UNIVERSITYTHE DISTRICT OF COLUMBIA 1851

University of the District of Columbia Handbook for Principal Investigators

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PREFACE

Research and sponsored programs are vital to the University of the District of Columbia's (UDC) mission as a land-grant institution. These programs have the potential to advance and enhance our educational, research, and service activities and help us make progress toward the University's vision of being a diverse, selective, teaching, research, and service university in the land-grant tradition, serving the people of Washington, DC and the Nation.

Through grants, contracts, and other agreements, the University obtains resources that enable and accelerate the accomplishment of the University's goals, provide an outstanding 21st Century education to our students; foster the achievements and recognition of faculty and students; and drive the sustainability and economic development of the District of Columbia and the region. In this pursuit, the University seeks to increase its sponsored program portfolio dramatically, and to engage a sharply rising percentage of faculty and students in research its Strategic Academic Program Plan.

This *Handbook for Principal Investigators* has been compiled by the Office of Sponsored Programs to assist faculty members, staff, and students at the University of the District of Columbia in preparing successful proposals and in managing funded projects. It is a —live document, which is maintained on the website and, updated as needed, to stay current with sponsor requirements, university policies and procedures and forms. For access to the policies section and the forms library please visit the Office of Sponsored Programs website: http://www.udc.edu/osp/.

We welcome your questions, comments, suggested updates and improvements. The Office of Sponsored Programs stands ready to provide assistance for creating and submitting unbeatable proposals and managing funded projects successfully.

JoVita Wells, Director, Office of Sponsored Programs

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University of the District of Columbia Handbook for Principal Investigators

INTRODUCTION

The University of the District of Columbia is registered and authorized to receive and administer grants and contracts from federal, local and state governments and private-sector organizations. The University is responsible for developing and/or implementing systems, policies, and procedures that enable grants and contracts to be managed in accordance with sponsoring agency requirements. The Fact Sheet (**Attachment I**) provides essential information related to the University as a recipient of grants and contracts.

The Office of Sponsored Programs (OSP) is the centralized unit tasked by the University with the coordination of research and sponsored programs activities campus wide. The Office provides leadership, information, services, and support to the University community: faculty, research associates, students, and staff in the acquisition and administration of externally funded projects in furtherance of the instruction, research, and public service mission of the University. It is the function of OSP to ensure that the University complies with the regulations and guidelines of sponsoring agencies **and** with its institutional policies and procedures. The Office of Sponsored Programs partners with the Office of the Chief Financial Officer (OCFO) to ensure the integrity of accounting and financial information and reports.

The purpose of this handbook is to provide a guide for current and prospective principal investigators (PIs) in the acquisition and management of grants, contracts, subcontracts, and agreements (Memoranda of Understanding (MOU) and Memoranda of Agreement (MOA)). This handbook includes approved institutional policy statements and related procedures that govern externally funded proposals and awards. The guidance within applies to all grants, contracts, and agreements with federal agencies, District of Columbia agencies, and others for which the University commits to provide certain described products or services or perform specified research or programmatic activities. It does not apply to applications for student financial aid resources (such as Pell Grants or Stafford Loans) or to agreements in which the sponsor pays tuition and fees at the published rates for students who attend regularly scheduled classes. Nor does it apply to proposals to private-sector organizations or individuals from whom the University Foundation is seeking philanthropic donations or support. These latter proposals are handled by the UDC Foundation.

Faculty and staff are encouraged to seek external funding to support the mission and goals of the University to advance research, teaching, and service. OSP's services include: (1) assisting in the identification of funding opportunities; (2) coordinating proposal and budget development; (3) registering/authorizing qualified University personnel to have PI privileges for developing and uploading electronic proposals; (4) providing training; (5) formally submitting proposals on behalf of the University; and (6) assisting with project set-up, implementation, management, compliance, and close-out.

It is the responsibility of the Principal Investigator/Project Director (PI) of a sponsored project to:
Conduct the project in accordance with the approved proposal or agreement and the terms of the
sponsor;
Operate within the budget allocated and never incur budget overruns;
Use funds only for expenditures allowed by the sponsor;
Meet milestones and deadlines, including the submission of interim and final reports;
Ensure the integrity of data and results published in any forum or medium;
Comply with applicable regulations, policies and procedures, including those related to human subjects animal care, radiation protection, environment, health, and safety;
Ensure the integrity of financial, administrative, and technical information provided to the OSP and/or the OCFO; and

Refer to the OSP website [www.udc.edu/osp] for the most up-to-date version of guidance from various
agencies, updates to Federal and UDC policies, necessary forms, and the Fact Sheet (Attachment I),
which provides essential information for developing proposal submissions, as well as information
related to the University as a recipient of grants and contracts.

ROLES AND RESPONSIBILITIES

Introduction

While UDC is ultimately responsible for all grants, contracts, MOUs, MOAs, etc. the Principal Investigators, the Office of Sponsored Programs, Deans and Vice-Presidents, the Office the Chief Financial Officer, the Office of Contracts and Procurement (OCP), the Office of Human Resources (OHR) and the Office of General Counsel (OGC) all have their own roles and responsibilities detailed as follows:

Principal Investigator

PI Pre-Award responsibilities.

Principal Investigators have responsibilities that span the life of the project from conception through to close-out. These responsibilities can be divided into pre-award and post-award phases.

 Tward responsibilities.
Developing the idea and ensuring that the appropriate guidelines are followed prior to submission;
Crediting sources properly;

- Developing a budget in accordance with sound budgeting procedures;
- After making the decision to apply for funding, submitting a Proposal Submission Registration form as soon possible (See Proposal Submission Registration form in Appendices);
- Communicating funding application needs (i.e., Facilities, matching funds, etc.) clearly and often with Deans and VPs to ensure resources and approval;
- Providing OSP with a copy of the proposal narrative, budget, budget narrative, attachments, letters of support/commitment and RFP Guidelines in MS Word at least 10 days in advance of the deadline.
- Ensuring that indirect costs are captured unless the sponsoring agency has indicated **in writing ht** indirect costs are not allowable. (Indirect cost rates are found on the OSP Institutional Fact Sheet located on page 41 of this document;
- Securing required signatures on required Routing Forms.
 - This includes sending **ALL applications** to OCFO (Contact info: finance@udc.edu) and if applicable, OHR (Contact info: Sullivan, Deborah deborah.sullivan@udc.edu (202)274-5449);
- Ensuring all support letters are in place before the grant is submitted
- Understanding and following all agency requirements (e.g., NSF may require submission via Grants.gov)
- Securing agency identification ((e.g., Required NSF ID Number)
- Up-loading electronic proposal;
- □ Completing and uploading the Workspace (formerly Grants.gov) application and notifying the AOR; and
- Allowing the AOR access to electronic submission portals to officially submit the proposal to the agency.

PI Post-Award responsibilities:

- Conducting the project in accordance with the approved proposal or agreement and the terms of the sponsor;
- Operating within the budget allocated and never incurring budget overruns;
- □ Preparing a spending plan for account set up with the assistance and approval of OSP;
- Using funds only for expenditures allowed by the sponsor;

Meeting milestones and deadlines, including the submission of interim and final reports;
Ensuring the integrity of data and results published in any forum or medium;
Complying with applicable regulations, policies, and procedures, including those related to capturing indirect costs, human subjects, animal care, responsible conduct of research, radiation protection, environment, health, and safety;
Ensuring the integrity of financial, administrative, and technical information provided to the OSP and/or the OCFO; and
Submitting time and effort reports in accordance with the quarterly deadlines.
Office of Sponsored Programs
The Office of Sponsored Programs reports to the Chief Academic Officer. It is the centralized institutional office providing service, support, and non-financial compliance oversight for all sponsored work at the University. The office coordinates the University's sponsored program activities, supports and assists faculty and staff in the development, submission, implementation, and monitoring of grants, contracts, MOUs, and MOAs; and helps to ensure that the University manages its sponsored programs portfolio in a manner that is fully responsive to and compliant with sponsor and internal expectations. These responsibilities cut across both pre- award and post-award phases.
OSP Pre-Award responsibilities:
Ensuring proposals comply with UDC and sponsor requirements, including budgetary requirements;
Helping to develop grant-writing capacity and success;
Providing assistance with finding sponsors and preparing competitive proposals;
Assisting PIs and co-PIs with registering on various funder websites, if required;
Coordinating final internal approvals; and
Serving as Authorized Organizational Representative (AOR) for the submission of proposals
OSP Post-Award responsibilities:
Maintaining post-award non-financial oversight and compliance, including staffing the Institutional Review Board (IRB) governing human subjects protocols; tracking responsible conduct of research training; ensuring compliance with time and effort reporting requirements and maintaining these reports;
Maintaining grant files and documentation; and
Assisting PIs with grant management and administration including acting as a liaison between the PI and the Office of the Chief Financial Officer, Office of General Counsel, Office of the Chief Academic Officer, and the sponsors.
UDC-Office of the Chief Financial Officer
The UDC Chief Financial Officer reports to the DC OCFO. The OCFO works closely with OSP and the PI, and
it is a crucial partner in the successful accomplishment of sponsored projects. This office is responsible for
fiscal activities related to the grant. These responsibilities are primarily involved in the post-award and project
closeout phases. They include but are not limited to these vital post-award activities:
 Establishing grant budgets (creating an index, etc.) in the Banner financial system; Executing approved budget modifications in the Banner financial system;
 Executing approved budget modifications in the Banner financial system; Interfacing between the PI and other financial offices, which perform key financial functions
(accounting, payments, draw downs, etc.) required by grants;
☐ Ensuring that only appropriate and PI-approved expenses are charged to the grant;
Providing regular and required financial reports to the sponsor, the PI, and OSP; and,
Urifying the availability of funds before financial commitments (hiring, purchasing) can be made.
Other administrative offices on campus include Human Resources, Procurement, and the Office of

General Counsel, which perform the same functions for grants as for any personnel and procurement activities and who review and approve wording in MOUs, agreements, contracts and subcontracts.

UDC-Office of Human Resources

The UDC Office of Human Resources (OHR) reports to the University Chief Operating Officer. OHR works collaboratively with OSP, CFO and the PI to plan, direct and coordinate the strategic and administrative talent management functions at the University. OHR's primary focus is to ensure employee welfare and the successful implementation of grants and programs through the appropriate employment of staff. OHR is responsible for the oversight and implementation of the critical phases of the employment lifecycle for the University's workforce that include: recruitment, selection, hiring, staffing, classification, compensation (payroll and benefits), performance management, training, development and separation. OHR is the only UDC office that can officially recruit and extend employment offers and implement employee separations and is a crucial partner in the successful implementation of grant programs. When meeting with OHR about adding staff, PI must bring staffing information i.e., FTE, position description, organization chart, period of work, proposed salaries, scope of personnel work, etc. OHR's responsibilities in grant development, pre-award and post award phases, include but are not limited to the following:

	Assist with developing and establishing the grant staffing plan;
	Provide position classification and compensation advice and direction during the grant and budget preparation phases;
	Provide direction and implement sourcing and recruiting strategies for new and vacant positions
	Oversee and implement the selection and hiring processes to include onboarding and orientation;
	Process personnel actions and monitor employment trends, proactively addressing and resolving issues;
	Ensure employees are accurately and timely compensated;
	Provide workforce metrics and employment related data and reports;
•	Collaborate and guide PI's, managers and supervisors to ensure personnel related procedures, guidelines and regulations are appropriately implemented;
	Assist with performance management and staff development and training; and
	Handle all employee separations.

PRE-AWARD

Introduction and Process Overview: Types of Awards

The University of the District of Columbia accepts awards in the form of grants, contracts, cooperative agreements, interagency agreements, memoranda of understanding, memoranda of agreement, and subcontracts. All proposals, whether submitted in response to a sponsor's solicitation or without sponsor solicitation, must be developed in accordance with University policies and procedures, as set forth in this document. In addition, they must comply with the guidelines of the sponsoring agency.

Early Notification Process

Principal Investigators and Co-Principal Investigators must inform their department head and dean or vice president of their intention to prepare a proposal requesting funding for a project as soon as they have decided to pursue the opportunity. In addition, they should complete the Proposal Submission Registration Form (Attachment III), which may be found at http://www.udc.edu/osp/funding_proposal_form and contact OSP by email as soon as possible after the decision is made to pursue a funding opportunity. This should occur **no later than 20 working days prior to the deadline date**. The purpose of this notification is to ensure that the University is eligible to apply for the specific funding opportunities; to ensure that the PI and co-PIs are appropriately registered with the sponsor, if required; to coordinate proposal development in those cases where

there is a limitation on the number of proposals the University is allowed to submit; to make sure the PI and co-PIs are aware of the procedures, resources and support available for proposal development; and to provide OSP with information about any matching (cash or in-kind) requirements that are necessary or desired in time for these commitments to be coordinated with and agreed to by the responsible member(s) of the University's Administration. **Attachment III** provides an example of the Proposal Submission Registration Form PIs and co-PIs can use to request specific assistance from OSP.

Principal Investigator Registration Process

If the sponsor requires the University to register the PI and co-PIs, OSP must be notified as soon as possible. To enable OSP to accomplish this registration, the PI and each Co-PI must submit his or her name, type of highest degree earned, year highest degree awarded, email address, and phone number in a PI Registration Request form also known as Registration Request for Prospective Principal Investigator form (http://www.udc.edu/docs/osp/PI%20Registration%20Request%20Form-Saveable.pdf). Some agencies require additional information, such as social security number and/or date of birth. Usually registration goes smoothly and can be completed within a few days. **Attachment IV** provides a copy of the PI/co-PI Registration Request form. The PI/co-PI will receive notification from OSP and/or the agency when registration is complete. If you have not received a notification of receipt within one week, please check with OSP, which will investigate the reason for the delay.

Proposal Routing Process

A Proposal Routing Form (Attachment II) must be submitted to OSP, OHR, and the OCFO along with the final version of the completed proposal (including narrative, budget and support letters) and the sponsor's guidelines, no later than ten (10) days before the submission deadline. Incomplete packages and packages that include routing forms with missing signatures will not be submitted. It is the PI's responsibility to ensure the application package is sent to all offices and approved by all required offices prior to deadline. OHR requires 2-3 days to review documents. Commitment to provide any match, such as space, faculty teaching release, or other resources, must be obtained from the academic department head and college/school dean (for faculty PIs) or from the department head and Vice President (for PIs from administrative units). These managers must sign the routing form to document their agreement that the proposal should be submitted by the University, and that they are committed to provide the described or desired support. In many cases, an explicit, signed support letter from the dean, Vice President, or President can be included as an attachment and strengthen the proposal's prospects. In some cases, a support letter is required.

OSP will read the proposal, compare it with the sponsor's guidelines and University policy, review the budget to verify that it complies with UDC pricing policies (including indirect costs and fringe benefits), and make sure that commitments and match presented in the text are identical with statements on the routing form. OSP will contact the PI, department head, and/or dean, as appropriate, to resolve any questions or concerns. Once this review is complete, OSP will obtain all subsequent approvals required including, as appropriate, from the Office of the General Counsel, OCFO, and the Chief Academic Officer. Please refer to Attachment II for line-by-line instructions for completion of the Proposal Routing Form.

Proposal Development and Submission Process

Except for those that only provide direct student aid or pay published tuition for students to attend regularly scheduled courses, proposals, academic and non- academic MOUs, and academic and non- academic MOAs must adhere to the process described below. This process does not apply to requests for philanthropic donations through the UDC Foundation. Figure 1 and Table 1 below describes the major steps in the pre-award process. Each step must be followed in sequence.

