UCCS Principal Investigator Handbook

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A. INTRODUCTION

1. STRUCTURE:

a. Vice Provost & Associate Vice Chancellor for Research

The Vice Provost & Associate Vice Chancellor for Research (VPR) serves as the chief academic research administrator of the University. Other responsibilities include representing the University in various consortia and committees, creating and distributing internal funds to support faculty and students in their scholarly endeavors, encouraging a better understanding of the relation between teaching, research, and other scholarly activities, and fostering a diverse and inclusive research environment. The VPR serves as an advocate and a resource for researchers on the UCCS campus. **Learn more about the VPR here**.

b. Office of Research (OOR)

The Offices of Research (OOR) facilitates faculty and student development, growth, and inclusive participation in research, publications, grants and performances as well as national and international conferences and exhibitions. The OOR supports the surging research agenda at UCCS through strategic planning, professional development, workshops, grant writing bootcamps, seed grants, travel awards, research awards, post-award staff support, mentoring, policy, and practice. The OOR is guided by the Research Faculty Advisory Board. Learn more about the OOR here **https://research.uccs.edu/**

Example Services Provided by OOR
- Assist in locating funding opportunities
- Monthly funding bulletins
- Workshops and bootcamps
- Grant writing and proposal development support
- Post-award staff support
- Student research support

c. Offices of Sponsored Programs and Research Integrity (OSPRI)

The Offices of Sponsored Programs (OSP) support the University community in their pursuit and management of grants and contracts. OSP is the key point of contact around pre-award and non-financial post-award administration of sponsored research, instruction, and other activities. OSP reports to the Associate Vice Chancellor for Research. OSP works very closely with the Office of Research Integrity (ORI) to foster non-financial related research compliance.

Contact OSP

Example Services Provided by OSP:
- Institutional authority to submit proposals to sponsor
- Assist with proposal submissions
- Assist with routing via Cayuse (see C.2 for more information on Cayuse)
- Obtain guidelines/applications
- Interpret guidelines
- Budget assistance
- Coordinate PI eligibility and F&A reductions/waivers
- Review/completion of required representations & certifications
- Route files to Innovation and Technology Transfer Office, as needed
- Review and negotiate awards with sponsors
- Coordinate with the Controller's Office of Sponsored Projects Accounting for account set-up, post-award financial administration, and project close-out
- Processing for institutional approval and signature
- Liaison with funding organization throughout the project period
- Process requests for budget modifications, extensions, and other prior approval requests
- Track proposal/award data
- Maintain contract/grant records
- Final Project Reports
- Final Invention Statements

The Office of Research Integrity (ORI) is responsible for providing leadership and ensuring institutional compliance with diverse federal, state, and university regulations, policies, and procedures such as: Export controls, the protection of human subjects, animal care and use, and those related to sponsored programs, such as responsible conduct of research (RCR), FAR/DFARS clauses, and conflict of interest policies and procedures. The VPR serves as the campus Research Integrity Officer.

Examples of Services Provided by ORI:
- Institutional Review Board for the Protection of Human Subjects (IRB)
- Institutional Animal Care and Use Committee (IACUC)
- Institutional Biosafety Committee (IBC)
- Scientific Misconduct and Fraud
- Export Controls
- Conflict of Interest
- Restricted, Proprietary, and Classified Research

d. Venture Partners Office (formally the Technology Transfer Office)

Services offered by the Venture Partners Office include processing invention disclosures from CU personnel, conducting inventor interviews, processing intellectual property contracts, such as confidential disclosure and materials transfer agreements, and educating faculty and students about patents, CU intellectual property issues, software policy, copyrights, and industry-sponsored research. The VPR serves as the campus Tech Transfer Officer.

[Contact the Venture Partners Office](#)

This office is responsible for:
- Advising faculty on intellectual property issues.
- Fostering inventor participation in the technology transfer program.
- Educating campus researchers about the technology transfer process through newsletters, departmental presentations, and seminars by guest experts.
- Soliciting and analyzing invention disclosures from faculty, students, and staff and recommending commercialization strategies.
- Negotiating intellectual property language in sponsored research contracts, material transfer agreements, and confidential disclosure agreements.
- Licensing CU Tangible Research Property for commercial use.
- Licensing patents and copyrights for commercial use.

e. College/Departmental Sponsored Program Administrators

The College/Departmental Research Administrator is the key point of contact for pre- and post-award administration of sponsored research, instruction, and other activities. Contact your College/Department to locate your Research Administrator or visit the Sponsored Programs Administrator Network (SPAN) website for a list of up-to-date contacts: **https://osp.uccs.edu/resources/span. See Section I for more details.**

If your department does not have a designated administrator to assist with post-award administration of sponsored research, you can request assistance from the Post-Award Specialist in the Office of Research. Learn more here: **https://research.uccs.edu/post-award-support.**

f. Controller's Office – Sponsored Projects Accounting

Sponsored Projects Accounting is part of the UCCS Controller's Office and is the key point of contact for researcher's post-award financial administration, including account set up and close out. Each PI is assigned a SPA expert to financially monitor the award. SPA works very closely with College/Department administrators. See Section I for more details.

[For more information, visit the Controller's Office website](#)

Services Provided:
- Coordinate with the Office of Sponsored Programs and Research Integrity for account set-up, post-award administration, and project close-out
- Set up project account in accordance with award notice
- Monitor expenditures as to allowability, allocability, and appropriateness; must hold up to Federal and State Audit
- Manage billing and receivable activities
- Prepare financial reports, as required
- Administer the personnel effort report (ePER certification) system
- Coordinate cost share/match documentation for audit
- Coordinate project close-out
- Final financial reports
- Final property reports
- Final technical reports

2. WHAT IS A SPONSORED PROJECT?

Most grants, contracts, and other agreements from outside sources that have terms and conditions are "sponsored projects" and are administered through the Office of Sponsored Programs.

A project is considered a "sponsored project" if it meets **any one** of the following criteria:
- Award contains a detailed budget that must be approved by the sponsor
- Modifications to the budget must be approved by the sponsor
- Unexpended funds must be returned to the sponsor
- Sponsor designates an employee as a technical monitor as opposed to a contact person to improve communications
- Payments made by the sponsor are required to be allocated to specific expenditures incurred to provide specific deliverables
- Payments are contingent upon programmatic or fiscal reporting (milestones)
- Sponsor requires specific deliverables such as a detailed technical report of research results and methodologies, and/or a report of detailed expenditures
- Award contains intellectual property rights provisions
- Award restricts or monitors publications or use of results
- Award includes boilerplate terms and conditions imposed by the sponsor
- Award contains provisions to protect the sponsor and confidential information
- Award requires a matching or cost-sharing commitment from the University

- Proposal involves the use of human subjects, animals, radioisotopes and radioactive materials, recombinant DNA, human body substances, etiologic agents, or proprietary materials
- Agreement contains provisions for an audit by the sponsor or on behalf the of sponsor
- Testing or evaluation of proprietary products is involved
- Award is funded by resources from Federal, State, or local government.

3. WHAT IS A GIFT?

A Gift/Donation is considered a "gift" if it meets any of the following criteria:
- Award is a voluntary and irrevocable transfer of money or property
- Award is unrestricted
- Donors expect no direct economic benefit or any other tangible compensation (goods or services) from the University in return for the gift or donation, except in the case of life income gift arrangements
- Gifts/Donations to the University for the University's ownership and benefit are generally considered to be gifts if the donations do not include any of the conditions defining a sponsored project.

Gift solicitation and receipt should be coordinated with the University of Colorado Foundation. The Foundation will accept the gift on behalf of the University and deposit the donation in a restricted gift account. By policy, the Executive Director of OSP makes the final determination if there are terms and conditions that classify a funding stream as a gift or sponsored program. Please see the Gifts-in-kind (GIK) Frequently Asked Questions Document or email GIK@cu.edu for guidance.

B. FINDING FUNDING: TIPS AND STRATEGIES

1. TIPS ON LOCATING FUNDING OPPORTUNITIES & POTENTIAL SPONSORS

- Review the OOR website for funding bulletins and funding agency spotlights.
- Read footnotes and acknowledgments: In reviewing the literature on a topic, look in these places to see who funded the project. The organization may have current funding opportunities.
- Read CVs of your colleagues and peers: It is typical to list funded grants on a CV, so if you have a colleague or peer whose research you follow and are interested in, check their CV for funding ideas.
- Check funder databases: Often, both federal and private funders will have a searchable database of funded projects. Here you can see what the funder is interested in funding, how much they are funding projects for, and related projects.
- Check your professional association newsletters: Often these sources announce grant competitions.
- Discuss the project with colleagues: They may know additional sources of support.
- Read the descriptions of grant announcements carefully: The announcements could suggest other "keyword" areas to pursue. Since guidelines are not always descriptive, contact the program officer/contact person at the agency to confirm that the program is the right match.
- Talk to the Program Officer/contact person: Program Officers are there to help you. They want to receive quality proposals that are consistent with their priorities.
- If the announcement deadline has passed, keep it in mind for the future. Many programs have cycles or annual competitions.
- Contact the Research Development Coordinator: The research development coordinator, in the Office of Research, can help with your grant writing needs including searching for funding. Request support here: **https://research.uccs.edu/research-development-coordinator**
- Sign up for SPIN alerts (see #2 below).

2. ONLINE RESOURCES FOR INTERNAL AND EXTERNAL FUNDING SEARCHES

There are a number of online resources available to assist you in your search for internal and external funding. Here are some resources for finding external funding opportunities:

- Pivot-RP: a web-based suite of tools used to identify funding opportunities and potential collaborators across all disciplines. It is freely available to all faculty, postdocs, staff and students at UCCS.

- **SPIN**: A database of sponsored funding opportunities. SPIN aggregates funding from both federal and private funding sources and is a great place to start your search. To log in, choose Colorado Springs from the dropdown menu and login in with your UCCS credentials.
- **Grants.gov**: A database of federal grant opportunities that includes both posted and forecasted opportunities.
- NIH RePorter
- NSF Award Search
- NEH Funded Project Query
- NEA Grant Search
- USDA Current Research Information System
- DoE Portfolio Analysis and Management System
- DoD Congressionally Directed Medical Research Programs

C. PROPOSAL SUBMISSION POLICIES AND PROCEDURES

1. WHO MAY SERVE AS PRINCIPAL INVESTIGATOR/PROJECT DIRECTOR?

Individuals holding tenured and tenure-track faculty positions or having the title of Research Associate, Senior Research Associate, Assistant Research Professor, Associate Research Professor, or Research Professor at the University of Colorado Colorado Springs are automatically eligible to serve as a Principal Investigator or a Co-PI. **Retired tenured faculty or emeritus faculty will need to seek approval following the procedures below.**

Other individuals may seek approval by the VPR to serve as a Principal Investigator or Co-PI. To initiate a request for approval, a recommendation is required from the academic unit, center, or institute taking responsibility for the project; and the dean(s) or Vice Chancellors, when appropriate. This approval must be obtained prior to contacting OSP for proposal assistance.

