and staff in the steps necessary to secure and administer external funding. The Office coordinates proposal development and submission and post-award activities for individual, interdisciplinary, and multi-institutional sponsored programs, and oversees a number of regulatory and compliance issues related to sponsored program activity.

The intent of this *Manual for Sponsored Programs* is to provide a reference in areas of services and support offered by the Office of Sponsored Programs and to present the policies and procedures that guide the University community. Sections provide overviews on informational services, multi-institutional coordination, proposal development and submission, post award negotiation and management, and regulatory and compliance issues.

Please find the *Manual for Sponsored Programs*, as well as other forms and materials as they become available, on the Office of Sponsored Programs home page (www.osp.htu.edu).

I. Overview of Sponsored Programs

Huston-Tillotson University seeks to provide a learning environment that promotes the personal, intellectual and professional development of all members of the University community. To this end, the Office of Sponsored Programs encourages, assists, and supports faculty and staff who are seeking sponsorships in a broad range of externally funded projects.

The Office of Sponsored Programs is responsible for identifying potential funding sources and communicating such information to the faculty and maintaining contacts with potential sponsors. In addition, the OSP is responsible for proposal processing, ensuring prior to submission that proposals conform to all agency requirements, that the proposed financial arrangements are correct and consistent with the regents and University's requirements, and that special commitments have had prior internal review. OSP is the keystone for grant and sponsored program administration, functioning as the liaison between the funding agency, faculty member, and other University offices and departments.

A. Definitions

Sponsored Programs

Sponsored Programs are projects supported by non-University (external) funds that are awarded as a result of an application submitted to a potential sponsor by the University. Sponsored grants usually involve research, training, or service activities and typically include one or more of the following:

- *Formal sponsor application guidelines*
- *Restrictions on the use of funds*
- *A specific program period*
- *Specified performance or outcomes*
- *Specified use of program outcomes or data*
- *Required fiscal and/or programmatic reports*

Excluded from this definition are:

- *Direct payments to individuals, such as faculty fellowships not administered by the University*
- *Student financial aid*
- *Gifts and bequests to the University*
- *Donations of equipment or property*

The official applicant for all sponsored programs is the **University**, with the Executive Offices of the President designated as the official signatory. The Office of Sponsored Programs is responsible for the authorization of the University commitments to all sponsored programs.

If an individual or organization (donor) designates funding as a gift and the donor requires no financial or programmatic reports, Institutional Advancement is responsible for the activity. Any request for donations or gifts from an outside donor should be coordinated through Institutional Advancement.

Proposal

A proposal is a request for funding of a particular sponsored project. In general, it consists of several parts: a technical or narrative section, a budget, and various assurances and forms. Appendices and attachments may or may not be required. A good technical proposal is a concise and coherent explanation of a project plan that has specific and reasonable goals. It should clearly state both the goals of the project and the methods to be used in reaching those goals. Finally, it should comply with sponsor limitations on length and should include only those supporting materials that are relevant. The budget is the Principal Investigator's/Project Director's (PI/PD) best estimate of the funds needed to carry out the project. It should be as detailed as is reasonably possible; the PI should be able to justify each budget item in writing.

When a sponsor has its own application form or instruction for submission, it is important that the PI use these forms and format, and follows the guidelines. PI's should remember that the lead-time for review of proposals is six to nine months.

A proposal can describe a new, renewal, supplemental, or continuing project for which funds are sought from a potential sponsor in the form of a grant, contract, cooperative agreement or other instrument. Proposals may be in response to a solicitation (often an RFP, RFA or program announcement) from a sponsor or may be unsolicited. Following is a definition of types of proposal:

- **New Proposal:** A new proposal is one which is submitted for funding of a new project that has not previously been funded. In almost every instance, new proposals are subject to competitive review. Proposals will be evaluated and ranked according to criteria established by the funding agency.
- **Continuation Proposal:** Most agencies award grants for a specified project period (usually one, three, or five years). Regardless of project length, the grantor generally makes funds available for only one year at a time. In order to obtain funds for additional periods of time within the grant period, a "continuation application" must be submitted. Continuation applications usually are not subject to competitive review.
- **Renewal Proposal:** In a renewal proposal, the PI requests support beyond the initially approved project period. The type of sponsored program award—grant, contract, or cooperative agreement—is an indication of general program requirements regarding the sponsor's role in the program, the Principal Investigator's responsibilities, the nature of expected outcomes, the payment method and schedule, and the use of program results or data. The particular program requirements for each sponsored program are specified in the award document.
- **Supplemental Proposal:** A supplemental proposal can be one of three things: it can add to an existing proposal to compensate for a deficiency, give further

information or change the direction of a proposal, and it can be a special subject added to enhance an existing proposal. With Supplemental proposals, PI/PD's usually ask for additional funding or an extension on existing funding. Supplemental proposals are subject to competitive review.

B. Types of Sponsored Funding Sources

Familiarity with the types of funding sources can help faculty and staff identify potential sponsors (as opposed to donors) whose interest and level of support are appropriate to the project planned. Common categories of funding sources include federal, state, and local governments, foundations, and business/industry.

Government

Federal, state, and local governments provide support for various sponsored programs. Examples of federal funding sources include the Environmental Protection Agency (EPA), National Endowment for the Humanities (NEH), Health and Human Services (HHS), National Institutes of Health (NIH), and the National Science Foundation (NSF).

Examples of state funding sources include the Texas Higher Education Coordinating Board (THECB), etc.

Examples of local government sources include County government, city government and various councils.

Foundations

Private and community foundations are another source of funding support. Many foundations have very small staffs, so communication can be quite limited. However, foundations can be excellent sources of funding if applicants have innovative ideas and target foundations that are most likely to have an interest in the project topic. Most foundations restrict their support to very specific areas of interest, so obtaining a foundation's published annual report or funding, when available, can help researchers determine particular funding opportunities. Providing a foundation with a brief (e.g., three-page) concept paper of proposed research is often an important first step in seeking foundation sponsorship.

Individuals seeking gifts, as opposed to sponsorship, from foundations should work with Institutional Advancement (see *Section I, A* for clarification of distinctions between gifts and sponsored programs).

Business and Industry

Although often overlooked by academic researchers, business and industry can be important funding sources. Business/Industry support may include cash funding and/or in-kind contributions of expertise, services, equipment, or materials. Not only can

business/industry provide support or partial support for a new project, but academic business/industry partnerships can also establish a basis for seeking additional funding from federal agencies or other sources, especially those requiring or rewarding such partnerships.

Proposals to business/industry generally originate with the creator of the project, not with an announced program. Therefore, extensive communication with the business/industry representative is crucial in determining project goals and expectations. Proposals are often much shorter and simpler than those submitted to federal agencies, although the resulting legal agreement can be quite complex. Business/Industry agreements often contain special clauses covering such things as publication rights, patents, nondisclosure of proprietary information, and indemnification (**Section V.P.** offers further information on non-governmental contacts).

Note: The Principal Investigator shall consult the Office of Sponsored Programs prior to entering into any agreement with business and industries to ensure that any proposed provisions are in compliance with University and State policies and to involve the Office of Sponsored Programs in the negotiations process.

C. Types of Sponsored Programs

Sponsored programs fall into several general categories, which could serve as guides for the particular design of proposed projects. Specific guidelines from the sponsor will provide details for particular programs, but the determination of the “type” of sponsored program is an important early step in designing appropriate and competitive program goals, methods, and structure. The types of sponsored programs include:

- Research, involving any activity specifically organized to produce research outcomes
- Education and Training, involving any activity that is part of an institution’s formally organized instruction program
- Public Service, involving any activity that provides non-instructional services beneficial to individuals and groups external to the institution
- Scholarships and Fellowships, involving any scholarship or fellowship in the form of grants, trainee stipends, prizes, and awards
- Other, involving any activity that does not fall into the above categories

D. Types of Sponsored Program Awards

Grants

A grant is “an award of financial assistance to an eligible recipient in support of a proposed program.” The term “grant” is used to describe awards of extramural support for projects submitted by faculty or staff. Grants for student financial aid are managed by Huston-Tillotson University Office of Financial Aid.

Grant recipients make no guarantees other than work will be done as described in the proposal. If an agency wishes to award grants for research, training, or public service in a particular area, it will announce the availability of funds and invite interested parties to submit proposals.

The grantor offers a grant award via a Notice of Grant Award or letter indicating the amount to be awarded as well as the conditions that might be met. The requirements associated with a grant award vary widely from sponsor to sponsor. Generally, grant awards are made for a particular period of time, with definite start and end dates; grant awards usually include restrictions on the use of funds and on the reallocation of funds from one budget category to another. Most sponsors require periodic progress reports and annual technical and financial reports as well as final technical and financial reports at the end of a project. The sponsor expects to receive reports but not to supervise the program. Reports are submitted to sponsors to measure the success of the program.