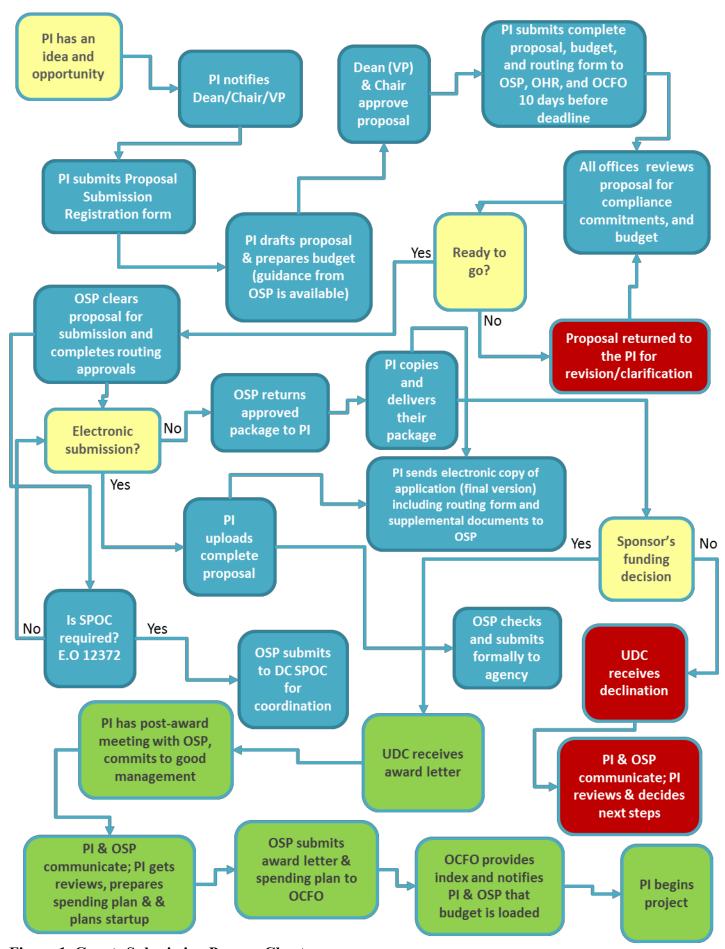


Figure 1. Grants Submission Process Chart

Figure 1 reveals the major steps in the process of submitting a grant application via OSP. Briefly, once a PI identifies a grant they want to apply for, the PI will notify their supervisors. After they receive the green light from their supervisor, the PI will notify OSP that they want to submit a proposal via the proposal submission registration form and email. The PI then prepares their application and requests written approval from their supervisors via the routing form. Once all parts of the application are finished, the PI will submit the application and routing form to OSP at least 10 days prior to the agency deadline for review. OSP will review the documents and either clears the application for submission or returns it to the PI for revision. Once the application is cleared, the PI will upload the application and give OSP permission to submit (electronic submissions) or mail copies of their application (if hard copies are required). Regardless of the format for submission, the PI will provide an electronic copy of the application including routing form. Following the sponsor agency decision, the PI and OSP will communicate and take the necessary steps (in green) to ensure the activities associated with the award is compliant with the agency, the Department of Human Health Services, and the Office of Management and Budget policies.

Table 1. Major Steps

Step	MOU's/MOA's	Grant Proposals
1.	Early Registration Originator registers intent via OSP Website with notification to OSP, department head, and dean (or Vice President, if not in Academic Affairs). http://www.udc.edu/osp/forms/	Early Registration Originator registers via email and on OSP Website with notification to OSP, department head, and dean (or VP, if not in Academic Affairs). http://www.udc.edu/osp/forms/
2.	Originator works on MOU/MOA with appropriate support and involvement. When MOU/MOA final draft is completed, the originator obtains and completes the Proposal/MOU/MOA Routing/Review Form; secures signatures from department head and dean/VP, and submits one original to OSP, with a copy to the department head and the dean. All MOU/MOAs must be submitted in MICROSOFT OFFICE WORD format, along with routing/review form, must be sent to OSP (sponsoredprograms@udc.edu and jowells@udc.edu) at least 10 days before due date.	PI works on proposal with appropriate support and involvement. When "final draft" is completed, the PI obtains and completes and signs the Proposal/MOA/MOU Routing and Review Form and secures signatures from the department head, and dean (VP, if not in academic affairs). The Proposal and the OSP Routing form must be submitted to OSP (sponsoredprograms@udc.edu), in hard copy format and electronically as a package, at least 10 days before the deadline for submission.
3.	During the 10-day period, OSP logs in MOU/MOA, reviews it, interacts with originator for clarification and/or modifications, obtains all other needed reviews and approvals; i.e., OCFO, General Counsel (OGC), Facilities, etc., documented on routing form.	During the 10-day period, OSP logs proposal in, reads proposal, reviews budget and matching commitments, compares proposal with agency guidelines (if any) and works with PI on any clarification and /or modifications needed, obtains all other needed reviews and approvals, and clears as OK for submission.
4.	Still within the 10-day period, originator submits two final originals (one for UDC and one for other MOU Party) to OSP for final UDC signature (typically the Chief Academic Officer for the Flagship or System and the Chief CCDC Officer for the Community College).	For electronic submission, depending on the e-portal, PI finalizes proposal and all attachments and uploads it for approval and submission; or provides OSP on a flash drive the proposal file with all forms and attachments for upload and submission.
5.	If the other party's signature is needed, both originals are returned to the Originator, who delivers both originals to other party, and ensures one fully executed original is returned to OSP.	For a paper submission, OSP obtains final signature on the appropriate form (provided by the PI) from Authorized Organizational Representative, keeps a copy of the complete application and routing form, and returns the complete proposal to the PI for copying and submission, per sponsor's instructions.
6.	OSP files the original, logs the action, and provides official notice that the MOU/MOA is active, with copies sent to OCFO, OGC, the originator, department head, dean, and others, as appropriate. PI with OSP develops spending plan. OCFO sets up the index, and the Originator initiates the work.	OSP files the copy and logs action. If an award is made, OSP will be notified, and will provide official notice of the award to OCFO, the PI, department head, dean, Chief Academic Officer or Chief CCDC Officer, and others as appropriate. PI with OSP prepares spending plan; OCFO sets up the index and the PI initiates the project.

Electronic Proposal Submission

For proposals electronically uploaded through electronic portals, such as research.gov or grants.gov, the PI must provide a complete hardcopy and electronic files to OSP at least 10 days prior to the submission deadline. In an ideal situation, the budget and an abstract are provided two weeks prior to the submission date for budgetary committee review. In addition, as soon as the proposal has cleared through the internal routing process, the PI must provide the complete proposal file (all forms, the proposal, budget, all attachments and supporting documentation) ready for submission. Ideally this occurs at least 24 hours before the final closing deadline. Depending on the procedures of the portal, the PI must either have the entire proposal fully uploaded. The complete file must be ready for final checking and submission by the Authorized Organizational Representative (AOR) at least one full work day before the final closing deadline. When submitting files electronically, the best format to use (in some cases the only format accepted) is PDF format. Please advise OSP if the sponsor has any particular requirements about specific Web browsers or browser versions required by its website.

Proposal Development

Generally, proposals have certain components, such as a cover sheet, abstract, project description, budget, budget justification, bibliography, biographical sketches of the PI, co-PIs, and other key personnel; and supplementary supporting material. Frequently, the sponsor may specify exactly the proposal outline and components or may have defined page limits, margin sizes (minimum), line spacing, font sizes (minimum), and font styles. Be sure to follow the sponsor's instructions or your proposal may not be considered for review. This requirement includes using the latest forms and instructions. Sponsors update their forms on a regular basis. All updates are posted on the OSP website: www.udc.edu/osp. Please check the policies and compliance tabs on the OSP website for any changes that may have been announced by major sponsor agencies since your last submission.

Office of Sponsored Program's staff can provide technical assistance, on request, with regard to completion of the face page (cover sheet), budget completion, certification, assurances and related forms, and interpretation of sponsor guidelines as well as editing of the submission and other technical assistance. If budget development assistance is needed, an appointment must be scheduled to **meet with the OSP budget specialist at least 14 days prior to the deadline date for submission**. Please refer to the Proposal Submission Registration Form (Attachment III).

General Advice for Preparing a Proposal

Preparing a proposal can be a rewarding experience, especially if the proposal is funded. The key to success is to be disciplined, focused, well organized and meet the deadlines. By following these steps, UDC PI's can avoid common mistakes and errors. For best results, the PI should:

- Read the grant notification thoroughly and make a checklist of necessary components for a successful application
- Correctly fill out the appropriate agency forms!
- Provide all mandatory attachments and address all required topics!
- If the sponsor provides an outline or other formatting instructions, FOLLOW THEM!
- Carefully check/edit for spelling, grammar, and clarity.
- Arrange for support letters and matching commitments EARLY.
- Obtain and attach senior personnel bios, in the correct format, EARLY.
- Obtain friendly constructive pre-review from colleagues, and use it to improve the proposal.
- If the proposal involves multiple partners, start early and keep all partners engaged and involved.
- Meet internal processing deadlines. Proposals that do not adhere to these guidelines may miss the submission deadline.

Project Description, Narrative, or Technical Approach

The project description, narrative, or technical approach is the main body of the proposal. PIs should develop the narrative in a succinct manner, paying careful attention to the sequence and ensuring that all required sections and topics are included while remaining within the page limitation. It may be helpful to use the headings outlined in the narrative description portion of the grant announcement as the initial outline for the narrative. The project description or narrative should address goals and objectives, why the project is important; who it is important to; any contextual background or theoretical basis; hypotheses if applicable; what you plan to do and how you will do it; any preliminary data or your track record; what makes you well qualified to do the project; what you will do if the primary approach doesn't work; the predicted results; how you will know if the project is successful, and how you will publicize the results. Be sure to address all the topics required by the sponsor, paying careful attention to the review criteria. Specific proposals may require different sections. Use headings, white space, bold, figures, tables, captions, or other means to bring attention to the ideas and topics you want to emphasize. Structure the proposal to be easy for reviewers to read and evaluate against the criteria established by the sponsor.

Face Page (Cover Sheet)

Some sponsors, including federal agencies, have a mandatory cover page or form, often called a face page. The information on this form indicates the specific program the proposal responds to and provides information about the applicant institution i.e., the University of the District of Columbia. Information required to complete this form accurately is summarized in the Institutional Fact Sheet (**Attachment I**). Please consult the OSP website for most current instructions for the Cover (424) Sheet

Abstract

Most funding entities require a summary or abstract of one-page or less. The summary is used for dissemination or public relations purposes. It should be jargon-free and comprehensible to the non-expert. It should connect clearly and in a compelling fashion with the mission and priorities of the sponsor. Consult program or sponsor guidelines for specific information on abstract specifications.

Table of Contents

The format of this section is often specified in the solicitation's general section. At a minimum, the table of contents should identify major proposal sections. Some e-portals and agency proposal forms prepare the table of contents automatically.

Attachments

The solicitation's general section or sponsor's guidelines will identify all required attachments, also called "supplementary material". Reviewers are not required to read attachments, so only supporting information should be provided there. Some solicitations limit the attachments to a certain list of items, specify the maximum number of pages or specify a specific total maximum file size. Required attachments usually include Assurance Forms signed by the designated university official. Attachments may include Letters of Support, Letters of Commitment, and other specific documents. If requested, Letters of Support should be acquired from external organizations that are not a part of the project but support the project as a benefit to the community and/or their work. Letters of Commitment or Memoranda of Understanding (MOU) or Memoranda of Agreement (MOA) from entities that will partner with and/or provide services to the project should be attached, if requested.

Some proposals require or allow a section on facilities available, either as a special document within the narrative or as an attachment. A listing of available "Research Facilities, Infrastructure, and Resources" at the University is provided on the OSP website. This document may be excerpted or used in its entirety, as appropriate, for the proposal. It is best to include only facilities that are relevant for the proposed project. Any faculty or staff member, who is aware of additional facilities, is requested to inform the Director of OSP, so that those facilities and infrastructure can be included in updates.

Budget

Proposal budgets must be developed in accordance with the University's financial policies and the sponsor's guidelines. OSP staff members are knowledgeable of these policies and are available to assist with budget development. Such assistance must be requested well before the agency's submission deadline, using the form that can be found in **Attachment III**. Note that OSP will review the proposed budget in detail as part of the proposal routing process. Any proposal with a budget that is inconsistent with the University's policies and/or the sponsor's requirements CANNOT be submitted.

When developing a proposal budget, the PI must comply with both the budget requirements of the sponsor and the University. Funding must not be requested for services, effort, or items that the sponsor does not allow. It is a good idea, prior to developing the project budget, to think about the funding needed for the project to succeed, how the funding will be used, and how it can leverage other resources within the University or from partners. The following paragraphs provide information useful for developing project budgets; however, it is impossible to cover all possibilities. Consult with OSP early and often to avoid serious budget problems that could prevent submission of the proposal.

Salaries

The University manages and sets salaries and wages for individuals and positions. All salaries in grant budgets must comply with the approved institutional salary range or represent the actual salary of the individual to perform the work. The amount available in the budget of a sponsored project does not determine the compensation for any individual or position. Therefore, external funding cannot be used to increase University-established salaries. It is highly recommended that PI's work with OHR early in the grant development process on position descriptions and staffing plans that will appropriately support the proposed grant program. Collaboration with OHR during the development phase will allow for more accurate staffing with respect to position classification and compensation ensuring the submission of more a more defined personnel budget, staffing strategy and plan.

External funds may be used to support summer salaries for 9-month faculty. Charges for work performed by faculty members on sponsored program agreements during summer months or other periods not included in the base salary period must be calculated for each faculty member at a rate not in excess of the base academic year salary, divided by the period to which the base salary relates. In other words, the grant proposal budget cannot contain a summer salary that is higher per month than the faculty member's monthly salary during the academic year. In no case can the total summer compensation from all sources paid by the University to a faculty member exceed 33% of the salary for the immediately completed academic year. Faculty members cannot be paid during the academic year in excess of their base salary. For more information, see the section titled "Important Post-award Topics".

Fringe Benefits

Fringe benefits are specifically identified for each employee and are charged individually as direct costs. Vacation, holiday, sick leave and other paid absences are included in salaries and wages claimed on grants, contracts and other agreements as part of the normal cost for salaries and wages. Separate claims are not made for the costs of these paid absences. Fringe benefits include FICA, retirement, disability insurance, life insurance, workers compensation, unemployment insurance, health insurance, and dental insurance. Please contact the Office of Sponsored Programs for the latest fringe benefit rates.

Participant Support Costs

OMB Uniform Guidance defines participant support costs as "Participant support costs means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects." Uniform Guidance also states that participants support costs are allowable with prior approval from the awarding federal agency. The university requires that throughout the grant cycle (pre-award to closeout) the PI

- 1. Clearly defines participant support costs in the application or scope of work
- 2. Ensures that the participant support cost narrative adheres to the sponsor's guidelines and at a minimum 2CFR

200.456

3. Properly records, reports, and maintains all documents related to participant support costs

Travel

The budget should indicate the purpose, frequency, and number of persons to be involved in expected travel. The University will pay reasonable travel and subsistence costs, consistent with University's policies and as reflected in the approved budget. Travel budgets are scrutinized closely by agencies, and certain kinds of trips, such as international travel, may not be allowed. Only request travel funding if the program allows and only request the minimum necessary and reasonable to accomplish project goals and objectives and disseminate its results.

Equipment

Federal guidelines define equipment as individual items costing at least \$5,000 with the durable life of a year or longer. Items purchased greater than \$5,000 should be brought to the attention of OCFO for proper tracking and capitalization. All items costing less than \$5,000 should be budgeted under supplies. The budgeted amount should include freight, shipping, handling, and other related costs. Maintenance agreements, if purchased separately from the equipment, should be budgeted under services or contracts.

Facilities and Administrative Costs (F&A)/Indirect Costs

The University's approved F&A rates for grants, contracts, and other agreements with the federal government are based on Modified Total Direct Costs (MTDC). Modified total direct costs consist of all salaries and wages, fringe benefits, materials, supplies, services, travel, and subcontracts (up to \$25,000). If the sponsor requires a specific lower percentage base (8%, 10%, 15%, etc.), the PI must provide documentation of the agency's rule with the proposal and signed routing/review form. (Refer to the Proposal Routing and Review Process Chart on page 12.)

Equipment, capital expenditures, charges for patient care, participant costs, student tuition and fees, rental costs of off-site facilities charged directly to the grant, scholarships, fellowships and subcontract amounts in excess of \$25,000 shall not be included in the base upon which facilities and administrative/indirect costs are calculated, when the full approved F&A rate is used. When sponsors specify a lower rate, often the base is allowed to include many of the normally excluded items. The following F&A rates have been approved for the University through 9/30/2019. The Fact Sheet located on the OSP website and designated **Attachment I** has current information:

- On-campus (Project activities implemented on campus at least 50% of the time) 48%
- Off-campus (Project activities implemented at off-campus sites at least 50% of time) 26%.

For activities performed in facilities not owned by the institution and to which rent is directly allocated in project(s), the off-campus rate will apply. Grants and contracts are not to be subjected to more than one F&A cost rate. If more than 50% of a project is performed off-campus, the off-campus rate applies to the entire project. If your project is taking place at any UDC site, e.g. PR Harris, Backus, 801 North Capitol, please use the on campus rate.

