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Mission Statement

The Office of Sponsored Programs is dedicated to supporting faculty development of their research initiatives; providing a basis to strengthen sound scholarship and excellence in teaching. A strong OSP-Faculty partnership benefits the students, the University, and the Hampton Roads community as a whole.

Sponsored Programs and Educational Foundation

The Christopher Newport University (CNU) Office of Sponsored Programs (OSP) strives to support CNU faculty in the development of research initiatives, connections and collaborations, well-orchestrated proposals, and successful submissions. We assist with award negotiation, post award-non-financial project management, compliance and closeout. It is our goal to be a solid resource in the CNU community for the benefit of the University and its students, faculty, and staff.

The objective of these internal controls is to provide the Principal Investigator (PI) or Project Director (PD) with information and guidance for external funding applications and award administration. Developing a research concept into a fundable package, identifying funding sources, facilitating collaborations, creating comprehensive budgets, advising on compliance, and non-financial administration of awards are just some of the tasks OSP performs.

Christopher Newport University manages gifts and grants differently. Federal, state and private sponsors provide grants, contracts, and cooperative agreements. Gifts are generous donations, with very limited commitments on the part of the recipient organization. Gifts may be designated or restricted in purpose, but not in outcome. At CNU, gifts and grants are delineated as follows:

Gift

- Awarded irrevocably
- Given in the spirit of “Disinterested Generosity” (IRS Term)
- No contractual obligations or deliverables
- No formal fiscal accountability

Grant

- Award that is specific in scope of work, performance period
- Requires financial and technical reports
- Grantee may be subject to intellectual property terms
- Obligations, including payment contingencies, prior approval for deviation, and possible return of unobligated balance, may be required

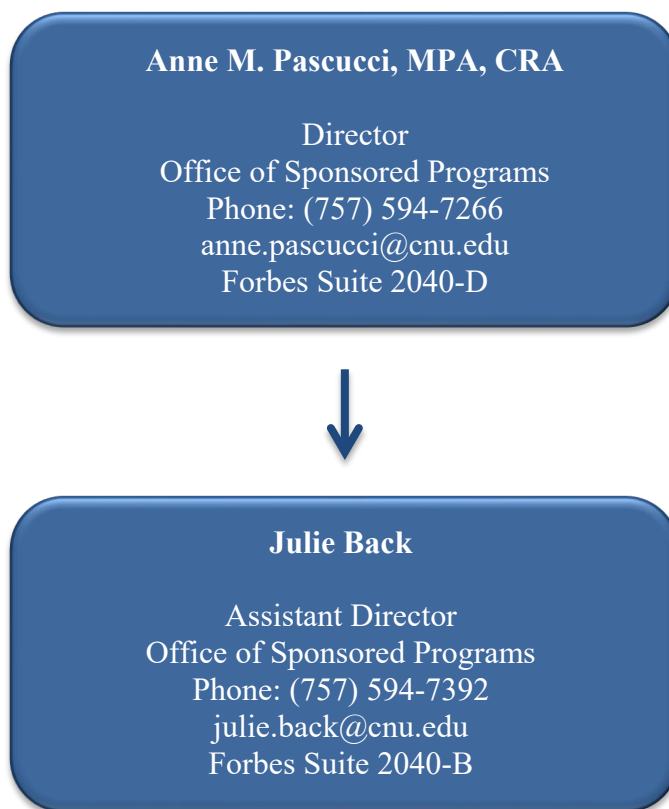
All gifts are processed through the CNU Office of Advancement, Foundation and Corporate Giving.

All grants are processed through the CNU Office of Sponsored Programs.

Purpose of Manual

The funding landscape and federal regulatory environment are dynamic. As such, the Sponsored Programs Internal Controls document is a living document that will be revised annually in response to these changes. This document is intended to be a guide for CNU faculty and staff seeking external funding and/or administering an award. Companion to this document are resources located on the Business Office website. Members of the CNU community should contact the CNU office of Sponsored Programs for further clarification or answers to additional questions that arise.

Office of Sponsored Programs Staff



Proposal Preparation – The Essential Quick Facts

Federal Entity Identification Number or Tax ID Number	54-0701501
DUNS Number (Data Universal Numbering System)	879330801
Unique Entity ID	VMYDF2TZHHB6
Congressional District	VA-003
EU PIC	920708384
CAGE Code (Commercial & Government Entity)	OKFU9
FICE Code (Federal Interagency Committee on Education)	0030706
MPIN	CNUrocks1
SIC Code (Standard Identification Code)	8221
NAICS Code (North American Industry Classification System)	611310
Human Subjects Federal Wide Assurance (FWA) Number	FWA00016196
Animal Welfare Assurance	Approval of Assurance D19-01053
NSF Organization Code	0500306000

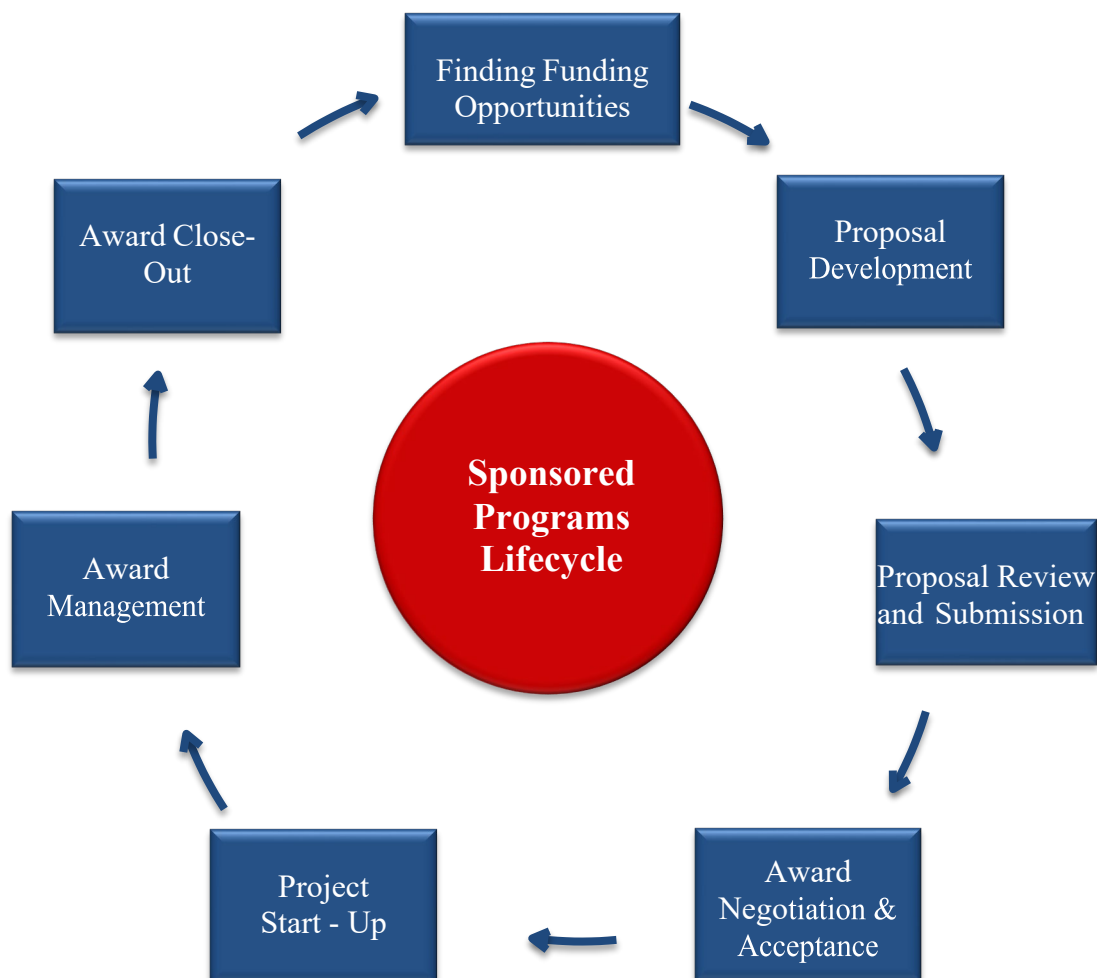
Other Information:

Name of Organization to which Award should be made	Christopher Newport University
Address of Awardee Organization	Christopher Newport University 1 Avenue of the Arts Newport News, VA 236063072
Authorizing Official: Signature of Institutional Representation	Dr. Lynn Lambert Associate Provost
Financial Contact	Business Office
Indirect Cost (F & A) Rate	60% On-Campus 24% Off-Campus
Indirect Base	Salary, Wages and Fringe Benefits
Negotiated with:	U.S. Dept. of Health and Human Services
Date of Agreement:	7/1/21-6/30/25

If seeking institutional statistics, data or demographic information, please contact the Office of Institutional Research located at <https://my.cnu.edu/institutionalresearch/>.

The Sponsored Programs Lifecycle

The Sponsored Programs Lifecycle (below) depicts the typical progression of a sponsored program from concept to closeout. For each respective step, various academic and administrative units and personnel coordinate efforts to support faculty and staff and steer each project to its successful completion. Each chapter of this Internal Controls document refers to a specific stage in the sponsored programs lifecycle.



Chapter 1: Finding Funding Opportunities

Federal Opportunities

The federal government funds research and non-research programs in priority areas through relevant agencies like the U.S. Department of Education, the National Endowment for the Arts, National Endowment for the Humanities, National Science Foundation and the National Institutes of Health among others. The government funds their extramural programs through various types of mechanisms, most commonly, the “grant.” Federal government funding mechanisms are described below:

Grant: A form of financial assistance intended to carry out a public purpose. A grant is used when the sponsor anticipates no substantial programmatic involvement with the recipient during the performance of the project and provides the recipient the most flexibility and discretion in how the project is conducted.

Cooperative Agreement: Similar to a grant, a cooperative agreement is a form of financial assistance. However, the funding agency expects to be substantially involved in the project.

Contract: A contract is used when the principal purpose is to procure a service or good for the direct benefit or use of the sponsor.

In issuing these awards, the process begins when Federal sponsoring agencies transmit public announcements that describe the funding opportunity, including the broad or specific interests of the agency. The most common types of announcements are listed below:

Request for Applications (RFA): Announcements that indicate the availability of funds for a research area of specific interest to a sponsor.

Request for Proposal (RFP): Announcements that specify a topic of research, methods to be used, product to be delivered and appropriate applicants sought.

Program Announcement (PA): A PA is a formal statement from the National Institutes of Health

(NIH) about a new or ongoing extramural activity or program. It may serve as a reminder of continuing interest in a research area, describe any modifications in an activity or program, and/or invite applications for grant support. Most applications in response to PAs may be submitted on a standing submission date and are reviewed with all other applications received at that time using the standard peer review processes. NIH may also make funds available through PARs (PAs with special receipt, referral, and/or review considerations) and PASs (PAs with set-aside funds). PAs may be used for any support mechanism other than construction awards. Unless otherwise specified in the PA, new applications (and associated renewal and revision applications) submitted in response to PAs are treated as investigator-initiated proposals.

Broad Agency Announcement (BAA): An announcement of a federal agency's general research interests. Invites proposals and specifies general terms and conditions for award (e.g., Department of Defense agencies, such as the Army Research Office (ARO), Office of Naval Research (ONR), and Air Force Office of Scientific Research (AFOSR)).

The National Science Foundation and other agencies identify funding opportunities through their websites and on grants.gov through solicitations. Additionally, many agencies have subscriptions for funding opportunity and proposal guidance.

In addition, much of the federal budget flows to the states through formula and block grants. From there, the states decide how to allocate the funds. Applications to various state agencies may involve federal pass-through funds, which is funding that the state typically receives from a federal parent agency.

Private (Non-federal) Opportunities

Private sponsorship can be obtained from a variety of sources including foundations, corporations, associations, and community foundations. Philanthropic organizations fund programs that either address their individual interests or benefit a particular group.

OSP and the University Advancement Office often consult each other to determine which office is best suited to work with faculty on a private proposal. Funding that is administered as a grant

will run through OSP, while support that qualifies as a gift is handled by the University Advancement Office.

[Examples of private organizations](#)

Foundations: The funding priorities of private foundations are usually based on the personal philosophies of the founding member(s). Foundations generally receive their income from an individual, family, or group.

Corporations: These private organizations receive contributions from a for-profit entity such as a business and/or through a corporate foundation.

Associations: These private grant-making groups are typically nonprofit and include organizations such as the American Heart Association (AHA) and the American Cancer Society (ACS).

Community Foundations: These groups are typically involved in grant giving within a specific community or region.

[How to Search for Funding](#)

The Office of Sponsored Programs is dedicated to facilitating sponsored programs and research initiatives for all. To that end, OSP subscribes to GrantForward, a funding opportunity database with a number of resources that should prove helpful in the search for funding.