Check with OSP early to determine PI eligibility and fill out the PI Eligibility Request if, and only if, the intended PI/Co-PI does not hold any of the titles listed above. Visit the OSP forms website for the PI eligibility paperwork.

*NOTE: The completion of a PI eligibility form is not required when submitting applications for: 1. Mentored projects, such as mentored career development awards; or 2. Mentor/mentee type fellowship applications where the sponsor requires that the mentee conduct their research under the supervision of a designated faculty mentor/sponsor in the facilities of that designated mentor/sponsor and/or the sponsor requires supporting documentation from the mentor (e.g., CV, letter of support).

Eligibility to be a Principal Investigator, Co-PI, or any UCCS personnel associated with a sponsored programs project must have a current Conflict of Interest (COI) Disclosure on file. The UCCS COI policy requires all employees to submit a COI disclosure within 60 days (about 2 months) of hire and annually thereafter. The annual requested window for faculty to complete their COI disclosure is April 1-June 30th or the last two months of the faculty performance evaluation cycle. Once you have completed your COI disclosure, please forward the email you receive confirming completion to OSP. Complete the COI disclosure form here: **https://hr.uccs.edu/document-library/conflict-of-interest**

2. INTERNAL PROCESSING OF PROPOSALS

a. Proposal Routing through Cayuse:

As of July 1, 2024, all proposals must be routed via our proposal routing software, Cayuse: https://uccs.app.cayuse.com/. For FAQ, training, and additional information on Cayuse, please visit: https://osp.uccs.edu/cayuse

The PDF Proposal Routing Form is no longer in use and will not be accepted for proposal submissions

Proposal routing via Cayuse (https://uccs.app.cayuse.com/, see more below) is required for **all** proposal submissions, whether new, resubmissions, or renewals. All proposals must have institutional approval before submission to the sponsoring organization. For special requests regarding cost sharing, differentiated facilities and administrative (F&A) costs, and course buyouts, addenda are required and Cayuse will request these documents be uploaded as you answer the routing form questions.

To note, Cayuse only replaces the PDF routing form and does not replace other processes in place. Budgets and budget justifications/narratives must still be approved by OSP in addition to being attached to the routing document. Follow the guidelines and deadlines emailed to you by one of OSP's pre-award specialists.

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Signatures: The Principal Investigator is responsible for inputing the correct information into Cayuse and confirming that the routing tab populates the correct individuals for signatures. This includes adding any Co-PIs and department staff administrators (if applicable) as well as indicating the department/center/institute that will administer the grant. If there are any errors such as incorrect or missing approvers, please contact OSP to adjust the form.

NOTE: Routing will take longer than usual in the following cases, so please plan accordingly:
- The proposal budget is over $1M
- Cost-share is required
- Involves subawards/subcontracts/subrecipients
- Involves curriculum changes
- Involves student training/internships/scholarships
- Requires research security compliance
- No cost extension is over $1M

Collaboration notes:

- If **UCCS is the lead** institution (sometimes called the "prime"), the UCCS PI will need to 1) generate the routing from via Cayuse for internal approval and 2) work with OSP to collect subrecipient commitment forms (found on the forms page of the OSP website) from all collaborators/subcontractors which includes the signature of a person authorized by the subcontracting organization to commit the subcontractor. The PI must inform OSP of the subaward organization/institution and provide a point of contact for all documents needed for submission. In addition to these forms, the UCCS PI needs to incorporate the subcontract costs into the budget category "Subaward/Contractual Costs." In collecting subcontracts to append to a proposal, the UCCS PI should make sure

that each subcontract contains a specific statement of work or line of scientific inquiry, a related budget, required representations, certifications, and assurances (e.g., human subjects assurance,).

- If **UCCS is a subcontractor**, the routing process is no different; the PI adds the proposal to the Cayuse portal and will indicate that UCCS will be a subaward/subcontract and name the organization (lead/prime institution) to which UCCS will be a subcontractor. The PI must inform OSP of the lead/prime institution and provide a point of contact for all subaward documents needed for the submission. The subcontract proposal must also have institutional approval before being sent to the lead institution; allow plenty of time for the approval process, and for transmission to the lead institution well before the submission deadline date.

- NOTE: OSP is responsible for obtaining or submitting all FINAL prime or subcontract documents to the other organization/institution on behalf of UCCS.

- For a further discussion of subcontracts, [see Section K](#).

b. **Additional Forms and Addendums:**
Depending on the solicitation, your collaborators, etc., you may need to fill out additional forms and addendums for internal processing. NOTE: PI's are responsible for the routing of signatures on all forms.

Below is a breakdown of the most commonly needed addendums. All up-to-date forms can be found here: **https://osp.uccs.edu/resources/forms**

- **Cost Share Addendum:** If the solicitation requires a cost share or matching funds, the PI will need to fill out the cost share addendum to denote how the cost will be split between colleges/departments/units. *Note that cost sharing is discouraged if not explicitly required by the sponsoring agency.*
- **Additional Space/Facilities Addendum:** If additional space is needed beyond what the PI can currently access, a request can be submitted.
- **Differential F&A Distribution Addendum:** When multiple colleges/centers are involved, these units will need to agree on how to distribute the F&A from the project. Be sure to start these negotiations early so that this form can be uploaded in the appropriate field in the Cayuse portal.
- **PI Eligibility Request:** If the PI or Co-PI does not hold any of the job titles outlined in C.1. above, the PI Eligibility Request form must be filled out and approved by their supervisor for the proposed project. Additional approvals also need to be obtained; check with OSP to determine additional paperwork and approvals necessary to ensure the PI or Co-PI is eligible ahead of the draft budget deadline (10 business days before the sponsor deadline).

3. MEETING THE DEADLINE

Countdown to proposal submission success:

- **Notify:** As soon as you have determined an opportunity to apply for, contact OSP at osp@uccs.edu and copy the Executive Director to ensure receipt of your intent to apply. To allow adequate time for review, this initial notice should occur ideally **at least six (6) weeks** prior to the agency deadline. It is never too soon to notify OSP that you are planning a submission.

- **Check Agency Login Access:** Make sure you have credentials to log into the correct funding agency portal. The portal often contains detailed information on the forms and paperwork required with your submission. Contact OSP for help in setting up your login if needed.

- **Penultimate Draft Budget*:** The **final** drafts of your budget and budget justification/narrative are due to OSP by **8:00 am at least ten (10) business days ahead of the submission deadline**. OSP will review your budget for compliance and request edits as appropriate. If the sponsor does not require a budget, you will still need to complete the budget template and justification for internal purposes. If a sponsor has its own budget template, you will need to complete both the sponsor budget template and the OSP budget template by the OSP budget deadline.

  *While Cayuse requires that the draft budget and budget justification be uploaded in the portal, this is for routing purposes ONLY. The PI is still responsible for sending these documents directly to OSP for review.

- **Complete and Final Package:** All proposal documents (full proposal, final OSP approved budget, budget justification, narrative, routing form, addendums, etc.) need to be received by OSP *and* uploaded to the agency portal by **8:00 am at least five (5) business days before the submission deadline**. This does not include weekends or holidays, so please plan accordingly.

For a comprehensive breakdown, see "A Timeline to UCCS Grant Submission" on the OOR toolkit website: **https://research.uccs.edu/grant-writing-tool-kit**

FIVE (5) FULL BUSINESS DAYS ARE REQUIRED FOR ADMINISTRATIVE REVIEW OF THE FINAL AND COMPLETE SUBMISSION PACKAGE. FAILURE TO MEET THE DEADLINE MAY JEOPARDIZE THE ON-TIME SUBMISSION OF THE PROPOSAL AND MAY RESULT IN AN INCOMPLETE REVIEW BY OSP.

Conditional submission: On a case-by-case basis, proposals that do not meet the deadline may be submitted to the Sponsor with conditional approval only. Determination depends on the complexity of the project, the number of compliance issues involved, etc. If a submission is conditionally submitted and subsequent review

reveals that the proposal is incomplete or does not conform to Institutional or Sponsor requirements, the proposal may be withdrawn by OSP on behalf of UCCS.

Enforcement of our five (5) business-day <u>8:00 am</u> deadline: Please pay close attention to the deadlines for the penultimate draft budget review and your complete and final submission package. ***Keep in mind: "complete" means you have uploaded the documents to the correct submission portal***, *that you've already had your budget reviewed and approved/finalized, and you have obtained all necessary signatures via Cayuse.*

OSP provides a targeted review. A targeted review does mean there is more burden on the PI to read the solicitation and follow the directions. But it also means that there will be fewer last-minute changes and lists of items to fix**.** Proposal review will include only:
1. Budget Excel file, using the most current form of the budget template
2. Budget justification
3. Checking to ensure all required proposal components have been uploaded. You should plan on this being your final submission barring any major omissions or compliance errors to fix.

Only the UCCS-designated official can submit a proposal. In rare cases (e.g., a fellowship proposal) the PI will need to work with OSP to submit. The OSP official is the only person who can represent the University, certify, and submit the proposal in accordance with the sponsor's requirements.

4. SIGNATURE AUTHORITY

OSP will obtain signatures on non-internal documents on behalf of the University of Colorado Colorado Springs.

- **Authorized individuals are:** OSP Executive Director, OSP Associate Director, Vice Provost and Associate Vice Chancellor for Research, Provost and Executive Vice Chancellor for Academic Affairs, and the Chancellor

- **Principal investigators, deans, chairs, and others are <u>not authorized</u>** to sign proposals, contracts, grants, licensing agreements, material transfer agreements, non-disclosure agreements or any other legal document on behalf of UCCS.

5. ELECTRONIC SUBMISSION OF PROPOSALS

Most proposals are submitted electronically through grant submission portals (for more information on these, see **<u>section G</u>**). In rare cases, a hard copy of the proposal will need to be mailed. In these cases, OSP will need a hard copy of your proposal ahead of the submission deadline to mail on your behalf. No proposal may be submitted without an authorized official approval.

6. PRELIMINARY PROPOSAL/LETTER of INTENT

A preliminary proposal (pre-proposal, sometimes called a white paper, letter proposal, pre-application, or concept paper) is a short (generally 2-5 pages) description of the proposed project. Usually, the purpose of a pre-proposal is to inform the potential sponsor of your interest in submitting a full proposal; if they are interested, the sponsor requests a more detailed formal proposal. In most cases, the pre-proposal **does not involve a commitment of university resources and does not include a total cost estimate or budget**. It is not expected to result directly in an award.

A pre-proposal does not typically require routing via Cayuse or involvement with OSP. However, there are some cases in which OSP must be alerted of your intent to submit a preliminary proposal. **If your proposal meets <u>any of</u> the following criteria, contact OSP:**

- an authorized signature is required
- funding amounts are mentioned
- a budget is included:
  - In many cases, although it's only a "ballpark" figure, the sponsoring agency may obtain approval to fund the program based upon this figure and will put forth your preliminary proposal as an official proposal. Be aware that this may be the case, so have your budget finalized before sending a LOI (letter of interest/intent) that requires a budget

7. SOLICITED PROPOSAL

Sponsors may solicit formal proposals by publishing a specific program announcement. Researchers responding to the program announcement write the proposal to meet the sponsor's program guidelines.

