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INTRODUCTION

The mission of the **Office of Research and Sponsored Programs** is to support faculty, staff, and students in the pursuit of academic, scholarly, and creative excellence as they seek external funding, to provide leadership in matters of compliance and research ethics, and to create opportunities that elevate research and the creative arts on our campus in line with MTSU's mission and to serve our community.

In performing its functions, ORSP works closely with faculty, department chairs and administrators, as well as several University administrative offices. The department serves as the prime contact point for sponsors and subrecipients on the business and compliance related issues associated with sponsored projects.

This *Guide to Sponsored Research* was designed to give an overview and general guidance to faculty and administrators on obtaining funding and administering sponsored projects through closeout.

As you use it while performing or administering sponsored projects, we would appreciate any comments or suggestions you would like to make the Guide as useful as possible.

Rachel McGinnis
Director
Office of Research and Sponsored Programs

SECTION I: **SPONSORED PROJECTS – BASIC CONSIDERATIONS**

WHAT IS A SPONSORED PROGRAM?

"Sponsored Programs" are defined by the University as those projects or programs that are (1) conducted by members of the faculty and administration; and (2) supported fully or in part by externally restricted funds awarded to the University. Sponsored programs may involve research, instruction, or service. In all sponsored programs, the University has obligations to the funding source in accordance with the terms of a proposal or agreement. These obligations are based on the project description developed by the faculty member(s), as in the case of a proposal, or jointly by the sponsor and the faculty member(s), as in the case of a contract or cooperative agreement.

Although the award may be made on the basis of a specialized proposal, as its formal recipient, MTSU assumes programmatic and fiscal accountability for the project. Therefore, internal review and approvals are required.

All sponsored activities are processed through the Office of Research and Sponsored Programs, and awarded funds are placed in restricted accounts in the Business Office for post-award administration. The faculty member directing the project serves as the primary budget officer (i.e., principal investigator or project director). The Business Office assists in monitoring all sponsor-related expenditures to ensure oversight and compliance but is not responsible for disallowances. This policy concerning sponsored-program funding applies to all individual sponsored program activity as well as departmental and institutional proposals.

In accordance with OMB's Uniform Guidance – 2 CFR 200 sponsored projects fall within three major categories: Research, Training and Other. Examples of the "Other" category include: curriculum development, conferences, public services, art exhibitions, and equipment awards. Sponsors of those activities include the Federal government, state and local governments, foundations, international organizations, research institutes, and corporations. These organizations fund sponsored projects through a variety of mechanisms such as contracts, grants, letter agreements, purchase orders, cooperative agreements, and a variety of awards that fall under the general rubric of subcontracts.

GIFT vs. GRANT

Another class of awards is gifts. ORSP is not responsible for gifts or other unrestricted funds that fall within the purview of the Development Office. The words “gift” and “grant” are sometimes used interchangeably by donors, grantors and faculty/staff. However, the nature of the transaction drives MTSU accounting procedures (not the words). These procedures reflect IRS regulations, Government Accounting Standards Board (GASB) standards, MTSU policies and other related internal and external requirements. The information below covers most of the distinguishing characteristics between gift and grant transactions.

Grants and Contracts

If **any** of the following conditions are part of the transaction, then it is a grant and must be processed through the Office of Research and Sponsored Programs.

- Sponsor is the federal, state, or local government or an agency established as a flow-through of federal, state, or local government funds for accounting purposes.
- Proposal or award requires a signature from an authorized official binding the university to the terms and conditions of the proposed project.
- Sponsor has written policies requiring indirect cost recoveries. Note: the absence of a policy does not preclude the award from being a grant.
- Award contains provisions regarding ownership of intellectual properties, i.e. patents or copyrights and /or the sharing of royalties.
- Sponsor requires the formal delivery of specific goods and/or services, or a commitment of institutional resources by the University.
- Sponsor retains the right to terminate the award at their discretion.
- Award requires testing or evaluation of proprietary product(s).
- Award requires a detailed technical report.
- Award payments are contingent upon programmatic or fiscal reporting (e.g., milestones and invoices).
- Award includes budget restrictions (e.g., prior approval for re-budgeting and restrictions on certain budget categories, equipment, or fringe benefits).
- Award includes a provision for audit by the sponsor.
- Award requires the return of any unspent funds to the sponsor.
- Award restricts or monitors publications or use of results.
- Award requires protection of proprietary or confidential information.
- Project requires institutional approval for the use of human and animal subjects and involves the use of human subjects, vertebrate animals, radioisotopes on humans, radioactive materials, recombinant DNA, human body substances, etiologic agents, or proprietary materials.

Gifts

Activities supported by a donor that are generally not considered grants and that can be processed as gifts through the Development Office may include the following characteristics:

- Award provides support for broadly defined activities, such as professorships, endowments, building projects, instructional programs, and unrestricted research. The donor may restrict the use of funds to a specific program area or purpose.
- Award contains only minimal requirements, generally relating to required donor pledges or payments and the University's commitment to effectuate the donor's intent.
- Award requires only minimal reporting to the sponsor donor in the form of a general statement of how funds were used. The unit or faculty member involved may give the donor a brief summary of the results of supported activities and/or a statement that expenditures were made in accord with the gift's intent.
- Award is irrevocable. Unspent funds are retained by the institution to be used at its discretion, mindful of the donor's original intent.
- Funds may be returned or reallocated only in the event the University discontinues or chooses to abandon the supported activity.
- Award requires the use of 501(c)(3) organization.
- Award requires no formal or specific deliverable.
- Funds are provided to the institution with true philanthropic intent.

Determination

These policies will provide the context by which all external funds will be evaluated, processed and managed. However, situations may arise that do not clearly meet the above criteria or that may contain elements of both a charitable gift and a grant award. In those cases, the Office of Research and Sponsored Programs and the Development Office will work together to assess the intent and obligation of the award and determine the correct processing actions. In some rare cases, awards may be considered both a gift and a sponsored award and will be processed accordingly. In those cases, institutional records will reflect the dual nature of the award, and this will be reflected in institutional reports and financial statements.

PRINCIPAL INVESTIGATORS (PI)

According to MTSU Policy 401, Principal Investigator (PI) is defined as a person responsible for the intellectual content and administrative leadership of a sponsored program. The PI accepts overall responsibility for directing the research, the financial oversight of the award's funding, compliance with relevant University policies and federal regulations, as well as sponsor terms and conditions of an award.

Project Director (PD)

Person responsible for the programmatic content and administrative leadership of a sponsored program. The PD accepts overall responsibility for directing the project, the financial oversight of the award, as well as compliance with relevant MTSU policy and sponsor terms and conditions.