[Meetings with OSP Staff and Customized Search Requests](#)

CNU OSP offers group training or private sessions on GrantForward registration and initial funding searches. You are welcome to stop by our office during business hours, or contact us directly and we will come to you. We are also available to meet and discuss your specific interests and/or assist in implementing search strategies and identifying potential sponsors. Chairs are welcomed to contact OSP to provide a general training during Departmental meetings.

Conferences and Networking

National, regional, and local funding agency conferences or seminars provide an ideal opportunity to interact with agency program staff while learning about emerging trends and priority areas. Faculty are in the best position to discuss projects with potential sponsors and to discover external collaborators while attending such events. Conferences also provide an opportunity to discuss with other attendees the nature of their work and from whom they receive funding. OSP regularly engages in networking via Twitter and LinkedIn and shares relevant articles, funding opportunities, and contacts who may serve as future collaborators or mentors.

Chapter 2: Proposal Development

Principal Investigator Eligibility

Full-time Christopher Newport University faculty are eligible to be Principal Investigators or Project Directors on externally funded programs. Retired faculty are eligible provided that a full-time CNU faculty member is identified and accepts the role as Co-Principal Investigator. Affiliated Scholars are also eligible to be PIs. Eligible Principal Investigators, Program Directors, key personnel, sub-recipients and subcontractors may NOT be listed as debarred or suspended in the United States Government System Award Management (SAM) system. Search SAM.gov to verify status.

Proposal Development Timetable

Most proposals take several months to prepare. Plan thoroughly to ensure you and everyone involved have ample time to research, plan, write, gather necessary internal approvals, and solicit and respond to feedback on your draft. This approach will ensure you are submitting a high-quality and competitive proposal. Applicants are **strongly encouraged to notify OSP** as soon as they know they are interested in submitting a proposal to an externally sponsored funding opportunity, especially if it involves multiple institutions. Proposals involving more than one institution and international collaborations take additional time to coordinate.

Proposal Types

Letter of Intent: Submitted by Principal Investigator/Project Director (PI/PD) to the funding

agency indicating intent to submit a full proposal in the future, typically to enable the funding agency to prepare their resources in advance of the full submission date. OSP can submit for the PI/PD if the funding agency requires it. Letters of Intent do not require the PI to submit an (internal) electronic Proposal Summary Form (ePSF).

White Paper: Less formal than a preliminary or full proposal, a White Paper is typically a two to five-page document describing a research hypothesis, submitted by the PI/PD directly to the funding agency. Discussions with an agency program officer may result in an invitation to submit a full proposal. White Papers do not require completion of the ePSF.

Pre-Proposal (also Preliminary Proposal, Pre-Application): Solicited or unsolicited, a brief presentation by the PI/PD of goals, methods, personnel, and overall budget submitted to a funding agency. Pre-proposals are used by funding agencies to determine the eligibility of the applicant and the suitability of the proposed project for support. They are not binding for the institution. PIs may receive assistance from OSP to prepare these but it is not required. We do advise notification to Chairs and Deans of grant activity. Pre-Proposals do not require completion of an ePSF.

Full Proposal: A complete application package for funding includes all attachments, representations, and certifications by OSP attesting to adherence to federal/state and CNU policies. Completion of the ePSF is required two full weeks prior to the due date of the proposal. OSP typically submits proposals on behalf of University faculty and staff. Proposals may be classified as follows:

New: A proposal not previously submitted to a sponsor.

Renewal/Competing Renewal: A proposal based on previously funded work for consideration by the sponsor for renewed funding.

Resubmission: A proposal, based on a previously unfunded application, which has been revised (often according to Reviewer comments) and resubmitted for sponsor consideration.

Non-competing Continuation: A proposal submitted to a sponsor for expected, continued

funding (e.g., year 2 funding of a 5-year grant).

Supplement: A proposal for supplemental support on an active award (e.g., NSF Research Experience for Undergraduates (REU), or stipend support).

Process for Limited Submission

Certain agencies and program announcements limit the number of proposal submissions from a given institution. Submitting proposals in excess of the sponsor limit may result in the automatic rejection of all proposals from the University. If the funding agency limits the number of submissions, please let OSP know of your submission plans as soon as possible. In the event the number of proposals exceeds the sponsor limit, OSP will ask proposers to submit their full proposals to the Associate Provost for Research at least 5 business days prior to it being due to OSP (8 business days from the sponsor due date). With the assistance of anonymous faculty reviewers, the Associate Provost will select the most fundable proposal(s) up to the sponsor limit. These selected proposals will be submitted on behalf of the institution.

Contact with Funding Agency (Program Officers)

Building a relationship with a sponsor is a great way to stay on top of funding trends at agencies and it supports more competitive proposal submissions. Program Officers are in the best position to advise if your idea is a “good fit” for their program. They may even suggest other programs and/or agencies that would be better suited for a particular project.

Consider sending a short e-mail to a potential sponsor. The e-mail should be clearly written and succinct—a paragraph or two summarizing the proposed research project and requesting a good time to schedule a call for feedback. Be prepared to discuss the pertinent details of your project idea, facilities available at CNU, and to ask questions about the funding opportunity. Ensure that you have reviewed the program announcement thoroughly as Program Officers do not respond well if the answer is available in the announcement.

Meeting in person is ideal but not always feasible. Faculty may request funding from OSP to assist with travel to meet with a Program Officer or potential sponsor if, after speaking with a Program Officer, it is believed that a face-to-face meeting would benefit the proposal.

Please reach out to OSP if you would like additional resources to help you prepare for conversations with Program Officers.

[Application Guidelines/RFPs](#)

Federal, state, and many private agencies solicit proposals in predetermined areas of need by publishing Requests for Proposals (RFPs) or Requests for Applications (RFAs). The specific funding opportunity guidelines must be followed in addition to those of the larger funding agency; however, in the event of a conflict, the requirement(s) of the specific opportunity supersede. In addition to basic proposal content and format instructions, most RFPs include a section outlining the evaluation criteria that determine the outcome of the review process. To ensure a competitive proposal, carefully respond to each aspect of the review criteria. This will help you to target your proposal directly to the concerns of the reviewers.