Cost Sharing/Matching

Cost sharing or matching are terms used interchangeably to represent the support and contributions the University commits to provide to the project. Cost sharing or matching can be provided in the form of money (cash or budget) or in-kind support or services. In-kind contributions represent non-cash contributions. University policy is to provide only the minimum amount of match necessary to meet the sponsor's requirements. When cost sharing is required, the preferred type is in-kind matching in the form of faculty, senior researcher or staff time and effort. Other possible types of match include partial tuition waivers or

scholarships, use of specialized equipment not purchased with previous Federal (or sponsor) funds or previously used in a match and special facilities upgrades/investments.

Cost sharing, when required, must be reflected in the proposal budget. The Proposal Routing/Review Form must be clearly marked in the appropriate box to indicate that cost sharing is being proposed. The detailed nature and source of cost sharing must be described on page three of or accompanying the Proposal Routing Form. The dean and department heads must commit on the Proposal Routing Form to providing the match by their signature. If the proposed match is not available within the department or college or school, OSP must be enlisted early to work with the PI and arrange with the appropriate Vice Presidents for the portion of the match not available within the department, school, or college. Proposals relying on or even mentioning any form of cost sharing that has not been approved by Administrators with the resources and authority to provide the match will not be submitted to the sponsoring agency for consideration and review.

Official Signing for Applicant Organization

The Chief CCDC Officer must sign the Routing Form for proposals generated at the Community College. The official signatory for the Flagship University and the Community College is the Chief Academic Officer. The official signing for the Community College is the Chief CCDC Officer. For proposals involving both the Flagship and the Community College, the Chief Academic Officer is the signing official. The official signing for proposals funded by the United States Department of Agriculture under the Land-Grant program is the dean or higher level administrator designated by the University and USDA as responsible for the Land-Grant research and cooperative extension programs. The Chief Academic Officer and designated personnel in OSP serve as the authorized representatives for these signing officials.

Single Point of Contact

Under Executive Order 12372, District of Columbia Law 2-104 requires that all agencies, with the exception of the Court System, submit grant applications to the Single Point of Contact (SPOC), OBP for review prior to submission of the grant to the grantor. (Executive Order 12416, Sec.4) Unless otherwise required by the sponsor the Director of Sponsored Programs shall act as UDC's official administrative point of contact.

Negotiations

All pre-award negotiations on behalf of the University for Sponsored Programs shall be led by the Chief Academic Officer and the Office of Sponsored Programs.

POST-AWARD

Congratulations!!! You have succeeded in securing a grant award, cooperative agreement, interagency memorandum of understanding/agreement, or sub-contract. Now the work begins. The Office of Sponsored Programs will serve as a resource to help troubleshoot barriers to project success and assist with and monitor non-financial compliance. The OCFO is responsible for budget, accounting, financial documentation, compliance and reports. Figure 2 illustrates key steps and important responsibilities in the post-award process at UDC.

Grant Award Notice (GAN)

When a contract/grant/cooperative agreement has been awarded for a program or project, the sponsoring agency issues a formal grant award letter or (signed contract). Depending on the agency, the award notice is sent to the President of the University, the Chief Academic Officer, the Authorized Organizational Representative, or the PI. Anyone receiving the GAN (electronically and/or via mail or fax), should notify OSP. OSP ensures that the notice is forwarded to the PI, Department Chair, Dean or Vice President, and OCFO.

A grant award or approved contract does not immediately authorize the PI or project director to spend or obligate funds. Upon receipt of the GAN or signed contract, the PI, along with OSP, will develop the grant award package (GAN, proposal, reporting requirements, and spending plan) to be forwarded to OCFO. Please contact OSP to schedule an appointment to develop the grant award package. After the grant award package is submitted to OCFO, the grant account, called an index, will be established. This process takes anywhere from 30-45 days. Funds may be obligated by the PI, only after he or she receives an index number/code from the OCFO. The notification from OCFO confirms the project's Banner index and fund codes as well as any special terms and conditions. Under no circumstances will an agency's letter of funding intent or an informal communication from a program officer of the agency be accepted as evidence of a program award or obligational authority. Steps in the post-award process are illustrated in Figure 2 and described in Table 2 for grants, cooperative agreements, research contracts, and MOUs/MOAs that bring funding to the University to support specific work or projects.

Table 2. Post-Award Procedures for Grants or other Funding Agreements

- 1. Receive GAN
- 2. PI and OSP communicate, to be sure both know about GAN.
- 3. PI obtains reviews from sponsor (if available) and uses them to help plan the work.
- 4. PI meets with OSP to review all aspects of the award; prepare the spending plan; ensure the PI and co-PIs understand the grant conditions, compliance requirements, reporting requirements and due dates; and assemble the information required to be submitted to OCFO to establish the budget and create the index. PI commits to good management and compliance.
- 5. OSP submits the grant award package (GAN, proposal, reporting requirements, and spending plan) to OCFO, with a request to establish the budget and index.
- 6. OCFO notifies PI, OHR, and OSP of the index and funds availability.
- 7. PI begins the project, administering the budget as stipulated in the GAN, proposal, and complying with applicable regulations, policies, procedures, and guidelines of the sponsor and the University.

The package to be sent to OCFO must include:

- A copy of the official grant award letter with all terms and conditions.
- A Spending Plan This plan must be provided in the University's format, which is different than the grant budget submitted with the grant application. To set up the Banner coding attributes, the budget must be transformed into a spending plan with the appropriate codes. The spending plan template and the list of appropriate codes can be obtained by contacting the Office of Sponsored Programs, which will have the most recent versions, or by visiting the OSP website. An index cannot be established and grant funds may not be obligated or spent unless this plan is completed correctly. OSP can advise on completing the template appropriately.
- Grant Reporting Requirements The reporting requirements for the grant, both programmatic and fiscal, need to be outlined along with appropriate due dates. These requirements may or may not be part of the grant award letter. If they are not part of the Award Letter, the PI is required to research and document all reporting requirements prior to the obligation of funds.
- If the grant award requires or the submitted proposal committed to a match, upon award, the PI must immediately contact the University official who approved or committed to the match to verify the source of the match. The PI must then communicate this information (index, fund, account) to OSP and OCFO as part of the package
- The OCFO will be responsible for monitoring and tracking the match expenditures or value as the grant proceeds, so it is essential for OSP/OCFO to be informed of the source or nature of the intended match. It may be necessary to set up a distinct account for the match.

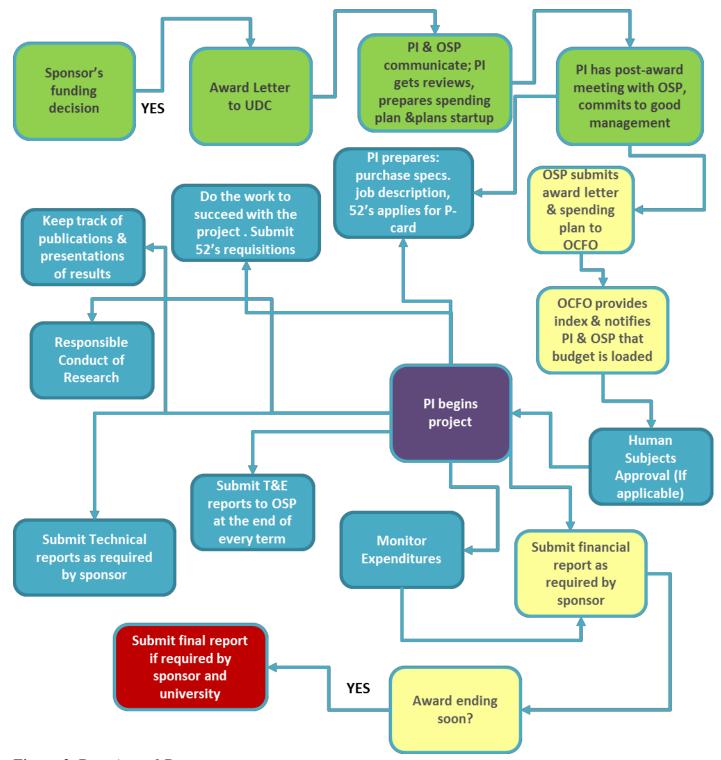


Figure 2. Post-Award Process

Once a sponsor decides to fund a proposal, an award letter is sent to the University. OSP and the PI alert one another and begin to develop spending plan. The award letter and spending plan is sent to OCFO to receive and index number. Concurrently, the PI prepares by identifying purchase specifications, job description and applies for P-card etc. Once an index code is received, the PI begins the project and throughout the project continually monitors expenditures, time and effort, publications, responsible conduct of research (including human subjects research). If required by the sponsor at the end of the award, the PI will provide a final report of data and finances.

Cash Match Requirements

If the grant award includes or the proposal commits to cash match using local funds, the PI is required to contact OCFO for an index code to identify cash match from non-grant (local) funds. No federal funds (including Title III or pass-through funds from the District) can be used as part of a cash or in-kind match for a federally funded project.

- ☐ In-Kind Match Requirements:
 - o Personnel: The PI must list the employee's name and position as well as the value and percent of employee time given to the match. The value of employee time should be based on current salary.
 - o Non-Personnel Expenditures: The PI must identify the expenditure amount (and index code) on the original requisition and Purchase Order (P.O.) to account for any expenditure when paid for by non-grant (local) funds.

Pre-Award Expenditures

Some sponsors allow grant recipients to spend grant funds within a specified period (90 days for some federal agencies) PRIOR to the official award being made. When such expenditures are made, the University is taking a risk, and will need to cover the costs from its own resources, in the event the sponsor does not make the award. Only under limited circumstances will the University allow pre-award expenditures. The decision is made on a case by case basis by the CFO on the recommendation of the Chief Academic Officer.

A decision to allow pre-award expenditures will only be made if all of the following criteria are met:

- 1. An official representative of the sponsor has communicated in writing the sponsor's intent to make the award, or the sponsor's website shows the project as recommended in its proposal status screen. Alternatively the award could be for a continuing period of a multi-year grant, for which the sponsor obligates funding for the coming period via an award letter or modification, and administrative factors delay the new award letter beyond the end date of the prior phase, leaving a funding gap.
- 2. The amount of pre-award expenditures anticipated would be both small in absolute size and relative to the total size of the grant.
- 3. The pre-award expenditures are necessary to keep the project on track, to deliver on commitments made to students pursuant to the grant's purpose, or to satisfy deadlines that are beyond the University's control.
- 4. The sponsor allows pre-award expenditures.
- 5. The expected date of the award is well within the time limit under which pre-award expenditures would be allowed by the agency.
- 6. The purpose for which the expenditures would be used is included in the approved project budget and allowable by the sponsor.

A PI desiring to make pre-award expenditures must submit a written request to the Chief Academic Officer, who will review the request and make a recommendation to the CFO. A copy of the request must be forwarded to OSP. The request form is available on the OSP website and included as **Attachment VI** in the Appendices. If the request is approved, an OCFO representative will set up the account and enable the spending within the approved limits. The request must include the following:

- Sponsor, title, and description of the anticipated grant or agreement;
- Copy of documentation demonstrating sponsor's intent to make the award and approval of pre- award expenditures, including the maximum allowable amount, if applicable;
- Itemized budget for pre-award expenditures (in UDC's budget categories and in the submitted grant budget);
- Justification of urgency of the pre-award expenditures.
- Anticipated date of receipt of the award; and
- Signatures of the PI; department head; and dean/VP.

Compliance in Non-Financial Matters

UDC's acceptance of funding for a sponsored project carries with it the legal responsibility to comply with all terms and conditions of the award, including any mandated prior approval of post-award fiscal and administrative changes. Specific levels of prior approval are determined first by the sponsor's regulations and guidelines and second by the internal UDC policies and procedures.

Compliance is critical to successful development and implementation of a grant-funded project. Sponsored program awards will be monitored by OSP staff to ensure compliance, as stipulated in the award or required by the sponsor. The designated OSP compliance officer can also provide technical assistance to ensure compliance. The following policies and procedures must be followed after receipt of an award.

The PI is responsible for the management and administration of his/her individual award within the constraints outlined by the individual sponsor in the terms of the award and in accordance with University policies and procedures governing, grants, contracts, agreements, or subcontracts.

In addition, throughout the period of the project, it is the PI's responsibility to supervise the performance and effort of any staff, students and/or research assistants who are also working on the project. If there are eligibility restrictions for students or personnel to receive funding of scholarships from the grant, it is the responsibility of the PI to verify eligibility and keep copies of documentation that demonstrates eligibility. In no case shall grant funds be used in ways that are not allowed by the sponsor or UDC internal policies and procedures.

Responsible Conduct of Research (RCR)--The University expects that faculty, staff, and students will conduct research responsibly. This expectation applies to all types of research and research settings, including but not limited to laboratory research; literature research; internet research; field research; research using human subjects or animals; and computer-based, computational, and theoretical research. Faculty and staff must stay current in the issues surrounding RCR in general and in their specific research areas.

RCR is a significant component of professional ethics for disciplines in which research is performed. Departments should include RCR outcomes and instruction in their learning goals, curriculum, courses, and seminars. Faculty members have an important responsibility to educate students at all levels about the ethics and professional norms of research both generally and in their specific disciplines. Part of educating students and supervising their research involves helping them learn the knowledge, skills, and attitudes associated with performing research responsibly and ethically. Students include pre-college students, undergraduate students, graduate students, and post-doctoral fellows.

RCR is made explicit in the requirements of at least some Federal government agencies. For example, section 7009 of the America COMPETES Act (42 U.S.C. § 1862o-1) and its corresponding regulations (74 Fed. Reg. 42126-28 (Aug. 20, 2009)) requires institutions applying for assistance from the National Science Foundation to conduct research responsibly and provide documented training to students in a more formal way than has been traditional. The University has joined the Collaborative Institutional Training Institute (CITI), located at the University of Miami to assist faculty, staff, and students in understanding the components of RCR. CITI offers institutionally tailored on-line courses in RCR. Courses are available for each research area (biomedical, engineering, physical sciences, social and behavioral sciences, and humanities). The CITI courses include tests of knowledge and provide documentation of satisfactory completion.

1. Each student (undergraduate and graduate) and post-doctoral researcher who conducts research (paid or unpaid) is required to have a foundation of documented training in RCR. This foundational requirement can be met by having the student take and pass (>80%) the appropriate CITI RCR on- line course prior to doing research at the University. The CITI courses are found at www.citiprogram.org. Students must take a refresher course if 2 years or more have elapsed since the previous documented RCR training.

- 2. Faculty supervising student research shall provide the students with additional mentoring in RCR, as well as in specific research and analysis protocols and procedures appropriate to the project.
- 3. The University recommends that faculty and staff members engaged in research complete the CITI course appropriate to their discipline every 2 years, and provide feedback to the Office of Sponsored Programs to improve the curriculum.
- 4. The Principal Investigators of sponsored research projects are responsible for understanding and fully implementing the specific sponsor's requirements for RCR training for all persons participating in the project, including faculty, staff, students, and other collaborators. The University's foundational training requirement, above, satisfies the National Science Foundation's requirement for student RCR training. If supplemented by at least 8 hours of documented in-person mentoring and/or face-to-face coursework, the required RCR training also satisfies the National Institute of Health's requirement for student training. When sponsors require more than the foundational training, the Principal Investigator is responsible for certifying to the Office of Sponsored Programs the training method, content, and date the sponsor's RCR training requirements are met for each student paid through the grant or contract.
- 5. The Office of Sponsored Programs is responsible for maintaining the CITI membership, maintaining documentation of RCR training, and updating the on-line curriculum with institution-specific content. All documentation demonstrating satisfactory completion of RCR training shall be submitted to the Office of Sponsored Programs.
- 6. For research projects involving human subjects, additional specialized documented training and institutional review of research protocols are required to assure the protection of these subjects. Researchers and students whose projects involve human subjects must obtain Institutional Review Board (IRB) approval or exemption before beginning their work. Obtaining approval includes submitting proof of completion of human-subject-protection coursework found at http://phrp.nihtraining.com. Additional information is available at http://www.udc.edu/irb/.