Eligibility to Serve as Principal Investigator and Project Director (PD)

Full-time faculty and staff are eligible to serve as PI/PD of sponsored projects. Additionally, Professors Emeriti and faculty with active-retiree status are eligible to serve as PI/PD for sponsored projects.

In order to serve as PI/PD for the submission of a proposal or acceptance of an award, an eligible employee must also be current on required trainings, certifications, and disclosures.

Exceptions to these eligibility requirements may be requested in writing from the Vice Provost for Research and require the endorsement of the Provost and the respective supervising Department Head and Vice President.

ORGANIZATION: OFFICE OF RESEARCH AND SPONSORED PROGRAMS

Reporting to the Vice Provost for Research, College of Graduate Studies, this office deals with all matters related to research and sponsored activity in the University. For adequate services and support, the office's functions are divided into three major sections. A brief synopsis of these functions is provided below:

Education and Training:

- Development and presentation of workshops and seminars for competitive grantsmanship
- Organizing faculty site visits to funding agencies and vice versa
- Oversight of the faculty mentorship program
- Developing and sustaining internal and external interdisciplinary collaborations and partnerships

Proposal Development:

- Timely dissemination of relevant information regarding sources of available funding
- Facilitating proposal development and submission
- Development of budgets for grants and contracts
- Preparing and negotiating contracts

Awards Management:

- Establish accounts for awarded grants and contracts
- Review, approve and reconcile all grants and contracts-related spending
- Maintain accurate time and effort reports
- Generate quarterly spending reports
- Administer Tennessee's Public Records Act (T.C.A. 49-7-120) relative to sponsored research and services

RESEARCH COMPLIANCE

The mission of Research Compliance is to enhance compliance consciousness for MTSU's workforce and student research by promoting the highest standards of ethics and integrity through awareness, education, monitoring, oversight, and appropriate responses to violations.

Institutional Animal Care and Use Committee (IACUC)

The IACUC is committed to the humane care and use of laboratory animals. The IACUC has oversight of all animal use in research, testing and teaching. The IACUC is responsible for ensuring that all work performed with research laboratory animals used at MTSU complies with

applicable federal, state, and institutional laws, policies and guidelines. The committee ensures that the federal laws enforced by the Office of Laboratory Animal Welfare are being followed.

This committee includes as its members representatives from the academic departments in which research on animals is performed, a consulting veterinarian, and a representative member of the surrounding community. It reviews and approves protocols submitted by faculty who wish to use animals in their research, conducts inspections of the animal care facility, and makes recommendations to the University administration on changes and improvements that may be necessary to provide optimal and humane care of the animals in the facility. A representative from ORSP participates in the committee's meetings.

Institutional Review Board (IRB)

The IRB is tasked with protecting human subjects in all research conducted by the university. The IRB office facilitates the review of protocols in accordance with federal, state and local regulations, university policies, and ethical standards.

The IRB committee is composed of faculty members from various departments and the Research Compliance Officer in ORSP. The IRB has authority to review and approve or disapprove research activities involving human subjects conducted by faculty, staff or students. Protocols can be submitted electronically through Cayuse.

SECTION II: PRE-AWARD ACTIVITIES

FUNDING SOURCES

Resources For Identifying Open Sources of Funding

The most important step in looking for funding starts with the identification of the research area. The funding search is driven by the topic of research or area of discipline identified by the faculty. Once those have been determined, the search is further refined by the project itself, but it can be a challenge to be specific in search criteria without restricting the search to such an extreme that no results are found.

Peer-reviewed publications will sometimes list funding sources for projects, so it is also helpful to review relevant articles to determine which sponsors have supported research similar to yours. Unless such sponsors have changed focus, which you can determine by reviewing their current funding announcements, there is a chance that your own project will be competitive for that same funding.

ORSP staff review funding opportunities as they can and so sharing the most relevant key words you identify will aid them in recognizing opportunities that best fit your interests.

a. Funding Databases

To help faculty find funding sources for their research, ORSP subscribes to GrantForward.com, which allows users to search for funding opportunities nationally and internationally, as well as federal and non-federal sources. By creating a research profile on GrantForward, you can receive individualized funding suggestions. Researchers can upload a resume or CV and publications from which the system will extract information to quickly build a profile of key terms. Once a researcher profile is created, faculty members can add keywords manually or adjust the prioritization of keywords within their profile based on current research interests. Faculty can then have funding announcements based on their profile and/or saved search criteria emailed directly to them on a preset basis. GrantForward also provides researchers the ability to look for collaborators both inside and out of the University through the research profile. As a faculty member of Middle Tennessee State University, you can use your MTSU email to create a user account under our institutional license at the following address:
<https://www.grantforward.com/signup>.

b. Grants.gov

Grants.gov is the federal repository for all federal funding opportunities. You can search for opportunities by agency, categories, eligibility and keywords. The link for the website is:
<http://www.grants.gov/web/grants/search-grants.html>

c. Google Search

It can sometimes be worthwhile to do a straightforward search of the internet as well.

PRE-PROPOSAL ACTIVITIES

Initial Contact with Sponsors

Funding agencies have various requirements for making initial contacts regarding funding of sponsored projects, from none at all to very strict guidelines. These guidelines frequently specify

the exact requirements regarding the appropriate means of initial contact (e.g., by letter, telephone or brief pre-proposal).

While keeping in alignment with these guidelines, faculty should feel free to contact funding officers directly to discuss the scope of individual projects. Such contact allows faculty to ask potential sponsors the kind of questions that will assist them in submitting the most competitive proposal possible. The sponsors' officers can, in turn, give valuable guidance and assistance to the faculty member in preparing the proposal according to the requirements of their organizations. Although program officers usually do not score proposals, they can provide the review panels with additional information about your proposal. When the funding is offered by a private foundation or corporation, ORSP will enlist the help of the MTSU Office of Development before the faculty makes contact. Often these sponsors prefer to work through established points of contact, and the MTSU Office of Development can ensure the same sponsor is not approached by multiple MTSU representatives with competing interests.

Contract Agreement Preparation

Faculty who identify an opportunity for a noncompetitive proposal for funding a project that will use university resources (including faculty effort), such as a contract agreement to perform research, should notify ORSP to discuss the execution of a contract with the appropriate legal parameters. ORSP and associated offices have templates available for fixed-price and cost-reimbursable contracts, and non-disclosure agreements that include legal terms required by the University. ORSP can advise faculty of applicable options given the project needs and commitments to be made to the sponsor on behalf of MTSU. Faculty will still need to work with the sponsor to develop the technical proposal and agree to specific deliverables for the proposed work, but ORSP can also advise faculty of typical deliverables given the proposal's nature.