The success or failure of an application depends on following the sponsor's programmatic and formatting guidelines in addition to the strength of its academic composition. In an era of increased applications and limited funding, sponsors can and will reject incorrectly formatted proposals before they ever reach committee (called Return without Review). Formatting rules can vary significantly depending on the sponsor and the program. For example, sponsors may have word count limits for the project abstract or include strict limitations on page numbers, spacing, font size and margins. Applicants should review the sponsor's application guidelines **carefully** before beginning to write the proposal. Ideally, provide OSP with a copy of the funding opportunity as soon as you begin to seriously contemplate preparing a proposal so that OSP has enough time to become familiar with the RFP and can support your preparation and reviews.

Federal, state, and many private agencies solicit proposals in predetermined areas of need through publications called Requests for Proposals (RFPs) or Requests for Applications (RFAs). Both the generic requirements of the funding agency and the more specific guidelines of the RFP or RFA must be followed.

It is strongly recommended that the PI reviews the sponsor's mission statement and integrates it into the proposal. Assuring a sponsor that your project goals align with their mission can mean

the difference between a fundable score and rejection.

Typical Proposal Components

Requirements will vary across funding sponsors; however, there are some components that are common to almost all proposals. These include:

Abstract: A brief summary of your proposed project in layman's terms. It should describe the objectives and significance of the project in a way that most non-scientific people would understand. The project abstract offers a first impression and sets the tone, making it one of the most important parts of the proposal. It is often the first section a reviewer reads and it may be the last. If the abstract is jargon-heavy or otherwise difficult to read, or does not convey the importance of the work, the reviewer may not feel compelled to read the full proposal. To maximize clarity, write this section last and think of it as a sales pitch. Ensure it conveys why the research is important and the significance of this project to the field.

Project Narrative or Description: The project narrative truly is the story of the project plan. It typically includes an introduction or statement of need, project objectives and goals, methodology, evaluation, anticipated outcomes, impact, and data dissemination. Sponsor guidelines usually explain the order in which these components and others should appear in the proposal, and the length is usually restricted. A competitive proposal will follow the order in which the components are listed in the funding opportunity and will use the headers to clearly identify each one. If visuals such as tables, charts, timelines, and other graphics are allowed, they are an excellent way to visually convey large amounts of information while also breaking up a text-laden narrative. A logic model may also be an appropriate addition, and sometimes even a requirement. The Kellogg Foundation created a logic model development tool that simplifies the process. It may be downloaded online or contact OSP for support.

Bibliography/References Cited: Demonstrate to the reviewers that you have done a thorough literature review and are aware of the latest research on the topic by providing citations of all relevant publications. Keep in mind that reviewers may be among those whom you cite! Adhere tightly to guidance from the sponsor about format and organization.

Facilities, Equipment and Other Resources: Typically, a description of the resources that you and the University have at your disposal to carry out the project or that can be leveraged to make your proposal more competitive. Some examples include laboratory, library, human capital and/or particular institutional strengths or programs that can be brought to bear on the project, collaborators or other local resources. These resources should simply be qualified as available and not individually quantified to the project at hand.

CV/Biographical Sketch: Use the format provided by the sponsor and do not include additional information beyond what is required. As with all proposal components, consistency assures your information and ideas are clearly communicated and less likely to be overlooked. Reference the sponsor's most up-to-date guidelines as the format may be altered from year to year. It is strongly suggested that you obtain an ORCID ID and ensure that all of your publications are up to date. SciENCv is often preferred or even required, and it is based on the ORCID ID. The Tribble Library created a [resource](#) to assist with use of these tools. Please contact OSP with questions or if you need help locating sponsor-specific formatting requirements.

Current and Pending Support: Include all active and pending federal and non-federal support of your research or other programs. If the sponsor provides a format, use it! If not, OSP can provide one. SciENCv creates an NSF compliant Current & Pending Support. Sponsors evaluate this section to assess the capacity of the individual to carry out the research as proposed, as well as to help assess any potential overlap or duplication.

Data Management /Dissemination Plans: Most sponsors now require assurance that project data will be securely stored and protected from threats, including cybercrime and natural disasters. Sponsors want assurance that the research findings they fund will be available for dissemination. National Institutes of Health (NIH) implemented its [Data Management and Sharing \(DMS\) policy](#) in January of 2023. While each sponsor may have unique requirements, the general approach outlined in the NIH policy is appropriate for all: [determine if](#) the proposed research is required to have a plan, identify the appropriate methods for [managing](#) and storing your project's data, [develop a plan](#) for managing and [sharing](#) the data that is aligned with the sponsor-specific requirements, [estimate and request funds](#) to support your plan as allowed by the funding

opportunity. Using this approach will likely make your proposal more competitive. For additional assistance creating a sponsor-specific Data Management Plan, please log on to DMPTool.com using your CNU credentials. While not sanctioned by sponsors, this tool will help to explain what is generally required. Look to the funding opportunity announcement for the most up-to-date and specific requirements.

Safe and Inclusive Work Environments Plan for Off-Campus or Off-Site Research: This plan became a requirement on January 30, 2023 for all NSF proposals that will involve off-campus research. It is also considered best practice at CNU for off-site research activities, regardless of the sponsoring agency. The NSF Proposal & Award Policies and Procedure Guide ([PAPPG](#)), Chapter II E.9, provides this definition: “data/information/samples being collected off-campus or off-site, such as fieldwork on research vessels and aircraft.” The PI on a proposal to NSF that includes this type of research activity must complete the Safe and Inclusive Work Environments Plan, a form available through the OSP website. The form must be returned to OSP before submitting the proposal; it will be referenced in the ePSF as well. Please note that the plan is currently not required to be *submitted* as part of the proposal; however, the Authorized Organizational Representative (AOR) must certify that the plan is in place. If awarded, a copy of the plan must be distributed to all participants before departing for the off-campus or off-site research and the PI must document receipt. While this procedure is currently only required by the NSF, PIs at CNU are highly encouraged to complete the plan document and submit it to OSP for any grant-funded off-campus or off-site research activity.

Budget: The budget is the fiscal expression of the project. It should be reasonable and carefully considered within the project’s scope; reviewers in the field generally know what it takes to do the proposed work. Whenever possible, use real-time information and get quotes to develop this section. Bear in mind that, if awarded, your purchases will be required to follow Virginia purchasing policies and procedures and use eVA. Consultation with the Office of Procurement is advisable as prices on eVA may vary from on-line estimates.

Budget Narrative: The budget narrative is the verbal expression of your budget. It explains each item of cost necessary to carry out the project. This is particularly important where salary is

estimated, equipment is requested, and/or travel is required. Sponsors look to see the basis of calculations for each requested amount. Be sure the calculations you provide are clear and easy to follow.