A response to a Request for Proposal (RFP) is one type of solicited proposal. Most RFPs have a stated deadline, though some have "rolling" or "open" due dates. The proposed project must respond to the specific work statement in the RFP.

Solicited proposals are to be routed through OSP and the University administrative channels before submitting the proposal to the sponsor.

8. UNSOLICITED PROPOSAL

Unsolicited proposals are proposals submitted in response to a general area of interest expressed by the sponsoring organization. These are often termed "Parent Announcements," "Broad Agency Announcements," or "Investigator Initiated

Applications," etc. These tend to be open for several years and have deadline cycles that occur either annually or a few times a year, depending on the agency.

Many organizations publicize their areas of interest and their procedures for submitting an unsolicited proposal, which often have stated deadline dates.

Unsolicited proposals are to be routed through OSP and the University administrative channels before submitting the proposal to the sponsor.

9. RESUBMISSIONS

Some federal agencies, such as NIH, allow for resubmissions of previous grant applications. In this case, be sure to alert OSP that the proposal you are submitting is a resubmission as you will need to mark it as such in both the submission portal as well as in Cayuse. In some cases, you will also need to include a summary of the revisions made to the proposal as part of the project narrative.

If you are resubmitting to an agency that does not use a formal resubmission process, such as NSF, often you may still submit a revised version of your proposal. In this case, significant changes should be made to the proposal and it is often advised to include a short paragraph addressing changes made in response to reviewer feedback.

10. RENEWAL AND CONTINUATION PROPOSALS

A competing renewal proposal (also called a competing continuation) is a request for continued funding of a project for which funding is about to terminate. Such proposals are similar to "new" proposals and are to be routed and approved in the same manner.

Non-competing continuation proposals, which request the next year's funding within a multi-year grant, generally consist of a progress report, budget, and other relevant materials such as research results, reprints, vitae for new personnel, etc. They sometimes include a financial status report indicating the unobligated balance for the current year. Read the application instructions carefully, as federal sponsors are eliminating some requirements in their efforts to reduce paperwork and streamline their processes.

Generally, sponsors require the signature of the institutional official on the application page of non-competing continuation proposals. Non-competing continuation proposals are to be routed through OSP and University administrative channels, even if a budget is not required. This is to ensure that appropriate University officials are informed of the current status and any changes from the original proposal before the institutional endorsement is provided.

The four relevant questions are:
- Has there been a change in the "other support" of key personnel since the last reporting period?

- Will there be, in the next budget period, significant re-budgeting of funds and/or change in level of effort from what was originally approved for this project?
- Has there been a change in status of conflict of interest or commitment since the last reporting period?
- Has a significant change in direction occurred, or is one planned?

11. LIMITED-SUBMISSION PROPOSALS

Occasionally, sponsors announce a program limiting the number of proposals that may be submitted by each institution. Faculty interested in submitting proposals to such a program are required to follow the directions sent out by OSP, or if none are provided, the researcher can send a one-page description of the proposed project and list of collaborators to OSP as well as the VPR.

Limited submissions are reviewed by a subset of the OOR's Research Faculty Advisory Board and/or by the VPR. The major criterion for selecting proposals is the relevance to the program selection criteria and the potential for successfully competing in the sponsor's competitive process. Researchers whose pre-proposals are selected through the institutional pre-competition will prepare a complete application to submit to the sponsor.

12. REVISED BUDGETS

When a sponsor wants to fund a proposed project at an amount different from that originally proposed, the sponsor may ask the PI to submit a "revised" budget supporting the amount to be funded. A revised budget is to be routed through OSP. If the sponsor reduces the budget, the investigator must determine whether the originally proposed scope and objectives of the project can be met under the revised budget. If not, the investigator and sponsor must redefine the scope and objectives in writing before the University accepts the award.

13. REDACTED BUDGETS (Currently NASA-specific)

In the event the PI is submitting a proposal to NASA, a redacted budget and budget justification are required as part of the complete proposal package that will be submitted to the sponsor. To completely anonymize the budget, NASA requires both a budget and budget justification that cannot show names of investigators, names of institutions nor any dollar values or rates for salary, fringe, or indirect costs.

14. AFTER-THE-FACT (ATF) PROPOSALS

Proposals are considered ATF when they are submitted to the sponsor without OSP review/approval and are funded. If OSPRI receives an award which has not previously

been reviewed the proposal must follow all of the normal submission processes. See section C.2.a. Proposal Routing through Cayuse.

After-the-Fact (ATF) grants: Committing UCCS to a Sponsor/Grant application before the OSP reviews and approves is an ATF. An ATF grant occurs when a commitment is made to a sponsor on behalf of the University without prior approval of the OSP, when University approval is required. PI's are not authorized by UCCS to initiate and submit a grant before receiving OSP approval. UCCS cannot receive grant funds when an ATF grant has been submitted, until the grant has received OSP approval.

ATF grant submissions may result in significantly delayed signature/approvals to sponsors who have provided funds to CU in good faith.

NOTE: To avoid ATF grant submissions, please be sure to communicate and work with OSP when you intend to apply for funding. If you are unsure if the funds you are seeking are gift/in-kind or considered a sponsored project, please contact OSP for guidance.

D. REGULATORY APPROVALS

1. HUMAN SUBJECTS

Research: A systematic investigation designed to develop or contribute to generalizable knowledge.

Human Subjects: Involving human beings, including observation of, collection of data through surveys, research on medical records, use of human tissue or fluids, etc.

a. Project Review and Approval

The proposed project must be reviewed and approved by the UCCS Institutional Review Board (IRB). Federal law requires this review and approval for the protection of human research participants, providing assurance that all individuals involved in research will be treated ethically. A completed application must also be filed when resubmitting research-related revisions to a granting agency, submitting supplements, and when submitting continuations involving changes or additions to the original research that affect any procedures used in the research.

All projects conducted by UCCS faculty, staff, and students that involve human subjects must be reviewed and approved prior to any involvement of human subjects. See the ORI website for more information.

This includes, but is not limited to, the following:
- Projects <u>with or without funding</u>
- Projects <u>on or off the UCCS campus</u>
- All projects that involve an outside collaboration (i.e., information/data sharing and/or data gathering)
- All applications being reviewed by an outside board
- Student projects including Honor Theses, Graduate Theses, and Dissertation Research
- Research utilizing surveys, interviews, oral history
- Program evaluations
- Questionnaires
- Retrospective data analysis
- Research on individual or group characteristics or behavior
- Focus groups, pilot studies
- Projects that might be considered "Exempt" require a determination of this exemption by the IRB

Documents relating to the conduct of research using human subjects, including the application form, can be found here: **https://osp.uccs.edu/research-compliance/research-involving-human-subject-irb**

Training for the Human Subjects Researcher
ORI recommends that researchers complete appropriate training on the protection of human subjects before conducting human subjects research. Many projects require CITI Training to comply with responsible and ethical research. Links to the CITI training instructions can also be found on the ORI IRB website.

Note: Education on the protection of human research participants **is required for investigators conducting research involving human subjects funded by NIH**. See the OSP website on [Research Involving Human Subjects IRB](#) for training information and modules.

2. ANIMALS

At this point, UCCS does not have a Public Health Service/National Institutes of Health/Office of Lab Animal Welfare (OLAW) accreditation. For this reason, it is currently only permissible to conduct non-federally funded research with wildlife.

Any individual proposing to use animals is required to obtain approval from the UCCS Institutional Animal Care and Use Committee (IACUC). "Animal" is defined as "any live, vertebrate animal (e.g., traditional laboratory animals, farm animals, wildlife, and aquatic animals) used or intended for use in **research, teaching, or testing**."

Prior to initiating newly funded or unfunded research, teaching, or testing involving animals, individuals must complete an application for review and approval and receive IACUC approval. A completed application must also be filed when resubmitting research-related revisions to a granting agency and when submitting continuations involving changes or additions to the original research that affect procedures used in the research.

Should your research involve laboratory animals, please make sure to contact the Office of Research Integrity as early as possible to get the appropriate procedures and safeguards in place. Documents and information relating to the conduct of research using animals can be found here: **https://osp.uccs.edu/research-compliance/research-involving-animals-%28iacuc%29**.

3. RECOMBINANT DNA, MICROBIAL PATHOGENS, HUMAN TISSUE, AND BIOHAZARDS

Any individual proposing to use recombinant DNA, microbial pathogens, human tissue or biohazards is required to obtain approval from the UCCS Institutional Biosafety Committee (IBC). The IBC reviews all projects involving the use of recombinant DNA, microbial pathogens, human tissue, and biohazards to assure compliance with current guidelines from regulatory agencies. Principal Investigators at UCCS who conduct experiments involving these materials must inform the Institutional Biosafety Committee as stipulated below.

Prior to initiating newly funded or unfunded research involving recombinant DNA or microbial pathogens, principal investigators must complete an application for review and receive IBC approval. A completed application must also be filed when resubmitting research-related revisions to a granting agency and when submitting continuations involving changes or additions to the original research that affect biosafety procedures used in the research. When submitting continuations without changes in the research, the original application on file will be used as a basis for signing the Proposal Routing Sheet. The IBC will review the proposed research as described in the application, and, if it is in compliance with federal, state, and local guidelines and regulations, the application will be approved and the Principal Investigator will be notified. If questions arise or revisions are needed, the Principal Investigator will be contacted.

Documents and additional resources relating to the conduct of research using recombinant DNA, microbial pathogens, human tissue, and biohazards can be found on this site: **https://ehs.uccs.edu/hazardous-materials-management/biosafety**

All faculty, staff and students are required to review the Lab Safety Manual and complete a Lab Safety examination prior to using any biohazards.

a. Recombinant DNA/Microbial Pathogens/Human Tissues

As part of the 1996 Anti-terrorism and Effective Death Penalty Act (PL 104-132), the Centers for Disease Control and Prevention (CDC) and Department of Health and Human Services issued a final rule regarding the transfer of select biological agents that could be used in terrorist activities. Researchers who plan to ship or receive any of the listed agents must contact the IBC Chair and the Director of Risk Management so that the University is properly registered prior to shipment or receipt of the listed agent(s). A current list of select agents is available at: **https://www.selectagents.gov/sat/list.htm**

b. Hazardous Materials, Chemicals and General Biohazards

Hazardous materials are any chemical or biological agent that may pose a physical or health hazard to persons exposed to them. Use and disposal of hazardous materials are governed by many Federal, State, and local agencies. Regulations must be adhered to by all laboratory personnel.

Hazardous chemicals are defined as any chemicals that exhibit a physical or health hazard. Examples of such chemicals are flammable liquids and solids, corrosives, oxidizers, and any chemicals that are considered toxic such as heavy metals.

The term "biohazards" generally refers to carcinogens, mutagens, teratogens, and all microbiological agents. Examples of materials that fall into the biohazard

classification are viral, bacterial, and fungal agents, and chemical toxins. Principal Investigators proposing to conduct research involving biological agents or certain toxins must complete an application for review and approval as outlined above under Recombinant DNA/Microbial Pathogens/Human Tissues.