Contracts

A contract is “an exchange of promises that gives rise to legally enforceable rights and duties.” Contracts are agreements signed by each party which stipulate that the sponsor will provide funding to a recipient in support of a specific set of activities in return for which the recipient will furnish a particular product, service(s), analysis, report(s) or other materials. Contract negotiations is more likely than grant negotiations to involve discussion of proposed provisions restricting the publication or other use of data, or clauses affecting potential patent rights and licensing agreements. Contracts also generally require frequent, detailed reporting. In a contract arrangement, the sponsor is actively involved in overseeing the progress and direction of the project. A number of federal agencies use contracts to fund research, development, training, and public service programs. Most state awards are made in the form of contracts.

There are many different types of contracts. In sponsored projects, however, contracts are usually of two types, either fixed-price or cost-reimbursement. Under a fixed-price contract, the parties agree in advance on the price for a particular product or service. Once the agreement has been executed, the recipient is obligated to perform the work set forth in the contract and to deliver any and all products or “deliverables” specified in the contract. This requirement must be fulfilled, regardless of the cost to the recipient. If the cost of performing the contract is less than the amount set forth in the contract, the recipient (University) may retain the excess funds.

Under a cost-reimbursement contract, the sponsoring agency and the recipient agree on the work to be performed and on an estimate of the total cost for performing the work. The sponsoring agency is obliged to reimburse the recipient for actual costs (up to the contract total) incurred in the performance of the work specified in the contract.

Cooperative Agreements

Cooperative Agreements involve the active participation and collaboration of the sponsor in all aspects of the project. In these types of agreements, the sponsor participates (to some extent) in all decisions about what work is to be done, when it is to be done and who is to do it. Thus, the sponsor becomes a true and genuine partner in the project. Because the degree of sponsor involvement and the segregation of responsibility require specification, the cooperative agreement usually involves more detail than a grant, though perhaps less than a contract.

E. Responsibilities

Each proposal for external funding has the potential to become a legal document binding the University to fulfill the conditions specified in the proposal. When a proposal is submitted to a sponsor, it is submitted by the University, not the author of the proposal. When an award is received, the University on behalf of the Principal Investigator/Project Director, receives it. Thus, the author of a proposal must seek, secure, and substantiate the University's commitment to issues of compliance, support, and concurrence with fiscal and programmatic statements. To do so, the author must ensure that the proposal conforms to the University's policies, mission, and obligations; must inform relevant administrators of potential commitments of time and resources and obtain their written consent to these commitments; and must document the University's compliance with applicable regulations.

It is the responsibility of the Office of Sponsored Programs to review the accuracy and completeness of the University's support of the proposed project and the University's suitability as a recipient of the targeted award. University procedures for proposal development and submission are detailed in *Section III*.

Responsibilities associated with proposal development and submission and the conduct of resulting sponsored programs are outlined on the following pages.

PRINCIPAL INVESTIGATOR (PI)/PROJECT DIRECTOR (PD)

University policy generally requires that the Principal Investigator/Project Director of external grants and contracts must be a permanent employee (faculty member or staff member) of the University at the time of proposal submission.

RESPONSIBILITIES

- Develops program plans consistent with the mission of the submitting department/unit and school
- Writes and prepares proposal narrative and budget
- Transmits the proposal and one copy, with a completed and signed Transmittal Sheet for Sponsored Programs, to the Department Chair or Unit Head, the

Dean and the Office of Sponsored Programs for further processing and signature, final signatures by President (allow 2 weeks minimum)

- Sends copy proposal as submitted to the sponsor to the Office of Sponsored Programs for the Official University files
- Assumes responsibility upon award notice
- Implements and manages of the program consistent with University and sponsor policies
- Maintains technical, programmatic, and fiscal management and maintenance of related records
- Oversees quality program performance
- Prepares of all technical or programmatic reports
- Reporting of all inventions that may result
- Reporting of equipment purchased, as appropriate

DEPARTMENT CHAIR

If an academic department(s) is involved, the Chair(s) is the designated responsible person(s) at the department level. If a non-academic unit is involved, the Unit Head is the responsible party at this level.

- Reviews proposal for consistency with department/unit or college/school mission and availability and commitment of human and support resources, including time, space, and finances.
- Assures that all faculty/staff and department/unit proposal obligations will be met.
- Indicates concurrence with the proposal by signing the Transmittal Sheet (including signing any cost sharing agreements).

COLLEGE/SCHOOL DEAN

The Dean of the Principal Investigator's college/school is the responsible party at the college/school level, or, if Co-Principal Investigators are involved from different schools, the respective Deans are the responsible parties at the college/school level.

- Reviews proposal for consistency with college/school and University missions and availability and commitment of college /school support services, including time, space, and finances.
- Assures that all department/unit and college/school obligations, as delineated in the proposal, will be met.
- Indicates concurrence with the proposal and budget (including cost sharing, if any) by signing the *Huston-Tillotson University Routing and Approval Form for transmittal of proposals*

OFFICE OF SPONSORED PROGRAMS

The Office of Sponsored Programs performs a variety of pre-award and post-award sponsored program activities.

- Reviews the proposal for consistency with University mission and policies and reviews the budget and financial commitments
- Verifies that all required committee reviews have been conducted on proposals that involve research using animals, human subjects, or biohazards.
- Ascertains Principal Investigator/Project Director certifications if required in anticipation of federal award.
- Reviews certification regarding conflict of interest and forwards any attached disclosure forms and documents to the Director of Human Resources.
- Reviews and confirms cash cost sharing arrangements as needed.
- Coordinates the budget reviews and obtains a signature from the Business Office.
- Obtains the signature of the University's authorizing official (the President)
- Maintains the official University file for sponsored programs and provides periodic reports to University, State, and Federal officials.
- Coordinates award review with Business Office as appropriate
- Engages faculty in multi-disciplinary and statewide consortium activities.
- Provides leadership for faculty development activities and activities to secure external funding.
- Stimulates environment conducive to sponsored programs
- Manages system for pre-award and post-award operations for sponsored programs

DIRECTOR OF SPONSORED PROGRAMS

The Director of Sponsored Programs is the principal officer for sponsored programs at Huston-Tillotson University.

- Accepts awards on behalf of the University approved by the President.
- Responsible for monitoring and overseeing the administration of programmatic and fiscal aspects of grants and contracts
- Responsible for reviewing all awards of grants and contracts and advising the President on the acceptability of the award
- Serves as the institution's point of contact with external grantors and contractors. Acts as liaison between the University and the external sponsor on contract, grant, and indirect cost inclusion
- Provides institutional review and authorization for proposals submitted to external agencies
- Recommends to President institutional acceptance of award terms and conditions ensuring that the President sign and submit appropriate documentation to accept approved awards.

- Monitors the conduct of programs supported by grants and contracts
- Has overall responsibility for coordination of University compliance with certain federal regulations pertaining to grants and contracts

II. Grantsmanship Services for Sponsored Programs

To help faculty find sources of funding and develop the skills necessary for successful proposal and budget development, Office of Sponsored Programs provides information and support services that faculty can assess in a variety of ways. Many of these can be tailored to specific interests and needs, giving faculty individualized assistance in seeking external funding.

A. Information Services

The Office of Sponsored Programs serves as the central resource on campus for information on funding opportunities through external sponsors. Information is collected, maintained, and disseminated to faculty and staff concerning available funding opportunities.

The Office of Sponsored Programs maintains a comprehensive computerized database to target news of funding opportunities to the interests of specific faculty members. Staff members regularly screen a variety of publications for announcements of funding opportunities and send copies of these announcements to interested faculty members.

Disseminate of potential funding sources using the Foundation online Directory, an online resource for funding information, including private sources are available upon request. The Office of Sponsored Programs receives funding updates from many federal agencies, including the National Institutes of Health (NIH), bulletin boards, and grants (grants.gov), a free online resource of Federal Grant Information. These government agencies provide program announcements, deadlines, names, phone numbers and addresses of program officers, and other information about funding programs. This information is also available to the general public via the internet.

The Office of Sponsored Programs home page <http://osp.htu.edu> includes:

- Information on services available (e.g., announcements of workshops and seminars)
- Various forms and spreadsheet templates (including the *Transmittal Sheet for Sponsored Programs*)
- Links with funding sources (e.g., *NIH and NSF*)
- Huston-Tillotson University Manual for Sponsored Programs: Policies and Procedures
- Other sponsored programs information as available

Many federal government agencies provide announcements via their World Wide Web (www.) home pages. Links to agencies can be made via the Office of Sponsored Programs home page.

The Office of Sponsored Programs also assists faculty applying for external funding for sabbatical support, fellowships, and similar opportunities. Interested faculty may request funding information, guidelines, and suggestions for preparing applications.