Budget Development

Federal Uniform Guidance sets forth the criteria for determining allowability of costs applied to research and development, training, and other sponsored activities performed by colleges and universities under federal grants, contracts, and other agreements. Under these principles:

Costs must be **allowable**, according to [2 CFR200.420](#), the section of the uniform guidance regarding considerations for selected items of cost.

They must be **reasonable**; an action which a prudent person would have taken in similar circumstances (e.g., travel at federal domestic and/or foreign per-diem rates are generally deemed “reasonable” on federal grants).

They must be **allocable** to the sponsored project under consideration (e.g., a purchase of specific materials and lab supplies must be directly attributable to the particular sponsored grant or project being charged).

They must be given consistent treatment through application of generally accepted accounting principles appropriate to the circumstances. (E.g., expenses charged as a direct cost to a project may not also be charged as an indirect cost on a federally sponsored project). Under limited circumstances, such assistance may be directly charged but, in most cases, these costs are included in the institution’s Facilities & Administrative rate.

Costs must be incurred during the life of the award.

Budgets include two cost categories:

Direct costs: Costs directly required to accomplish the specific project. Some examples of direct costs are salaries (including associated fringe benefits), equipment, materials, supplies, travel, consultants, and subcontractors.

Indirect costs: Otherwise known as Facilities and Administrative (F&A) Costs, these are expenses incurred on behalf of the research enterprise that cannot be directly associated with one project. Some examples of indirect costs are maintenance of university lab facilities, utilities, university administration, library, security, human resources and sponsored programs. Assuming the sponsor does not have a published policy restricting them; F&A costs are applied to each project according to a formally negotiated rate. CNU's current federally negotiated indirect cost rate for on-campus research and sponsored programs is 60% of a project's salaries and wages (including fringe benefits). CNU's off campus rate is 24%. The off-campus rate will apply for all activities: a) performed in facilities not owned by the institution and where these facility costs are not included in the F&A cost pools; or b) where rent is directly allocated/charged to the project(s). If more than 50% of a project is performed off-campus, the off-campus rate will apply to the entire project. OSP will consult with the PI/PD and the Associate Provost for Research to determine which rate is applicable to each proposal.

Specific budget elements include: elements of a budget include:

Salaries and Wages: Payment for academic year or summer work may be allocated to sponsored projects.

Academic Year Course Release: Time away from teaching responsibilities during the academic year, in the measurable unit of a course, to conduct research or other sponsored activities. Faculty members must coordinate with their Chair when proposing release time (approvals will be required before submission). Release time for faculty is expressed in terms of percentage of effort and is based on the 9-month academic year and CNU's currently required course load of 3:4. OSP has developed a Course Release Calculator to determine the amount of funding required to release a PI/PD from a course. OSP obtains the faculty member's current salary from the Provost's office and the fringe benefit selections from Human Resources.

Summer Salary: Faculty who are on a standard nine-month appointment have three months available over the summer for grant-funded work hours. Most sponsors do not expect to see more than two of the available months on sponsored program(s) each year. CNU requires faculty requesting more than two summer months to certify that they will not be taking vacation over the summer as the full budgeted summer salary will be charged to the sponsor. Full summer salary is 2/9 of a PI/PD's Institutional Base Salary (IBS). OSP has developed a Summer Salary Calculator to determine the maximum allotted summer funding.

Other Project Personnel: Student research assistants, graduate assistants, undergraduate/graduate student workers, and/or other technical personnel may be included in the budget when directly related to the project.

Fringe Benefits: Fringe benefits are those direct costs associated with salaries and wages and include FICA (7.65%), retirement, health insurance, unemployment insurance, disability, and worker's compensation. CNU fringe costs are dependent on individual benefit selections. The CNU Office of Sponsored Programs will contact the Human Resources department to obtain faculty elections and develop a proposal budget.

Travel: All travel attributable to the project should be itemized. Travel expenses should be subdivided for domestic and foreign travel. List countries to be visited, dates of travel (if known), and justification for each trip. Per-diem is to be calculated using the instructions located on <https://www.gsa.gov/travel/plan-book/per-diem-rates>.

Estimates for foreign travel per-diem rates are available at https://aoprals.state.gov/web920/per_diem.asp. Please note that government agencies require the use of a domestic carrier for travel both in the U.S. and abroad, except under very strict conditions. For more detailed information, see the [Fly America Act](#).

Equipment: The Federal government identifies equipment as a single item of \$5,000 or more with more than one year of useful life. Some sponsors do not allow equipment purchases. Please review your particular solicitation to confirm whether equipment purchase is acceptable and what, if any, restrictions exist. If a piece of equipment in the budget has a generalizable use

then its necessity must be clearly justified and specifically related to the scope of work in the proposal narrative. Please consider space availability and the costs of alteration, installation, and/or maintenance before proposing an equipment purchase. As Christopher Newport University is a public institution of higher education and must adhere to the Commonwealth's purchasing procedures, OSP strongly recommends the PI/PD contact Procurement at the proposal stage so that requirements and lead-time are thoroughly considered.

Supplies: Identify all consumable supplies needed for the project. Supplies are items of expendable use that do not meet the definition of equipment. These include laboratory supplies, chemicals, and computer accessories. Some sponsors will request itemization (rate x qty) for these types of costs. Supplies must be clearly attributable to the specific project's completion. Generalized consumables that are not solely and specifically attributed to the project, such as office supplies, are considered indirect costs and may not be approved for purchase on grant funds.

Publication: If a publication is one of the expected results of the project, a brief synopsis of the expected publication content and its costs should be detailed. Dissemination costs are one of the few expenses that can be incurred after the term date of an award. PIs who plan on publishing with a journal that charges fees must include those cost in the proposed budget.

Multi-Institution Collaborations

Multi-institutional and multi-disciplinary collaborations are becoming increasingly prevalent as research problems become more complex. As a result, sponsors are finding these types of efforts desirable and, in fact, are issuing more RFPs that call for multi-disciplinary efforts.

When a decision is made to collaborate with other institutions, it is imperative that faculty get in touch with OSP as soon as possible so that CNU's office can coordinate with the collaborating institution's Sponsored Programs Office.

When collaborating with other individuals or institutions, the nature of the collaboration should be predetermined and identified in the proposal. Collaborators meeting generally accepted

criteria (below) can be appropriately identified as a Co-PI, a subrecipient, subcontractor or consultant/vendor.