Research Misconduct—On December 6, 2000, the White House's Office of Science and Technology Policy (OSTP) developed a definition of research misconduct that is accepted by all Federal agencies (https://www.gpo.gov/fdsys/pkg/FR-2000-12-06/pdf/00-30852.pdf). Five years later the Department of Health and Human Services' Public Health Service released a final rule: 42 C.F.R. § 93.103, part of the Public Health Service Policies on Research Misconduct(https://ori.hhs.gov/FR_Doc_05-9643). This final rule defined research misconduct as:

- "Fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results.
 - o Fabrication is making up data or results and recording or reporting them.
 - Falsification is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
 - Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.
 - o Research misconduct does not include honest error or differences of opinion"

The definition of research misconduct lists fabrication, falsification, and plagiarism as the three types of unacceptable practices that set a floor, or minimum standard, in research. University faculty, staff, and students engaged in research must understand and avoid these unacceptable practices, and go beyond them consistently to achieve the highest professional standards of responsible and ethical research in their respective disciplines.

The University of the District of Columbia holds all researchers, whether faculty, staff or students, accountable for the conduct of the research they perform. Faculty and staff are responsible for assuring the conduct of research by students they supervise.

- (1) Anyone who observes research misconduct or has evidence of possible research misconduct is obliged to report it to the supervisor, dean, or Chief Academic Officer. The individual receiving the report must convey it promptly to the Chief Academic Officer.
- (2) The University allows individuals to report suspected research misconduct confidentially and protects them from retaliation.
- (3) Any concerns about the integrity of specific research should be directed to the Chief Academic Officer, who is responsible for ensuring that the concern, observation, or suspicion is investigated promptly and objectively, and for reporting the results of the investigation per applicable Federal requirements.
- (4) The University will impose appropriate discipline in cases of substantiated research misconduct by faculty, staff, or students.

For up-to-date information, the University's Policy on Responsible Conduct of Research may be viewed at http://www.udc.edu/osp/policies/.

Health. Safety. and Environmental Protection—As a leader in the local community, the University of the District of Columbia is committed to: (1) protect the health and safety of students, neighbors, visitors, staff, faculty, and the local community; (2) meet or, where practical, exceed the requirements imposed by applicable safety and environmental laws and regulations; (3) conduct activities in a manner that safeguards the environment; (4) reduce the use of toxic or hazardous substances and the generation of wastes; (5) adopt processes, practices, materials or products that avoid or reduce waste generation through process changes, recycling, more efficient use of resources or material substitution; (6) manage and dispose of wastes in an environmentally sound manner; and (7) maintain associated records and documentation, as required. Every member of the University community must do his or her part to meet this commitment.

Protection of Human Subjects— The University of the District of Columbia conforms to and abides by scientific and administrative guidelines and procedures required by the U.S. Department of Health and Human Services for the protection of human subjects. In accordance with Federal regulations, the University has an *Assurance Agreement* with the Federal government, which describes University policies and procedures for the protection of human subjects in research. To fulfill this responsibility, the University has established an Institutional Review Board (IRB), populated by University personnel and members of the public, appointed by the Institutional Official responsible for the Human Subjects Protection Program.

The University has a responsibility to assure that research involving human subjects must be conducted in a manner that protects the privacy and safety of the subjects. Additional protections must be provided when the subjects are children, prisoners or pregnant women; are vulnerable to exploitation in an identifiable way; or have potentially compromised understanding of the research project being conducted. If children are involved in the research, the IRB must certify that the activity is within permissible categories, and that adequate provisions are made to solicit the assent of each child and the permission of each child's parent or guardian (45 CFR 46.404-408). Individuals involved in human subject research should be treated as autonomous agents.

The complete requirements are specified in Title 45 of the Code of Federal Regulations, Part 46. The requirements apply to research conducted by faculty, by students, or by any others conducting programs within the University's scope of work. The University must assure that human subjects enter the research voluntarily, with adequate information, and are treated in an ethical and just manner. 45 CFR 46, the "Common

Rule" defines a *human subject* as a living individual about whom an investigator (whether professional or student) conducting research obtains (1) data through intervention or interaction with the individual, or (2) identifiable private information. All research that includes human subjects as defined above is under the purview of the IRB.

All research that involves human subjects MUST be submitted to the Institutional Review Board for review and approval prior to proposal submission. Under no circumstances may human subject research be supported or conducted prior to certification (45 CFR-46.103(f)). Under the terms of the Assurance Agreement, all projects involving human subjects must be reviewed and approved by the Institutional Review Board prior to submission, unless otherwise indicated by the sponsoring agency. This review is required whether the research is faculty or student-directed and whether it is funded or unfunded. There are three levels of review, exempt, expedited, and full board review. Exempt and expedited review are defined by statute (45 CFR 46), and under the terms of the assurance, all human subjects research projects must have an IRB approval or exemption letter attached to the project prior to commencement. All research that is not exempt or expedited is subject to a full board review where a quorum of the IRB members must be present and there is a vote whether or not to approve the submission.

All exemptions must be validated by the IRB or its chairperson or designee via a submission to the IRB, and the exemption must be documented by a letter from the chairperson or designee. Generally categories of research that could be exempt are: educational research activities involving normal educational practices; comparisons of the educational effectiveness of various pedagogical approaches; cognitive, diagnostic, aptitude and achievement tests or observations of public behavior in which individuals cannot be identified; studies in which the human subjects are public officials or candidates; research involving publically available sources of existing data or information recorded in a manner that prevents identification of subjects; and consumer taste/acceptance studies involving wholesome foods without additives or containing only ingredients at or below levels found to be safe by the Food and Drug Administration, Environmental Protection Agency, or U.S. Department of Agriculture.

The IRB uses IRBNET for all IRB submissions. Detailed instructions as to how to submit an application can be found on the IRB website (http://www.udc.edu/irb). All submissions must be accompanied by a completed Application for Review by the Institutional Review Board, including any applicable attachments (i.e. completed Consent Form, PI biographical sketch, PI Certification of Human Subjects Research, etc. Please refer to the website (http://www.udc.edu/irb) to access the Application for IRB Review form (also included in this manual as **Attachment IX**). This website should be reviewed periodically for changes. To apply to the IRB, the PI or researcher must first-register with IRBNET. To register, go to www.irbnet.org and click new user registration on the left side of the screen. Use your first initial and last name as your User ID. For specific instructions please click the link for IRB Login Registration Tips http://www.udc.edu/irb/application-process/.

Student research subject to IRB review includes studies intended to satisfy the academic requirements for independent study, Master's thesis, or doctoral dissertation; intended to result in publication, presentation outside the classroom, or public dissemination in some other form; and those studies conducted outside the classroom and/or departmental research participant pool if they involve minors, or populations of adults whose ability to give informed consent freely may be compromised. For UDC students conducting research as part of an academic program including theses, all requests for review must list the faculty member as the PI, and the student researcher as the Co-PI and both must digitally sign the submission package.

<u>Protection of Laboratory Animals</u>— The University is committed to ensuring that laboratory and other research animals are used and cared for in a humane and appropriate manner. **Before any research project** involving the use of living laboratory vertebrate animals, such as mice, rats, moles, gerbils, pigeons, birds, fish, etc. can be proposed, **the University must establish and activate a review and approval committee and process**. Any researcher desiring to use vertebrate animals in research, must notify the Chief Academic Officer at least three (3) months prior to the proposal deadline, so that the systems and processes to ensure humane

animal treatment can be activated in full compliance with the regulations, or alternative solutions can be arranged.

<u>Radiation Safety</u>-- The University is licensed by the Nuclear Regulatory Commission (NRC) for limited use of radioisotopes and radioactive materials. Any new project intending to use radioactive sources or isotopes must be reviewed in advance, provisions must be made for safe handling and disposal of the materials, and notification might need to be sent to the NRC. For information regarding radiation safety requirements, contact the Office of Sponsored Programs.

<u>Data Management Plans</u>— The UDC's mission as a public land-grant institution of higher education requires us to engage in research of importance to the District of Columbia and the nation, to ensure the integrity and reliability of the research, and to facilitate transfer of research results to benefit society and expand the knowledge base of the discipline. The University's policy is that the **Principal Investigator (PI) is responsible for understanding and fully implementing the specific sponsor's requirements in all respects**. When research is supported by public funds, the data obtained should be appropriately and responsibly managed, and they should be shared to maximize its benefits to the taxpayer.

The National Science Foundation requires proposals to include plans for managing data and sharing of the results of research it funds. Research.com no longer permits submission of any proposal that is missing a data management plan. The data management plan cannot exceed two pages in length, and it will be reviewed as part of the intellectual merit or broader impacts of the proposal, or both, as appropriate. The data management plan should detail how the proposal will conform to NSF policy on the dissemination and sharing of research results (see the National Science Foundation's Award and Administration Guide (AAG) Chapter VI.D.4). If no data are involved in a particular proposed project, the data management plan can be very short and simply state this fact.

Many factors, some discipline or field specific, are involved in the management of data. The Data Management Plan should reflect best practices in the area of research, and it should be appropriate to the data produced. The process of preparing a data management plan gives the PI and collaborators an opportunity to address prior to starting the project, such matters as:

	The types of data that the project might generate and eventually share with others, and under what conditions;
	How data are to be organized, maintained, archived, curated, and protected against distortion;
	Factors that might complicate or compromise the data or their management, for example possible legal or ethical restrictions, human subjects concerns, etc.;
•	The level at which data are to be aggregated, prior to sharing them with others in the scientific community, given that community's norms on data;
	The mechanism for sharing data and/or making them accessible to others;
	Other types of information that should be maintained and shared regarding data, e.g. the way it was generated, analytical or procedural information, and any associated metadata.

What type of data is covered under a Data Management Plan? The Federal definition of data covered by a Data Management Plan is provided in the Uniform Guidance part 200.315 (e) (2) (ii) (3). Research data are defined as:

the recorded factual material commonly accepted in the scientific community as necessary to validate research findings, but not any of the following: preliminary analyses, drafts of scientific papers, plans for future research, peer reviews, or communications with colleagues. This recorded material excludes physical objects (e.g., laboratory samples). Research data also do not include:

Trade secrets, commercial information, materials necessary to be held confidential by a researcher until
they are published, or similar information which is protected under law; and

Personnel and medical information and similar information the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, such as information that could be used to identify a particular person in a research study.

Attachment X provides a sample outline for a Data Management Plan.

Records Retention--Appropriate project records and accounts, including personnel records, must be maintained and made available for audit as prescribed by Federal and District regulations. University policy requires that all financial records be retained for a period of at least three (3) years after completion of a project or until an audit is completed and/or any litigation is resolved and all questions arising there from are resolved, whichever is later. In the event a sponsor requires a longer records retention period, the longer period applies. Records and supporting documentation must be sufficient for the D.C. Inspector General's auditors or a certified independent auditor (one who is not an employee of the University).

Reporting-- PIs and sub-grantees shall maintain data and information and submit reports in such form, at such times, and containing such information on project activities as required by UDC and/or the funding agency. Reports to agencies must be either submitted through OSP or OSP must be provided with a copy, depending on the requirements of the agency.

Publications— The PI/Originator is encouraged to publish the results of grant activity. Any publication (written, visual, Web, or sound) deriving from the project must provide acknowledgment of the sponsor's support, citing a grant number, if appropriate, and also acknowledging the University of the District of Columbia, as the institution where the author is affiliated and the work was done. These acknowledgements must be included, even if the first author is from a different organization. Different sponsoring agencies have different desired citation format for works published based on projects they sponsor. Please check your sponsor's requirements before publication.

<u>Freedom of Information Act</u>-- Pursuant to the terms of the Freedom of Information Act, certain information documents, correspondence, data, publications, and other materials relating to a project shall be available for public inspection (http://www.nih.gov/icd/od/foia/efoia.htm).

<u>Conflict of Interest</u>-- No PI, Co-PI, or project staff member is permitted to engage in activities which either present or have the potential to appear to a reasonable person to present a conflict of interest. A conflict of interest occurs whenever an individual or organization has an interest that might compromise or inappropriately influence their actions. There are four common types of conflict:

- □ Self-dealing, in which public and private interests collide, for example issues involving privately held business interests;
- Outside employment, in which the interests of one job might conflict with another;
- Family interests, in which one hires a spouse, child, or other close relative or purchases goods or services from such a relative or a firm controlled by a relative; and,
- Accepting gifts from friends, organizations, or individuals, who could be viewed as seeking influence, having an interest in the results of the project, or biasing one's objectivity. (Such gifts may include non-tangible things of value such as transportation, lodging, or prestigious invitations.)

Disclosure is the first step in managing conflicts of interest. Thus, a potential conflict of interest related to work funded by sponsors must be reported in writing to the Director of OSP, as soon as it arises or in advance, if possible. Additional information may be requested to assist with review of the potential conflict, and a determination will be made in consultation with the Office of General Counsel on how it will be managed.

<u>Discrimination</u>-- In the event a Federal or District Court or administrative agency makes a finding of discrimination after due process hearing on the grounds of race, color, religion, national origin, sex, sexual

orientation or disability against the PI, originator, or sub-grantee, the party upon whom the finding is made shall forward a copy of the finding to the University of the District of Columbia.

Nepotism-- An individual cannot be hired as an employee or retained as a consultant for a project that is supervised by a close relative or domestic partner. In addition, immediate or extended family members of project personnel may not be hired to report directly or indirectly to their relative.

Intellectual Property—Intellectual property refers to creations of the mind, such as inventions; artistic and literary works; and names, images, or designs used in commerce. Under intellectual property law, owners are granted certain exclusive rights to such intangible intellectual assets. Intellectual property includes patents, copyrights, trademarks, and the concepts or works to which they are applied. Some information developed or provided by the University, its sponsors, or its partners, may be considered proprietary, not to be shared or released without permission from the owner. When sponsors fund projects at the University, they may impose intellectual property requirements on the University. The sponsor may require the PI and other participants in the research to sign confidentiality agreements, non-disclosure agreements, or intellectual property agreements. If these requirements are unsatisfactory to the University or to the PIs, the funds should not be accepted and the work should not be done by UDC. In situations where the University and/or the PI agree in writing to the sponsor's intellectual property, confidentiality, or non-disclosure agreements, these agreements supersede the University's policy and apply to the specific project and the work done by University faculty, staff, or students on this project, funded by the sponsor.

The University is in the process of developing its intellectual property policy. This policy is under review. Please contact the Office of General Counsel (OGC) at 202-274-5400 for further information.

Other Non-Fiscal Compliance Areas

<u>Major Project Changes</u>— Written approval must be obtained from the funding agency for major project changes. All major changes (programmatic and budgetary) must be coordinated with the Office of Sponsored Programs. Major changes include:

Changes of substance in project activities;
Changes in the principal investigator, co-investigator (where applicable), project director or other key
personnel; and,
Changes in the approved project budget, in excess of the flexibility allowed in OMB Uniform Guidance
or in the terms and conditions specified in the notice or referenced grant award.

If types of expenditures required for the project are not consistent with applicable UDC policy, it is essential to obtain from the sponsor specific documentation that these types of expenditures are appropriate for the project. For example, University travel policies may forbid reimbursement for lodging costs for local travel of less than 50 miles. However, for a grant, which funds student participation in a multi-day conference or professional development event within this distance, it is wise to obtain program officer approval in advance for the lodging costs for the students and accompanying faculty/staff. This documentation should be retained by the PI, with a copy provided to OSP and to OCFO.

Project Extension—Requests for extension of a project must be submitted to the sponsor by OSP. The Project Extension Request Form, found in the Appendices, **Attachment VII**, should be completed and submitted to the Director of OSP, with a copy to OCFO, with the required signatures. No-cost extensions, in which additional time is requested to complete the project, but no additional funding would be required, are common and usually approved by the sponsor.

Hiring-- When the grant requires hiring individuals into full- or part-time positions to work on the project, the same procedures are followed as would be followed to hire regular University employees. The employment

term cannot exceed the duration of the grant. Funds must be available in the approved grant budget for the position. These employees are grant-funded employees. Depending on the grant conditions and budget, they may be provided with benefits, but the District of Columbia Municipal Regulations (DCMR) calls these employees "Sponsored program personnel". DCMR Chapter 17 describes their employment terms and conditions. **The Office of Human Resources (OHR) must review all personnel requests prior to submission of the grant, MOU, or MOA.** OHR is the only UDC office that can officially recruit and extend employment offers and implement employee separations. OHR provides guidance to all PI's and works directly with department/office Human Resources Liaisons to hire and onboard sponsored program personnel in accordance with applicable District and federal government laws, rules and regulations as well as established University policies and procedures. OHR maintains each employee's Official Personnel File (OPF) and the official system of record is the current human resources information system, PeopleSoft. The PeopleSoft system houses official personnel position and compensation records.