B. Workshops

The Office of Sponsored Programs presents periodic contract/grant-related seminars and workshops on a variety of topics. The Office of Sponsored Programs encourages requests for coordination of workshops, for contacting and inviting federal or state funding representatives to campus, and for other developmental activities.

III. Proposal Development and Submission

The Office of Sponsored Programs provides services and support to assist faculty with the development and submission of proposals for sponsored programs. Office staff also assist faculty in initiating or participating in collaborative, frequently interdisciplinary or multi-institutional project development.

The Office of Sponsored Programs is responsible for reviewing and approving all proposals for sponsored funding. The Huston-Tillotson University Proposal Routing and Approval Form is the official University form for the documentation for concurrence of University officials with plans and commitments contained in proposals for externally funded projects. (See *Appendix A*)

A. Solicited vs. Unsolicited Proposals

A **proposal** is a request for funding of a sponsored project. In general, it consists of several parts: a technical or narrative section, a budget, and various assurances and forms.

A **solicited proposal** is one that is submitted in response to a specific work statement from the sponsor. Sponsors to solicit proposals for specific research, development, or training projects or to provide specific services or goods sometimes use a **Request for Proposal (RFP)** or **Request for Application (RFA)**.

The RFP or RFA includes standard terms, conditions, and assurances the institution is asked to accept. Upon request, the Office of Sponsored Programs will obtain the detailed solicitation.

An **unsolicited proposal** is initiated by the investigator and submitted according to the sponsor's guidelines. The funding arrangement for unsolicited proposals is usually a grant. The Principal Investigator may locate potential sponsors and ascertain, primarily through telephone or personal contact with sponsor program officers, the degree of interest these sponsors have in supporting the proposed work and the extent of available funding.

B. Office of Sponsored Programs Services and Support

Office of Sponsored Programs staff is available to assist with proposal development in whatever manner is appropriate to the proposal. This includes helping with guideline interpretation and proposal organization; assisting with budgets; providing standard institutional information that might be useful or required in the proposal; coordinating multi-institutional project development (*See Section III, C*); convening multi-disciplinary or inter-departmental groups; reviewing proposals for readability and compliance with guidelines.

Faculty members are encouraged to contact Office of Sponsored Programs staff in the early stages of proposal development. Staff members welcome the opportunity to review rough drafts of proposals. In addition, the following materials relevant to the proposal development and submission process are among those available in the Office of Sponsored Programs (<http://osp.htu.edu>)

- *Proposal Development and Submission Guide*
- *Huston-Tillotson University Intent to Apply (also located in Appendix A)*
- *Huston-Tillotson University Proposal Routing (also located in Appendix A)*
- *Informational aids for proposal and budget development*

C. Multi-Institutional Programs

The Office of Sponsored Programs facilitates faculty participation in a wide range of multi-institutional programs and projects, providing a statewide response to common needs and opportunities in research, instruction, and public service.

Initiation of Collaborative Projects

The Office of Sponsored Programs **assists faculty initiation of collaborative projects** through a variety of informal and formal networks. To expedite the presentation of the proposed project to other institutions or consortia, the faculty member should prepare a one to three-page concept paper outlining the project proposed, the collaboration sought, and, if relevant, the funding needed or available. The faculty member should then contact the Office of Sponsored Programs to discuss the concept with appropriate staff members.

The University encourages faculty to participate in collaborative projects initiated by faculty at other institutions. For assistance with project coordination or review of the University/sponsor requirements for these proposal submissions and sponsored program activities, the faculty member should contact the Office of Sponsored Programs.

The process for internal review of proposals involving University participation in such collaborative projects is the same as that for proposals submitted by the University. The proposed project activities, a budget reflecting the portion of work to be performed at the University, and documentation of the University's obligation to the project must be reviewed and approved through the internal review process before the proposal as a

whole is submitted to a sponsor by the collaborating entity. The Office of Sponsored Programs must receive a copy of the full proposal within ten working days before the submission deadline. This copy will be reviewed for conformance to the portion previously approved. The University reserves the right to withdraw from any collaboration if the activities, budget, or other arrangements involving the University are altered without Huston-Tillotson University's Authorizing Official's approval.

D. Cost Sharing Procedures

Cost sharing should be included in the budget accompanying the proposal submission only if such arrangements are required by the sponsor's program guidelines. During the early stages of proposal development, prospective Principal Investigators anticipating a need for cost sharing should work closely with the Office of Sponsored Programs staff to identify sources for cost sharing and should begin the process of securing agreements to cost share and arrangements for documentation. Principal investigators must include, along with the proposal, written documentation by separate letter describing the source and amount of cash cost sharing. In-kind cost sharing contributions may be documented by signature only. If the project is funded, the cost sharing included in the proposed budget must be carefully documented throughout the program period (*see Section V, J on cost sharing documentation*).

University cost sharing

Potential sponsors may require that the University share the expenses of a sponsored program. The prospective Principal Investigator during the proposal development process must secure the University's agreement to any such costs sharing. Completion of the Transmittal Sheet requires signatures confirming any cost sharing agreements (*see Section III, E Transmittal Process*). Common items for University cost sharing include salaries, fringe benefits, and indirect costs related to Huston-Tillotson University direct costs.

Third Party cost sharing

Occasionally, guidelines for sponsored programs suggest or mandate the inclusion of a third party (an entity in addition to the University and the sponsor) to share in the cost of the project. At the time of the proposal submission, the prospective Principal Investigator must have written confirmation from the third party on the amount and nature of cost sharing to be provided and also a commitment to provide appropriate documentation to demonstrate the agreed upon amount of cost sharing to the satisfaction of the funding agency and the Business Office.

E. Transmittal Process

The Office of Sponsored Programs is responsible for reviewing and processing proposals and budgets submitted to external sources **before** they are submitted. The Office of

the President is Huston-Tillotson University's authorized official for grants and sponsored programs.

To begin the transmittal process, the faculty/staff member (Principal Investigator/Director) should first complete the form and obtain the signatures of the department chair, dean, and ancillary signatures as required. Allow a minimum of two weeks for the signature process.

The Grants & Proposals Routing form, the Official University form for the documentation of concurrence of University officials with plans and commitments contained in proposals for externally funded programs, is the internal mechanism to:

Inform all affected parties of the proposal

- Document their knowledge of and support for the proposal
- Document any needed and committed cost sharing for the program
- Document that the PI or any member of the proposed research team does not have a significant financial interest in the proposed project
- The Grants & Proposals Routing form is to be completed for **all projects** for which external funds are sought or received by the University, **excluding gifts** to the University (*see Section I, A for a discussion of gifts vs. grants*). A copy of the Grants & Proposal Routing form and instructions for its completion are located in Appendix A.
- Copies of grants/proposals are provided to:
 - Office of the President
 - Unit VP
 - Office of Sponsored Programs
 - Business Office
 - Project Administrator/Project Director/Principal Investigator

The Principal Investigator should then forward the complete proposal, along with the Transmittal Sheet, necessary certifications, and any Significant Financial Interest Disclosure forms, if appropriate, to the Office of Sponsored Programs **for internal review and approval**. The PI should allow at least **two weeks** for this internal review. If this is not feasible, the PI should contact the Office of Sponsored Programs immediately to make other arrangements.

The Office of Sponsored Programs reviews proposals for completeness of the grants & Proposals Routing form and compliance with agency regulations and coordinates budget review and approval with the Business Office (*see Section III, F for a description of the budget review process*). Upon approval of the proposal, officials of the Office of Sponsored

Programs and the Business Office affix the appropriate documents as required by the University and by the potential sponsor.

The staff for the Office of Sponsored Programs will inform the PI of any elements of the proposed programs (i.e., hiring a consultant, organizing a conference) that require **special considerations** in addition to procedures common to all sponsored programs and provide additional information on steps to be taken to avoid delays in establishing an account should the project be funded.

When the sponsor notifies the Office of Sponsored Programs that the proposal will (or will not) be funded, the Office will inform all signatories of the final action taken by the sponsor.

Note: To expedite the review process, PI's may circulate a draft proposal with the Grant Proposals & Routing form and budget; however, one copy of the final proposal (as sent to the sponsor) must be sent to the Office of Sponsored Programs before or at the time of submission to the sponsor. In addition, the Office of Sponsored Programs highly recommend that Principal Investigators submit draft budgets to the Office for review of completeness and correctness to alleviate last-minute revisions.

F. Budget Review

The Office of Sponsored Programs coordinates the review of proposal and contract budgets with the Business Office. When the Office of Sponsored Programs receives a proposal or contract for transmittal, the office sends the Grant Proposals & Routing form and a copy of the budget justification to the Business Office for review and approval. At the same time, the Office of Sponsored Programs reviews the narrative, budget, and Transmittal Sheet to ensure consistency and completeness of information. If the budget is approved, the Business Office's reviewer signs the Grant Proposals & Routing form and returns it to the Office of Sponsored Programs.