All laboratory personnel (employees, students, and volunteers) who work with or generate chemicals/hazards/related waste must attend an OSHA-mandated Laboratory Safety Training. This training must be attended yearly. Previous training at other institutions does not preclude any laboratory personnel from this requirement.

For additional information, visit the UCCS Environmental Health & Safety (EHS) website: **https://ehs.uccs.edu**

c. Radiological Hazards

Any proposed use of radiological materials must be approved by the Environmental Health & Safety Office and the personnel must complete the necessary training.

Contact: Cynthia Norton**, cnorton@uccs.edu**

E. ADDITIONAL APPROVALS

1. ADDITIONAL SPACE/FACILITIES

Research projects requiring additional space and/or facilities will require that the Additional Space/Facilities Addendum Form be completed and approved. The Additional Space/Facilities Addendum Form is available at **https://osp.uccs.edu/resources/forms** and will need to be attached in Cayuse as part of the routing approval process.

2. CURRICULUM, CERTIFICATES, STUDENT INTERNSHIPS, or TRAINING

Projects that include curriculum or certificate changes and/or additions or projects that will include internships or training for undergraduate or graduate students may require additional review. Please see the Procedures for Curriculum/Program/Trainings FAQ on the OSP Policies and Procedures website to help inform how to proceed and what approvals to seek before you submit. Typically, approvals must be obtained by the chair and dean(s) including any associate deans and the dean of the graduate school (if applicable). Approved requests should be obtained prior to the final submission of the proposal to the sponsor. The goal is to determine the campus or college financial implications, staff implications, and/or program use and changes that may require System and/or Regent approvals.

3. EXTRA COMPENSATION

CU Regents policy and Federal regulations state that grant or contract funds **may not** be used to increase an individual's regular full-time salary during the academic year. However, in unusual cases, charges for such work representing extra compensation above the base salary are allowable when; a) consultation is across departmental lines or involves a separate or remote operation; b) the work performed by the consultant is in addition to the regular departmental load; **and** c) the consulting arrangements are specifically provided for in the agreement or approved in writing by the sponsoring agency.

UCCS employees may not serve as consultants on UCCS-sponsored programs, but instead should be listed under salary and wages as key personnel or as PIs or Co-PIs, as appropriate.

Any requests for additional compensation are to be approved prior to formal submission of the proposal to the sponsor. Required approvals include those of the appropriate chair and dean. Written approval from the sponsor may also be required.

RESEARCH SECURITY COMPLIANCE

Some U.S. government agencies (e.g. DoD, GSA, NASA and DHS) and private sponsors are implementing requirements for safeguarding information provided by, collected, or maintained on their behalf. These requirements include securely managing Controlled Unclassified Information (CUI). To learn more about data security on campus please visit the OIT Research and Compliance Information website: **https://oit.uccs.edu/security/ResearchComplianceResources**

- If researchers receive federal funding that is subject to information security requirements, that information will need to be safeguarded through a set of defined standards. These standards include access control, physical security standards, and IT system security.
- Researchers who are applying for awards from agencies listed above may want to consider incorporating funds for information security requirements in their proposed budgets for all new proposal submissions.
- Researchers who suspect they may be required to implement these controls in the future should also figure the additional costs of such controls into their budget proposals.

Please reach out to OIT security@uccs.edu for guidance.

F. INDIRECT COSTS (FORMERLY FACILITIES AND ADMINISTRATIVE (F&A) COSTS) AND FRINGE BENEFITS

1. WHAT ARE INDIRECT COSTS (FORMERLY FACILITIES & ADMINISTRATIVE (F&A) COSTS)?

The UCCS negotiates its indirect costs, formerly known as F&A, with the Department of Health and Human Services.

Indirect costs are those that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project but contribute to the ability of the University to support research projects and programs.

For the current rate, go to **https://osp.uccs.edu/resources/frequently-needed-information-for-proposals**

According to UCCS Policy 900-003, the primary purpose of indirect cost recoveries (formerly referred to as Indirect Cost Returns (ICR)) is to invest in the development and maintenance of an infrastructure for research and sponsored programs including, but not limited to:

- Operational costs in the Office of Research and the Offices of Sponsored Programs and Research Integrity.
- Adequate personnel in support of sponsored research and other sponsored projects, including financial, administrative, technical, security, maintenance, and janitorial staff.
- Library and research facilities.
- Utilities - ventilation, heat, air conditioning, water, and lighting.
- Secure data storage, telecommunications, and high-speed internet.
- Costs of regulatory compliance, such as human subject review boards and export controls.
- Technology transfer and patent costs.
- Funding required for cost sharing associated with participation in some federal programs.
- Funding to support faculty and student engagement in research, and otherwise support the University research mission.
- Resources for performing sponsored activities and attracting sponsored awards.

In other words, indirect costs stem from providing research space, administering the activities, and allowing for day-to-day operations of the university. They are not project-specific and, therefore, are not from the actual performance of the activities under the sponsored agreement.

2. INDIRECT COST BASE

The UCCS indirect cost rate is applied to a Modified Total Direct Cost (MTDC) base. The MTDC is your total direct cost amount minus excluded costs (listed below).

To calculate indirect costs:
Total Direct Costs minus Exclusions = MTDC
MTDC x indirect cost % = indirect cost $

Indirect cost rate does not apply to the following direct costs:
- Equipment-defined as tangible nonexpendable personal property having a useful life of more than one year and an acquisition cost of $5,000 or more per unit
- Capital expenditures
- Charges for patient care
- Tuition remission
- Rental costs of off-site facilities
- Scholarships
- Fellowships
- Individual subcontracts in excess of $25,000 (indirect cost rate is charged on the first $25,000)

3. UNIVERSITY POLICY ON INDIRECT COST RECOVERY

The negotiated indirect cost rate is required on all sponsored programs, whether they are from public or private sources.

The **only exceptions** to this requirement are:

When the sponsoring organization has a formal written policy, consistently applied to all such awards, limiting the indirect cost rates or amounts. For example, it is not uncommon for a foundation/non-profit to limit indirect costs to 10% or less; the U.S. Department of Education and the National Institutes of Health typically limit indirect costs to 8% on training grants.

OR

In accordance with the Statement of Support for NEH and NEA F&A on Proposals, a reduced indirect rate of 36% can be applied to proposals where the PI is housed within:
- *The College of Letters, Arts, and Science,*
- *A humanities or arts related center, program, or museum (e.g., the Heller Center, Center for Research Frontiers in the Digital Humanities, Galleries of Contemporary Art, TheatreWorks, ENT Center)*

PIs submitting to NEH or NEA can opt-out of the reduced rate by emailing OSP with their desire to use the full indirect cost rate negotiated by HHS.

Any other requests for an exception require negotiation with, and the written approval of, the VPR **per UCCS policy 900-002.** Only the supervisor of the primary college or unit (e.g., a Center or Institute or Vice Chancellor unit) can submit the request on behalf of the PI. Typically, the PI will draft the request letter for the Dean or Director or VC. The request must include adequate justification (see policy 900-002) and explicitly state that the requestor understands that the F&A will be reduced. It is not sufficient to justify that a proposal "needs more direct funds for the project goals" and instead a policy-approved justification must be provided. Only the VPR can review and approve or deny F&A waivers or reductions. A written decision will be provided by the VPR that the PI will then send to OSP.

4. DISTRIBUTION OF INDIRECT (F&A) COSTS RECOVERED

Indirect costs recovered are allocated back to the colleges or departments following policy 900-003 to provide the infrastructure for additional contract and grant activity as an investment in the continued ability of the departments to generate sponsored activities. These funds are used to enhance the sponsored activity environment.

Colleges, Centers, Institutes, and others are required by policy to post their F&A distribution plans on the OSP website. https://osp.uccs.edu/resources/policies-and-procedures. When F&A distribution will be shared or otherwise differ, the PI must complete and route for signatures the **Differential F&A Distribution Addendum form** available on the OSP forms website. This form must be turned sent to OSP before the draft budget can be reviewed. It must also be attached in the Cayuse Portal prior to routing.

5. WHAT ARE FRINGE BENEFITS?

Fringe benefits are **charged on salaries** processed through UCCS payroll. Fringe benefits include costs such as FICA, dental, health and life insurance, and retirement. The fringe rate is dependent upon the type of appointment. The most current fringe rates are updated on the OSP Budget Template form. The most recent version of the form can be found here: **https://OSP.uccs.edu/resources/forms**

G. PREPARING A SUCCESSFUL PROPOSAL

1. PROPOSAL DEVELOPMENT TIPS

a. Contact the Program Officer

Program officers can provide a wealth of information. Although no two agencies operate in the same manner, it is to your benefit to explore possibilities with the program officer or contact person identified by the funding agency as soon as you have identified the agency you want to target—**start early**. Each program officer may assist you in a different manner. Ask for information and assistance that seems reasonable, based upon your conversation. It can be especially helpful to send a one-page summary of your project to ask if it would be a good fit for the program as this demonstrates your interest, gives the PO insight into your project, and opens the doors of communication.

In many instances the program officer may give you information that informs your proposal, such as:

- tell you whether or not your proposal fits within the program guidelines/priorities and can suggest other calls/directorates to apply for if your proposal is not a great fit
- feedback on draft proposals or concept papers
- recommend strategies, such as cutting back on costs, that may enhance funding success probability
- provide copies of previously funded proposals for the competition you're applying under
- tell you how firm the dollar limit is
- tell you how proposals are reviewed and who reviews them
- tell you what the most common mistakes are
- give other valuable insights and recommendations
- have a voice in determining what gets funded

b. Follow the Guidelines

The key to a successful proposal is to read the sponsor and program guidelines. The proposal funding call (also known as RFA, RFP, NOFO, etc.) generally contains a wealth of important information and reading the *entire* call will be beneficial to your proposal success.

The guidelines specify who is eligible, if there are limitations on who can be PI or number of proposals an institution can submit, areas that are eligible for funding, deadlines, contact person, and other key elements. Agencies often restrict document margins, type size, lines per vertical inch, appendices, and length. In

addition, information regarding funding limits, format for the proposal, eligible budget line items, etc. are included in the guidelines.

Your proposal may be **returned without review** by agencies if you deviate from their guidelines. **They mean what they say.**

c. **Have Others Review Your Proposal**

Ask your colleagues, individuals who have served on review committees, those who have been successful in obtaining grants, and those who have received funding from the agency you're targeting (or others) to review your proposal and/or provide tips, insights, guidance, and recommendations.

You can also request a review of your proposal by the UCCS Research Development Coordinator. To learn more about this role and to request support, visit this site: **https://research.uccs.edu/research-development-coordinator**

Use information you receive to strengthen your proposal.

d. **Talk to Other Successful PIs**

Ask successful investigators about their experience and insights. Ask reviewers for their advice. Ask them about their strategies, tips, suggestions, etc.

e. **Review Successful Proposals**

Obtain copies of successful proposals to the agency and program you're targeting. Review their format, style, budgeting strategies (if provided), how the plan is put together, etc. Be aware that many PIs regard their proposals as intellectual property and may request/require that you do not share documents with others.