<u>Travel</u>-- When a grant requires travel, the procedure to be followed is identical to the procedure followed for University-funded travel. In cases where the travel policies of the sponsor and the University are different, the most restrictive rules apply. Specific travel needs for a project that appear to be contrary to UDC's or the sponsor's general policies must be approved by the sponsor in writing (or email), and the documented approval must be provided to OSP and OCFO for the grant's records.

Purchasing-- When the grant requires materials, supplies, equipment, or services, the University's normal purchasing procedures must be followed. Items or services proposed to be purchased must be both within the scope of the project and a type of expense that is allowable by the sponsor and the University.

A PI can obtain a purchase card (P-card) to use for purchasing supplies and materials, if the grant budget includes funds for such purchases. Services, computers, food, and many other types of items may not be purchased using the P-card. Training is required, along with meticulous record keeping and prompt monthly reconciliation of the charges.

<u>Subcontracts</u>—To place a subcontract, the PI or Project Director must work with the Procurement Office in accordance with the University's procurement policies. In some cases, the subcontractor or sub-awardee has been specified in the proposal. In other cases, it may be necessary to place the subcontract using a competitive bidding process. A strong and written justification is required to limit eligibility to the preferred vendor. A Statement of Work must be provided, along with any special terms and conditions. The subcontract is not in place and the subcontractor is not permitted to start work until both the subcontractor and the University have signed the subcontract agreement. The Final Subcontract MUST have a Purchase Order as the subcontract number.

The subcontract specifies the scope of work, cost, schedule, reporting required, and other terms and conditions, some of which may be —flow-down conditions specified by the sponsor. The PI is responsible to inform the Procurement Office of any flow-down requirements. In some cases, the methods, procedures, facilities, and personnel will also be specified. The subcontractor must establish a separate account for the funds; ensure that funds received under the grant are not commingled with other organization funds, and satisfy all the conditions in the subcontract.

Once the subcontract is signed, the PI, Project Director, or individual the PI/PD designates would serve as the Contracting Officer's Technical Representative (COTR). This role is also known as the Contract Monitor. A UDC procurement official will serve as Contracting Officer. The COTR has specific important responsibilities related to overseeing the subcontractor's work; assuring it is proceeding in accordance with the contract; monitoring progress; approving subcontractors in writing; communicating with the Contracting Officer in advance regarding subcontractors and possible changes; and officially accepting the products, services, or results on behalf of the University. Note that only the Contracting Officer is permitted to make changes to the scope of work, schedule, or other requirements. The COTR is not permitted to communicate such

changes directly to the subcontractor, as they frequently have implications for the subcontract and possibly the price. Prior to the award of a contract, the designated COTR must sign a statement accepting and agreeing to the responsibilities.

Funds awarded via the subcontract can only be expended for the purposes and activities covered by the approved scope. The subcontractor or sub-awardee must obtain prior written approval from the UDC Contracting Officer, who works closely with the COTR, when major project changes might be needed. Unallowable or unsupportable costs, as determined either by an on-site monitoring visit or official audit, must be refunded to UDC. Sub-award records shall be maintained for at least three years after the completion of a project or until an audit in progress at that time is completed, and all the questions rising there from are resolved.

<u>Close-Out</u>-- The Principal Investigator must submit to OSP all final technical reports, patent reports, invention statements, equipment/property reports, and/or other non-financial statements or reports required by the sponsor at least 15 work days prior to the final report due date.

Financial Compliance

The UDC OCFO is responsible for the application, administration, financial management, including the drawdown of funds, and the overall successful fiscal management of the grant. (Executive Order No. 12416, Sec. 5a).

The University of the District of Columbia is an independent agency of the District of Columbia government. As such, the University's financial managers and financial staff are employees of the OCFO of the District of Columbia, assigned to the University. All financial support, processing, record-keeping, payments, collections, budgeting, financial reporting, and drawdowns are performed by OCFO staff assigned to the University.

The University is responsible for managing and administering grant resources ethically and in full compliance with the requirements and expectations of the sponsor. The University must exercise due diligence to prevent and detect possible criminal conduct (fraud, theft, embezzlement, etc.) and promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

The University's fiscal year, like that of the DC government, begins October 1st and ends September 30th of the following calendar year. Financial policies and procedures followed by the financial staff are described in the Financial Policies and Procedures Manual of the University of the District of Columbia Office of the Chief Financial Officer. The Financial Policies and Procedures Manual has a chapter on Grants Management, to provide reasonable assurance that Federal awards are expended only for allowable activities and that the costs of goods and services charged to Federal awards are allowable and in accordance with the applicable cost principles. The Policies and Procedures document describes internal controls, designed to ensure compliance with program requirements and ensure that transactions are properly recorded and accounted for; transactions are executed in compliance with laws, regulations, and award requirements; and funds, property, and other assets are safeguarded against loss from unauthorized use or disposition. This PI Handbook does not reproduce the Financial Policies and Procedures Manual, but summarizes some important financial requirements, responsibilities, policies, and procedures that PIs need to be knowledgeable of and follow.

<u>Commitment of University Resources</u>—Commitments of University resources, including grant funds, can only be made by administrative authority designated by the President of the University. **No other employee** (i.e. PI, co-PI, full or part-time faculty, staff, senior researcher, and/or administrator) has the authority to commit University resources. Commitment of University resources includes such actions as payment for unapproved expenditures, unapproved promise of time and effort or a position, negotiating outside of the policy stated above, and any other unauthorized action related to expenditures for the grant, contract, or agreement.

Equipment Identification and Management-- The University is responsible for taking proper care of equipment purchased with grant funds. The U.S. Office of Management and Budget Uniform Guidance Section 200.315 and 200.439 contain requirements on the management of equipment purchased with grant funds by recipients of Federal financial assistance. These requirements are as follows:

- 1. Each item of equipment must be properly identified;
- 2. A physical inventory to verify that recorded equipment exists and is usable or listed as surplus must be conducted at least every two (2) years;
- 3. Equipment must be kept in good condition, and appropriate safeguards must be in place to prevent loss, damage, and/or theft; and
- 4. Proper loaned or purchased project equipment reports must be filed with the assigned Federal contract administration offices for equipment support by the U.S. Department of Defense (DOD).

The OCFO is responsible for providing assistance in the preparation of loaned/purchased equipment reports and serves as the transmitting office for such reports.

Time-and-Effort Documentation— The PI/Originator is responsible for preparing and submitting Time-and-Effort Reports for each employee who receives a full or partial salary or wages from a grant, MOU, cooperative agreement or contract from the Federal government. This report must account for 100% of the individual's total time or effort for all compensation received from the University, and indicate how much was devoted to each project or activity. Employees for whom effort documentation is required include student workers, administrative professionals, faculty and staff who work or otherwise expend time and effort that benefits the project. This requirement also applies to projects funded by a non-Federal sponsor if that sponsor's funding came from a Federal grant (i.e., pass through funds). Effort reports are required even if no salary is funded in the grant or contract.

An After-the-Fact Effort Report (**Attachment V**) must be completed and certified (by the employee, the PI, the direct supervisor, and Dean) at least once per academic term (fall, spring, and summer) for each University employee working on a Federally sponsored project. The reports must be submitted to the Office of Sponsored Programs for review and record-keeping. After- the-fact effort reports are due by January 15th (Fall Term), June 1st (Spring Term), and September 1st (Summer Term).

There are serious consequences of failure to comply with the time-and-effort reporting policy, because the University will have inadequate documentation to provide evidence that the person worked on the project that paid his or her salary. If the periodic effort reports are not completed, certified, or submitted properly and in a timely manner, the Office of Sponsored Programs will work with the Chief Academic Officer and the Vice President of the unit involved to take action to ensure compliance with Federal requirements. These actions may include, but are not limited to:

- 1. Placing active projects/awards on hold.
- 2. Adjusting uncertified labor distributions and the effort they represent to non-sponsored accounts as *cost share*.
- 3. Barring non-compliant individuals from serving as a Principal Investigators, and non-compliant units from submitting or administering Federal grants or contracts.
- 4. Barring non-compliant units from submitting or administering Federal grants or contracts.

Please see Attachment V for a copy of the Time and Effort Reporting form.

Expenditures – Funds are to be expended only for the purposes and activities covered by the approved project application and budget and in accordance with the cost principles delineated in the Office of Management and Budget Uniform Guidance. The fiscal administration of funds shall conform to the Generally Accepted

Accounting Principles (GAAP). Funds may not be expended for:

- Items not part of the approved budget;
- Purchase or construction of land or buildings or improvements thereon, unless specified as an approved part of the project;
- Dues to organizations or federations;
- Decorations; and
- Purchase of automobile(s) or other automotive vehicles, unless provided for in the award agreement.

The value of project expenditures shall be based on actual costs incurred and shall be supported by detailed documentation (voucher, receipts, invoices, etc.). Bills, invoices, or receipts must support all project expenditures (checks and cash). This applies to petty cash, miscellaneous office expenditures, and all other expenditures. Financial offices are responsible for maintaining these documents. PIs are urged to keep local backup copies of these documents. The District of Columbia shall make payment(s) on invoiced amounts in accordance with the approved budget and the method cited above. All unallowable or unsupportable costs, as determined either by on-site monitoring or official audit, are to be refunded to UDC and to the sponsor. Under no circumstances shall the PI, Project Director, Originator, or sub-grantee expend funds or approve the expenditure of funds beyond the amount stipulated in the award agreement.

Cost Sharing—The University is obligated, when committing to cost sharing, to ensure that at least the promised amount of in-kind or cash support is provided and documented. When a component of the cost sharing comes from in-kind labor, the PI or his/her designee is required to document and confirm cost sharing effort using the Time-and-Effort reporting form (Attachment V). The OCFO will prescribe the method to facilitate the accounting of cost sharing, both effort and other cash and in-kind contributions. Both mandatory and voluntary cost sharing must be accounted accurately and thoroughly during the conduct of the project. OCFO will also keep track of cost sharing and generate cost sharing reports required by the sponsor. OSP will review and assure institutional approval of cost sharing committed in proposals, and will monitor cost sharing provided during the project. Records related to cost sharing must be retained for the period of time prescribed under the University's record retention policy or the sponsoring agency's policy, whichever is longer.

Program Income—Federal sponsoring agencies require recipient organizations to account for program income related to programs that are funded wholly or partially utilizing Federal funds. Program income usually takes the form of earnings on service fees, sale of commodities, rental and other user fees, royalties on patents and copyrights, proceeds from sales of real property and interest earned on fund advances. In some instances, program income may be used to finance the non-Federal share of a grant program, if it is approved in advance by the Federal sponsoring agency. In instances where program income is unapproved, the income may be deducted, by the sponsoring agency, from the total program costs when it determines the net costs on which the Federal share of costs is based. Any interest earned on advances of Federal funds or profit from the sale of real property must be remitted to the sponsoring agency unless provided otherwise under the Intergovernmental Cooperation Act of 1968 (Public Law 90-577.)

Budget Revisions— If it is desired to use funding in different ways than originally planned, it may be necessary to revise the budget. In this case, the PI/Project Director/Originator, as applicable, must provide to OSP a written, detailed justification describing the nature and purpose of the request and its impact on the project goals and objectives along with a revised budget on the Spending Plan Form required by OCFO to set up the budget. In the case of budget revisions that require the approval of the sponsor, OSP will assist the PI in obtaining this approval prior to making the changes requested. In cases where the budget revisions are within the flexibility provided to UDC by the sponsor, OSP will assist the PI in working with OCFO to modify the project budget/spending plan accordingly.

<u>Close Out</u> – Direct cost expenditures incurred after the end date will not be allowed, unless an extension of time has been approved in writing by the sponsor. Official electronic forms of approval associated with e-

business are recognized by UDC as equivalent to the traditional letter. The OCFO will work with the PI to complete reconciliation of the account. The award account will be monitored for the following criteria:

- Account budget, expenditures, and payments are equal;
- Open encumbrances and balance available on the account are zero; and,
- All payments have been received.

Upon meeting the above criteria, the account will be closed to ensure no further activity occurs.

The Principal Investigator must submit to OSP all final technical reports, patent reports, invention statements, equipment/property reports, and/or other non-financial statements or reports required by the sponsor at least 15 work days prior to the final report due date. Project-related technical records and financial documentation must be retained for a period of at least 3 years beyond the date of submission of the Final technical report and financial statement, whichever is later. If an audit is in progress at this time, the documentation must be retained until 3 years after the audit or litigation is completed.

University policy requires that all project-related financial records be retained for a period of at least three (3) years after completion of a project or until an audit us completed and any litigation is resolved and all questions arising there from are resolved, whichever is later. These records and supporting documentation must be sufficient for the D.C. Inspector General's auditors or a certified independent auditor (one who is not an employee of the University or the District of Columbia) to review and validate.

Other Important Spending-Related Post Award Topics

Personnel Management— The University is responsible for personnel management. The same human resource policies, benefits policies, compensation policies, and salary scales apply to grant-funded personnel as apply to regular personnel. However, grant-funded personnel cannot occupy permanent positions or positions with unspecified termination dates. Individuals are permitted to be partially funded by a grant and partially funded through appropriated or other University funds. Individuals in regular positions can elect to join grant-funded projects without losing their seniority or regular employment status. If the movement to the grant involves a change in position level or salary, when the individual returned to the regular position, the salary would be rolled back to what it would have been, had the person stayed in the regular position for the period.

<u>Compensation of Faculty on Grants</u>-- The Office of Management and Budget has issued Uniform Guidance http://www.ecfr.gov/cgi-bin/text-idx?SID=40b70d353b03b6af3118093cbf78a817&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1430 which

defines the Federal cost reimbursement rules for educational institutions. The following five principles underpin compensation policies and procedures.

- 1. The University is responsible for setting and administering compensation.
- 2. Compensation policies must be consistent and administered consistently.
- 3. The University's compensation system must comply with law and regulation.
- 4. Compensation from Federal sources must comply with OMB Uniform Guidance Section 200.430
- 5. A compensation system, which has different rules for compensation derived from different sources, is neither consistent, nor compliant with Federal rules, which require the use of Federal funds to be the same as the use of institutional funds.

Consistent with these principles, the University's faculty-compensation policy, described below, applies to faculty compensation from grants and contracts regardless of funding source, and it complies with OMB Uniform Guidance. In no case, can the interpretation of the faculty collective bargaining agreement require the University to compensate faculty members using Federal grant funds in a manner that is not compliant with the OMB Uniform Guidance.

The collective bargaining agreement defines the compensation policies for faculty members, including the workload and conditions under which a faculty member would be entitled to overload pay. Since overload makes extra demands on a faculty member's time and attention, it can limit the faculty member's ability to do a quality job in all respects. Thus, the University strives to minimize overload assignments. The workload normally consists of a combination of teaching, research/scholarly pursuits, and service. If the teaching assignment is not reduced proportionately for a faculty member working on a sponsored project to which the University has committed a portion of the faculty member's effort, then the teaching assignment may put the faculty member in an overload situation. In this case, appropriate overload compensation would be paid to the faculty member from the departmental budget, in the same manner and amount as if the workload and overload were all due to teaching. In no case may the overload assigned to a faculty member with teaching release to work on a sponsored project exceed 25 percent. Any overload in excess of this amount would unacceptably compromise the faculty member's ability to do a quality job on all teaching, research/scholarship, and service obligations.

When a faculty member's responsibilities during the academic year include work on a sponsored project, University policy is that the sponsored project's budget must pay for the portion of the faculty member's effort to be dedicated to the project. This effort is included in the workload assignment. The grant budget must pay the indicated proportion of the salary plus the associated proportion of fringe benefits. The teaching assignment for that faculty member would be reduced proportionally, such that the member has a full workload assignment.

Example 1: A faculty member has a 9-month base salary of \$60,000 and her normal workload is to teach four courses (12 credit hours) plus do some research and service. However, she is committed to work 25% on a sponsored project. The project's budget would include \$15,000 to cover the 25% of her academic year salary and an additional amount to cover the associated benefits. The teaching assignment for the faculty member would be reduced to three courses (9 credit hours) per term. If the project is to be conducted in only one of the terms, then the salary cost to the grant would be only \$7,500, and the teaching assignment would be reduced only for that term. The associated benefits amount would also be paid by the project. The normal paperwork (Form 52) is used to cause the grant to be charged for the salary and benefits. The net result in the first case would be that the faculty member would receive her \$60,000 salary, of which \$45,000 would come from the department's budget and \$15,000 would come from the grant budget, with benefits apportioned in the same manner.