Please note: If faculty are acting as individual contractors and will NOT be using *any* MTSU resources to complete a project, they are not required to notify or work through ORSP. However, they are required to disclose this work to the university:

https://www.mtsu.edu/policies/personnel/814_Individual_Report_on_Outside_Employment_or_Business_Activity.pdf

Grant Proposal Preparation

When an appropriate funding source has been identified, the PI should contact the sponsor directly to ensure that the proposed research topic is within the current scope of interests. This is especially important in dealing with both public and private funding sources since direct contact with the sponsor may also help to answer questions about the project that may not be addressed in the printed materials.

ORSP will assist faculty on specific issues regarding the submission of proposals. The ORSP staff are knowledgeable of sponsor policies and can clarify key questions or problems well in advance of the proposal submission deadline. As a result, ORSP requires submittal of Proposal Request Form in Cayuse at least 30 calendar days before the grant due date. (See the "[Cayuse](#)" section of the website for detailed submission information.) All proposal documents should be received by ORSP at least 7 days before the sponsor due date.

With many faculty developing proposals, the importance of notifying ORSP as soon as possible of upcoming project deadlines cannot be over-emphasized.

ORSP is also equipped to assist faculty through the proposal development and building process. Please note, assistance with technical elements specific to the research is not available. Services offered may include but are not limited to; budget development, budget justifications, formatting, providing basic institutional information, identification of potential collaborators, special signature or letter requests, application building through the appropriate website or hard copy submissions, representations, certifications, assurances, and so forth. All budgets must be approved by ORSP prior to submission.

Application Guidelines – Overarching requirements for all applications submitted to a sponsor

Larger agencies, including federal sponsors, often have a general set of guidelines that must be followed for all applications submitted regardless of the specific funding competition. Faculty should be sure to review the most recent version of guidelines available from the sponsor. Care should be taken to closely follow application guidelines in preparing the proposal. Sponsors frequently spell out the requirements for their applications in extremely specific terms. These organizations can and do return proposals without review if they do not strictly conform to the directions given in their application guidelines. ORSP will often help clarify requirements or assist faculty in seeking clarification from sponsors if needed. Particular attention should be paid to all the following in preparing the proposal:

Specifications about the margins, typeface size, line-spacing (i.e., single or double spacing), and page limitations

Required proposal elements such as CVs, facilities description, other appendix materials, etc.

Any required templates or forms

Certifications, representations, or assurances to be sent with proposal that may require signatures of specific organizational representatives

The submission method, i.e., portals, email, or paper

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

Proposal Guidelines

-More specific requirements for an individual funding opportunity

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

RFP -- Request for Proposals
RFA -- Request for Application
FOA -- Funding Opportunity Announcement
NOFO -- Notice of Funding Opportunity
NOFA -- Notice of Funding Availability
BAA -- Broad Agency Announcement

The sponsor guidelines/instructions should be followed carefully, with particular attention paid to eligibility, as sponsors will list the organization types eligible to apply for that competition. MTSU is considered a “public / state-controlled institution of higher education” but may still be eligible to participate in applications for competitions that exclude public institutions from the eligible organization list, particularly if the solicitation states that universities are allowed to be a collaborator on a proposal submitted by another applicant. If 501(c)3 status is required by the sponsor, the MTSU Foundation housed in the MTSU Development Office qualifies for this status. The University itself is a non-profit entity, though the 501(c)3 designation held by the MTSU Foundation identifies it more specifically as a charitable organization. The Foundation opportunities may restrict applicants to those whose board members they have had contact with, and so the MTSU Development Office may need to help determine if MTSU would be competitive and facilitate this exchange.

Sponsors may also request information be submitted before the application deadline, such as a letter of intent or a preliminary proposal. It should be noted that sponsors may use the preliminary information for several reasons. They sometimes need preliminary materials simply to prepare for the number and type of reviewers they will need to score proposals, though sometimes they use preliminary submissions to determine which projects are most competitive and will only issue an invitation for full proposals to selected applicants. Regardless of how the information is being used, failure to complete this preliminary step can disqualify an applicant from being eligible to submit a full proposal.

Budget Considerations

Direct Costs

Direct costs are defined as those costs that can be directly attributed (or allocated) to the execution of the proposed or funded activity. Examples of direct cost are salaries and fringe benefits for those individuals performing work on the project, materials and supplies, equipment, publication fees, and travel. Some funding solicitations will limit the types of direct costs that can be included or how much can be proposed for a specific cost category. In addition, some funders are less open to moving costs between categories once an award is made, which makes it particularly important to propose a realistic budget at the proposal stage.

ORSP staff are familiar with special criteria and definitions that should be considered when building a budget for different sponsors and can assist faculty in this process. They also have access to Banner and Argos reports (the university ERP system and reporting software) that

provide accurate and current salary and fringe benefits information. Moreover, other departments such as Human Resource Services and the College of Graduate Studies, routinely provide information to ORSP about upcoming changes to MTSU expenses that are commonly budgeted for in grant proposals (e.g. changes in health care costs or GRA tuition rates) so they can provide the best estimate for these expenses. In using this ORSP service, faculty are welcome to send a basic list of items needed, and ORSP will build a draft budget for the project. If instead, faculty do an initial draft of the budget, it must be submitted to ORSP with adequate time for review prior to the sponsor's deadline. All budgets must be approved by ORSP before the proposal will be signed and submitted by the University.

Facilities and Administrative (a.k.a. Indirect or Overhead) Costs (F&A)

Indirect costs or F&A costs are ones that are not readily identifiable/attributionable within individual projects. Nonetheless, these costs must be included in all budgets as a separate line item. F&A is calculated as a percentage of the direct costs, and MTSU has a federally negotiated rate that is used. Faculty should consult with ORSP to determine the correct and most current rate for their proposals. If a sponsor has a written policy limiting F&A recovery, the proposed budget and the solicitation or other documentation of the required F&A reduction must be submitted to ORSP for approval of a reduced indirect rate.