If the Business Office detects a problem with the budget, the Grant Proposals & Routing form is returned to the Office of Sponsored Programs with the nature of the problem indicated. An Office of Sponsored Programs staff member contacts the Principal Investigator and works with him/her and the Business Office to resolve the problem. The Grant Proposals & Routing form and corrected budget are then returned to the Business Office for approval of the budget and signing of the Grant Proposals & Routing form, which is then returned to the Office of Sponsored Programs. The final budget is included with the proposal for review by the President.

G. Restrictions on Multiple Submissions to Sponsors

Some funding sources formally prohibit or informally discourage the submission of multiple applications from a single institution. In such instances, when Huston-Tillotson University faculty and staff prepare competing grant applications, the University will

approve the submission of only the number of applications specified by the sponsor. Faculty and staff are, therefore, encouraged to notify the Office of Sponsored Programs of their intent to submit a grant application in those instances in which the University is limited in the number of applications permitted.

The Office of Sponsored Programs will work with the appropriate officials (e.g., department chairs, deans, and directors) to determine a procedure for selecting the proposals to go forth from the institution. For some programs that have yearly deadlines, a formalized procedure may have been established.

Note: Principal Investigators should contact the Office of Sponsored Programs as soon as possible when considering submission under these circumstances.

IV. Post-Submission Activities

The decisions involved after proposals have been submitted require that the faculty member and the Office of Sponsored Programs continue to work together closely. As with the transmittal process, the procedures for award review/acceptance and budget negotiation and/or proposal modification are established by University policy. The Office of Sponsored Programs also coordinates University procedures for the Principal Investigator's withdrawal of the proposal. Should the proposal be denied funding, the Office of Sponsored Programs notifies signatories of the Transmittal Sheet and assists faculty members in requesting reviewers' comments and addressing the issue raised.

A. Award Review and Acceptance: Sequence and Responsibilities

When the Office of Sponsored Programs receives notification that an award has been made, the Principal Investigator is then asked to review the award document. The Principal Investigator must be aware of all terms and conditions of the award document.

While the Principal Investigator is reviewing the award document, the Office of Sponsored Programs conducts its own review of cited terms and conditions, including relevant regulations (e.g., Code of Federal Regulations {CFR}, Federal Acquisition Regulations {FAR}, Office of Management and Budget {OMB}, Circulars, and other references). The Office of Sponsored Programs determines if the award document complies with University policies and procedures and is acceptable to Huston-Tillotson University. If there are any questions of compliance with Huston-Tillotson University policies and procedures, the Office of Sponsored Programs will consult with the appropriate University department (e.g., Human Resources, Administration and Finance, The Executive Office of the President, etc.).

If both the Principal Investigator and the Office of Sponsored Programs find the award document acceptable, the Office of Sponsored Programs secures the signature of the President, the only person authorized to accept such awards/contracts for Huston-Tillotson University. If/when the award document has also been signed by the sponsor; the document is considered to be fully executed and is forwarded to the Business Office.

Upon acceptance, copies are forwarded to the Office of Sponsored Programs and the Fiscal Analyst in the Business Office.

The Office of Sponsored Programs will provide the Business Office and the Principal Investigator with project briefs, a summary of the award terms, applicable rules and regulations, e.g., equipment, publication, intellectual property, issues requiring prior approval, budget considerations, and usual restrictions or requirements.

B. Budget Negotiations and Proposal Modification

Occasionally a sponsor will express interest in supporting a proposed project provided that certain changes are made. These may include:

- *Changes in the budget (usually a reduction)*
- *Addition, modification, or deletion of objectives*
- *Change in performance period*
- *Change in Principal Investigator*

The Principal Investigator should review the proposed revisions and determine whether the revised project would be in the best interest of the University. For instance, if a sponsor wishes to reduce the amount of a budget without a comparable reduction of objectives, the project will probably not be in the best interest of the University and the Principle Investigator.

If the sponsor-suggested changes can be made and the Principal Investigator revises the overall proposal or budget, the revised proposal should be transmitted through the usual transmittal process (*see Section III, E*), with “**revised**” indicated on the Transmittal Sheet. The President must signify approval.

Note: Negotiations regarding the technical content of the proposal are the responsibility of the Principal Investigator. However, all questions relating to fiscal and administrative aspects of the proposal should be referred to the Office of Sponsored Programs staff, which will, in close collaboration with the Business Office and the Principal Investigator, negotiate on behalf of the University. Principal Investigators/Project Directors are reminded that they do not have the authority to commit the University contractually.

C. Withdrawal of Proposal

If for some reason it becomes necessary to withdraw a proposal before it has been acted upon by the sponsor, the Principal Investigator should notify the Office of Sponsored Programs. The Office of Sponsored Programs will take appropriate action for the withdrawal of the proposal and will notify the President

D. Denial of Funding

When the Office of Sponsored Programs receives notice that a proposal has not been selected for funding, a copy of the Transmittal Sheet for Sponsored Programs is sent to each signatory of the Transmittal Sheet, indicating that the project was not funded. If the Principal Investigator receives a rejection notice, a copy should be forwarded to the Office of Sponsored Programs.

In the case of denied funding, the Principal Investigator is encouraged to request from the sponsor an evaluation summary of the review. This evaluation may point out omissions and weaknesses in the proposal which, if addressed, could result in a much stronger subsequent proposal. First time applications, on the average, are less successful than subsequent applications. The Principal Investigator is encouraged to share reviewers' comments with Office of Sponsored Programs staff and discuss resubmitting the application to the same sponsor or seeking other possible funding sources.

V. Sponsored Program Post-Award Management

The Principal Investigator/Project Director (PI/PD) is responsible for conducting the sponsored program in accordance with University and sponsor regulations. This responsibility requires expert knowledge of the issues related to sponsor program management.

A number of University offices share in the responsibility and provide detailed manuals, as well as individual staff assistance, to assist the PI/PD in gaining the knowledge and skills needed for successful, accountable program management. The PI/PD should become thoroughly knowledgeable of the policies and procedures covered in the manuals provided by the following offices and contact their staff as needed:

- Office of Sponsored Programs – Manual for Sponsored Programs: Policies and Procedures;
- Business Office-Travel Regulations;
- Department of Human Resources-Huston-Tillotson University Personnel Handbook, Personnel/Affirmative Action

A. Establishment of Sponsored Program Account

The Office of Sponsored Programs normally receives the award notice on behalf of the University; reviews the terms and conditions of the award; forwards a copy of the award notice and attendant materials to the Principal Investigator for his/her review and acceptance of the award and its obligations; negotiates with the sponsor regarding any

terms or conditions that are problematic to the University; keeps the President apprised of changes and status. The President ultimately accepts the award on behalf of the institution.

The Award Notice document provided by the sponsor is used to establish a separate University account for the intended purpose of the award.

The Office of Sponsored Programs furnishes the necessary grant/contract information, including a budget, to the Business Office to establish the account. The Business Office notifies the Principal Investigator and the Office of Sponsored Programs of the assigned number and provides information regarding expending the award.

B. Grant/Contract Post-Award Administration: Responsibilities

Principal Investigator Post-Award Responsibilities

The Principal Investigator is responsible for the day-to-day management of the program in accordance with University/sponsor policies and guidelines. Responsibilities include:

- Assembling and providing guidance to program personnel
- Expending funds in accordance with University/sponsor regulations; providing the Business Office with activity reports documenting the personnel time devoted to the program
- Working with the Business Office to document cost sharing committed in the grant, as appropriate
- Conducting the program as described in the proposal and award notification
- Providing technical liaison with the sponsor
- Preparing and submitting technical reports and invention reports and cooperating in the completion of other reports, as required and
- Maintaining records in accordance with University and sponsor regulations

Office of Sponsored Programs Post-Award Responsibilities

The Office of Sponsored Programs is responsible for the non-financial administration of sponsored programs which includes:

- Negotiating and accepting award terms and conditions
- Coordinating with the Business Office the preparation of subcontracts related to sponsored programs
- Ensuring that the PI has obtained all required certifications and assurances (regarding, for example, the use of animals or human subjects in research, biohazards, etc.)
- Serving as a liaison between the University community and the external sponsor regarding non-fiscal grants-management issues and no-cost extensions

- Processing actions that require prior sponsor approval or those allowed by the expanded authorities (*see Section V,K*)
- Monitoring report submission
- Coordinating overall non-fiscal grants management and
- Ensuring University concurrence with federal regulations regarding non-fiscal compliance issues

Business Office Post-Award Responsibilities

The Business Office is responsible for financial administration of all external grants and contracts. Specific responsibilities include:

- Serving as contact point with agencies for fiscal matters;
- Assisting PI's in fiscal post-award administration;
- Ensuring consistent application of federal policies related to fiscal matters;
- Establishing accounts for programs after the fiscal review of award documentation;
- Informing PI's of program expenditures and encumbrances;
- Processing expenditures and submitting fiscal reports;
- Ensuring that all documented cost sharing is reported to the sponsor;
- Calculating and recovering all legitimate indirect costs; and
- Closing out accounts

C. Subcontracting Procedures

Implementation of some sponsored programs may require that a significant portion of the work be conducted by a person or persons not affiliated with Huston-Tillotson University. In such cases, Huston-Tillotson University, when designated the official or "prime" recipient and fiscal agent of the award/contract, issues a subcontract for the portion of work to be performed by the non-affiliated party. Usually the PI must indicate in the proposal any intent to subcontract a portion of the project. The President is informed of subcontract involvement before approval. Sponsor regulations that apply to the prime recipient of an award may also apply to any subcontractors and must be referenced in the subcontracts accordingly.