Any effort of a faculty member on a sponsored project that is not paid for by the project is an in-kind match or cost share. Note that approval for release time, whether paid for by the project or supported in kind by the University, must be obtained from the faculty member's department head and dean at the time a proposal is developed and submitted, and documented on the OSP Proposal Routing Form (Attachment II). It will be verified by OSP as part of the review and clearance process that must be followed before the proposal can be submitted.

The typical faculty member's contract and base salary only covers the 9-month academic year (August 16 through May 15). It is normal for faculty members with funded projects to work full time on them during the summer. The sponsored project must pay the full salary cost and benefits for this effort. Since the summer period (May 16 through August 15) is 3 months long, the maximum compensation a faculty member may receive from all University sources for working full time during this period is limited to one third (3/9th) of the base salary for the academic year just completed. (Some agencies, such as the National Science Foundation, limit the summer compensation from their grants to 2/9 of the base salary; however the total summer compensation limit from all sources is still 33.3% of the base salary.)

Example 2: A faculty member has a 9-month base salary of \$60,000. Her maximum summer compensation from all sources is \$20,000 (33.3% of the base salary). She will be working on a sponsored project full time during the summer, and the project can budget to pay her a salary of \$20,000 for this work. If, however, she accepts an assignment to teach one summer session course for \$4,000, the sponsored project could only pay her \$16,000, otherwise the total summer compensation would exceed the limit. If the project is sponsored by the NSF (2 months limit on summer compensation), however, she could be paid 2/9 of her base salary from the project (\$13,333), and would be allowed to add summer teaching payment to bring her summer compensation total to \$17,333. Fringe benefits would also be charged to the project, at the very low part time rate.

Compensation of 12-month faculty or personnel in administrative appointments on sponsored projects

For 12-month faculty or personnel in 12-month administrative appointments, the base annual compensation is their annual salary. The portion of their effort that is dedicated to the sponsored project would be paid from the project budget, along with the associated benefits. Only under highly unusual circumstances would 12-month salaried personnel be paid above their salary level, and the sponsor would need to approve such payments in advance. Such circumstances could include, for example, intensive 7-day per week summer programs of limited duration, where regular weekend and/or overnight duties are required and there is no compensatory adjustment of other responsibilities. The associated fringe benefits would be paid at the rate applied to faculty summer salary and part-time workers.

Compensation of hourly workers (non-exempt) subject to overtime/holiday premiums— When hourly (non-exempt) personnel are assigned to work on grants, their compensation is determined by their contract and the total number of hours they work in a specific week. Sponsored project budgets would be charged for time at the worker's established hourly wage rate (or overtime/holiday rate, if these conditions apply), with accompanying payments for the fringe benefits.

Direct Costs—OMB Uniform Guidance Section 200.413 defines direct costs as those costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct costs or F&A costs. Where an institution treats a particular type of cost as a direct cost of sponsored agreements, all costs incurred for the same purpose in like circumstances shall be treated as direct costs of all activities of the institution.

Indirect or Facilities and Administrative (F&A) Costs—OMB Uniform Guidance Section 200-56 defines F&A costs as costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect (F&A) costs. Indirect (F&A) cost pools should be distributed to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.

The University of the District of Columbia (UDC) is required by Federal Law to account for and allocate the costs of its central operations to grant budgets and therefore must track its indirect costs. Indirect Costs are defined by the Office of Budget and Management (OMB) Uniform Guidance as those costs incurred for common or joint objectives and therefore cannot be identifies readily and specifically with a particular sponsored project, as an instructional activity, or any other institutional activity. At educational institutions such costs normally are classified under the following indirect cost categories: depreciation and use allowances, general administration and general expenditures, sponsored projects administration expenditures, operation and maintenance expenditures, library expenditures, departmental administration expenditures, and student

administration and services. F& A costs are further sponsored project administration expenditures.

Negotiated Indirect Cost Agreement—The Department of Health and Human Services is the Federal agency that negotiates and approves the University's indirect cost rate. The most recent agreement is dated January 29, 2015. The Agreement is provided as Attachment VII. It is in effect through September 30, 2019. It is based on detailed information and analysis provided by the University in accordance with detailed instructions set forth in OMB Uniform Guidance.

Based on this analysis, the Department of Health and Human Services has approved an indirect cost rate of 48% for on-campus projects and 26% for off-campus projects. A project is categorized as on or off-campus, depending on the location of the majority (over 50%) of the activities. Indirect costs are calculated at the indicated percentage of modified total direct costs (MTDC), which include all costs, except equipment, tuition payments, participant costs, and subcontract amounts above \$25,000 per subcontract. In accordance with OMB Uniform Guidance, the indirect cost rate in effect at the time a grant award is made will apply to that grant for its approved duration.

The approved indirect cost rate applies to projects sponsored by any Federal agency, and it has been set to cover the added costs of facilities and administrative services attributable to sponsored projects. Private, state, and local sponsors and certain Federal grant programs that include a lot of funding for student support or tuition often specify a reduced indirect cost rate. However, Federal sponsors do not in any way subsidize the F&A costs of other sponsors, specifically industry and foreign governments, and the University must describe how it ensures that Federal funds do not subsidize such work. Approved rates must be accepted by other agencies, unless specific program regulations restrict the recovery of indirect costs. In the case of agency restrictions, the official statement must be presented in writing to the Office of Sponsored Programs prior to proposal submission.

Allowability of Costs—OMB Uniform Guidance Section 200.403 lists and describes principles to be applied in establishing the Allowability of certain costs. These principles apply whether the costs would be direct costs or indirect costs. The Federal government will not reimburse the University for costs that are not allowable, therefore PIs and other project personnel must not incur and expect to be reimbursed for costs that are not allowable. Examples of unallowable costs include, alcoholic beverages, alumni activities, bad debts, personal use of automobiles, social activities, most costs associated with legal proceedings, donations given or received, entertainment, fines and penalties, costs of fundraising or investment advisors, lobbying, memberships in civic or community organization or country club or social organization, costs incurred prior to the effective date of the grant unless approved in advance by the sponsoring agency, and costs for student activities (unless specifically allowed in the grant). Moreover, there are tight limits on the type of marketing, public relations, and patenting costs that can be covered. Proposal costs can only be covered as F&A (indirect) costs. This list presents only examples, and it cannot be assumed that if an item is not presented here, its cost is allowable. For additional information, consult with OSP or OCFO staff or refer to OMB Uniform Guidance.

<u>Use of Indirect Costs</u>— Indirect revenues are University funds, with some restrictions on how they can be spent. They are intended to reimburse the University for facilities, maintenance, and administrative costs that are necessary for supporting the sponsored work, such as library assets, facilities modifications or upgrades, equipment purchase and maintenance, costs of sponsored-programs administration, and general administrative and support costs at the department, school/college or University level. The University has established its indirect cost distribution policies. Cost accounting principles do not allow indirect costs to be used as direct supplements to funded projects. They must not be mingled with direct costs or other funds, such that auditors cannot ascertain that they have been spent in acceptable ways. The principles of allowability in OMB Uniform Guidance and summarized in the paragraphs immediately above apply to indirect and direct costs, alike.

GLOSSARY

AOR – Authorized Organization Representative, the person or persons designated by the institution as authorized to submit proposals and interact with the sponsor on behalf of the organization. Principal Investigators are not AORs, and they cannot represent UDC on behalf of their own proposals.

Application – A set of specific forms and documents for a specific funding opportunity which are used to apply for a grant.

Application Template – One or more forms and documents which can be reused for multiple opportunity- specific application packages.

Authorized Organization Representative (AOR) - Person authorized to submit a grant of the institution and sign applications, required certifications and assurances necessary to fulfill requirements of the application process. The University's AORs are personnel in the Office of Sponsored Programs.

Award – The document that provides financial assistance and governs the purpose, direction, implementation of a project.

Carryover Funding – Funding remaining at the conclusion of one project year and able to be used during the next project year.

Catalog of Federal Domestic Assistance (CFDA) – An online database of all Federal programs available to governmental entities, profit and Non-profit organizations, institutions and individuals.

Catalog of Federal Domestic Assistance (CFDA) Number – The identifying number that a Federal program is assigned in the Catalog of Federal Domestic Assistance.

Central Contractor Registry (CCR) – The CCR is a government-wide registry for organizations that seek to do business with the Federal government. The CCR collects, validates, stores and disseminates data to support a variety of Federal initiatives. The University is the registrant in the CCR. Individual grant seekers do not need to register.

Chief Academic Officer (COA) – UDC Administrator responsible for the academic offerings and accreditation.

Chief Financial Officer (CFO) – UDC administrator responsible for ensuring that all District of Columbia and sponsoring agency financial regulations, policies, procedures and laws are adhered to by the University of the District of Columbia.

Close-out – Process by which the awarding agency determines that all applicable administrative actions and all required work of the award have been completed by the recipient and the awarding agency, all documentation both technical and financial is complete and the project is over.

Competition ID – A grantor-selected ID that allows further distinction of the funding opportunity and applications with the same funding opportunity number to be assigned unique identifiers.

Congressional District – The Congressional district where the University is located; DC Congressional District

Contract – An agreement between two parties in which one party agrees to provide specific property or specific goods or services on the specified schedule and at the specified price to the other party.

Cooperative Agreement – A cooperative agreement is a financial assistance mechanism that provides for substantial involvement between the sponsor and the grantee organization in carrying out the activity contemplated by the award.

Community Partnership – A community partnership is an award involving equal participation by the recipient and community entities in the development of a specified activity.

Cost-Reimbursement – Reimbursement of allowable costs in the performance of a contract.

Cost Sharing or Matching – The value of third party in-kind contributions and the portion of the costs of a Federally assisted project or program not borne by the Federal Government. Matching or cost-sharing may be required by law, regulation or administrative decision of the sponsor. Costs used to satisfy matching or cost-sharing requirements are subject to the same policies government allowability as other costs under the approved budget.

Data Universal Numbering System (DUNS) – A unique nine-character identification number provided for the University by the commercial company, Dun & Bradstreet.

Date of Completion – The date upon which all work regarding a specific project or program is to be completed and award sponsorship ends as specified in the award document or supplemental documents.

Disallowed Costs – Charges that the sponsor determines to be unallowable in accordance with cost principles or other terms and conditions contained in the award.

EBiz-POC – An E-Business Point of Contact identified as responsible for the submission of an application through grants.gov and for the administration and management of the grant activities.

Entitlement – A government program that guarantees and provides benefits to a particular group.

Employer Identification Number (EIN) – An identification number assigned to an entity by the Federal government. The EIN for the University of the District of Columbia can be obtained through the Office of Sponsored Programs, and it is listed in the Fact Sheet (**Attachment I**).

Equipment – The definition for equipment, as stated in OMB Uniform Guidance Section 200.33, is tangible nonexpendable personal property including exempt property charged directly to the award having a useful life of more than one year and an acquisition cost of \$5000 or more per unit. However, consistent with recipient policy, lower limits may be established.

Excess Property – Property under the control of an awarding agency that as determined by the agency is No longer required for the agency's need or the discharge of its responsibilities.

Exempt Property – Tangible personal property acquired in whole or part with funds that provide for the sponsor's statutory authority to vest title in the recipient without further obligation to the agency.

Fastlane.gov – The secure e-business portal for the National Science Foundation, which allows proposals to be created by PIs and submitted by Authorized Organizational Representative, progress, final, and financial reports to be submitted, reviews to be obtained when available, and proposal processing to be tracked.

Federal Share – The percentage of cost and any expenditure by the Federal agency.

Funding Opportunity Announcement – A publicly available document by which a Federal agency makes known its intentions to award discretionary grants or cooperative agreements, usually as a result of competition for funds.

Funding Opportunity Number – The number that a Federal agency assigns to its grant or cooperative agreement announcement.

Funding/Grant Period – The period of time for funding availability to the recipient.

Grant – A financial assistance award to develop a project or program.

Grants.gov – A web portal that publicizes announcements of grant opportunities from all Federal agencies. Also, an e-

portal for grant submission and used in electronic collection of data, forms, and reports for Federal grant- making agencies. (www.grants.gov).

OHR – Office of Human Resources

In-kind Contributions – The value of goods and services directly benefiting and specifically identified for a particular project or program as a part of cost-sharing or matching.

Interagency Agreement – A document delineating all aspects of understanding related to a project or program between and among partnering agencies.

Intangible Property – Term referring to trademarks, copyrights, patents, and patent applications.

Line Item Transfer – A request to transfer funds from one budget category to another within the approved guidelines.

Matching Funds – Interchangeable term for cost-sharing.

Memorandum of Agreement (MOA) – A document that delineates the responsibilities and areas of program and fiscal accountability of all partners in the development and implementation, of a project or program.

Memoranda of Understanding (MOU) – Term which is used interchangeably with Memorandum of Agreement.

No-Cost Extension – A mechanism for extending the time period for a grant without any additional funding being provided by the sponsoring agency.

GAN – Grant award notice

OCFO - UDC Office of the Chief Financial Officer

OGC – UDC Office of General Counsel

OSP – UDC Office of Sponsored Programs

PI (**Principal Investigator**) – Faculty or staff member, who is ultimately responsible for grant or agreement development, implementation, management, and administration from concept to close-out.

Proposal – A document written in response to a grant announcement or as an unsolicited submission containing a narrative that contains a research methodology, justification, budget and other information as requested by the grantor.

Research.gov – **a** Federal government web portal providing access to NSF, NASA, and some other Federal agency information about grant opportunities and awards.

Solicited Proposal – A document that responds to a formal solicitation or request for proposal.

Sponsor - The funding entity or entity providing the money.

Sub-Award – An award of financial assistance made under an award by a recipient to an eligible sub-recipient.

Sub-recipient – The legal entity to which a sub-award is made, and which is accountable to the recipient for use of the funds provided.

Supplies – As stated in OMB Uniform Guidance Section 200.94, **supplies** means all personal property excluding equipment, intangible property, and debt instruments as defined in this section, and inventions of a contractor conceived or first actually reduced to practice in the performance of work under a funding agreement ("subject inventions"), as defined in 37 CFR part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts, and Cooperative Agreements."

Suspension – A post-award action by the sponsor that temporarily withdraws the financial assistance or sponsorship under an award, pending corrective action by the recipient or pending a decision to terminate the award.

Trading Partner Identification Number (TPIN) - The restricted identification number assigned by Central Contract Registry (CCR) to the Point of Contact who manages information for the CCR registrant.

Trademark – Marks, pictures, letters, or name used to distinguish an entity from other entities that is approved via governmental application.

Unobligated Balance – The portion of funds authorized by an awarding entity that has not been obligated by the recipient and is determined by subtracting the cumulative obligations from the cumulative funds authorized,

Unsolicited Proposal – A proposal submitted to a funding source that has not published an official solicitation or request for proposal.

ATTACHMENTS

- I. UDC Institutional Fact Sheet
- II. OSP Proposal Routing Form and Instructions
- III. Proposal Development Technical Assistance Form
- IV. Registration Request for Prospective Principal Investigator
- V. Time and Effort Reporting Form
- VI. Request for Pre-Award Expenditures
- VII. Project Extension Request Form
- VIII. Negotiated Indirect Cost Reimbursement Agreement
- IX. Application for Approval to Use Human Participants
- X. Sample Data Management Plan

NOTE: Forms included in these appendices are provided as a courtesy. Please check the OSP website (http://www.udc.edu/osp) and use the latest version.