Investment Guidance for Recovered F&A Funds

The revenue resulting from the recovery of Facility and Administration (F&A) costs, also called indirect costs (IDC), allowed on sponsored research and public service projects is recognized by the University as "unrestricted" funds. The following list serves as a guide to investment strategies of these allocated funds, including but not limited to;

- Seed new research initiatives
- Provide cost sharing or matching funds on individual projects
- Support MTSU's technology commercialization efforts
- Pay salaries for research support personnel
- Develop new core facilities
- Build the University's sponsored research and public service programs
- Purchase capital equipment directly related to expanding the research capability
- Fund bridge programs to provide continuity between externally funded projects
- Provide incentives and support in preparing competitive proposals
- Distribute seed funding for interdisciplinary, multidisciplinary, or center proposals
- Provision of start-up funding for new hires
- Support research related expenditures (e.g., computers, software, travel, publication costs, training, certification, consumables)
- Reward units that are successful in attracting funds
- Support the University's efforts to increase extramural funding

Priority should be given to meeting the needs for equipment, facilities, and administrative costs to support the research infrastructure. F&A funds should be used to help faculty, staff, and

students to become competitive for extramural funding and to incentivize submitting proposals for competitive funding.

Administrators should consider this guidance when approving expenditures from F&A accounts.

Faculty and administrators seeking advice on using recovered F&A funds should consult their college Research Coordinator / Associate Dean for Research or ORSP.

Annual Reporting of F&A Account Balances

To promote transparency, accountability, engagement, and research productivity, ORSP will provide PIs, Departments, and Colleges with annual summary reports of F&A accounts relevant to their level (PI, Department, College, Centers). That is, PIs or Centers will receive a report of their F&A account balance. Departments will receive a report of their F&A account balance and account balance information for PIs within that Department. Colleges will receive reports of their F&A account balance and account balance information for Departments, Centers, and PIs within that College.

Each person of authority (PI, Department Chair, Center Director, Dean) is encouraged to review the summary report(s), develop strategic plans, and discuss ways to maximize the use of these funds to meet the needs of faculty and increase funded research at MTSU. F&A accounts with low use over an extended time and/or accounts with excessively large balances should be addressed by appropriate administrators during this annual review.

Additionally, ORSP will provide an annual report of F&A funds recovered by ORSP and information about reinvestment of recovered F&A funds.

Cost Sharing/Matching Funds

Some sponsors require that the University contribute a certain portion of funding to the overall cost of a project or the purchase of a piece of equipment. It is the University's practice not to propose cost-sharing unless the sponsor requires it and not to cost-share in excess of the sponsor's stated requirements. Please contact ORSP if you want to discuss different cost share options. Cost share contributions must be approved by the appropriate Middle Tennessee State University Dean, the Vice Provost for Research, and the University Provost's Office prior to submission. For this reason, be sure to obtain written authorization for cost sharing before writing or submitting a proposal requiring cost share.

Proposal Submission Process

Identification of Partners

While not usually required, sponsors will frequently look for collaborative proposals or proposals that otherwise include the appropriate partners (and evidence of their commitment) necessary for the project at the submission stage. The solicitation will usually describe what is needed for documentation of project partners.

If letters of support or collaboration are required be aware of the availability of the appropriate signatory or the amount of time the partner may need for reviewing the final proposal before

signing a letter. It is generally prudent to begin seeking letters as early as possible during the proposal development process and well in advance of the submission deadline.

Collaborative proposals that include subawards or contracts

The collaborating entity's role in the project is crucial for determining whether the relationship should be defined as a subaward recipient or as a contractor/vendor at the proposal development stage, and ORSP staff can assist faculty in deciding how to proceed with a potential collaborator.

Subawards (as opposed to contracts) require additional administrative oversight, and consequently, a greater amount of documentation by MTSU, including additional administrative forms and certifications that must be collected from the proposed subrecipient **prior to submission**. If the budget proposes a subaward, ORSP will need to work directly with the sponsored programs office representatives at the proposed subrecipient's institution to complete an administrative subrecipient package. This process can take an additional week or more to complete depending on the availability of key approvers and the sponsored program office staff available to assist. ORSP requests at least 14 business days prior to the submission deadline to contact the cooperating subrecipient's sponsored programs office for proposals that include subawards. If funded, the award will be issued to MTSU, and MTSU will then issue a subaward agreement to the subrecipient. MTSU will have direct oversight of the subrecipient's project activities, and the subrecipient will invoice MTSU to be paid out of the award for project activities.

Contract agreements are typically just described in the proposal at the time of submission but a sponsor may require supplemental application materials such as a biosketch describing qualifications of the contractor and a letter of support documenting their agreement to participate. Like the subaward agreement, the award funds will be issued to MTSU, and the contractor will invoice MTSU for payment. The contractor will need to be set up as a vendor in the MTSU system to receive payment. Contractors/vendors must be selected competitively if the budgeted amount is \$10,000 or greater and the services/materials they provide could be fulfilled by multiple companies.

Note: The documentation and administrative records required for a contractor are generally much simpler than a subaward agreement, but if the project relationship/collaborator's contributions meet the definition of a subaward then ORSP needs to establish that type of agreement including the appropriate certifications to meet audit requirements.

Collaborative Proposals

Collaborative proposals are those submitted by multiple organizations that result in an award issued to each partner organization directly from the funder. These types of proposals can be preferable to a subaward because each organization maintains oversight of its own award. This may not be possible, however, if the proposed partner does not have the infrastructure required by the funder to receive and maintain financial oversight of the award, in which case a subaward relationship may be more competitive or necessary.

University Review and Approval

Proposal Request Forms should be completed by the PI or PI's representative *at least 30 days before the submission due date* in [Cayuse](#). They are the first step in the application process and are used as a basis for developing sponsored projects, i.e., grants, service contracts, etc. Upon completion, a Proposal Request Form will be routed to a pre-award specialist for completion. Please make sure to route this form for review. After a Proposal Request Form has been submitted, you will be contacted by ORSP staff within two (2) business days if you are not in previous communication about the project.

Full Proposal Forms should be completed with ORSP staff in collaboration with the PI *after* the Proposal Request Form has been submitted. These forms are completed prior to submission to sponsor and *routed for approval by chairs and deans seven (7) days prior to submission due date*.

The proposal approval form provides the necessary certifications for a number of items, including:

- additional space for the project
- use of human subjects in the project
- use of animals in the project
- use of hazardous materials
- conflicts of interest for the Principal Investigator
- intellectual property or proprietary information export controls
- cost-sharing (allocation of University funds)
- PI certifications regarding debarment and agreement to responsibilities of managing an award

The Full Proposal Form requires general information regarding the proposal, such as type of project, Principal Investigator's name, Principal Investigator's department, title of project, agency, period of performance and anticipated costs (both direct and indirect) of the project, abstract, budget (using ORSP budget template) and budget justification.

Sponsor Deadlines

Deadline dates are strictly enforced by the sponsor. Sponsors rarely make any exceptions. If the proposal does not meet the deadline requirements, it will be returned to the Principal Investigator without review. ORSP can provide the Principal Investigator with the deadline dates upon request or the Principal Investigator can find them in the sponsors' website or the solicitation for the opportunity.