Federal regulations, including OMB Circular A-110, stipulate clauses that must be passed down to subcontractors. The prime recipient is responsible for ensuring that the subcontractors are informed of and comply with these regulations. Standard clauses in federal subcontracts include, but are not limited to, the following:

- Audit;
- Records and retention; and
- Certification of assurances

The Office of Sponsored Programs assists Principal Investigators/Project Directors in the development of subcontracts for sponsored programs and ensures that subcontractors have supplied appropriate financial information. This assistance ranges from designing subcontracts to ensuring compliance with sponsor guidelines. The Office of Sponsored Programs staff work with the Principal Investigator and the proposed subcontractors to design and negotiate acceptable subcontracts wording in keeping with sponsor guidelines and regulations and University policies and procedures.

After subcontracts have been signed by the subcontractor and Huston-Tillotson University has received required documentation (audit reports and documentation of indirect cost and fringe benefit rates), the Office of Sponsored Programs processes subcontracts and secures the signature of the President.

The PI is responsible for monitoring subcontracts, including reviewing all invoices from subcontractors and attesting that subcontractors' performance is satisfactory and on schedule prior to payment of the invoice.

Subcontractors are also involved in the closeout process of grants and contracts. The PI is responsible for receiving final invoices in a timely manner so that Huston-Tillotson University final financial, programmatic, and other reports can be filed as required by the sponsor (see *Section V, I Reports* and *Section V, N Program Termination and Program close-out*).

D. Sponsor Regulations and Policies

The PI has the responsibility to administer the grant in accordance with both the sponsor and University regulations. The Office of Sponsored Programs is responsible for reviewing award documentation and preparing Project Briefs of the award for the PI. In order to provide a supplement to the Principal Investigator's own reading of the award document, the project briefs outline key information regarding the award, including performance period, budget amount, costs sharing commitments, key sponsor personnel information, sponsor regulations, acknowledgment requirements, and reporting requirements.

E. Financial Management

The Business Office has responsibility for fiscal matters regarding grant and contract awards. After the award is reviewed and processed by the Office of Sponsored Programs, the Department of Finance establishes the sponsored program account (see *Section V, A*) and forwards information pertinent to the fiscal management of the sponsored program to the Principal Investigator. Principal Investigators are provided with monthly expenditure sheets reflecting monthly and cumulative expenditures and encumbrances on a University fiscal year basis (July 1 – June 30).

The PI is responsible for managing the budget and expending it in accordance with sponsor and University regulations on allowable, allocable, and attributable expenses

related to the project, as indicated in the approved budget. Some sponsors require approval of any divergence from budget categories or items. **Section V, K** provides information regarding procedures for seeking prior approval for deviations from conditions imposed in an award document. The PI must be familiar with and comply with both the sponsor's guidelines and the University guidelines for fiscal management of sponsored programs.

General guidelines for expending sponsored program funds are as follows:

- Costs must be allocable, bearing a direct relationship to the activities of the program, not the general needs of the department or University
- Costs must be reasonable, reflecting conscientious and prudent financial decision-making.
- Costs must be consistently treated with the normal costs standards of the University and not exceeding normal limits of similar charges that are not grant supported.
- Costs must adhere to sponsor-stated restrictions, recognizing and respecting any restrictions on use of funds stipulated by the sponsor.

The University is subject to an annual audit in accordance with *OMB Circular A-133*. This audit conforms to specified federal guidelines and serves to certify the effectiveness of the financial management systems and internal procedures. Fiscal integrity of financial transactions is tested, as well as compliance with terms and conditions of federally sponsored activities. The annual audit involves a review of both institutional systems and selected individual programs accounts. Financial records and internal oversight are also subject to review by internal audit.

The Business Office personnel are available to Investigators to assist and advise Principal Investigators of fiscal issues related to sponsored programs management.

F. Personnel Issues and Procedures

University policies and procedures, as well as any sponsor regulations, strictly guide the hiring of personnel to be associated with a sponsored program. The PI will be required to address issues such as the following:

- Determination of status, e.g., consultant/independent contractor, or employee
- Determination of position classification, which establishes salary range
- Compensation guidelines
- Personnel policies; for information on personnel issues, consult the Huston-Tillotson University Employment Handbook, and/or contact the Human Resources Department; and
- Affirmative Action policies and procedures

G. Purchasing and Property Control

General Purchasing Procedures

Federally funded projects are required by law to comply with certain purchasing standards. These may include documentation of bid, utilization of women/minority owned businesses, compliance with Labor Standards, and other issues.

The PI should work with the Business Office and the Office of Sponsored Programs to ensure compliance with sponsor purchasing requirements.

All funding through federal grants and contracts will be processed through the University's accounting system. Therefore, purchases are subject to Public Purchasing Laws.

Property Control

The Business Office manages property reports requirements. Inventory Control numbers will be assigned by the Department of Informational Technology and the Business Office and affixed to each piece of equipment in a readily accessible place.

The purchasing of sponsored equipment requires the initial determination concerning whether the item is a purchase that must be inventoried (Capital Purchase) or one that is expendable in nature (Non-Inventory-Miscellaneous Minor Equipment Purchase). The following information is provided in identifying and classifying equipment purchases for sponsored projects:

Capital Equipment - Inventory

Capital equipment is defined as any item of non-expendable nature, such as a movable unit of furniture or furnishings, an instrument, or apparatus, a machine (including attachments), an instructional skill training device, or a set of small articles whose parts are replaceable or repairable; the whole retaining its identity and utility over a period of time which is characteristic of and definable for items of its class. Items in this group, generally, should have a useful life expectancy of three years or more and an acquisition cost of \$1,000 or more per unit.

Miscellaneous Minor Equipment - Non-Inventory

Miscellaneous equipment is defined as any item of an expendable nature, regardless of service life, and having an acquisition cost of \$999.00 or less.

Note: Sponsor definitions of equipment may vary from University definitions. The Business Office and the Office of Sponsored Programs can assist in determining whether an item should be purchased with equipment funds.

H. Travel Policies

Travel activities must be in compliance with the sponsor's travel policies and University Travel Policy. For example, travel outside the continental United States generally requires prior approval by the sponsoring agency grants officer, as well as by the University. When Huston-Tillotson University and the sponsoring agency travel rates differ, the more restrictive rate applies. The Huston-Tillotson University Travel Policy is available from the Business Office.

I. Reports

For all sponsored programs, Principal Investigators must notify the Office of Sponsored Programs when a technical/programmatic report is sent to the sponsor. This may be accomplished by sending the Office of Sponsored Programs a copy of the report sent to the sponsor and/or a copy of the cover letter addressed to the sponsor representative. In addition, for all other reports required by the sponsor(except for fiscal/financial reports), Principal Investigators should send the Office of Sponsored Programs a copy of the report for the Official University files to document report submission.

Time and Effort Reports

Purpose of Report

The Time and Effort Certification Form represents an after-the-fact certification of an individual's actual effort. The Time and Effort Certification is designed to gather effort-related data as required by Office of Management and Budget Circular A-21. Employees who are paid (totally or partially) from federally funded sponsored agreement—or employees who are used in mandatory or voluntary cost sharing for those awards—are subject to A-21 reporting requirements.

Frequency of Reports

The Time and Effort Report is generated at the end of each academic semester for employees having academic year appointments and at the end of summer session for those individuals on appointment during that period. The Effort Certification Report must be certified by the employee and a responsible University official (usually the Principal Investigator and the immediate supervisor). The persons certifying the report must have firsthand knowledge or suitable means of verifying all the effort shown on the report. Suitable means of verification include effort that is inferred from time sheets, work product, work contributed, etc. The signed Effort Report must be submitted to the Office of Sponsored Programs within thirty days after the end of the academic semester.

Reports to the Sponsor

Sponsors frequently require the following types of reports:

Technical/Programmatic Reports: The PI is responsible for meeting the sponsor's schedule for technical or programmatic reports in a timely fashion. The frequency and type of reports vary by sponsor and program. Some programs require only a final program report. The reporting requirements are stated or referenced in the grant/contract award document.