Subrecipient: Subrecipients are responsible for a portion of the scope of work proposed and receive a subaward in which the terms and conditions of the prime award flow to the subrecipient. Subawards have some or all of the following characteristics:

- ✿ Has some responsibility for administrative and technical/programmatic decisions;
- ✿ Uses the resources (both human and physical) of their institutions/organizations;
- ✿ Provides on-going intellectual contributions for the life of the program;
- ✿ Assists the Principal Investigator/Project Director of the lead institution in annual and final technical reporting;
- ✿ Responsible for applicable program compliance requirements;
- ✿ May share in potential patentable or copyrightable technology to be created through project; entity has responsibility to protect technology.

Subcontractor: Subcontractors are vendors who provide goods or services to the public at a consistent rate.

Consultants/Vendors: Consultants and/or vendors may have one or more of the following characteristics:

- ✿ Provide a particular service, or set of services as part of their routine professional activity and/or business operation.
- ✿ Provide a similar service to other individuals/institutions.
- ✿ Operate in a competitive environment (compete with others who can provide a similar service). Consultants/vendors are independently responsible for providing ancillary services in support of the project and are not responsible for the overall research

management and direction of the project. As such, the primary sponsor's terms and conditions, and compliance requirements do not typically flow down to consultants. Consultants/vendors are generally independent contractors and not CNU employees. Consultants are generally work-for-hire, and are not provided rights to copyright and/or patent.

Establishing a Subaward, Subcontract and/or Consultant/Vendor at the Proposal Development Stage

CNU as Lead Institution

If CNU is the lead on a collaborative submission that will include one or more subrecipients, the PI/PD must provide their names, their role(s) in the project and their contact information to OSP as soon as possible in the proposal development stage so that OSP can coordinate its efforts with their respective counterparts at each institution. This is a time-consuming process so it is recommended that you notify OSP of your intention to include subrecipients as soon as they are identified.

Each Subrecipient Organization must include the following to CNU OSP staff prior to submission:

- ✿ Institutional Letter of Commitment – A letter from the authorized official of the institution pledging their organization's support of the proposal. It should identify the co-Investigator, title of the project, and quantify any cost share if applicable.
- ✿ Statement of Work - A brief description of the proposed work that the subrecipient entity will perform. It should identify all senior/key personnel and specify tasks/deliverables expected during the project. It sets the ground rules for the relationship.
- ✿ A completed CNU Subrecipient form.
- ✿ An FDP subrecipient risk assessment form.
- ✿ Detailed Budget and Budget Justification.

External Institution as Lead

If an external institution is the lead entity on a proposal submission, CNU will act as the subrecipient. The CNU faculty member should provide OSP's contact info to the lead collaborating PI/PD. As a subrecipient, the full ePSF must be completed prior to submission. The lead institution's Sponsored Programs office should contact OSP as soon as possible to request proposal materials required for submission.

At minimum, CNU would provide the following documents to the lead institution:

- ✿ Letter of Commitment
- ✿ Statement of Work
- ✿ Detailed Budget and Budget Justification

Cost-Sharing

The Office of Management and Budget (OMB) defines cost-sharing as that portion of a project or program costs not borne by the sponsor. That portion of the total cost is usually borne by the University or a third party. It includes both cash and in-kind contributions that the recipient makes to an award.

Cash contributions: The recipient's cash outlay, including the outlay of cash contributed to the recipient by third parties.

In-kind contributions: Non-cash contributions in the form of committed effort, real property, equipment, supplies, and other expendable property, and the value of goods and services benefitting and specifically identifiable to the project or program.

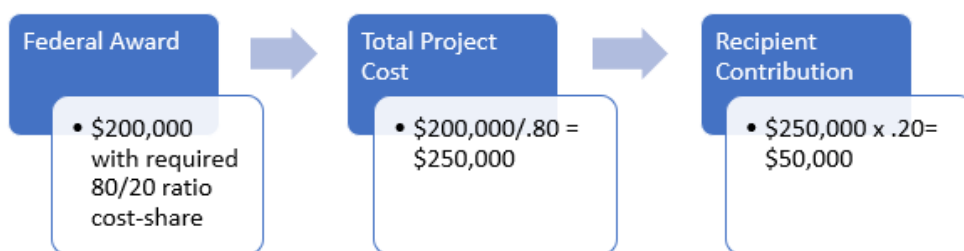
Cost-Sharing Approval: Cost-sharing or matching will only be approved if the sponsor requires it as a condition of the award. Christopher Newport University limits cost sharing to the sponsor-mandated amount. Per federal Uniform Guidance, if cost sharing is not sponsor required, it cannot be used as leverage during the merit review of an application. **It will not make a proposal more competitive if the sponsor does not require it.** Once awarded, the cost sharing

becomes a University commitment and represents a legal, binding obligation of the University.

The term “matching” may also be used in a funding opportunity announcement to indicate that a cost-share is required in the same amount as the award. The OMB makes no distinction between cost-sharing and matching since both calculations are based on a ratio of federal-to-recipient contributions provided in the funding opportunity. A match requirement is essentially cost-sharing with a one-to-one (1:1) ratio. For example, if a funding opportunity offers a \$50,000 grant and a match is required, the recipient will have to also fund \$50,000, for a total project cost of \$100,000.

Not all cost-sharing requirements are matches, however, and this distinction is important to understand so that proposal-writers correctly calculate their university’s required project contribution. When the cost-share ratio is not 1:1, follow these steps:

1. Calculate the total cost of the project (award amount plus required: Award Amount/Percentage of Federal Share of Total Project Cost = Adjusted Project Cost
2. Calculate the dollar amount of the cost-share: Adjusted Project Cost x Percentage of Recipient Share = Required Cost-Share Amount



Prior to considering University cost share on a sponsored proposal/project:

- ✿ the PI should confer with the Chair and/or Dean regarding a cost share strategy to meet the sponsor’s mandatory requirements;
- ✿ the PI, Chair, and/or Dean may wish to contact OSP to discuss the specifics of the proposal and to determine the sources of funds to meet this requirement; and

- ✿ the PI must include cost sharing in ePSF prior to submission with authorized documentation from the sources.

Cost-sharing of direct expenditures represents a commitment of departmental, program, or University resources from teaching or some other University activity to support a sponsored project or program. Committed cost sharing creates a legal, binding obligation by the University and must be treated similarly to direct or indirect expenses, whether paid for by the sponsor or shared by the University.

Source of Funds: The PI is responsible for identifying all sources of funds for cost sharing of direct costs. The PI may not utilize funds from a federal award as the source of cost sharing.