SPONSOR PROPOSAL REVIEW

Types of Review

In evaluating proposals submitted for funding, sponsors utilize several different kinds of evaluation procedures depending on the kind of organization and the policies and procedures governing their operations. The ORSP staff are available to assist faculty in reviewing these comments and offer suggestions for revising the proposal for resubmission to the same agency or to another potential sponsor. Some of the more common kinds of sponsor review procedures are discussed below.

Peer Review

Many public sector organizations like the National Science Foundation, the National Institutes of Health, and the National Endowment for the Humanities use peer reviewers selected from faculty across the country who are acknowledged experts in the subject area. These agencies send copies of the proposal to the expert reviewers for independent evaluation and scoring based on the evaluation criteria published in the solicitation. The results of these reviews are then rank ordered and a determination is made on how many can be funded based on the availability of the sponsor's total allocated funds. Other factors are sometimes also weighted, such as geographic distribution of funding or distribution of funding among types of applicant organizations. Faculty members should ask to see the results of these evaluations if they are not already provided as part of the proposal review process. However, many public agencies will provide reviewer comments with the letter of notification of the results of the review. If a proposal is rejected, the evaluations are extremely valuable in reviewing the original proposal and learning how the proposal can be strengthened for submission in the next funding cycle. In addition, program officers are often willing to discuss results with the project team and it is typically helpful to request a phone call with the program officer directly to discuss opportunities to make an unsuccessful proposal more competitive. ORSP staff can assist faculty in the revision and resubmission of these proposals.

Non-Peer Review

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

NEGOTIATION AND ACCEPTANCE OF SPONSORED AGREEMENTS

Negotiation

ORSP, in conjunction with the Principal Investigator (PI) and the contracting office, is responsible for reviewing all terms and conditions of an award prior to acceptance by the University. ORSP is responsible for assuring that sponsor requirements are compatible with

University sponsored project policies, consistent with government-wide regulations applicable to universities, can be performed by the PI, and reflect the understandings agreed upon prior to the award, particularly with respect to the proposed budget.

Award Acceptance

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

In reviewing the terms and conditions of an award, ORSP is concerned with protecting academic freedom, the rights of the PI and the University, and assuring the feasibility of administering the award and conducting the research.

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

Once the terms are finalized, many award documents require a signature by the authorized individual of the University, indicating acceptance, as well as a countersignature from the sponsor, before they are considered fully executed. The individual who is authorized to sign agreements that are legally binding for the University is the Vice President for Business and Finance and the University President.

SECTION III: POST-AWARD ACTIVITIES

ROLES AND RESPONSIBILITIES

Principal Investigator (PI) / Project Director (PD):

- Adhere to federal, state, university and sponsor policies, procedures, terms and conditions.
- Ensure programmatic responsibilities and deliverables are completed and submitted to the sponsor in accordance with the award. Send copies of any reports to Award Manager for inclusion in grant file.
- Ensure sub-recipients' completion of programmatic responsibilities and deliverables. Communicate with Award Manager regarding any issues with sub-recipient performance.
- Authorize and approve only those expenditures that are allowable, allocable, and reasonable.
- Review reports generated by Award Manager for accuracy.

- Complete Effort Certifications as required.
- Communicate with Award Manager regarding any changes in project timeline, budget, or personnel. This includes requests for budget revisions and no cost extensions.
- Contact Grant Financial Analyst before providing any financial information to the sponsor to ensure accuracy.
- Submit all close out requirements including technical reports, invention disclosures, and deliverables by the sponsor's due dates.
- Maintain and retain grant files for required retention period.

Award Manager

- Establish new sponsored project index numbers, create Grant Notification form, and disseminate details to appropriate university personnel.
- Create Award Management Plan (AMP).
- Coordinate award kickoff meeting with PI(s), support staff, ORSP staff, and Grant Accounting staff to discuss award details.
- Review/approve all expenditures for allowability, allocability, and reasonableness.
- Monitor budget and provide quarterly budget reports to PI(s).
- Assist faculty in submitting progress reports.
- Send reminders to PI(s) of upcoming deadlines/due dates.
- Provide guidance to support staff on university processes for expenses, personnel transactions, procurement, etc.
- Sub-recipient monitoring
- Provide assistance with interpretation of sponsor regulations and university policies and procedures
- Serve as liaison between PI(s) and other university departments (Grant Accounting, Business Office, Human Resource Services, etc.).
- Serve as liaison between PI(s) and sponsor.
- Maintain and retain grant files for required retention period
- Assist with closeout of the award

Grant Financial Analyst

- Submission of invoices to sponsor
- Federal drawdowns
- Collection of sponsor payments
- Financial reporting
- Assist with closeout of the award

AWARD SETUP

Upon receipt of a fully executed award, ORSP will initiate the setup of a new index number. This process involves multiple university departments which often requires several days to complete. A Cayuse Award Form (CAF) will be disseminated via email to all relevant parties when the new account is active.

Cayuse Award Form (CAF)

A Cayuse Award Form (CAF) is created by the ORSP Award Manager for all new awards and amendments to existing awards. This document includes important information regarding the award including account information, indirect cost distribution, budget details, position numbers, and match account details. A copy of this document should be retained in the grant file. This form replaced the Grant Notification Form.

Award Kickoff Meeting

The Award Manager will meet with the PI(s), support staff, pre-award staff, and grant accounting staff to discuss the details of the award. This discussion will include award terms & conditions; the budget plan; MTSU procedures for initiating expenses; hiring, timekeeping, and payroll processes; a timeline and task list for the project; and relevant MTSU policies and procedures.

Signature Authority

The PI has signature authority for the grant and match index numbers. The PI may delegate signature authority to another employee; however, the PI has fiscal responsibility for the project. Please contact your Award Manager to request a Signature Authority Form.

PIs do not have the authority to sign awards, contracts or agreements on behalf of the university. Please contact your Award Manager or Pre-Award Specialist for assistance with these documents.

AWARD ACTIVITIES

Budget Management

The Principal Investigator (PI) is responsible for ensuring financial management of a sponsored project in accordance with all relevant local, state, federal, university and sponsor terms and conditions.

Awarded Budget

- Summarizes the financial aspects of the sponsored project
- The Cayuse Award Form (CAF) includes the awarded budget translated into Banner account codes

Budget Revision

- If a budget revision is required due to going over any allowable budget variances, then a [Budget Revision form](#) is required for the transfer of funds from one budget line (e.g., salaries, fringe, travel, operating, equipment) to another budget line.