How to get copies of successful proposals:
- Program officers may provide copies of previously funded grants under the same or similar competition.
- Many federal agencies have abstracts of funded projects on the web; email investigators you identify and ask them for a copy of the proposal.
- Contact colleagues directly.

f. **Serve as a Reviewer**

Serving on a review panel can give valuable insight into what the agency is currently interested in funding, how the review process works, and what the priorities of various proposal components are. Several federal agencies allow you to volunteer to review.

g. Other Sources

Several publications provide information and instructions on proposal submission/how to write a successful proposal. Agency tips are available in some cases, often in the form of webinars.

h. Check out UCCS Resources and Tools

One of the ways the Office of Research helps drive success at UCCS, is by providing research resources. You can find resources, tools, templates, and a list of past and upcoming events, grant writing bootcamps, and workshops aimed at enhancing research capacity and opportunity here: **https://research.uccs.edu/grant-writing-tool-kit**

i. Start Early

Give yourself time to prepare the best proposal possible. You need to start early to have the opportunity to get input from program officers, colleagues, etc. ahead of both the internal OSP deadline and the submission deadline. This entire process can take nine (9) months, and even up to a year, depending on the scope of the work.

j. Submission Portals

For most federal agencies, you will prepare your submission via the grants.gov portal. The exceptions to this are the NSF (use research.gov) and NIH (use ASSIST). For all federal agencies, OSP will need to create your account and workspace. Reach out to the pre-award specialist to help when you submit your initial inquiry.

For private foundations or local sponsoring agencies, you'll often be able to create your own account login and workspace. OSP will still need to review your uploaded documents, so be sure to either share your login information with the office or provide a PDF document showing your information in the portal. The same timelines above for proposal preparation and submission also apply in these cases.

2. CONTENTS OF A TYPICAL PROPOSAL

Most funding agencies have specific requirements as to the preparation of a proposal, such as content, order, page limits, type size, etc. It is crucial to follow the funder's specifications regarding the content of the proposal and the documents needed. The following are the potential components of a proposal that you may need to provide:

a. Cover Letter

- The purpose of the cover letter is to introduce your proposal to the funding agency. It is important for you to make your cover letter brief and to the point. Use official university letterhead when writing the letter.
- Items to include are: your organization's name, the title of the project, information about the funding opportunity if applicable, and a general introduction to your proposed project.

b. Cover page
- Project Title
- Sponsoring Agency
- Principal Investigator/Project Director name, title, address, phone number and email address
- Institutional Contact name, title, address, phone number and email address
- Budget Total
- Date of Submission
- Expected Starting and Ending Dates
- Authorized Signature(s)

c. Table of Contents
- The Table of Contents is to help a reviewer identify and locate the major components of the proposal. Identify the major components of the grant, and list any minor subheadings used to divide the proposal.

d. Response to Funding Agency's Questions and Concerns
- The purpose of this section is to show you have addressed the funding agency's questions and concerns expressed in the request for proposal. As mentioned previously, these questions and concerns are outlined in the RFA/RFP/NOA. List the specific questions and concerns raised by the funding agency and identify page number(s) in the proposal on which these questions and concerns are addressed.

e. Research Plan/Project Narrative
- The Research Plan should include information needed for evaluation of the project. The information contained in the Research Plan should allow for the evaluation without the need for any other document.
- The Research Plan will address: What you intend to do; why the work is important; what has already been done; and how you are going to do the work.
- For many federal agencies, the research plan typically includes the following sections:
-
    i. **Specific Aims/Objectives/Goals/Research Questions:** In this section you will list what the proposed project intends to accomplish in broad terms. The details of how the aims/goals will be

accomplished will be outlined later. This section is usually no more than one page.

ii. **Background & Significance:** In this section, briefly address the background of the project. Critically evaluate existing knowledge and identify gaps that the proposed project is intended to fill. State the importance of the project proposed and relate how the aims or objectives will fill these gaps.

iii. **Preliminary Results:** This section addresses preliminary studies pertinent to the proposal. This also helps to establish the experience and competence of the investigator to carry out the proposed project.

iv. **Project Design and Methods:** Describe the design and the procedures to be used to accomplish the goals of your project.

v. **Evaluation:** Agencies often want to see an evaluation plan. This might be formative or summative or both. Evaluation should not be an afterthought, but well integrated into your project goals, inputs, and outcomes. In thinking about your evaluation plan, consider:

1. Do you want to hire a professional external evaluator? The VPR can consult with you to help identify options. An external evaluator will write the evaluation plan to be inserted into your proposal. If funded, they can charge anywhere from 10-15% of your yearly direct budget so plan accordingly.

2. Do you want to include a logic model? A logic model is a clear and concise way to present the inputs and outcomes. For a template see the https://research.uccs.edu/grant-writing-tool-kit website.

3. Who will serve as your evaluator if you are not hiring a professional? What type of data will you collect to assess that the project deliverables are on time and within scope? Will a PI or key personnel take on this role? An advisory board? There are many ways to envision a strong evaluation plan.

f. **Budget and Budget Narrative/Justification**

The budget narrative/justification is a restatement of your budget in a narrative format. This is where you explain why you need what you asked for. This should be project-specific (that is, the salaries, materials, equipment, etc. should be specific to the project and not typical day-to-day operations/expenses). It is a good idea to put the order of your budget justification in the same order as the excel file. Also, be very sure your numbers match up across all your documents! A sample budget and budget justification can be found on the OOR Grant Writing Toolkit website: https://research.uccs.edu/grant-writing-tool-kit

Some typical budget items to consider in a research project include the following:

i. **Salaries and Wages** (anyone who is or will be employed by UCCS)
    1. Senior/Key Personnel
        - Includes PIs, Co-PIs, and key individuals who will be working on the proposed project and are all UCCS employees.
        - All salaries need to be at the individual's current rate of pay however annual salary escalations may be included if allowable by the sponsor
        - Effort from ALL sources cannot exceed 100%.
        - Faculty Institutional Base Salaries include permanent positions (chair stipends, director stipends, IRB stipends).
    2. Other Personnel
        - Includes other professionals, post-doctoral fellows, graduate students, and undergraduate students.
    3. Student Salaries
        - The Affordable Care Act limits the number of hours students can work while enrolled full-time.
        - Full-time students may work 20 hours a week during the AY (max = 25/wk for domestic students) and may increase hours to 40 hours in the summer.
        - Fall/spring are considered 20 weeks and summer is considered 12 weeks for a total of 52 weeks in a year.
        - For undergraduate and graduate hourly rates, please visit the [student employee job classifications and pay ranges website](#).
    4. For post-doctoral salaries and graduate student monthly rates, please consult with your department administrator for consistent rates or contact OSP for assistance. Budgeting for GRA Salaries
        - When Graduate Research Assistants are supported by external grant funding the following guidelines apply:
            - A Year at the University:
            - Academic Year (AY) = 9 months. The AY year consists of two semester which are 4.5 months each or 9 months total: mid-August to December and January 1 to mid-May.
            - Summer consists of 3 months. Approximately: mid-May to mid-August
            - UCCS Fiscal Year (FY) = 12 months, July 1- June 30.
            - Calendar Year (CY) = 12 months or Jan 1 – December 30
        - Full Time Equivalent (FTE): During the AY GRA's are generally paid 50% FTE it is the expectation that the other 50% of their time during the AY is dedicated to their classes and coursework. GRA's can also be paid in the summer months, ranging from 1%-100%
        - How should I budget for my GRA's pay? You must know if the GRA is paid over the AY or the FY and at what FTE in the summer.

The math: Budgeting a GRA paid on a FY for a full year on a project

$60,000/12 months = $5,000/month

*$5,000/month*50% FTE = $2,500/month*

*$2,500*4.5*2 semesters = $22,500/AY + $2,500*3 months = $7,500/summer = $30,000*

  ii. **Fringe Benefits** (applies to university faculty and staff salaries)
1. Current fringe rates can be found on the OSP budget template. Please make sure to always download the most recent budget template from the [OSP](#) website to make sure you are using the current fringe rates and/or visit [https://rmd.uccs.edu/fringe-benefit-rate.](https://rmd.uccs.edu/fringe-benefit-rate)
2. Note that fringe rates do not apply to students for sponsored projects.

  iii. **Equipment**
1. Individual units costing $5,000 or more with a useful life expectancy of greater than one year.

  iv. **Travel** (both domestic and international)
Travel requires a detailed justification for how you arrived at your budget. In many cases, the PI will have experience with travel to a certain conference or field site in which case the PI can estimate the cost and state clearly in the budget justification that the travel cost is **"calculated based on the PI's experience."** Keep in mind that the travel budget must be "*considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the non-Federal [CU policy] entity in its regular operations*". The CU policy is, 'allowable to the extent of actual cost of reasonable accommodations.' In other cases, the PI will know the typical locations of and timing for conferences or field site visits and can use GSA (General Services Administration) rates or anticipated conference rates (if different) to determine their travel budget which must be itemized.
1. For domestic per diem and lodging rates, use the GSA website: [https://www.gsa.gov/travel/plan-book/per-diem-rates.](https://www.gsa.gov/travel/plan-book/per-diem-rates)
2. For international per diem and lodging rates, use the U.S. Department of State website: https://aoprals.state.gov/web920/per_diem.asp.
3. Typical travel budgets include:
   - Registration Fee costs
   - Per diem for first and last day of travel
   - Per diem for the remaining travel days
   - Lodging
   - Air, car, bus, or train fare
   - Luggage fees

- Airport transportation and parking
- Mileage

v. **Participant/Trainee Support Costs**
This section of the budget **may not** be used for incentive payments to research subjects, that should be included in "Other Direct Costs: Human Subject Payments."