ATTACHMENT I: UDC Institutional Fact Sheet

Applicant Organization Name and	University of the District of Columbia
Address	4200 Connecticut Avenue NW, Washington, DC 20008-1122
Tay ID (TIN) also known as FIN	The tax payer Identification Number (TIN/EIN) is the number companies use for income tax
Tax ID (TIN) also known as EIN (Employer Identification Number)	purposes. It is also known as Employer Identification Number and Federal Identification Number.
(Employer Identification Number)	TAX ID number: 53-6001131
	The Data Universal Numbering System (DUNS) number is a unique, nine-character industry-standard
	and government-wide company identifier code.
DUNS Number	DUNS Number for the National Science Foundation: 038994133
	DUNS Number for Grants.gov & other Federal agencies: 137460275
	Standard Industrial Classification (SIC) The Standard Industrial Classification (SIC) coding system
SIC Codo	identifies the type of activity your business performs and the type of product or services you offer.
SIC Code	
	SIC Code: 8221 (Colleges and Universities)
NAICS Code	611310
	9T240 for DUNS 038994133
CAGE CODE	4FGH2 for DUNS 137460275
EICE Codo	
FICE Code	29100
SAM Registration	DUNS:038994133 Expires: November 18, 2017
	DUNS:137460275 Expires: June 16, 2017
Federal wide Assurance Number	FWA 00013788; Institutional Review Board Chair: Dr. Arlene King-Berry
	Expires: 9/28/2020
Number of Employees (Faculty and Staff, Including Law School)	Full Time:707
Stan, including Law School	Part Time:443 Reference: http://docs.udc.edu/irap/15 16 udc factbook.pdf
	Public
Type of Organization and Business	*Educational Institution
Туре	*Nonprofit Institution
	*Historically Black College/University (HBCU)
Congressional District	DC-001, the 1st Congressional District
	4200 Connecticut Avenue NW, Washington, DC 20008-1122
HUB Zone and Census Tract	Census Tract Number: 12, Ward 3
	Shaina Cooper
Chief Financial Officer	4200 Connecticut Avenue, Washington, DC 20008
omer i muneiui omeei	(202)274-5415; E-mail Address: shaina.cooper@udc.edu
Name of Official Signing for	Ronald Mason, President
5 5	
Applicant Organization	4200 Connecticut Avenue, Washington, DC 20008
	Telephone: (202) 274-6016; E-mail Address: ronald.mason@udc.edu
	Indirect charges are applied at the agreed upon rate to Modified Total Direct Costs (MTDC)
	incurred under the sponsored agreement. Please refer to <u>PI Handbook</u> for determining MTDC.
Indirect Costs	Indirect cost rate is 48% for on-campus projects
	Indirect cost rate is 26% for off-campus projects
	DHHS is our approval agency. Date of current agreement: 10/01/2015 - 09/30/2019
	Faculty on 9-month contracts and Regular staff or faculty on 12-month contracts-28.7%
	ractity on 3-month contracts and negular stan or faculty on 12-month contracts-20.7%
Fringe Benefits	Students, adjunct faculty, part-time or casual workers, and summer compensation for faculty on 9-
	month contracts - 7.65%
For More Details and Administrative	JoVita Wells J.D., Director, Sponsored Programs, 202-274-6260; Email: jowells@udc.edu
Official	joria ir ene jibij bii eetor, oponoorea rrograms, 202 27 1 0200, Eman, jowense ade.edd

ATTACHMENT II: OSP Proposal Routing Form and Instructions

UNIVERSITY OF DESTRICTOR OF Sp	University of the Distr consored Programs Pro		Print Forn
Chimin			ALCOHOLDS.
To prevent a delay in processing, all items r	equiring a routing form (proposals, agreemen	its, contracts, MOUs, etc.) must be submitted	to OSP first
Proposal No.	Proposal Type Select One	Agency Type	
Proposal Purpose	Proposal Status	CFDA No.	
Sponsoring Agency		Sponsor's Deadline	
Project Title Principal Investigator(s)			
Department Sch	ool/Division Pho	ne Email	
Consultant/Sub-Award/Subcontract Amoun	t on the proposal Proposal	ed Start Date Proposed End Date	
Total project cost requested \$	Ye.15 Ye.23	Yr.3.5 Yr.45 Yr.5	
Indirect Cost: \$	On Campus Rate = 48% Off	Campus Rate = 26% Other Rate:	%
If other rate, please explain		· · · ·	
☐ No cost share/matching required	Cost share/Matching required In	n-Kind:\$ Cash:\$	
If cost share/matching is required, pleas or website URL of the sponsor's guideli	e complete the COST SHARE/MATCHI ne for cost sharing	ING AUTHORIZATION FORM and pro	wide a copy
Principal Investigator/Projec	t Director's Statement		Yes N
1. Does the Proposal Involve Human Subject? If Yes, attach IRB Approval or Explain			
Does the Proposal Involve DNA Techniques, send copy of abstract to the University	ies, Radioactive or hazardous materials or in Wide Safety Committee	fectious agents, hazardous chemical waste? i	f 🗆 🗆
3. Is adequate space already assigned for the proposed program? if no, submit explanation to the Chairperson/Dean			
 Does the project provide for new academi 		W-000	
-	reement? If no or uncertain, contact the Directed, suspended or proposed for debarment by		
contain explanation for each such person			
The second secon	ptance that the University absorb the services	s should project fund be reduced or terminate	d2
7. Will project require as a condition of accellifyes, please explain so that approval may be	e obtained in advance		5 97 7



University of the District of Columbia Office of Sponsored Programs Proposal Routing Form

Page 2

Check here If more than	n five faculty a	re involved a	and include a contin	nuation page.		
Faculty Member's Name	Department	Release/Yr.	Release Salary Yr.1	Release Benefits Yr.1	Release Salary Total	Benefits Total
Faculty release time: Pro mount of release time per a nd the total grant.	cademic year. L	ist the amoun				
. Explanation of Items from page 1. Add continuation page if needed						
Chief Academic Office	r					
VP Human Resource	s					
Chief Financial Office	г					
General Counse						
Director of Sponsored Program Procurement Directo	s					
Chief CCDC Office						
Dear	n					
Chair/Department Head	d					
Principal Investigato	r					
Title		Name		Sig	gnature	Date



University of the District of Columbia Office of Sponsored Programs Proposal Routing Form

Page 3

. Complete this section if person			
Complete this section if person			
Complete this section if person			
Complete this section, if person			
Complete this section if person			
	nel in-kind or cash matching is reque	ested:	
s matching required by the spons	or? Yes No		
If yes, how much is required	TI-	w much cash is required	
r yes, now much is required	, no	w much cash is required	
From what budget(s) will the mat	ch be provided?		
Name of approving person respor	scible for the budget	Signature	
vame of approving person respor	isible for the budget	3 Signature	
How much In-Kind is requested (Value Description)		
	or a	Date:	
Availability of match has been	verified. OCFO	Date.	
I. Human Resources requirements	s; 		
a What is the scope of work to b	e provided:		
	100 H		
	0		÷35
 b. Did you attach a detailed desc 	ription of the staffing needs? (Please	include position title and proposed salary)
If Yes to question 8, please des year commitment and plan to fulf			
von vonningnen une plan to ren			
	(Fig.		

This Routing Form document must be completed for all proposals submitted to external funding entities. The form is also used to route proposals for on-campus signatures.

All forms and a copy of the application and budget are due to the Office of Sponsored Programs at least 10 days prior to the due date for the grant.

These instructions will help you (the PI) complete the Office of Sponsored Programs' Proposal Routing Form (PRF). The instructions follow the order of information as it appears on the Proposal Routing Form. The PI is responsible for completing the form and transmitting it and a copy of the proposal, including budget and other applicable forms, to his/her chair and/or dean for review and approval prior to the form and supporting documents arrival at the Office of Sponsored Programs.

Proposal No.: Enter the Proposal's ID Number assigned by the sponsoring agency.

Proposal Type: Select the type of proposal (Federal Grant, Intra-district Agreement, Contract,

Cooperative Agreement, Memorandum of Agreement, Memorandum of

Understanding, Private Foundation Grant, Sub-award, Other)

Date: Enter the date the grant application was submitted to the Office of Sponsored

Programs for review.

Phone #: Enter the telephone number(s) of the Principal Investigator(s)/Co-PI(s)

Department(s): Enter the name of the academic department that will administer the grant.

College/School: Enter the name of the **College/School** where the Academic Department is located.

Email: Enter the PI Contact Email

Fax: Enter the PI Contact Fax

Principal/Co-PI

Investigator(s): the proposed project. Enter the name(s) of the Co-Principal Investigator(s) (Co-PI)

Sponsor: Enter the name of the sponsor – the immediate source of external funds. This is the

entity with whom UDC would enter into a contract if the proposal is funded. This

Enter the name(s) of the Principal Investigator(s) (PIs)-The initiator(s) and director(s) of

could be the Federal Agency, the Private Foundation or other funding source.

CFDA: Code of Federal Domestic Assistance Number (CFDA). Enter the Code Number

indicating the program of Federal assistance assigned by the Federal agencies.

Project Title: Enter the complete title of the project.

Project Period: Enter the beginning and ending dates of the entire project, beginning with the first day

the award is expected and ending with the last day of the project. Thus, if a three-year award is made on October 1, 1994, the project period will be 10/1/94 through 9/30/97.

Proposal Status (Please check as appropriate):

□ New Project: A new request for funding that includes a full, detailed proposal. This category

includes new projects, full submissions in response to pre-proposals, resubmissions of

	previously non-funded proposals, and funding requests for existing projects submitted to a new sponsor.
□ Renewal:	A request to the same sponsor for continuation of funding for an existing project that does not change its fundamental scope. Often used for projects awarded incrementally.
□ Continuation:	A request for funding to renew, by one or more additional budget periods, an existing funded project that would otherwise expire.
□ Extension:	Indicate reason:
□ Supplement:	A request to the same sponsor for additional funding for an existing project for activity that is beyond the scope originally proposed.
Total Project Cost: Er	ter the sum of direct and indirect costs for the entire Project Period (all years).
Indirect Cost: Cos	ts which are not directly charged to a project but are associated with the cost of doing research, training or other sponsored activities (e.g., costs for general operations such as utilities, building operations, library services, purchasing, etc.).
	Enter the total amount of indirect costs budgeted for the entire Project Period (all years) \$
	Enter Percentage % amount \$
	Enter 48% of Modified Total Direct Costs \$
	Other: Please explain.
Matching Funds:	Indicate whether or not the application requires that the University provide matching funds or financial support for this project. If matching funds are required, enter the amount of that support. If not, check —None.
	Enter In-Kind (Facilities/Services) amount. Enter

Cash Amount, if any

Sponsor's Deadline: Date by which the proposal must be received by the sponsor. Enter Month/Day/Year.

Principal Investigator/Program Director's Statements: Check (Yes) or (No) next to each statement where applicable.

If necessary, use space that appears in the box on Page 2 of the **Proposal Routing Form** for explanations of items from Page 1. Please add continuation page(s), if necessary.

If you checked —Yes to a question where prior authorization is required (i.e., IRB Approval, Animal Safety Protocol, etc.), please attach that documentation to the routing form prior to submittal.

Sign and date when completed

Signature of the Department Head and Dean or VP: Solicit appropriate signatures and have them affixed where indicated. Ensure that the date is entered for each signature.

If Yes to Question 8 on Page 1 under the Section, —Principal Investigator/Program Director's Statement, please describe the level of commitment, period of time, and plans to fulfill it.

On Page 2:

Faculty Release Time: Provide the names and departments of any faculty members for whom release time is requested. Indicate the amount of release time per academic year. List the amount of funds (\$) requested in this grant for release (salary and benefits) for the first year and the total grant. You must have your department chair's and dean's signature approving the release time prior to submitting your routing form to OSP.

Complete Section 3 on Page 3 if in-kind or cash matching is requested.

Complete Section 5 on Page 2 if out-year commitment is required.

Agreements Rising out of Grant Awards:

With all contracts/agreements arising out of grants, the UDC Procurement office should review and sign off on all terms and conditions for compliance with state and local procurement policies regardless of sponsor and negotiate appropriate remedies, when appropriate, if an award fits in to one of the following categories:

- 1. Agreement contains provisions that are incompatible with the Universities policies on sponsored research as detailed in PI Handbook located at www.udc.edu/osp
- 2. Agreement is inconsistent with government wide regulations for universities.
- 3. Agreement is inconsistent with DC and UDC Procurement policies.
- 4. Agreement fails to include all elements agreed upon prior to the award.
- 5. Agreements that include hiring a consultant

Agreements Wherein Consultants Are Hired Must Consider the Following:

- 1. Essential services unavailable from existing project personnel.
- 2. PI should provide in writing to the Office of Procurement and OSP the following:
 - i Scope of work to be performed by the consultant with performance milestones
 - ii. Consultants resume, address and social security number
 - iii. Compensation terms
 - iv. Duration of the agreement

ATTACHMENT III: Proposal Submission Registration Form PROPOSAL SUBMISSION REGISTRATION FORM

INTENT TO DEVELOP A PROPOSAL. FILL OUT AND SUBMIT THIS ONLINE FORM. This form will alert the Office of Sponsored Programs (OSP) that a proposal is being initiated for a particular grant announcement. It will also allow OSP to coordinate filing of competitive proposals and to plan its workload to provide maximum support. This Form will help eliminate duplicate proposal submissions from the University. Please remember the proposal must be submitted to OSP 7 business days before the due date.

PI Name *
PI College/Department *
Telephone
Email *
Name, College/Department/Institution of likely co-P
Sponsoring Agency *

if the sponsoring agency is Fed Please provide the CFDA numb	eral, er
Please provide the URL for this solicitation	
Type of Submission * Mark only one oval.	
Electronic Hard Copy	
Proposal Due Date *	
Would you like any assistance t	rom OSP?

- 3	Editing	
	Research	
1	Guidelines/Compliance Check	
	Grant Writing/ Technical Assistance	
1	Agency Form Completion	
	Proposal Development	
1	Budget Development	
	Brainstorming	
1	Other:	
-	Other Comments	

ATTACHMENT IV: Registration Request for Prospective Principal Investigator



UNIVERSITY OF THE DISTRICT OF COLUMBIA REGISTRATION REQUEST FOR PROSPECTIVE PRINCIPAL INVESTIGATOR

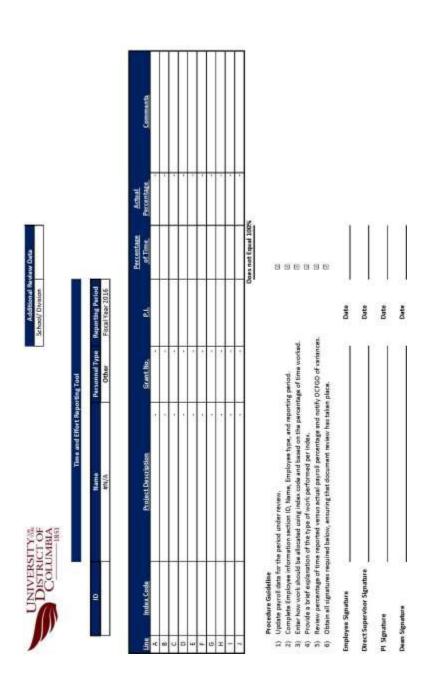
Print Form

Principal investigator roles and responsibilities are limited to individuals in regular faculty positions or in regular, professional-level administrative positions at the University.

1. Nam	ne:		
2. Posit	rition Title:		
3. Acad	Academic Department or Administrative Unit:		
4. Nam	me and signature of Department or Administr	ative Unit Head	
5. Phon	one number: Fax num	ber:	
6. Ema	ail address:		
7. High	thest academic degree: Y	ear Awarded:	
8. High	hest degree field:		
	rarding institution:		
	ner degrees and fields:		
	encies or E-Portals:		
a	a. National Science Foundation (Fastlane) a	md Research.gov	
	b. National Institutes of Health (eRA Comm		
	c. FedConnect		
	d. Other (list all)		
	a. outer (ms an)		
onsor poli	d the responsibilities of a principal investigat licies and procedures in developing proposals ning and reporting the work for any funded pr	s, preparing them for submission, and	
	Signature	Date	
	OSP USE ONL		
		y 2:	
		put:	
		y ID:	
User Pas	Date User Notified:	assword:	

Please submit this form by email or fax to the UDC Office of Sponsored Programs

ATTACHMENT V: FACULTY/PROFESSIONAL STAFF AFTER -THE-FACT



ATTACHMENT VI: Request for Pre-Award Expenditures

Print Form

Request for Pre-Award Expenditures



My grant is recommended for funding, and I request approval of pre-award expenditures essential to make progress on the project.

sential to make progress on the project.				
ame:	Phone Number			
nail:	Fax Number			
onsor:	Proposa/Award Number:			
ant Title:				
pected Award Date:	Expected Award Amount:			
quested Pre-Award Expenditure Amount:				
stification:				
Attachments:	A through E are required			
A Proposal abstract/summary (1 Page)				
B Documentation of sponsor's intent to ma	Documentation of sponsor's intent to make award			
C Documentation that sponsor allows pre-	☐ Documentation that sponsor allows pre-award expenditures			
D Proposal grant budget as submitted to sp	Proposal grant budget as submitted to sponsor			
E Requested pre-award budget (in UDC bu	dget categories)			
F Other				
I agree to use pre-award funds only in accorda	ance with sponsor and UDC policies			
Pl's Signature :	Date:			
Department Head's Signature :	Date:			
Dean or Vice President's Signature :	Date:			
Associate Provost for Research's Signature :	Date:			
Managing Director of Finance's Signature :	Date:			
□ Approved □ Denied By	Account #			

ATTACHMENT VII: Project Extension Request Form

Project Extension Request Instructions and Form

University of the District of Columbia Office of Sponsored Programs

INSTRUCTIONS: Please read these instructions prior to completion

This form may be used to notify OSP and/or certain agencies of authorized one-time, no cost extensions of up to one year. The notification process is applicable to all research grants and cooperative agreements from the following agencies, unless the special terms and conditions for the particular award require otherwise:

NSF - National Science Foundation

Army - U.S. Department of the Army

DOE - U.S. Department of Energy

EPA - U.S. Environmental Protection Agency

NASA - National Aeronautics and Space Administration

NIH - National Institutes of Health

USDA - U.S. Department of Agriculture (CSREES awards under FDP allows two (2) PENS to be authorized; award period

CANNOT exceed five years under Public Law)

USDE - U.S. Department of Education (award period CANNOT exceed five years under Public Law)

Please be sure to review the terms and conditions of a particular award before submitting a notification form to ensure that this procedure is applicable to the award.