Funds from non-federal awards are allowable as the source of cost sharing only if specifically allowed by that non-federal sponsor. Written authorization of third-party cost sharing must be submitted to OSP.

Cost sharing can be an in-kind donation of approved academic year time/effort, fringe benefits, or other such designated funds. Summer salary, if allocable to the project and certified, can be used as third party (the faculty) cost share. Cost sharing may include some portion of indirect costs associated with the identified direct costs if the sponsor has mandated a lower-than-negotiated indirect cost rate and allows indirect cost recovery as cost sharing. The University must approve of this method prior to commitment.

Allowable Cost-Sharing Expenditures on Federal Awards: Cost-sharing expenditures must satisfy all of the following criteria:

- ✿ Verifiable from the official University Records;
- ✿ Not previously used as cost sharing for another project;
- ✿ Sponsor mandated and reasonable for proper and efficient accomplishment of the project;
- ✿ Allowable under the terms of the award;
- ✿ Conforms to all provisions of the Uniform Guidance for federal awards;

- ✿ Incurred during the effective dates of the grant; and
- ✿ Not paid by the Federal Government under another award.

Unallowable Cost-Sharing Expenditures on Federal Awards:

- ✿ Costs considered unallowable by the sponsor;
- ✿ Costs considered unallowable under the Uniform Guidance;
- ✿ Salary amounts exceeding the regulatory salary cap (i.e., National Institutes of Health);
- ✿ University facilities such as laboratory space - PIs should not commit the use of facilities as cost sharing, but rather characterize the facilities as available for the performance of the sponsored agreement at no direct cost to the project.

Chapter 3: Proposal Review and Submission

OSP assists faculty in developing fundable proposals with a hands-on approach to all aspects of the proposal. With the support of the Principal Investigator (PI) and an appropriate amount of time to complete the review, OSP will edit and comment on each proposal component.

Revisions may be accepted or disregarded at the discretion of the PI.

The Electronic Proposal Summary Form (ePSF) form, described below, **must be completed**, including Vice Provost approval, **two weeks prior to submission**. OSP can assist the PI as needed to ensure the ePSF is completed correctly.

The proposal itself should be received by OSP **three business days prior to the submission due date**. This is to ensure there is sufficient time to review the entire proposal for compliance with the individual agency and program guidelines, federal and state regulations, as well as University policies. Many sponsors prescribe very specific content and formatting requirements that, if not followed, will result in a proposal being returned without review. To be clear, such proposals are ineligible for funding; they may not be corrected and resubmitted after the due date.

Please note that in general, any unauthorized submissions for external funding will not be accepted by the University. Proposal submission forms that come in after the cut-off of two weeks are at risk for approval and, therefore, authorization by the University. OSP will **not**

review proposal submission updates within the last hour of the due date. Full proposals are due three business days prior to the due date.

OSP staff are experts in what constitutes a compliant proposal and will expend every effort to provide you with a thorough analysis when your proposal is submitted according to this procedure. Proposals received after the OSP deadline will receive a truncated review and may be less competitive as a result. These guidelines are in place to assist proposal applicants in submitting a compliant, high-quality proposal.

[eProposal Summary Form \(ePSF\)](#)

The ePSF is a Google form on the front page of the OSP intranet site. The ePSF is a vital internal document used to ensure that the appropriate CNU faculty and administration have reviewed and approved the Principal Investigator or Project Director (PI/PD) proposed budget and activities. It is essentially a contract between the PI and CNU that spells out roles and responsibilities, any cost sharing, matching, research compliance elements, and other factors. OSP records, tracks, and reports on proposal submission activity and identifies any special considerations that may result if the proposal is awarded (human subject, animal work and/or use of biologically/chemically hazardous materials). The approval process is started when the PI submits the form. The PI, in collaboration with OSP, generates the ePSF. The ePSF must be completed prior to actual submission of the proposal.

[ePSF Sections:](#)

- ✿ Principal Investigator (PI) / Co-Principal Investigator (Co-PI) Information
- ✿ Project Information

Proposal Type: Use the dropdown box to select the type

Project Activity: Select which activity most closely resembles your project from the following:

Proposal Title: Provide full project title

Sponsor Name: Institution/Agency/Organization to which the proposal is being directly submitted (if CNU is a subcontractor, the lead institution will be listed in this field).

Sponsor Type: What type of Agency the Sponsor is (i.e. federal, state, private, or federal flow-through). A dropdown provides a listing of the types of sponsors.

Prime Sponsor: List the primary source of the funding. (If CNU were the subcontractor to XYZ University, then this would be the agency, which is providing money to XYZ)

CFDA Number: A Catalog of Federal Domestic Assistance number is assigned to all federally funded opportunities, and is required if applying directly to the Federal agency or as a subaward on another institution's proposal.

Proposal Due Date: The date and time listed on the proposal solicitation.

Project Start Date: Anticipated date that this project will begin, if awarded.

Project End Date: Anticipated date that this project will end, if awarded.

Project Purpose: Research (basic or applied), public service, instruction, etc. A dropdown listing of purposes is provided.

Project Abstract: Brief description of the activity (3,000 words or less)

✿ Regulatory & Institutional Compliance: Please select Yes or No to the questions that follow

Will your project include Human Research Participants?

Will your project include Laboratory Animals?

Will your project involve infectious materials and agents, including Human Blood or Tissue?

Will your project involve Biologically Derived Toxins?

Will your project involve utilization of Recombinant DNA of Transgenic Plants/Animals?

Will your project involve Animal Exposure to Infectious Agents?

Will your project involve instruments that produce ionizing radiation?

Will your project involve known or suspected carcinogens?

Will your project items of Dual Use of Research Concern?

When appropriate, safety assessments, protocols, and compliance plans are developed by the principal investigator(s) and shared with and approved by EHS. I acknowledge that a compliance plan will be required prior to acceptance of the award. The EPSF and the subsequent compliance documents are subject to approval by the Vice Provost for Research and Graduate Studies.

Will your project involve the utilization of controlled substances?

Will your project involve the use of IT systems or sensitive information?

Will your project necessitate the hiring of New Personnel?

Will project include foreign travel?

Will your project necessitate additional building space?

Will your project necessitate building alterations?

Will your project require sustainability after-the-fact?

Will your project necessitate a new course or curriculum?

Will your project involve any potentially patentable or proprietary information?