Fiscal/Financial Reports: Fiscal/Financial reports are completed by the Business Office on the schedule and in the format requested by the sponsor. For further details regarding these reports, contact the Business Office.

Equipment Purchase Reports: Occasionally, sponsors will require reports (usually on an annual basis and along with the final report) on the equipment purchased with sponsor funds.

Note: Sponsors may withhold payments to the University because of late or delinquent reports

J. Cost Sharing Documentation

It is the Principal Investigator's responsibility to work with the Business Office for the mandatory documentation of cost sharing committed in the approved budget (see *Section III, D for cost sharing procedures*).

Systems for capturing documentation already exist for common forms of University cash and in-kind cost sharing, such as indirect costs related to Huston-Tillotson University direct costs, salaries, and fringe benefits. Salaries and effort must be reported to the Business Office quarterly. In determining the level of effort for a sponsored project, teaching load and other assigned duties of individuals, in addition to other cost sharing commitments, must be considered. Time must be available for the individuals to perform on the project both for pay and for contributed effort.

For any third-party cost sharing, the PI should work with the sponsor, the Business Office, and the Office of Sponsored Programs to ascertain what constitutes appropriate documentation for cost sharing. The PI should then inform the third party cost sharer of the schedule and nature of the required documentation.

K. Systems for Sponsor Required Prior Approval

During the course of a program, a Principal Investigator may find it necessary to deviate from certain conditions imposed in an award, such as performance period, budget, etc. Some deviations from award conditions can be approved by Huston-Tillotson University as a result of expanded authorities provided in OMB Circular A-110, Uniform

Administrative Requirements for Grants and Agreements with Institutions of Higher Education, for federally funded programs. The PI is responsible for initiating the request and justifying the requested changes. The written request must be signed by the PI and forwarded to the Office of Sponsored Programs for review and approved by the President. The Office of Sponsored Programs will send the request to the sponsor. **Changes will not be made until written approval is received from the sponsoring agency.**

Note: The Office of Sponsored Programs, in coordination with the Department of Finance, processes all requests that are allowed by expanded authorities granted to the University or that require prior approval by the sponsor.

L. No-Cost Extension

Although sponsors expect the sponsored program to be completed by the originally specified deadline, some sponsors allow “no-cost extensions” of the program period. That is, the sponsor may agree to an extended performance period but commits no additional funding to the program. Among sponsors allowing no-cost extensions, the procedure for obtaining a no-cost extension and the amount of time allowed for an extension vary. Some federal agencies authorize the University to grant these extensions internally, within agency guidelines. The PI should provide the Office of Sponsored Programs, well in advance of the program termination date, information regarding the allowance of and the procedure for requesting a no-cost extension on a project.

M. Principal Investigator Transfer and Transfer of Equipment

The official recipient of the sponsored programs is the University; therefore, title to equipment acquired with sponsored funds vests with the grantee, the University. If the Principal Investigator leaves the University, a decision must be made as to whether or not the award will be transferred with the Principal Investigator. Principal Investigators should discuss their transfer plans with their immediate supervisor/department Chair and the Office of Sponsored Programs. If both the University President and the sponsor approve a transfer, the Office of Sponsored Programs and the Business Office will work with the receiving institution and the sponsor to effect the transfer of the grant. Each circumstance requires individual attention so that the process represents Huston-Tillotson University’s interests appropriately while respecting the future sponsored program needs of the Principal Investigator and the sponsor’s directives.

N. Program Termination and Program Closeout

Program termination procedures vary by sponsor. The Principal Investigator should review award documentation for termination procedures and work with the Business Office and Office of Sponsored Programs to effect the termination of the award in compliance with sponsor regulations. The Office of Sponsored Programs sends Principal

Investigators notices prior to the end of the performance period to remind them of the impending termination of the award.

The program close-out process varies with each sponsor but generally involves submission of final technical and financial reports and possibly other reports—most commonly patent, invention, and equipment reports—as specified by the sponsor. The PI should contact the Office of Sponsored Programs, if in doubt regarding reports that are due, and should make sure that all technical reports and any other deliverables required by the sponsor are completed and submitted in a timely manner. The Office of Sponsored Programs assists in the completion of property and patent reports and submits them to the sponsor on behalf of the institution. The Department of Finance will close the sponsored program after all the requirements have been met and final payment has been received.

O. Program Income

Some sponsored programs generate income (e.g., from registration fees for conferences, the sale of materials developed with sponsor funds, etc.). Sponsors, especially federal agencies, may have regulations and policies about how program-generated income should be accounted for and spent.

If the products or resources provided by the grant/contract are or may be involved in the generation of income, the Principal Investigator should contact the Business Office to identify procedures for the accounting and spending of sponsored program-generated funds.

P. Non-Governmental Contracts - Industrial

On behalf of the University, the Office of Sponsored Programs in concert with the Business Office reviews and negotiates all contracts, including agreements. Industrial agreements often require negotiations with the industrial sponsor, especially the rights to data and intellectual property. Principal Investigators considering contract work with industrial sponsors should contact the Office of Sponsored Programs early in the process.

Q. Records Retention

Sponsors vary regarding the length of time the University is required to maintain records. Sponsor terms may, in fact, differ from program-to-program. Typically, the University is required to retain official University records for seven years from the end of the project period and Principal Investigator records for three years. If an audit is initiated within this three-year period, records must be maintained an additional three years after audit issues are resolved.

Official records can include program records housed with the Principal Investigator, fiscal records and documentation housed with the Business Office, the official application and award file housed in the Office of Sponsored Programs. All reports are the property of the University. Principal Investigators must notify the Office of Sponsored Programs before any program records or files are destroyed or moved from campus.

VI. Compliance Issues: Regulatory Bodies, Policies, and Assurances

Federal guidelines require institutional approval and oversight of activities involving human subjects, animals, human body and fluids, and hazardous materials. Researchers whose projects, **whether externally funded or not**, involve one or more of these activities should seek the appropriate institutional clearances as early in the proposal development stage as possible and **must obtain approval before research proceeds**.

Funding organizations, particularly federal and state agencies, require numerous certifications and assurances as a part of the proposal submission and award acceptance process. Many of these are standard and simply require the signature of the University's authorizing official to certify compliance. The Principal Investigator, depending on the type of project, must initiate other clearances. Federal regulations stipulate that institutions applying for federal funds assure that appropriate federal agency that certain conditions and policies are in place and implemented at the applicant institution.

Federal funding is at risk institution-wide if individuals do not comply with these requirements. The Office of Sponsored Programs coordinates the assurance process and provides the President and/or Vice President for Administration and Finance signatures on institutional certifications for a number of compliance issues.

A. Huston-Tillotson University Indirect Cost Policy and Procedures

Definition

Indirect Costs or Facilities and Administrative Costs (F&A) are those that are incurred for common or joint objectives and, therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other activity or any other institutional activity.

Policy

The purpose of the Indirect Cost Policy is to provide direction for recovery of all program costs of grants by requiring that facilities and administrative costs are included in the proposed budgets.

Full F&A Cost recovery is to be included in all sponsored program proposals. The F&A costs rates are set through negotiations with the federal government (Department of Health and Human Services) to recover actual expenses incurred by the University. Exceptions to the policy are made for certain proposals to the state of Texas and proposals where agency guidelines state that no F&A cost or less than full F&A cost will be paid. Non-federal organizations whose guidelines will not permit F&A cost will be reviewed to determine if some of the F&A items might be included as direct cost.

Exceptions to the policy are to be initiated by the PI and Department Chair and approved by the Provost and or Dean, as appropriate. The exception request will then be forwarded to the Director of Sponsored Programs for review and signature. The exception will then be forwarded to the President and/or Vice President for Administration and Finance for final approval.

Under the current budget system, indirect cost dollars are collected and managed centrally by the Vice President for Administration and Finance and are used to provide general fund support for all the units within the University.

B. Standard Federal Assurances

Specific standard assurances are typically required by federal funding agencies. Most often, sponsors supply the institutional certification and assurance forms required. If the sponsor does not provide these, a copy of the form Institutional Certifications Regarding Lobbying; Debarment, Suspension and other Responsibility Matters; and Drug-Free Workplace Requirements, which is located in Appendix E, can be used for institutional certification. The Vice President for Administration and Finance signature on the standard federal assurances indicates the University's compliance with these requirements.