1. 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 (2 CFR 200, Subpart A, §200.75).
2. Participant Support Costs are excluded from indirect (F&A) costs.
3. Speakers and trainers are typically not considered participants.
4. Employees are not participants or trainees.

vi. **Other Direct Costs: Materials and Supplies**
1. These should be project-specific (e.g., lab supplies, laptops, computer software, books needed for deeper research, etc.) and not routine use items such as pens, copy paper, etc.
2. It is important to provide enough detail to illustrate how you arrived at your supply budget. List specific items, actual costs, or estimates.

vii. **Other Direct Costs: Publication Costs**
1. On August 25, 2022, the Biden administration issued a rule that any research funded by U.S. taxpayers must be made open-access and available to the public at no cost. This will go into effect no later than December 31, 2025 and many agencies have already made this mandatory.
2. Given this, if any publications are planned for the project, be sure to include funds for open-access publishing. Journals often state their current open access fees, so use this number as a guideline.
3. Journals also charge for color figures to appear in the print version of the publication. While optional, if you plan to have your figures printed in color, include the charge for this in addition to the open-access fees under publication costs.

viii. **Other Direct Costs: Other Category**
1. If you have expenses that do not directly fit into the categories outlined in the template, you can specify these costs under "Other". Be sure to be specific in describing what these costs are in the template (e.g., Other-poster printing fees).
2. Examples of costs that can be included in this category can include, but are certainly not limited to:

- Printing fees for poster presentations
- Contractors or vendors that do not fit under consultants or subcontractors
- User fees

ix. **Other Direct Costs: Collaborations ([Subcontracts vs Contractors](#))**
1. When investigators at different institutions want to work together on a sponsored project, they must first decide how their project will be administered. To help determine the nature of the collaboration (subcontractor vs. contractor/ consultant), see this file: https://osp.uccs.edu/sites/g/files/kjihxj1471/files/inline-files/Subcontract_vs_contractor.uniform_guidance.pdf
2. If UCCS is the lead or prime, the other investigators' institutions will be subcontractors/subawards and will need to complete the UCCS [subrecipient commitment form](#).
3. **Subcontractors:** Sometimes called subaward or subrecipient, depending on the funding agency. For more information, see section K of this handbook.
4. The lead institution is responsible for preparing the final proposal, while OSP, in coordination with investigators at the collaborating institutions, must prepare subcontract documents to be incorporated into the final proposal.
5. **Consultants** (are **not** employees of UCCS and do not supervise or train any UCCS employees): A consultant is an individual who provides professional or highly technical advice or assistance to the University, over which the University controls the results but not the way the service is performed. Consultants will need to provide a letter to the PI to describe the services they will perform, specify the amount of time they will devote to the project across the period of performance, outline travel costs, and provide total costs.
6. Occasionally, a **cooperative agreement** will be appropriate. A cooperative agreement is a project in which the sponsor will have regular, continuing input regarding technical aspects and the plan of work.

x. **Other Direct Costs: Human Subject Payments**
1. Payment or non-monetary reward to subjects for time and inconvenience of participation in research studies, as well as incentive to participate in research studies.
2. Human Subject Payments can include monetary items like cash, gift cards, vouchers, and/or non-monetary items like gifts, promotional items, course credit, extra credit, etc.
3. Human Subject Payments are subject to F&A and require IRB approval.
4. Employees may be eligible to participant in human subject research studies.

xi. **Other Direct Costs: Tuition** (Graduate Research Assistant Students)
   1. If allowed by the sponsor, tuition remission may be requested for Graduate Research Assistant Students (GRA) employed on a project.
   2. In order to provide tuition support, GRA's must be hired at a monthly pay rate (not hourly) at 50% effort (considered full-time) or less.
   3. GRAs' must also be receiving a salary for the same time period that tuition remission is received.
   4. Tuition remission must be proportional to salary (a student hired at 50% effort is considered full-time, so you can pay full tuition).
   5. The budget should include the tuition rates currently posted on the [Bursar's website](#).

xii. **Indirect (F&A) costs**
   1. Unless otherwise stated, use the university's negotiated rate. The latest rates can be found here: https://osp.uccs.edu/resources/frequently-needed-information-for-proposals.
   2. On occasion, funder's will cap the indirect rate. If this is provided in written form, inform OSP and use that rate in the budget template.
   3. In accordance with the Statement of Support for NEH and NEA F&A on Proposals, the indirect cost rate will be reduced to 36% unless otherwise desired by the PI.

Budgeting Notes:

Administrative and Clerical Salaries are normally **not treated as a direct cost**. However, direct charging of these costs may be appropriate where the nature of the work performed under a particular project requires an extensive amount of administrative or clerical support that is significantly greater than the routine level of such services provided by academic departments. In such cases, a "project manager" may, for example, be included in the key personnel budget.

Tuition: Tuition remission and other forms of compensation paid as, or in lieu of, wages to graduate research assistant students (GRAs) performing necessary work are allowable provided, (1) there is a bona fide employer-employee relationship between the student and UCCS for the work performed, (2) the tuition or other payments are reasonable compensation for the work performed and are conditioned explicitly upon the performance of necessary work, and (3) it is the practice to similarly compensate students in non-sponsored as well as sponsored activities. Before adding tuition remission to your budget, it is important to make sure tuition remission is allowed by the sponsor. GRAs must be hired at a monthly rate (not hourly) at 50% effort or less. For a GRA to receive tuition remission, they must also be receiving salary for the same time period that tuition remission is received. Tuition remission must be proportional to salary. If you pay tuition for a GRA on your sponsored program, your college must also offer tuition support for GRAs that are paid with institutional funds. UCCS only applies this to Graduate RESEARCH Assistants, not teaching assistants (GTAs).

Summer Salary or Course Buyouts/releases/off-loads: If you are on a 9-month appointment, you can request these items. For summer salary, the percent effort is calculated by dividing the amount of time requested by 9 months (e.g., one summer month would be $\frac{1}{9}$ x 100, or 11.111% effort). For course buyouts, the percent effort is calculated by a faculty member's differentiated workload dedicated to teaching (typically 40%) divided by the required annual course commitment in the faculty member's department (typically 5 which corresponds to a 3-2 load). For further explanation on course buyout funding, see this document here: **https://osp.uccs.edu/sites/g/files/kjihxj1471/files/inline-files/Course_Buyout_Guidelines_Web_5.13.19.pdf**

Budgets over $1 Million: Proposals or no cost extensions with budgets calculated over $1 million must have the Cayuse routing form signed by the Vice Provost and Associate Vice Chancellor for Research. It is advised that Cayuse routing that goes to the Vice Provost and Associate Vice Chancellor for Research include the final budget and final budget justification.

g. **Biographical Sketches**
   - Include biographical sketches or vitae for key personnel. Many agencies provide examples or templates that you can find on their webpage. **SciENcv** is a great resource for NSF and NIH specific biosketches and these agencies are starting to require the use of SciENcv.

h. **Other and/or Current and Pending Support**
   - In this section, you will indicate all sources of support for your research and proposals. You will include the proposal you are currently applying for in the "pending" section of this document unless the RFP states otherwise.

i. **Resources and Environment**
   - The OOR website contains templates you can use to inform your resources/environment section. This template is updated annually and includes statistics and descriptions about UCCS that you may find useful (see also the IR website). The goal is to describe the facilities available for use on the project. Include the facilities of performance sites also. Major items for use on the project should be included. Major items of equipment should be described and special technical support facilities, such as computing equipment, electronic shops, and reactor capabilities should be mentioned. This information will assist the funding agency in determining the capabilities of the organization.

j. **Human Subjects**
   - If your project involves human subjects, describe their involvement and characteristics; potential risks to subjects; assess the likelihood and seriousness to the subjects; how subjects will be protected against potential risks; potential

benefits of the proposed project to the subjects and others; and knowledge to be gained. Indicate IRB status for the project, whether obtained or starting the process.

k. **Animals**
   - If your project involves the use of animals, describe the proposed use; justify the use of animals, the choice of species, and the numbers to be used; provide information on the veterinary care of the animals involved; and the procedures for ensuring that discomfort, distress, pain and injury will be limited. IACUC number must be provided.

l. **Literature/References Cited**
   - List all references. Each reference must include the names of all authors in the same sequence in which they appear in the publication.

m. **Letters of Support/Collaboration**
   - Include supporting letters from performance sites, collaborators, administrators, etc. if allowable. Some agencies have templates you must follow, whereas others allow you to create your own. The goal for a letter of support is to showcase that there is enthusiasm for your project, and you have the support (e.g., from UCCS leadership, from scholars in the field) for the project. Carefully read the RFP to determine if these are appropriate or allowable as some agencies or calls will specify their guidelines on these.
   - Letters of collaboration are more common for advisory boards, external partnerships (e.g., an internship site), an external evaluator, etc.

n. **Institutional Letters**
   - If an agency requires an institutional letter, you can consult with OSP and/or the VPR to determine the best course of action. Often, they want a letter from the executive director of OSP to certify eligibility.

SAMPLE BUDGET and BUDGET JUSTIFICATION
To see an example budget using the most up-to-date UCCS OSP budget template as well as an example budget justification, check out the sample templates under "Proposal Templates" on the <u>OOR grant writing toolkit website</u>. Again, remember to always download the most recent budget template from the OSP website to ensure correct fringe and indirect rates.

H. INTELLECTUAL PROPERTY

1. OVERVIEW

Sponsored Project (Research) Agreement
A Sponsored Project (Research) Agreement (SPA or SRA) is a document that allows the university to accept outside sponsorship for research while maintaining some level of Intellectual Property rights. The OSP can negotiate modifications to SPA/SRA as suggested by the sponsor and as appropriate to the specific sponsored project activities contemplated.

Need for Sponsored Project Agreements
The academic mission of the University of Colorado requires that research be published in a timely manner. The university recognizes the need to protect newly acquired techniques, processes, and technology, yet it also considers it appropriate to provide sponsors advance copies of intended publications for review. The university also supports the need for certain limited delays of publication to give both industrial sponsors and the university adequate time to protect patent or other proprietary rights.

Patents and Other Intellectual Property
The Venture Partners Office at CU Boulder is responsible for ensuring that inventions and creative works mature from the research laboratory to the public marketplace. The program also stimulates the inventive genius of university faculty, students, and staff through economic and professional incentives and encourages further discovery by directing a portion of the university's license income to the laboratories and departments from which an invention or work originated.

Learn more about Venture Partners and what qualifies as intellectual property by visiting their site here: **https://www.colorado.edu/venturepartners/**

The university personnel who conduct research leading to a patentable invention or copyrighted work usually do so in campus facilities built and supported with funds from the State of Colorado. In such cases, the university retains ownership of the intellectual property and makes it available for commercialization through licenses.

Agreement Terms
Questions about agreement terms should be directed to OSP. Questions about intellectual property and patent rights should be directed to the Venture Partners office: **vpcontact@colorado.edu**

2. POLICY, FORMS AND OTHER INFORMATION
For additional information regarding intellectual property,
see **https://www.colorado.edu/venturepartners/**.

I. AWARD RECEIPT

1. ACCEPTANCE AND NEGOTIATION OF AN AWARD

a. Principal Investigator Post Award Responsibilities (see also UCCS policy 900-001: https://vcaf.uccs.edu/sites/g/files/kjihxj1631/files/inline-files/2017_JUN_27_%20900-001-Roles-and-Responsibilities-for-Sponsored-Programs-A.._.pdf)

- When an award is received, it is important for the principal investigator to review the award document to ensure the:
    - statement of work (SOW) is correct,
    - funding is sufficient to complete the work required,
    - time period is correct, and
    - technical reporting schedule may be met.
- Other terms and conditions of the award should also be reviewed by the principal investigator. Any questions or discrepancies are to be brought to the attention of OSP.
- Complete the contract/grant approval form received from OSP
- If subcontracts are proposed, the PI is responsible for completing and forwarding the Request for Subcontracts form to OSP. See **section K** for more information on subcontracts. See the Subcontract Request Form on the OSP Forms site: **https://osp.uccs.edu/resources/forms**
- The PI should inform their Dean/Chair/Director of the award terms and conditions and any anticipated impacts on the unit or affiliated offices.
- The PI should inform all parties (internal and external) about the award terms and conditions and revisit expectations and SOWs.
- The PI will meet with OSP for an orientation to the specific award and the research administration team prior to account set up.

b. OSP's Responsibilities (see also UCCS policy 900-001)

- Orient the PI and the sponsored program team (SPA, Research Administrator, and others as needed) using an orientation checklist. This includes reviewing the original routing form and proposal documents.
- Coordinate review of the award documents for compliance with UCCS requirements, including intellectual property, publishing rights, financial reporting, and payment provisions. If a signature on behalf of UCCS is required, OSP will coordinate this.
- Route files to Venture Partners Office as needed.
- Review and negotiate awards in cooperation with the PI. Initiate the routing of the grant/contract approval form.
- Orient the PI, assigned SPA liaison, and post-award specialist to the award terms and conditions, including reporting requirements.
- Coordinate with Sponsored Programs Accounting for account set-up.
- Prepare and negotiate subcontracts, if any.