- ORSP will request the budget revision from the agency if required.
- Contact Award Manager for assistance.

Budget Variance

- The amount of change to each budget line allowed by the funder without prior approval
- This amount is included in the CAF

Cost Transfer

- A [Cost Transfer Justification Form](#) is required for the transfer of any expenditure *to* a sponsored project after the expense is initially charged to another sponsored project or institutional account.
- A [Journal Voucher](#) is required if the cost is not a payroll expense.
- A [Payroll Redistribution form](#) is required if the cost is a payroll expense.
- Contact Award Manager for assistance.

Journal Voucher

- A [Journal Voucher](#) is required for the transfer of any transaction from one account code to another account code or from one index to another index
- Contact Award Manager for assistance.

Payroll Redistribution

- A [Payroll Redistribution form](#) is required to transfer a payroll transaction from one index to another index
- A [Cost Transfer form](#) is also required if transferring *to* a sponsored project

Quarterly Review Summary Report

- Provided by Award Manager
- Summarizes financial activity to date
- Requires review from PI for accuracy of information

Banner

Banner is the financial system used by the university. Access to the Banner system is available to PIs through submission of a [Banner Finance Account Request Form](#).

Project Expenses

All project expenditures must be approved by the PI and the Award Manager and must adhere to the principles of allowability, allocability, and reasonableness.

- **Allowable:** Complies with the requirements of the sponsor; must be necessary for the performance of the project; not included as cost share or match for any federally-financed project; must be adequately documented
- **Allocable:** Cost is incurred specifically for the project and is consistent with the scope of work; if the cost benefits both the award and other work, the cost can be distributed in proportions that may be approximated using reasonable methods.
- **Reasonable:** A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person at the time the decision was made to incur the cost.

Direct Costs vs. Indirect Costs

Direct costs can be attributed to a specific sponsored project or can be assigned to the project with a high degree of accuracy. Indirect costs are incurred for common objectives and cannot be easily assigned to a particular project or activity.

Examples:

Direct Cost	Indirect Cost
Technical supplies needed to complete research	Custodial supplies
Travel to meet with sponsor or to present results	Utility Charges
Payroll expenses for project-related effort	Payroll expenses for clerical support staff

If included in the budget, indirect costs will be generated monthly based on actual expenses and will be distributed as shown on the Cayuse Award Form. Each PI has signature authority for his/her individual indirect account and may use the funds to further research objectives.

Computers

Federal regulations allow the direct charging of computing devices costing less than \$5,000 as a material and supply cost provided that they are essential and allocable to the project. Essential is defined as being necessary for the performance of the project or activity being supported by the award. Examples of essential might include: (1) used to acquire, store, analyze, process, and publish data necessary for the performance of the project or activity; (2) used to create information electronically, including printing, transmitting, receiving and visualizing the information in support of the performance of the project or activity; (3) used in training, instruction, or curriculum development activities funded by the federal award. Computing devices do not have to be solely dedicated to the performance of an award in order to be charged 100% to a single award or allocated to several awards. Computer devices are expected to be primarily used to support the performance of the award.

Please see the Purchasing section for additional information regarding the process for purchasing computing devices.

Meals and Refreshments

There is a very high burden of proof to show that paying for food/meals and beverages with sponsored funds is necessary to meet the goals and objectives of the award. When the purchase of food is allowable under a sponsored project, a [Food Payment Authorization form](#) is required. Please contact your Award Manager for information regarding allowability or for assistance with the form.

Participant Support Costs

Participant support costs are defined as direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or

trainees (but not employees) in connection with conferences or training projects. All of the following criteria are required in order for a participant support cost to be allowable:

- The costs are included in the budget and the budget is approved by the Federal awarding agency or prior written approval is received from the awarding agency.
- The cost is a direct cost on the project
- The costs are justified programmatically.

A participant is a non-MTSU employee who is the recipient, not the provider, of a conference, workshop, seminar, training, or other short-term informational activity. Participants do not provide deliverables, perform work, or provide training.

Examples of Allowable Participant Support Costs:

- **Stipend** - A stipend is a set amount paid to the participant to be used in connection with training. The [stipend form](#) should be submitted along with a [W-9 form](#).
- **Subsistence allowance** - A subsistence allowance is a predetermined amount to be used to help offset housing or subsistence expenses during the period of the training. The cost of a participant's housing and per diem expenses must be necessary and reasonable for the individual to participate in the training. It should be noted that participants who live in the area local to the training are not entitled to subsistence payments. They can however, participate in the meals and snacks provided at the meeting or conference.
- **Travel** - Travel includes the actual costs of transportation, lodging, meals and associated expenses to and from the training location. These costs must follow sponsor guidelines as well as [MTSU travel policies](#). The sole purpose of the trip must be to participate in the training.
- **Fees** - The fees paid by a participant or on behalf of a participant in connection with training. These fees could include event registration fees, laboratory fees related to participant training, and passport or visa fees for foreign participants.
- **Other** - Other costs not listed above should be specifically allowable per the funding solicitation and identified in the approved sponsor budget. These costs are paid to or on behalf of the participant and should be required for their involvement in the training.

Participant Support Costs Do Not Include the Following Types of Expenses:

- Honoraria paid to a guest speaker or lecturer
- Expenses for project personnel or collaborators to attend meetings, conferences, or seminars including meetings to discuss a research project's progress and direction
- Payments or incentives given to participants in human subject research studies
- Conference support costs such as facility rentals, media equipment rentals, or conference food and snacks
- Payments to the providers of the training
- Payments to other employers to reimburse the employer for the costs related to sending its employee to a training

Personnel

Many sponsored projects include funding for personnel. The PI is responsible for recruiting, hiring, and supervising personnel for positions designated in the award in accordance with all relevant federal, state, local, and university policies and procedures ([MTSU Policy 224 Employee Compensation Charged to Sponsored Projects](#)).

Reassign Time – Course Release

- A [Personnel Event Form \(PEF\)](#) should be completed, signed by PI, department chair, and dean, and forwarded to ORSP for approval.
- Please contact your Award Manager for assistance.

Supplemental Pay – Extra Compensation

- Work that is performed outside the employee's normal work schedule and not within the scope of the employee's standard work duties
- May not exceed 15% of institutional base salary for the performance period
- Not applicable to hourly employees or graduate assistants
- Requires written approval from funding agency
- A [Personnel Event Form \(PEF\)](#) and an [Authorization for Payment of Extra Compensation form](#) are required for payment of extra compensation. Please contact your Award Manager for assistance.