Lobbying

Public Law 101-121 states that applicants for federal funding must provide the following information on any contract, grant, or cooperative agreement exceeding \$100,000:

- *Certification that no federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence a federal employee in connection with the appropriation of federal funds;*
- *Submission of Standard Form-LLL Disclosure Form to Report Lobbying (included in Appendix E) if non-federal funds are used to pay any person for influencing or attempting to influence a federal employee in connection with the appropriation of federal funds*

Debarment and Suspension

With the submission of an application for federal funding, an institution must certify or provide an explanation why it cannot certify that it and its principals, including consultants and subcontractors:

- *are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;*
- *are not presently indicted for or have not, within a three-year period preceding an application, been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public transaction or contract under a public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property; and*
- *have not within a three-year period preceding an application had one or more public transactions terminated for cause or default.*

Drug-Free Workplace and Workforce

All grants or contracts made by a federal agency after March 18, 1989, require that applicant organizations assure the federal government that work on these projects will be in a drug-free workplace. As part of the certification process, institutions federally funded are required by law to develop a drug-free workplace policy, which applies to all personnel engaged in the performance of a grant or contract funded with money from a federal agency. The policy also applies to undergraduate students and graduate students paid from funds acquired directly from a federal agency.

The policy states in part that:

- *the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited in the workplace;*
- *as a condition of employment, employees must abide by the terms of the statement;*
- *any employee convicted of a drug offense occurring in the workplace is required to notify his/her immediate supervisor no later than five days after the conviction.*

The policy outlines the sanctions which may be taken if an employee violates the policy. Such sanctions may include termination of employment, satisfactory completion of a rehabilitation program or suspension.

A copy of the complete Drug-Free Workplace and Workforce Policy is located in Appendix E and is available from the Huston-Tillotson University Human Resources Department and the Office of Sponsored Programs.

Appendix A

Guides/Forms for Proposal Development and Submission

- **Elements of a Proposal**
- **Proposal Budget Checklist**
- **Huston-Tillotson University Proposal Submission Procedures**
- **Huston-Tillotson University Routing and Approval Form for Sponsored Programs**

Grant Proposal Elements and Format

Proposed To – name and address of the funding source.

Proposed From – name and address of you and your organization.

Table of Contents – a table of contents page with page numbers for each of the following sections:

Abstract – a one page synthesis of the elements in the entire proposal, a brief description of all of the components of your project.

Problem Statement – a description of the problem, using risk and frequency assessments from legitimate sources that will state the extent of the problem.

Literature Review – a reference librarian will be priceless for this portion of your research. You will need to do a thorough search in all of the publications, professional journals, and demographic resources to demonstrate you have a professional understanding of the problem.

Methods – describe the methodology, activities, and resources you will use to complete research, initiate a social program, improve a social program, or implement resources requested from funding sources.

Evaluation – provide a means of demonstrating that the funding has achieved progress toward goals of alleviating the problem in the problem statement.

Budget – a detailed budget must be provided, done in a format that is easily understood by the funding sources grant proposal committee, including each person working for the project, contracted work, fixed and variable costs and supplies that will be necessary.

Budget Justification – a detailed rationale of why each component of the budget is necessary.

Project Personnel – Resumes and descriptions of the key project personnel and their qualifications to administer the project; smaller community projects require far less qualifications than a national program, of course.

Bibliography – a bibliography of all of the referenced material and resources in the problem statement and methodology section.

Exhibits – any materials you will use in your research project or program that you can demonstrate in hard copy such as tests, pictures, or diagrams.

Proposal Budget Checklist

I. General

1. Is your budget prepared according to the agency's guidelines?
2. Has enough money in each expense category been requested so that the project can be properly executed?
3. Have budget computations been double-checked for accuracy and do all of your budget figures balance?
4. Have you itemized each category of expenditure and are appropriate items described and/or justified in the narrative and/or budget justification page?
5. Have you explained any unusual expenditure in the narrative and/or budget justification page?
6. Have you itemized each University contribution to the project, both cost-sharing and matching funds? Have these items been approved and allocated by the appropriate administrators?
7. Have all the following items been accounted for if relevant: salaries for principal investigator(s); wages for undergraduate assistants; salaries for secretarial and technical assistance; payments to consultants; travel and per diem costs, building rental costs; equipment costs; cost of expendable supplies; long-distance telephone charges; mail costs; duplication costs; publication costs; costs of specific supplies (for example: magnetic tape, film, batteries); data processing costs; and so on?
8. Has excess "fat" or "padding" been trimmed from the budget while still allowing for normal inflation of items?

II. Personnel

1. Are salary rates compatible with current salary ranges?
2. If faculty-staff salaries are to be part of the cost-sharing contribution, have they been figured accurately and has approval been obtained?
3. Does the budget provide for salary increases if the project period extends over more than one academic year starting July 1st?
4. Does the budget include proper support for fringe benefits?
5. Have staff positions and the proportion of time being committed to the project by the principal investigator and others been cleared with the appropriate administrators?

III. Equipment

1. Have you checked with your unit and other units on campus to determine if needed equipment is presently available?
2. Is equipment purchase allowed by the sponsor?
3. Have you checked with appropriate sources for information on equipment costs, vendors, procedures for purchase, and so on?
4. Have you included the cost of delivery, installation and auxiliary parts in the purchase price? Have you considered increases in cost in the purchase price? Have you considered increases in cost if purchase will not be made until sometime in the future?
5. Have you included the cost of maintenance, service agreements and insurance (when appropriate) in the “other direct costs” budget category?
6. Have you included an itemized listing of equipment (including type of equipment, specific name, model number, price, vendor, and so on) either in the budget form or budget justification page?

IV. Expendable Equipment and Supplies

1. Have you provided for adequate expendable equipment and supplies to complete the project?
2. If substantial funds have been requested in this budget category, have an itemized list and justification been included?

V. Travel

1. Have you followed the University’s, agency’s or other applicable regulations for allowable rates for travel and per diem expenses?
2. Have you included adequate travel in your budget to complete the project, including possible travel to meetings or conferences?
3. Have you itemized and justified your planned travel, including destination and purpose?
4. Have you allowed for future increases in costs for transportation?
5. Have you included all types of travel expenses, that is, transportation, per diem, and local travel?

VI. Other Costs

1. Publication costs – have you itemized publication costs such as page charges, special photography layouts, purchase of books, reprints, abstracts, library searches, conference proceedings, and so on?
2. Computer costs – have you requested the full cost of computer services?
3. Other direct costs, if pertinent - have you itemized expenses for items such as: space rentals at sites other than the University?
4. Shipping of material?
5. Communications (telephone, long-distance charges, postage, etc.)?
6. Equipment rental, maintenance or service agreements?
7. Temporary secretarial assistance?
8. Subcontracts?
9. Consultant fees?

Huston-Tillotson University Proposal Submission Procedures

Huston-Tillotson University encourages faculty and staff to engage in scholarship, professional development and sponsored program activities. The University promotes the acquisition of external support for these endeavors. Listed below are established procedures for the solicitation of sponsored projects at Huston-Tillotson University. All grant and contract applications for external funding must be submitted through the Office of Sponsored Programs.

THE ONLY AUTHORIZED SIGNATURE FOR THE UNIVERSITY IS THAT OF THE PRESIDENT

Processing of requests from University employees to seek external funding involves the following steps:

1. Project Director: The Project Director/Project Administrator/Principal Investigator for the project/sponsored activity is responsible for initiating the submission process by completing a Huston-Tillotson University Proposal Routing and Approval Form and submitting it, along with a complete copy of the proposal, to his/her department chair. The Project Director is also responsible for ensuring that the proposal is routed through the campus process (steps 2-4 below) and delivered to the Office of Sponsored Programs for review.
2. Department Authorization: Department chairs are responsible for initial review to ensure that the proposed project is feasible with respect to personnel and material resources and that the proposed project is appropriate to the mission of the department. Signature of the Department Chair will signify approval of any department commitment for matching funds.
3. Project Director: Submits proposal to the Office of Sponsored Programs for further review.

4. Office of Sponsored Programs: All grant and contract applications are to be submitted to the Office of Sponsored Programs. Proposals will be reviewed for compliance with the agency/sponsor guidelines, University, state, and federal policies. After the initial review, the Office of Sponsored Programs routes the proposal, as needed, to the following: 1) Vice President for Academic and Student Affairs, 2) Budget Analyst for budget review, 3) Director of Facilities if the proposal involves any acquisition and /or modification of physical facilities 4) Vice President for Administration and Finance 5) Vice President for Institutional Advancement.
5. Designated Campus Official Authorization: The Designated Campus Official (The President) reviews the proposal for consistency with college/school mission and availability and commitment of support services, including time, space and matching funds after all other approvals have been secured.
6. Office of Sponsored Programs: The signed proposal will then be returned to the Project Director for submission to the agency/sponsor unless prior arrangements have been made with the Office of Sponsored Programs to assemble and mail the proposal.

Note: Proposals are to be submitted to the Office of Sponsored Programs AT LEAST TWO WEEKS PRIOR TO THE AGENCY/SPONSOR DEADLINE.

Huston-Tillotson University

GRANTS & PROPOSALS ROUTING SLIP

INTERNAL DOCUMENT

If assistance is needed to develop a proposal, a Project Executive Summary should be provided to the Grants Coordinator at least six months prior to the funding deadline to begin the research.