2. ASSIGNMENT OF AN ACCOUNT

When all required documents are in place, OSP forwards the award information to the Sponsored Programs Accounting, who initiates an account for the project in accordance with award notice.

3. PRE-AWARD COSTS

If an account is required prior to receipt/completion of award documents, the principal investigator may request a pre-award set-up.

This request includes the following:
- Time period requested.
- Dollar amount requested.
- The account number to absorb any costs that are unrecoverable. Examples of situations in which costs could be unrecoverable include: the award is not received; the award time period is inconsistent with the pre-award period or costs incurred are not included in the approved budget. Note: this account may not be another sponsored program's account.
- Signature of the authorized signatory for the account accepting responsibility for unrecoverable costs.
- Signature of the department chair/dean.

This request is forwarded to OSP. OSP will coordinate UCCS administrative approval and forward to the SPA when approved. See https://osp.uccs.edu/resources/forms for the Prior Approval Request Form.

J. POST AWARD ADMINISTRATION

1. OFFICE OF SPONSORED PROGRAM'S ROLE (see also UCCS policy 900-001)

- Route files to Venture Partners Office as needed
- Review and negotiate awards in cooperation with the PI
- Coordinate with SPA for account set-up
- Continue liaison with funding organization throughout the project period
- Process requests for budget modifications, extensions, and other prior approval requests
- Perform an annual check in with PIs who have subcontracts or external MOUs or SOWs.
- Prepare final invention reports

2. CONTROLLER'S OFFICE - SPONSORED PROJECTS ACCOUNTING ROLE (see also UCCS policy 900-001):

- Set up project account in accordance with award notice
- Monitor expenditures as to allowability, allocability, and appropriateness; expenditures must add up to Federal and State Audit.
- Manage billing and receivable activities
- Prepare financial reports as required
- Administer the personnel effort report system
- Coordinate project close-out
- Produce final financial reports and property reports

3. COLLEGE/DEPARTMENT RESEARCH ADMINISTRATOR ROLE

The PI may designate a Research Administrator. The Research Administrator is responsible for carrying out financial recording and other duties as designated by the PI including the recording of financial transactions in compliance with applicable laws, regulations, and University/Campus policies.

Specific responsibilities of a Research Administrator include the following:
- Maintain budgets showing anticipated revenues and/or expenditures to assess financial performance.
- Ensure all expenditures incurred or transfer of funds are:
  - Only for allowable costs under the terms of the sponsored agreement or applicable law.
  - Authorized in accordance with university policies, State and Federal laws and regulations, and specific sponsor or donor requirements or restrictions.
  - Made within the available funding for the account or supported by an appropriate alternate non-sponsored program fund with sufficient funding for the disbursement. When it is anticipated that expenditures

will exceed available funding, initiate plan for correction before exhaustion of funds.
- Transfer unallowable costs to an alternate non-sponsored funding source.
- Review monthly detail financial reports to:
  - o Detect financial transaction errors or discrepancies
  - o Monitor actual as compared to budgets
- Take immediate action to resolve discrepancies or significant errors noted during the monthly report review.
- Monitor subcontractors for fulfillment of technical roles and responsibilities.
- Review subcontractor invoices for compliance with budgetary requirements and obtain PI approval for payments.
- Follow up to ensure that such discrepancies or errors are corrected.
- Ensure copies of original supporting documentation for all financial transactions are uploaded to the applicable university purchasing and payment systems (Marketplace, Concur, PeopleSoft, etc.)
- Maintain copies of original supporting documentation for all financial transactions that reside outside of a university system for at least the minimum time periods specified in the funding agreement.
- Ensure the Research Administrator is adequately trained and fully understands the financial recording and monitoring responsibilities.

In addition to the day-to-day financial transactions, the Research Administrator:
- Helps PI with budget planning to make sure grant or contract has department and campus needs met in the planned budget (e.g., offload negotiations with Chair and Dean, benefit calculations and indirect costs).
- Assists the PI in the proposal process, i.e., budget development, getting signatures, etc.
- Coordinates grant/contract approval with OSP.
- Once grant or restricted contract funds are awarded, coordinates with OSP for award start date; follow through with Sponsored Projects Accounting to ensure PeopleSoft Chartfields is established so faculty have access to funds in a reasonable timeframe so that research is not hindered.
- Assists PI in hiring necessary student, professional, and support personnel for grants or contracts.
- Works closely with the PI and OSP to see that all deadlines are met.
- Provides fiscal oversight for staff that helps PI expend project funds in university purchasing and payment system.
- Approves workflow purchasing and A/P paperwork.

4. REPORTING/CLOSE-OUT

The Principal Investigator is responsible for the preparation and submittal of the final technical reports. If subcontractors are involved, the PI is responsible for ensuring that each subcontractor has fulfilled their responsibilities, including reporting requirements, final invoicing, and any other requirements specific to the project and subcontractor.

OSP is available to assist the PI. Other reports, such as final report of inventions, will be requested by OSP.

The Controller's Office of Sponsored Projects Accounting is responsible for the final financial reporting and will coordinate the submittal of final invention statements, property reports and releases.

5. OVER EXPENDITURES

The Principal Investigator is responsible for the fiscal status of the fund. Any over-expenditures are the responsibility of the principal investigator. If over-expenditures occur and are not resolved by the time the project is closed, the over-expenditure amount may be charged against the departmental operating fund.

6. CHANGES

The Principal Investigator is responsible for following proper process for any changes to the award:
- For a change in PI or Co-PI, see the FAQ and PI team change-request form here
- For a change in budget, see the OSP budget adjustment form and corresponding procedural guidance

7. AUDITS

From time to time, federal and non-federal sponsors may perform audits to inspect the University's sponsored accounts and processes to ensure compliance with the sponsor's financial requirements. Audits occur as part of federal requirements, as part of specific award terms, and on an ad hoc basis at the sponsor's discretion. For more information on the type of reviews and audits, please see the Audit and Awareness website at: https://osp.uccs.edu/resources/review-and-audit-awareness

K. SUBCONTRACTS

INTRODUCTION

Sponsored programs funded by agreements made to UCCS are usually conducted within the physical boundaries of the University or at field sites used by UCCS personnel. On occasion, a portion of the required effort may be provided by one or more other institutions or companies or other entities (third parties) who are to be responsible for a discrete part of the project. When the portion of effort performed by a third party constitutes a substantive component of the sponsored program, the third party is required to provide the resources and personnel necessary to conduct that portion of the work as an independent subcontractor. Costs normally associated with third party effort could include any or all of the following: labor, employee benefits, materials and supplies, travel, equipment, subcontracts, consultants, other direct costs, and facilities and administrative costs (indirect costs). In the for-profit sector, it is common to include costs such as labor overhead, material overhead, general and administrative expenses, and a profit or fee.

SUBCONTRACT RELATIONSHIP

The term Prime Sponsor or Sponsor refers to the organization that makes an award directly to UCCS. The award document is the agreement processed by the Sponsor and accepted by UCCS specifying the terms under which the program will be conducted. The document that the Office of Sponsored Programs generates to formalize a third-party relationship with another organization to perform substantive work based upon an award made to UCCS is a Subcontract (or Subaward). The third party performing the effort under a subcontract is the Subcontractor (or subawardee or subrecipient). For purposes of differentiating between prime awards that are contracts and prime awards that are grants, the terms "subcontractor", "subrecipient", and "subawardee" may also be used as appropriate.

Activities performed by an individual under a sponsored agreement are normally administered through a Consulting Agreement, Personal Services Agreement, or Scope of Work (SOW) issued by UCCS and CU Employee Services. A purchase order must be used when purchased services may involve an organizational entity but does not involve a substantive portion of the work effort of the project. For example, a purchase order would be appropriate for the performance of repetitive tests or activities requiring little or no discretionary judgment on the part of the provider. In these instances, a Consulting Agreement or a Purchase Order may be issued through the normal UCCS procurement process.

WORKING DEFINITION OF SUBAWARDS AND SUBRECIPIENTS

The working definitions of subawards and subrecipients are based on Uniform Guidance in the Code of Federal Regulations (January 2014). 2 CFR §200 contains most of our working definitions related to this. It should be noted that Uniform Guidance supersedes previous working definitions of subawards and subrecipients (i.e., OMB Circular A-110, A-133) and should be referred to regarding questions of subrecipients.

According to 2 CFR §200.1 under Uniform Guidance, **subaward** means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Under 2 CFR §200.1, **subrecipient** means a non-federal entity that receives a subaward from a pass-through entity to carry out part of anaward; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other awards directly from an awarding agency.

Subrecipient requirements are further described in 2 CFR §200.331-200.333. This also helps to determine when an entity is a subrecipient and when they are a contractor:

A subaward is for the purpose of carrying out a portion of an award and creates an assistance relationship with the subrecipient. Characteristics which support the classification of the non-federal entity as a subrecipient include when the non-federal entity:

1. Determines who is eligible to receive what federal assistance.
2. Has its performance measured in relation to whether objectives of a federal program were met.
3. Has responsibility for programmatic decision making.
4. Is responsible for adherence to applicable program requirements specified in the prime award.
5. In accordance with its agreement, uses the funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

Meanwhile, a contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the non-federal entity and a contractor are when the non-federal entity receiving the federal funds:

1. Provides the goods and services within normal business operations
2. Provides similar goods or services to many different purchasers
3. Normally operates in a competitive environment
4. Provides goods or services that are ancillary to the operation of the federal program
5. Is not subject to compliance requirements of the federal program as a result of the agreement, though similar requirements may apply for other reasons

To further assist in the determination on whether the third party you plan to work with is a subcontractor or a contractor, see this document here: **https://osp.uccs.edu/sites/g/files/kjihxj1471/files/inline-files/Subcontract_vs_contractor.uniform_guidance.pdf**

If there are still questions on this, contact OSP for additional help.

DOCUMENTATION AND MONITORING REQUIREMENTS

Whether an institution issues an agreement as a subaward, subcontract or as a procurement contract, the arrangement must be made in the form of a legally binding agreement. This agreement may be bilateral or unilateral but must contain all the clauses or other provisions and requirements appropriate to either a subaward, subcontract or a procurement contract.