Summer Pay

- Work performed beginning on the day after Spring Commencement through the day before the fall semester begins
- MTSU's policy: [Faculty Compensation During Summer Session](#)
- Regular academic year faculty (nine or ten month) may receive summer pay up to 33.33% of their regular academic salaries on externally sponsored contracts or awards. Compensation should not exceed 11.11% per month of the preceding academic year salary. This 33.33% is equivalent to 10.6656 hours.
- A [Personnel Event Form \(PEF\)](#) is required for summer salary and should be signed by PI, department chair and dean then forwarded to ORSP for approval.
- Please contact your Award Manager for assistance.

Full-time Benefited Positions

- Contact [Human Resource Services Employment staff](#) for assistance with the job posting.
- Guide explaining the process of developing position descriptions, request to post a position, completing the hiring process for regular benefited employees: https://mtsu.edu/hrs/employment/PageUp_Instruction_Manual.pdf
- Salary must remain within parameters set in the awarded budget.

- A [Personnel Appointment Form \(PAF\)](#) is required to hire the selected candidate.
- The PAF should be signed by employee, PI, department chair, and dean, then forwarded to ORSP for approval.
- Guides - How to complete a leave report or a time sheet:
- Administrative and Faculty Presentation:
https://mtsu.edu/hrs/leavereporting/Presentation_AdminFac.pdf
- Administrative and Faculty Quick reference guide:
https://mtsu.edu/hrs/leavereporting/QuickRefGuide_Users.pdf
- Classified staff presentation:
https://mtsu.edu/hrs/training/docs/WTE_Training_Presentation_Classified.pdf
- Classified Staff Quick reference guide:
[https://mtsu.edu/hrs/leavereporting/Quick Reference Guide for Classified Employees.doc.pdf](https://mtsu.edu/hrs/leavereporting/Quick_Reference_Guide_for_Classified_Employees.doc.pdf)
- Please contact your Award Manager for assistance.

Graduate Assistants

- Full assistantship = 20 hours per week
- Half assistantship = 10 hours per week
- Student's information should be submitted to [Workflow](#). If you do not have access to this site, you must go through training which is held once a month. Your departmental support may be able to assist.
- An [EPAF](#) and a [Summary of Graduate Assistants](#) is required for a GA position. The comment section of the Summary of Graduate Assistants should include the funding source for tuition.
- For additional information, please contact your Award Manager or the [College of Graduate Studies](#) (615-898-2840).

Adjuncts

- Adjunct salary is not an allowable grant expense unless specifically authorized by the sponsor.
- Adjunct's information should be submitted to [Workflow](#). If you don't have access to this site, you must go through training which is held once a month. Your departmental support may be able to assist.
- A [Personnel Appointment Form \(PAF\)](#) is required with signatures from the employee, principal investigator, department chair, and dean. The position number will be provided by ORSP. The "Remarks" section should include course name, faculty member receiving reassignment, and the grant index.
- Adjuncts do not report time worked so they do not have a process to complete.
- For additional information, please contact your Award Manager.

Student Personnel

- Student's information should be submitted to [Workflow](#). If you don't have access to this site, you must go through training which is held once a month. Your departmental support may be able to assist.
- Slide presentation on how to complete a New Hire Verification workflow to hire a student, temp hourly, adjunct, etc.
https://mtsu.edu/hrs/training/docs/Workflow_Training.pdf
https://mtsu.edu/hrs/training/docs/EPAF_Training.pdf For those individuals completing this process, there is required training to be given access.
- Students [enter hours worked](#) in the Web Time Entry system found in Pipeline. The PI will [approve these hours](#) monthly, prior to the [deadline](#).
- Student assignments should be hired and terminated using the EPAF system.
- Slide presentation on how to complete an EPAF to hire a student, temp hourly, adjunct, etc. https://mtsu.edu/hrs/training/docs/EPAF_Training.pdf For those individuals completing this process, training is required to be given access.
- For additional information, please contact your Award Manager.

Temporary Hourly Personnel (non-student)

- Employee's information should be submitted to [Workflow](#). If you don't have access to this site, you must go through training which is held once a month. Your departmental support may be able to assist.
- An [EPAF](#) is required for Temp/Hourly hires.
- Temporary employees [enter hours worked](#) in the Web Time Entry system found in Pipeline. The PI will [approve these hours](#) monthly, prior to the [deadline](#).
- How to submit a timesheet or leave report: For students and temp hourly employees Presentation:
https://mtsu.edu/hrs/training/docs/WTE_Student_Hourly_Employees.pdf
- Quick reference guide:
https://mtsu.edu/hrs/training/docs/WTE_Student_Hourly_Employees.pdf
- Temporary assignments should be terminated using the EPAF system.
- Temporary employees are automatically terminated by HR for two weeks at the end of each calendar year. The PI may request authorization for an alternate two week period from the Assistant Vice President, Human Resources, if necessary for completion of project objectives.
- A new EPAF will be required before the two week separation.
- Please contact your Award Manager for assistance.

Additional Guidance

- This PowerPoint on the Affordable Care Act explains the rules for offering health insurance benefits for those individuals that are not regular benefited employees but are working 30 hours a week or more:
https://mtsu.edu/hrs/affordable_health_care_act/docs/Affordable_Care_Act2.pdf
- Background checks are handled through the hiring process for regular employees. The departments are not involved in that process. For those individuals that need

sponsorship to work at MTSU, the department and the candidate would work with the HR staff in completing that process.

- Performance Reviews: Guide for supervisors in completing reviews for administrative/classified staff through PageUp system.
https://mtsu.edu/hrs/relations/docs/MTSU_Performance_Guide_for_Supervisors.pdf
- Guide for employees in completing their part in the evaluation process:
https://mtsu.edu/hrs/relations/docs/MTSU_Performance_Quick_Guide_for_Employees.pdf
- Campus closures: If an employee is a regular benefited employee, they would be eligible for holiday pay. If there is a closure due to weather they would also be eligible for inclement weather. If a non-benefited employee is paid by the hour, they would not be eligible for this leave, and would not record hours worked when the university is closed.
- Employee training – Title IX, etc. If employed through the PageUp system, the employee is presented with links to access the training. Otherwise, Equity and Compliance or ITD will send out the notices for the required training.

Professional Services Contracts/Consultants

[Professional Services Contracts](#) should be initiated for services provided by outside entities and should adhere to the [MTSU contracting policies](#). A contract should be executed *before* services are rendered, otherwise an exception memo will be required. Please see the Purchasing section for additional information.

Purchasing

Any goods or services purchased for a sponsored project must follow University purchasing [guidelines](#).