All proposals for external grants and contracts must have the appropriate signatures as indicated below at least two weeks prior to the deadline for submission to the funding agency. The President will sign only after all appropriate persons have signed

Please complete and return to Sponsored Programs Office, Agard-Lovinggood Building, with a copy of the RFP and the final proposals.

Funding Agency:

Project Title:

Project Purpose:

Total Budget Request: \$

Project Timeline: _____
Start Date End Date

Award Notification Date (Approximate): _____

Faculty/Principal Investigator Name and Signature _____ Date _____

Unit Head Chair Signature _____ Date _____

Director of Sponsored Programs _____ Date _____

Vice President for Institutional Advancement _____ Date _____

President _____ Date _____

GRANTS OFFICE USE ONLY:

Award Date	Program Reporting Date(s)
	Financial Reporting Date(s)
Denied Date	Evaluation Received:

Appendix B

Policies/Forms for Common Certifications

- **Assurances, Non-Construction Programs**
- **Institutional Certifications Regarding Lobbying, Debarment, Suspension and Other Responsibility Matters; and Drug-Free Workplace Requirements**
- **Certification of Eligibility for Federal Assistance in Certain Programs**
- **Disclosure Form to Report Lobbying (Standard Form LLL)**
- **Instructions for Completion of SF-LLL, Disclosure of Lobbying Activities**

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

<p>* SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> <p>Completed on submission to Grants.gov</p>	<p>* TITLE</p> <p></p>
<p>* APPLICANT ORGANIZATION</p> <p></p>	<p>* DATE SUBMITTED</p> <p>Completed on submission to Grants.gov</p>

Standard Form 424B (Rev. 7-97) Back

**CERTIFICATIONS REGARDING LOBBYING; DEBARMENT, SUSPENSION AND OTHER
RESPONSIBILITY MATTERS; AND DRUG-FREE WORKPLACE REQUIREMENTS**

Applicants should refer to the regulations cited below to determine the certification to which they are required to attest. Applicants should also review the instructions for certification included in the regulations before completing this form. Signature of this form provides for compliance with certification requirements under 34 CFR Part 82, "New Restrictions on Lobbying," and 34 CFR Part 85, "Government-wide Debarment and Suspension (Nonprocurement) and Government-wide Requirements for Drug-Free Workplace (Grants)." The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of Education determines to award the covered transaction, grant, or cooperative agreement.

1. LOBBYING

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 34 CFR Part 82, for persons entering into a grant or cooperative agreement over \$100,000, as defined at 34 CFR Part 82, Sections 82.105 and 82.110, the applicant certifies that:

(a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any Federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal grant or cooperative agreement;

(b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal grant or cooperative agreement, the undersigned shall complete and submit Standard Form - LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions;

(c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants, contracts under grants and cooperative agreements, and subcontracts) and that all subrecipients shall certify and disclose accordingly.

**2. DEBARMENT, SUSPENSION, AND OTHER
RESPONSIBILITY MATTERS**

As required by Executive Order 12549, Debarment and Suspension, and implemented at 34 CFR Part 85, for prospective participants in primary covered transactions, as defined at 34 CFR Part 85, Sections 85.105 and 85.110--

A. The applicant certifies that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;

(b) Have not within a three-year period preceding this application been convicted of or had a civil judgement rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(e) Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (d)(2) from an employee or

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (2)(b) of this certification; and

(d) Have not within a three-year period preceding this application had one or more public transaction (Federal, State, or local) terminated for cause or default; and

B. Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.

**3. DRUG-FREE WORKPLACE
(GRANTEES OTHER THAN INDIVIDUALS)**

As required by the Drug-Free Workplace Act of 1988, and implemented at 34 CFR Part 85, Subpart F, for grantees, as defined at 34 CFR Part 85, Sections 85.605 and 85.610 -

A. The applicant certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an on-going drug-free awareness program to inform employees about:

(1) The dangers of drug abuse in the workplace;

(2) The grantee's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will:

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position

title, to: Director, Grants Policy and Oversight Staff, U.S. Department of Education, 400 Maryland Avenue, S.W. (Room 3652, GSA Regional Office Building No. 3), Washington, DC 20202-4248. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted:

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

B. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Check ☐ if there are workplaces on file that are not identified here.

As the duly authorized representative of the applicant, I hereby certify that the applicant will comply with the above certifications.

NAME OF APPLICANT	PR/AWARD NUMBER AND / OR PROJECT NAME
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	
SIGNATURE	DATE

DRUG-FREE WORKPLACE (GRANTEES WHO ARE INDIVIDUALS)

As required by the Drug-Free Workplace Act of 1988, and implemented at 34 CFR Part 85, Subpart F, for grantees, as defined at 34 CFR Part 85, Sections 85.605 and 85.610-

A. As a condition of the grant, I certify that I will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant; and

B. If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, I will report the conviction, in writing, within 10 calendar days of the conviction, to: Director, Grants Policy and Oversight Staff, Department of Education, 400 Maryland Avenue, S.W. (Room 3652, GSA Regional Office Building No. 3), Washington, DC 20202-4248. Notice shall include the identification number(s) of each affected grant.



Certification of Eligibility for Federal Assistance in Certain Programs

I understand that 34 CFR 75.60, 75.61, and 75.62 require that I make specific certifications of eligibility to the U.S. Department of Education (ED) as a condition of applying for Federal funds in certain programs and that these requirements are in addition to any other eligibility requirements that ED imposes under program regulations. Under 34 CFR 75.60 – 75.62:

I. I certify that:

A. I do not owe a debt, or I am current in repaying a debt, or I am not in default (as that term is used at 34 CFR Part 668) on a debt:

1. To the Federal Government under a nonprocurement transaction (e.g., a previous loan, scholarship, grant, or cooperative agreement); or
2. For a fellowship, scholarship, stipend, discretionary grant, or loan in any program of ED that is subject to 34 CFR 75.60, 75.61, and 75.62, including:
 - Federal Pell Grant Program (20 U.S.C. 1070a, et seq.);
 - Federal Supplemental Educational Opportunity Grant (SEOG) Program (20 U.S.C. 1070(b), et seq.);
 - State Student Incentive Grant Program (SSIG) 20 U.S.C. 1070c, et seq.);
 - Federal Perkins Loan Program (20 U.S.C. 1087aa, et seq.);
 - Income Contingent Direct Loan Demonstration Project (20 U.S.C. 1087a, note);
 - Federal Stafford Loan Program, Federal Supplemental Loans for Students [SLS], Federal PLUS, or Federal Consolidation Loan Program (20 U.S.C. 1071, et seq.);
 - William D. Ford Federal Direct Loan Program (20 U.S.C. 1087a, et seq.);
 - Cuban Student Loan Program (20 U.S.C. 2601, et seq.);
 - Robert C. Byrd Honors Scholarship Program (20 U.S.C. 1070d-31, et seq.);
 - Jacob K. Javits Fellows Program (20 U.S.C. 1134h-1134i);
 - Patricia Roberts Harris Fellowship Program (20 U.S.C. 1134d-1134g);
 - Christa McAuliffe Fellowship Program (20 U.S.C. 1105-1105i);
 - Bilingual Education Fellowship Program (20 U.S.C. 3221-3262);
 - Rehabilitation Long-Term Training Program (29 U.S.C. 774(b));
 - Paul Douglas Teacher Scholarship Program (20 U.S.C. 1104, et seq.);
 - Law Enforcement Education Program (42 U.S.C. 3775);
 - Indian Fellowship Program (29 U.S.C. 774(b));
 - Teacher Quality Enhancement Grants Program (20 U.S.C. 1021, et seq.);

OR

B. I have made arrangements satisfactory to ED to repay a debt as described in A.1. or A.2. (above) on which I had not been current in repaying or on which I was in default (as that term is used in 34 CFR Part 668).

II. I certify also that I have not been declared by a judge, as a condition of sentencing under section 5301 of the Anti-Drug Abuse Act of 1988 (21 U.S.C. 862), ineligible to receive Federal assistance for the period of this requested funding.

I understand that providing a false certification to any of the statements above makes me liable for repayment to ED for funds received on the basis of this certification, for civil penalties, and for criminal prosecution under 18 U.S.C. 1001.

(Signature)

(Date)

(Typed or Printed Name)

Name or number of ED program under which this certification is being made: _____

ED 80-0016 (Revised 2/01)

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4c		5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:
6. Federal Department/Agency:	7. Federal Program Name/Description: CFDA Number, if applicable: _____	
8. Federal Action Number, if known:	9. Award Amount, if known: \$ _____	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI):	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI):	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		Signature: _____ Print Name: _____ Title: _____ Telephone No.: _____ Date: _____
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10.
 - (a) Enter the full name, address, city State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.
 - (b) Enter the full names of the individual(s) performing services, and include full address if different from 10(a). Enter Last Name, and Middle Name (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minute per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.