Absent specific additional award requirements, the level of documentation concerning issuance of subawards and subcontracts, should be consistent with good management practices.

These good practices normally include obtaining the following information from the subrecipient or subcontractor at the time of proposal or award:
- A scope of work to be completed by the subawardee.
- A budget that meets the requirements of the federal sponsor and the awarding institution.
- An institutional signature indicating commitment to perform the scope of work proposed, assuring the accuracy and reasonableness of the budget, and agreeing to enter into a subaward if the proposal is funded.
- All required representations, certifications, and assurances (e.g., human subjects assurance).

The awarding institution is responsible for providing an appropriate level of review of the subrecipient's scope of work and budget. The normal proposal review process of the institution fulfills this requirement.

The awarding institution is responsible for maintaining a system for monitoring the activities of subrecipients to ensure that they are complying with the terms of the

subaward agreement. Responsibilities include general compliance and subrecipient audit compliance. See generally 2 CFR 200, Subpart F; 2 CFR 200.513.

Per the Uniform Guidance, OSP will obtain either a copy of the most recent fiscal year audit report of subrecipient or a written certification that there were no findings relating to Federal award(s) that the pass-through entity provided; and the summary schedule of prior audit findings did not report on the status of any audit findings relating to the Federal award(s) that the pass-through entity provided. See generally 2 CFR.200.332 (b) and (d) for pass through entity risk assessment and monitoring of subrecipients.

SUBCONTRACTING PROCEDURES

Subrecipient Selection under grant funded subawards
Sponsor or Peer Reviewed

If the subrecipient is specified in the proposal and the collaboration is funded, it is not necessary to comply with the procurement requirements for competitive bidding or sole source justification since the sponsor or peer review process already approved the selection. If this is not the case, the following procedures must be complied with for subcontractor selection.

Subcontractor Selection under a contract-funded subcontract

It is the responsibility of the UCCS Principal Investigator (PI), along with OSP, to comply with procurement requirements of the sponsor in selecting a subcontractor. There are two methods of selecting a subcontractor: competitive bidding or sole source procurement.

Competitive bidding is used as the normal method of subcontractor selection. This method requires the PI to solicit proposals, bids, or quotes, from several sources and make a final selection of a subcontractor from those responding based on technical merit and cost objectives, normally the lowest price from a technically qualified respondent.

When the procurement requires performance from a sole entity because services or expertise are not available from other sources, the PI is required to provide sole source justification, identifying the need for the services and why the selected subcontractor is the only source available for the needed services. Sole source selection is not justified simply by the fact that there has been an ongoing collaboration between the two parties. It must be further justified with reasons for the unavailability of the services or expertise from other sources. Justification will be obtained by referencing the CU Procurement Service Center guidelines for sole source procurements.

Subaward/Subcontract Proposal

Regardless of the method used in selecting a subcontractor, there must be adequate time provided between the receipt of a subcontractor's proposal and the Sponsor's proposal due date, to allow UCCS's PI sufficient time to discuss and negotiate the statement of work. If the proposed subcontract involves human subjects or animal experimentation, appropriate subcontractor compliance with their own policies must be included with the proposal.

A budget, itemized by major budget category such as salaries and wages, employee benefits, supplies, equipment, travel, consultants, subcontractors, and other direct costs, is submitted by the subcontractor as part of its proposal. Greater itemization of categories may be needed if required by the sponsor's proposal guidelines or other requirements. Facilities and administrative costs (indirect costs, F&A) should be included as appropriate, be allowable and should be calculated using the subcontractor's current rate(s). A copy of the subcontractor's negotiated rate agreement is needed to verify the costs requested and to support those costs in case of an audit. If the subcontractor uses a rate for employee benefits, a copy of that rate agreement will also be needed.

The subcontractor's proposal must be signed by a designated official who is authorized to commit the subcontractor's resources to the completion of the project.

Incorporating the Subcontractor's Proposal into UCCS's Proposal

The subcontractor's costs are included in UCCS's budget as a direct cost. When calculating UCCS's facilities and administrative costs (indirect costs), the amount which exceeds $25,000 of each subcontract should be excluded from the calculation in accordance with our federally negotiated F&A agreement. Facilities and administrative cost on the first $25,000 are calculated using the appropriate rate. During the processing of a proposal by OSP, the subcontract portion is reviewed to ensure all items required have been incorporated.

Implementation Through a Standing Purchase Order

When OSP receives a fully executed award from the prime sponsor, a subaward / subcontract with the proposed organization is prepared. First, OSP must receive authorization from the PI to prepare the subcontract. The PI should complete the Subcontract Request form, which is available at: **https://osp.uccs.edu/resources/forms**. The completed form should be forwarded to OSP.

A Subcontract is a purchase of services, so the department needs to enter a Standing Purchase Order (SPO) Requisition into the CU Marketplace. After the department initiates the SPO Requisition it should be printed and sent to OSP

along with the subcontractor's budget and statement of work authorized by the subcontractor.

OSP approves the SPO for Sponsored Programs Approval only after all parties have signed the subcontract and before the SPO is forwarded to PSC.

Preparing the Subcontract

Usually, the subaward/subcontract is a line item in the proposal budget and, as a part of UCCS's prime award proposal, went through sponsor review or the peer review process. Thus, the funding of the proposal normally indicates that the sponsor has approved the sole source selection and the costs are determined reasonable to perform the subcontractor's statement of work.

If the subcontractor was not proposed in UCCS's original proposal, sponsor approval is typically required prior to issuance of the subcontract. In certain instances, sponsor approval may also be necessary even if the subcontractor was proposed in the original proposal. In some very rare instances, it may be necessary for the sponsor to review and approve the proposed subcontract agreement prior to UCCS's release to the subcontractor.

In preparing the subcontract, it is important to adhere to the prime agreement terms and conditions and to flow down the appropriate clauses. OSP is responsible for making other modifications to the standard subcontract template as necessary.

Subcontract Processing Documentation

OSP will create documentation of the subcontract's processing.

Subcontract Negotiation and Execution

Once the subcontract is prepared, the subcontract documents, which shall include the scope of work, the budget, and all appropriate flow-down terms and conditions required by the sponsor's prime award is forwarded to the subcontractor for review and signature. The subcontractor may want to negotiate changes or request clarification of the terms and conditions. OSP negotiates and coordinates those requested changes with department personnel and the PI where appropriate. In some cases, negotiation may require referral to Legal Counsel, Risk Management or Technology Transfer. Once negotiations are complete, the subcontractor signs the subcontract and returns the subcontract to OSP. . The subcontract is then signed by the OSP Executive Director or Associate Director on behalf of the Regents. Once all parties have signed the subcontract, OSP will approve the SPO requisition in CU Marketplace workflow

Procurement Service Center and the Purchase Order

CU's Procurement Service Center (PSC) incorporates the subcontract documents received in workflow into a purchase order to be sent to the subcontractor. The purchase order provides the mechanism by which the subcontractor's invoices can be paid by UCCS. The PSC also provides the Small Business Representative to assure compliance with all requirements for developing purchases with small businesses, small, disadvantaged businesses, HUBZone small businesses, veteran-owned businesses, service-disabled and veteran-owned businesses, and women-owned businesses.

SUBCONTRACTOR POST-AWARD MANAGEMENT

Technical Monitoring and Progress Reports

UCCS is responsible for ensuring that the subcontractor's work is conducted and completed in a timely manner. Progress reports must be reviewed by the UCCS PI and discussed with the subcontractor as needed. These reports are usually incorporated in the overall reports submitted to the sponsor by the UCCS PI. OSP and SPA are responsible for obtaining the other reports required by the subcontract terms and conditions (for example, invention, fiscal, property and audit reports may be required). See the subrecipient monitoring matrix and procedures for more information.

Relationship Monitoring

The UCCS PI should meet annually with the SPA liaison to review and discuss progress on the deliverables, scope of work, and other items in the annual subcontractor review checklist. LINK HERE

Fiscal Monitoring

The UCCS PI is required to review and approve all subcontractor invoices. Using the established guidelines written by Sponsored Projects Accounting's 'Subrecipient Monitoring Procedures', the PI and the Departmental Research Administrator are required to analyze and reconcile each invoice at hand back to the signed subcontractor document. After the invoice is deemed okay to pay, the SPA 'Subrecipient/Subcontractor (Subrecipient) Invoice Approval' form is required to be signed by the PI. This signed approval form and invoice should then be emailed to APinvoice@cu.edu for payment processing.

No invoice will be approved for payment that exceeds the estimated cost of the subcontract, even if approved by the PI.

Amendment to Subcontracts

During the term of a subcontract, it may be necessary to change or modify one or more of the terms and conditions of the subcontract. Some changes, such as

scope of work or PI, may require sponsor approval before an amendment can be issued. Requests for changes should be submitted by the subcontractor's authorized official and have the approval of the UCCS PI prior to OSP requesting sponsor approval.

In most cases, the terms and conditions of a subcontract will remain unchanged for the duration of the subcontract. Amendments to the subcontract, such as time extensions, rebudgeting or fund changes are accomplished by an amendment to the subcontract. If there is a change in the total estimated cost, a revised budget must be incorporated with the amendment. The amendment is the vehicle that clearly states the changes and provides for the signature approvals of both parties.

SUBCONTRACTOR CLOSE-OUT REQUIREMENTS

The UCCS PI will obtain the required final technical reports per the subcontract terms and conditions.

Close-out reports required for grant funded subawards:
- Final Invoice or Fiscal Report* (Marked Final)
- Final Technical Report (UCCS PI will obtain)
- Final Inventory of Property if required by prime sponsor
- Final Statement of Inventions
- Final Audit Notification (if subcontractor is subject to the Uniform Guidance)
- Other reports as required by prime sponsor

Close-out reports required for contract-funded subcontracts:
- Final Invoice or Fiscal Report* (Marked Final)
- Final Technical Report (UCCS PI will obtain)
- Final Inventory of Property, if required by prime sponsor
- Final Statement of Inventions
- Small and Small Disadvantaged Business Report (if subcontract is $500,000 or greater)
- Final Audit Notification (if subcontractor is subject to the Uniform Guidance)
- Other reports as required by prime sponsor

SPA will obtain verification from UCCS PI that work was performed satisfactorily for the subcontract, including verification that all deliverables have been received and accepted.

L. EXTERNAL PARTNERSHIPS

1. INTRODUCTION

Sponsored programs often involve many collaborators and partners that are important to the success of the project but are not listed as key personnel or consultants or subcontractors. Examples include an internship site, a museum, or a local industry partner. In these cases, often the PI has included a letter of support or a MOU that outlines the role and commitment of the partnerships. These letters of support often help convince an agency that the PI has the relationships and connections needed for project success.

2. RELATIONSHIP MONITORING

The UCCS PI should meet annually with SPA, OSP, or other designated party to review and discuss progress on the deliverables, scope of work, and other items using the annual partnership review checklist. Find the most up-to-date version of this checklist here: **https://osp.uccs.edu/resources/policies-and-procedures**