General Information

- Goods and services should be allowable, allocable, and reasonable.
- Goods and services should be procured utilizing current MTSU or [State of Tennessee](#) contracts when feasible.
- MT\$ource (located on the homepage of Pipeline) is the University's online purchasing, receipt, and invoice processing system.
- Electronic approval by the principal investigator is required before a purchase order is released. To access the MT\$ource system, principal investigators must first attend MT\$ource Approvers training.
- Contact [Procurement Services](#) (615-898-2944) for additional information.

Purchases less than \$500

- An MTSource requisition is not required unless vendor requires a purchase order.
- Purchasing Card ([PCard](#)) use is preferred unless otherwise restricted. (No medical, alcohol, gift cards. Food and travel have special limits). Original PCard documentation should be retained in your grant file with copies provided to your Award Manager. For additional information regarding the use of PCards, please contact [Purchase Card Compliance](#) (615-494-8813).
- If PCard is not used, invoice payments or reimbursements can be processed using the [Payment Authorization form](#) (PA) and forwarded to ORS for approval. Once approved, it will be sent to Accounting Services for processing. For more information regarding PA forms, please contact your Award Manager.

Purchases between \$500 and \$4,999.99

- MTSource requisition is required.
- Professional or consulting services will require a contract which must be processed in MTSource using the Contract Office Form.
- Contact [Procurement Services](#) (615-898-2944) or the Contract Office (615-898-2217) for additional information.

Purchases of \$5,000 to \$9,999

- MTSource requisition is required. Competitive price quotes are suggested.
- Personal, professional, or consulting services will require a [contract](#) (see above).
- Bids may be required. Contact [Procurement Services](#) (615-898-2944) for additional information.

Purchases of \$10,000 to \$49,999

- MTSource requisition is required. The purchases must be bid out, be available on an existing contract or approved as a [Sole Source](#).
- PI must obtain, at a minimum, three competitive bids.

Purchases of \$50,000 or greater

- MTSource requisition is required. The purchases must be bid out, be available on an existing contract or approved as a [Sole Source](#).
- Contact [Procurement Services](#) (615-898-2944) for additional information as they handle the bidding process.

Documents needing signature of University official

- Any document that will obligate the University requires the signature of the President or his designee (Software License agreement, Material Transfer agreements, Service contracts etc.) and should be routed through MTSource on the Contract Office Form.
- Contact your Award Manager for additional information.

Travel

All travel must comply with sponsor terms & conditions and university [travel policies](#). Some sponsored projects prohibit international travel. Please contact your Award Manager to determine allowability or for assistance with the forms.

For students: An approved [Travel Authorization form](#) is required prior to departure and a [Travel Expenses Claim](#) form is required within 30 days of your return.

For employees: Pre-approvals (Travel Authorization Requests) and travel claims are entered in [Chrome River](#). Travel claims must be submitted within 30 days of your return.

Subrecipients

ORSP Pre-Award staff initiate subaward contracts.

PIs are responsible for tracking and monitoring technical progress of all subrecipients to ensure the efforts outlined in the subaward's scope of work are being met and reimbursements are made in relation to technical progress. Specific deliverables and reporting requirements should be detailed in the subaward document.

Subrecipient invoices should be sent to the Award Manager who will review for allowability then forward to the PI for approval. The PI should not approve invoices if appropriate progress has not been made by the subrecipient.

The Award Manager will perform an annual review of active subawards to identify high risk subrecipients, to ensure appropriate progress is being made, and to ensure risk mitigation strategies are working effectively. In cases where there appears to be potential risk, ORSP will coordinate efforts with the PI to address concerns.

Effort Reporting

Pursuant to federal OMB Circular A-81: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" MTSU must implement a process by which time and effort of employees whose salary is paid in whole or in part with federal funds, or is used to meet a match or cost-share requirement for a federal grant or contract, is periodically reviewed in order to ensure fulfillment of effort promised in the award documents.

Best practices in sponsored programs administration dictate that the University's policies and procedures for the administration of externally funded activity are consistently and uniformly applied across the University and for all funding sources.

Faculty who serve as Principal Investigators or Project Directors for sponsored projects (i.e. externally funded grants and contracts) are responsible to certify the effort actually contributed to those projects by themselves and their employees.

MTSU time-keeping procedures for hourly employees and students satisfy this requirement. Exempt employees contributing effort to sponsored projects must complete a Time and Effort Certification every four months during the life of each award.

For the purpose of this requirement, effort is measured as the *percentage of total work time* for all job-related activities spent on a particular activity or project, including instruction, research, committee work, public service, and administration.

Time and Effort Certification provides assurance to the University and the funding agency that the effort proposed, budgeted, and charged or cost-shared to each award has actually been completed. *Time and Effort Certification is not simply a reiteration or confirmation of payroll records or faculty workload reports.* Federal guidance acknowledges that effort levels actually provided by the PI and team members may vary from the budgeted effort from reporting period to reporting period, but there is an expectation (requirement) that the overall effort proposed for the total project period will be fulfilled.

We strongly recommend that PI's and Co-PI's maintain weekly time records of their effort on sponsored projects.

Your Award Manager will send certification forms to all exempt employees who were compensated from grant or match index numbers during the reporting period. The forms should be reviewed for accuracy, and the Award Manager should be notified if discrepancies exist between paid effort and actual effort performed. The forms require signatures from the employee, the employee's supervisor, and the PI.

No Cost Extension

If additional time is needed to complete the scope of work on your sponsored project, please provide a brief justification for the extension to your Award Manager. Requesting additional time to spend remaining funds is not sufficient justification. The Award Manager will submit the request to the sponsor, and if the extension is granted, a revised Cayuse Award Form will be issued.

Award Closeout

An award closeout is the final reconciliation and reporting of expenses and activities. This involves reviewing project expenditures, resolving open commitments, collecting subrecipient documents, and preparing required final reports and deliverables for submission to the sponsor including:

- Financial Reports/Invoices
- Scientific/Technical Reports
- Milestone Deliverables
- Invention/Property Statements

Timeliness of final reporting is crucial to ensure compliance with sponsor requirements. Failure to submit reports by the deadline can result in suspension of the principal investigator (PI) and/or university from receipt of additional funding, reimbursement for current costs, and ability to submit future proposals. Please include your Award Manager on any communications regarding submission of reports and/or deliverables.

To ensure timely and accurate closeout of the award, standard communications will be sent to the PI from the Award Manager at three intervals (ninety days, sixty days, and thirty days) prior to the award's expiration. These emails will include an up-to-date budget report. Please review these communications carefully, and contact your Award Manager for additional information.

A Grant Closing Form will be sent to the PI by the Award Manager to certify completion of the scope of work and to verify that all expenses are accounted for.