All agencies, except for the U.S. Department of Education, implement this authorization under the Federal Demonstration Partnership (actual FDP terms and conditions listed below for your information).

Federal Demonstration Partnership General Terms and Conditions

Extensions Without Additional Funds

Recipients may extend the expiration date of the project if additional time beyond the established expiration date is required to assure adequate completion of the original scope of work within the funds already made available. A single extension, which shall not exceed twelve (12) months, may be made for this purpose, and must be made prior to the originally established expiration date. The recipient must notify the cognizant awarding agency official in writing with the supporting reasons and revised expiration date at least ten (10) days prior to expiration of the award.

Please complete the information requested, obtain the appropriate signatures, and forward the form to your College/Unit Research Office. One-time, no-cost extensions should be received at least 15 days prior to the current expiration date to allow for processing time. Completed forms must be sent to:

Office of Sponsored Programs Attention: JoVita Wells Building 39 Room 301-J

> Email: jowells@udc.edu Phone: (202) 274-6260 Fax: (202) 274-5267 Website: www.udc.edu/osp

ATTACHMENT VIII: Colleges and Universities Rate Agreement

COLLEGES AND UNIVERSITIES RATE AGREEMENT

EIN: 53-6001131

ORGANIZATION: FI

University of the District of Columbia

4200 Connecticut Avenue, N.W.

Building 38, Room 302-6 Washington, DC 20008DATE:01/29/2015

FILING REF.: The preceding

agreement was dated

03/26/2012

The rates approved in this agreement are for use on grants, contracts and other agreements with the Federal Government, subject to the conditions in Section III.

SECTION I: Facilities And Administrative Cost Rates

RATE TYPES: FIXED FINAL PROV. (PROVISIONAL) PRED. (PREDETERMINED)

EFFECTIVE PERIOD

TYPE	FROM	TO	RATE(%) LOCATION	APPLICABLE TO
PRED.	10/01/2015	09/30/2019	48.00 On-Campus	All Programs
PRED.	10/01/2015	09/30/2019	26.00 Off-Campus	All Programs
PROV.	10/01/2019	09/30/2021		Use same rates and conditions as those cited for fiscal year ending September 30, 2019.

*BASE

Page 1 of 4

U70466

AGREEMENT DATE: 1/29/2015

Modified total direct costs, consisting of all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). Modified total direct costs shall exclude equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

Page 2 of 4

ORGANIZATION: University of the District of Columbia

AGREEMENT DATE: 1/29/2015

SECTION II: SPECIAL REMARKS

TREATMENT OF FRINGE BENEFITS:

The fringe benefits are specifically identified to each employee and are charged individually as direct costs. The directly claimed fringe benefits are listed below.

TREATMENT OF PAID ABSENCES

Vacation, holiday, sick leave pay and other paid absences are included in salaries and wages and are claimed on grants, contracts and other agreements as part of the normal cost for salaries and wages. Separate claims are not made for the cost of these paid absences.

OFF-CAMPUS DEFINITION: For all activities performed in facilities not owned by the institution and to which rent is directly allocated to the project(s) the off-campus rate will apply. Grants or contracts will not be subject to more than one F&A cost rate. If more than 50% of a project is performed off-campus, the off-campus rate will apply to the entire project.

Fringe benefits include: FICA, retirement, disability insurance, life insurance, tuition remission, TIAA/CREF, workers' compensation, unemployment insurance, health insurance and dental insurance.

Equipment means an article of nonexpendible tangible personal property having a useful life of more than one year and acquisition cost of \$5,000 or more per unit.

Next proposal based on the fiscal year ending Semptember 30, 2018 is due in our office by March 31, 2019.

Page 3 of 4

ORGANIZATION: University of the District of Columbia

AGREEMENT DATE: 1/29/2015

SECTION III: GENERAL

A. LIMITATIONS:

A. Intrinsions:

The rates in this Agreement are subject to any statutory or administrative limitations and apply to a given grant, contract or other agreement only to the extent that funds are available. Acceptance of the rates is subject to the following conditions: (1) Only costs incurred by the organization were included in its facilities and administrative cost pools as finally accepted; such costs are legal obligations of the organization and are allowable under the governing cost principles; (2) The same costs that have been treated as facilities and administrative costs are not claimed as direct costs; (3) Similar types of costs have been accorded consistent accounting treatment; and (4) The information provided by the organization which was used to establish the rates is not later found to be materially incomplete or insecurate by the Federal Government. In such situations the rate(s) would be subject to renegotiation at the discretion of the Federal Government.

B. ACCOUNTING CHANGES

This Agreement is based on the accounting system purported by the organization to be in effect during the Agreement period. Changes to the method of accounting for costs which affect the amount of reloburgement resulting from the use of this Agreement require prior approval of the suchorized representative of the commission spency. Such changes include, but are not limited to, changes in the charging of a particular type of cost from facilities and administrative to direct. Failurs to obtain approval may result in cost disallowances.

C. FIXED BATES:

If a fixed rate is in this Agreement, it is based so an estimate of the costs for the period covered by the rate. When the actual costs for this period are determined, an adjustment will be made to a rate of a future year(s) to compensate for the difference between the costs used to establish the fixed rate and actual costs.

D. DIE BY OTHER PEDERAL AGENCIES:

The rates in this Agreement were approved in accordance with the authority in Office of Hanagement and Budget Circular A-21, and should be applied to grants, contracts and other agreements covered by this Circular, subject to any limitations in A above. The organization may provide copies of the Agreement to other Federal Agencies to give them early notification of the Agreement.

E. OTHER:

If any Pederal contract, grant or other agreement is reinbursing facilities and administrative costs by a means other than the approved race(s) in this Agreement, the organization should (1) credit such costs to the affected programs, and (2) apply the approved rate(s) to the appropriate base to identify the proper amount of facilities and administrative costs allocable to these programs.

BY THE INSTITUTION:	ON BIGUALF OF THE FEDERAL GOVERNMENT:
University of the District of Columbia	DEPARTMENT OF HEALTH AND MUMAN SERVICES
nould L. Related	(AGENCY) Darryl W. Mayes -5 States agending from the same of more and more control and the same of the
(STGHATURE)	(SIGNATURE)
JOHALD L. RICKFORD	Darryl W. Mayes
(HAME)	(NAME)
_ C.Fo	Deputy Director, Cost Allocation Services
(TITLE)	(TITLE)
2/5/15	1/29/2015
(DATE)	(DAYE) 0466
	HHS REPRESENTATIVE: Steven Zuraf
	Telephone: (301) 492-4855

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ATTACHMENT IX: UDCInstitutional Review Board Application for Approval to Use Human Participants

1

University of the District of Columbia Institutional Review Board APPLICATION FOR APPROVAL TO USE HUMAN PARTICIPANTS

IRB No:	Date Recei	ved:
Instructions to the applicant:		
1. Please review the UDC IRB Guide 2. Attach a copy of the informed consent recruitment strategy, any recruitment not interview forms, or scripts to be used. (The Checklist are useful guides.) Include a stapersons with disabilities. 3. Attach a certificate of completion of tracompleted within the last three years, from appropriate source for the PI and all Co-I 4. If your application has been approved 5. Submit completed application docume 6. Sign this application form (electronical contents).	form, project description includes, research survey instrument attached Sample Informed attement of how the researcher aining in the protection of hum http://phrp.nihtraining.com Pls. by another IRB, kindly attached the electronically in a single form.	uding methodology and, ents, psychological tests, Consent Form and will accommodate man research subjects, /users/login.php or other a copy.
A. Administration		
Principal Investigator:	Faculty Rank:	
investigator.	Tacutty Rank.	
Department:	Office Phone:	Email:
Co-Investigator:	Faculty Rank:	
Department:	Office Phone:	Email:
Project Title:	7.	
Source of funding:		
Dates of Brancoad Project From	To	

Type of application: () New () Renewal () Revision

Date of Submission to IRB:

B.	Pr	oject Information						
	1.	Is this proposal qualified as exempt research?	Yes ()	No ()		
		If yes, please check the following items to indicate why Exemption. If no, please complete items 2 to 9	this p	roposal o	_l ualifie	s for		
	a. b.	Does the research involve normal educational practice? Does the research involve the use of educational tests, surveys,	Yes ()	No ()		
	0.	interviews, and observations of public behavior?	Yes ()	No ()		
		If yes:						
		Can information be linked to the subject? Will disclosure of information place subjects at some	Yes (No (300		
		risk?	Yes ()	No ()		
	c,	Does the research involve the use of educational tests, surveys, interviews or observations of public behavior not exempt under (b) above, where participants are elected or appointment						
	d.	of public officials or candidates for public office?	Yes ()	No ()		
	u.	documents, records or pathological specimens?	Yes ()	No ()		
		If yes:						
		Are these sources publically available?	Yes ()	No ()		
	c.	Can information be linked to the subject? Is research conducted by or subject to approval of Federal	Yes ()	No ()		
	c	agencies?	Yes ()	No ()		
	f.	Is research an evaluation of taste, food quality, and consumer acceptance?	Yes ()	No ()		
	g.	Does the procedure meet government safety regulations?	Yes ()	No ()		
2.	Human Participant Pool (Please mark the appropriate space(s).)							
	CI	nildren: Age Range:						
	C	ollege Students:						
	Prisoners:							
		egnant women:						
		DS patients:						
	Pe	ersons with disabilities:						
	O	her (please specify):						

3.	Does the study involve:							
	University public records?	Yes ()	No ()			
	University non-public records?	Yes ()	No ()			
4.	Does the study potentially involve:							
	Physical risks to the participants?	Yes (y .	No (3			
	Social risks to the participants?)	No (Š			
	Psychological risks to the participants?	Yes (*	No (
	Discomfort to participants?			75-55502				
	Invasion of privacy?	Yes (100	No (
	Disclosure of information possibly damaging to participant(s) or others?	Yes () }	No (
5.	Are participants clearly informed about:							
	The nature and purposes of the study?	Yes ()	No ()			
	The procedures to be followed including alternatives?	Yes ()	No ()			
	Any risks and/or discomfort?	Yes ()	No ()			
	Any sensitive questions?	Yes ()	No ()			
	Any benefit to be derived?	Yes ()	No ()			
	The right to refuse or withdraw from the study?	Yes ()	No ()			
	The confidential handling of data?	Yes ()	No ()			
	The compensation policy (for more than minimal risk)?	Yes ()	No ()			
	Whom to contact?	Yes ()	No ()			
6.	Will a signed or oral consent be obtained?	Yes ()	No ()			
	If yes,							
	From participants?	Yes ()	No ()			
	From parent or guardian?	Yes ()	No ()			
7.	Will a copy of the disclosure consent form be given to the participant/guardian?	Yes ()	No ()			

		onymity of partic		(0.10)(10)	Yes ()	No ()
9.		roposal involve o lual etc.?	collaboration with	an institution, agency	y, or Yes ()	No ()
	If yes,	please specify	below:					
C.	700			a description of the	project's pu	rpose,	hypothe	sis,
	b.	Please attach,	1 100 300 FOURTH	ogy l a statement describ u will accomplish tl	Company of the compan			
D.		Name:	cetch of the Princ	cipal Investigator:			P	
	b	Rank: Education:						
		ighest Degree	Institution	Year Completed	Field of Stu	dv		
	c.	previous empl order the titles	loyment, experie	Experience: Please 1 nce and honors. Ple ons during the past t	ase also list i	n chro	nologica	ıl
	c.	previous empl	loyment, experie	nce and honors. Ple	ase also list i	n chro	nologica	ıl
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() Expedited Review	
() Full Review	
IRB Recommendation: (if disapprove, give reasons)	
() Approve () Need modification () Dis	approve
Reason (s)/modification (s):	
Signature:	
Chairperson:	Date:
Member:	Date:
	Date:
	Date:
	Date:
1 10	Date:
Vice President for the Academic Affairs or designee:	() Approve () Disapprove
Signature:	Date:

- IX. EXPLANATION OF TREATMENT AND COMPENSATION FOR INJURY:
- X. VOLUNTARY PARTICIPATION WITH RIGHT OF REFUSAL: I have been informed that my participation in this study is completely voluntary. I am free to withdraw my consent for participation in the study at any time
- XI. IRB REVIEW AND IMPARTIAL THIRD PARTY: This study has been reviewed and approved by the UDC Institutional Review Board (IRB). A representative of that Board, from the IRB Office, is available to discuss the review process or my rights as a research subject. The telephone number of the IRB Office is (202) 274-5973.
- XII. <u>SIGNATURE FOR CONSENT:</u> The above-named investigator has answered my questions and I agree to be a research subject in this study.

Participant's Name:	Date:
Participant's Signature:	Date:
Parent/Guardian Signature:	Date:
(for participants under the age of 18) Investigator's Signature;	Date:
Translator's Signature:	Date:
I have translated this form into the	language

ATTACHMENT X: Sample Data Management Plan

Sample Outline for a Data Management Plan: A data management plan typically contains the following sections below. However, please check your sponsor's specific requirements

<u>Data description and nature of the data:</u> This section should provide a general overview of the nature of the data or other materials produced under the NSF-sponsored project. What are the characteristics of the data? What type of data will be generated? If your data are of a sensitive nature (related to human subjects for example), it should be noted in this section and addressed more fully in later sections. Sample data management plans can be found on the OSP website.

Standards to be used for data and metadata format and content: This section should provide short summary of the data standards and metadata standards you will use over the course of your projects. The term, metadata refers literally to data about the data, and they usually take the form of a list of elements used to describe the data. Some of the questions you may want to answer in this section include:

- What file formats will be used for the data (if applicable)?
- What metadata will be collected and maintained to make the data meaningful?
- How will the project save the details of the data and metadata?
- How will the accuracy and validity of the data and metadata be assured?

Describe the method for preserving the data: This section should provide a short summary of how the data will be preserved and made available for sharing. Some of the issues to be addressed are:

- Will the data be shareable? (If the data will not be shareable, please explain why here.)
- How and when will you make the data available? (If there are any embargo periods due to contractual arrangements please detail those here.)
- What is the process others would use for gaining access to the data?
- Does the original data collector/ creator/ principal investigator retain the right to use the data before opening it up to wider use? If yes, for how long?
- What, if any, provisions will be made for appropriate protection of privacy, confidentiality, security, intellectual property, or other rights or requirements if necessary?

<u>State how long the data will be kept:</u> (OMB Uniform Guidance) mandates that original data be kept at least 3 years from the end of the project providing there are no ongoing investigations. However, the common practice is to keep the original data in perpetuity. Some issues you might want to address in this section are:

- What is the long-term strategy for maintaining and archiving the data?
- Where will the data be stored?
- What transformations will be needed to allow data sharing (de-identifying or aggregating the data, etc.)?
- What metadata and/or documentation will be created and where will it be stored?
- How long will the data be kept?