Depending on your answers to these research compliance questions, completion of other forms may be necessary. These forms are located in the in the same section with the ePSF. Any affirmative answer to the research compliance questions requires contact with EHS to determine if safety assessments, protocols, and compliance plans need to be developed by the principal investigator(s). Questions regarding regulatory protocols should be addressed to the Office of Environmental Health and Safety. OSP will notify the PI and EHS if any of the answers are “yes” and identify the form that they are required to complete and send to EHS with a copy to OSP. All other questions may be addressed to Sponsored Programs.

- ⊗ Course Release Information: Number of course releases per semester/per year
- ⊗ Undergraduate Support Information: Number of undergraduate students per year involved in research.
- ⊗ Budget Information: Required elements of this section are the budget form (approved by OSP prior to upload) and the cost share form, if applicable. If cost sharing is included, authorized officials committing to the cost share must sign the cost share form and include an account number from which the funds will be collected. This is also the section where the PI will indicate any subcontractors and consultants that may be included on the project.
- ⊗ Proposal Certifications: Each PI and Co-PI of the proposal must complete a Proposal Certification form. This form is a fillable pdf, which can be completed and signed electronically.
- ⊗ Principal Investigator Approvals preformed upon submission of the form.

✿ ePSF Routing Process: Once submitted, the ePSF will route for approvals. Approvals can be done on or off campus via computer, tablet, or smartphone. The routing process will proceed as follows:

1. Co-PIs – If there are any Co-PIs on the proposal, each one in turn will review and approve of the proposal before it proceeds for institutional approval.
2. Office of Sponsored Programs – The Director of OSP will review and approve the proposal for compliance and accuracy.
3. Department – Each PI/Co-PI’s Department Chair will have an opportunity to review and approve the proposal. If multiple Co-PIs are from the same department, please select “SAME AS PRINCIPAL INVESTIGATOR” for each subsequent department selection that is the same. This will ensure that each department only has to approve once.
4. College – Each PI/Co-PI’s College Dean will have an opportunity to review and approve the proposal. If multiple Co-PIs are from the same college, please select “SAME AS PRINCIPAL INVESTIGATOR” for each subsequent college selection that is the same. This will ensure that each college only has to approve once.
5. Associate Provost for Research and Dean of Graduate Studies – As the designated reviewer in the Provost’s office, the AP of Research and Dean of Grad Studie will have an opportunity to review and approve the proposal. For all proposals in excess of \$1 million dollars, the AP will obtain the Provost’s approval as well.

Electronic Proposal Submission

Most sponsors use electronic submission portals and submission must be done by the Authorized Organizational Representative (AOR) in OSP. Very few still require paper submissions. If you are submitting a proposal to a sponsor who requires paper copies, it is the PI’s responsibility to photocopy and mail the proposal. Generally, PIs are asked to join OSP for electronic submissions by registering for an account with the submission portal. Questions can arise at the

final stage of submission that only the PI can answer.

Faculty are required to submit their proposals to OSP at least three business days prior to the agency deadline. Grants.gov allows updated or corrected applications to be submitted prior to the project deadline; however, there is no grace period for corrections after the due date.

Funding Agency Review

After submission, many proposals will undergo a peer-review process specific to the funding agency. Typically, faculty are notified about the funding decision between six and twelve months after the submission date. More information about the NSF and NIH peer review processes and scoring guidelines is available on the following websites:

NSF Review Process: http://www.nsf.gov/bfa/dias/policy/merit_review/

NIH Review Process: http://grants.nih.gov/grants/peer_review_process.htm

National Institutes of Health “Just-In-Time” Process (JIT): Following the NIH peer review process, PIs may be asked to provide additional information about their project and the institution. OSP will assist you during this process. A request for JIT information may include:

- ✿ Other Project Support information: NIH can request that you list any active and pending support (including the proposal under consideration) and address any technical, scientific and/or budgetary overlap between the proposal being considered and any active/pending support.
- ✿ IRB approval letter (if human subjects are involved).
- ✿ IACUC approval (if animals are involved).
- ✿ Budget revisions, etc.

Other sponsors may request similar information if a proposal is being considered for funding. The PI/PD should contact OSP as soon as he or she has received such a request. Many sponsors have only a short window in which to issue an award. OSP will help to ensure responses are

complete, accurate, and timely.

Receiving Reviews, Proposal Scoring, Planning Resubmissions

The funding environment is increasingly competitive and there are not enough resources available to fund every worthy proposal. PIs rarely get an award on their first application. Second and third attempts have a much better chance of success. With this in mind, most sponsors will release the reviews of your proposal following the peer-review process. OSP asks that a copy of the reviewer comments be sent to osp@cnu.edu as they are a valuable tool to strengthen your proposal for resubmission. OSP is happy to assist in using the reviewer comments to restructure and resubmit the proposal.

Chapter 4: Award Negotiation and Acceptance

OSP supports university faculty and staff by negotiating federal and non-federal sponsored award agreements. OSP has the expertise necessary to navigate and understand the complex terms and conditions of grant, and to assist the PI in responsibly managing an award. OSP also assists faculty in restructuring the scope of work if the award amount is less than requested. OSP will negotiate with the sponsor directly in consultation with the PI.

Grants, Cooperative Agreements, and Contracts

OSP will assist the PI with any changes to the project or budget and ensure they are in keeping with University policy and federal and state rules and regulations. During the negotiation phase, OSP consults with many parties, to include University Counsel and other administrative/academic units, to ensure that the PI/PD and University's interests are protected.

Grants: Grants are considered a form of financial assistance in which the sponsor provides funding based on a previously approved proposal for research or other activity (e.g., instructional, educational). Grants typically benefit the public good. Grants are awarded to the institution rather than the PI, and the sponsor typically does not have any direct involvement in the research or work to be performed.

Cooperative Agreements: Cooperative Agreements are similar to grants in that they provide

financial assistance by way of a sponsor in order to benefit the public good. Under cooperative agreements, the sponsor anticipates having substantial involvement in the research or program.

Contracts: Under a contract agreement, the sponsor agrees to pay the contractor for the delivery of goods or services that directly benefit the sponsor. Clearly defined deliverables, along with a timetable for delivery, are included in the proposal and payment may be based on reaching specific milestones. Government procurement contracts can be quite complex. U.S. Government contracts are guided by Federal Acquisition Regulations (FAR), consisting of nearly two thousand pages of guidelines. Federal acquisition contracts from U.S. Department of Defense agencies, in particular, may include terms and conditions that restrict publication and impose export control requirements (among other considerations) that might limit who can work on the project. OSP works to negotiate and navigate through the complex terms and conditions of a federal, state, or local contract agreement. Where private, industrial or corporate sponsors are concerned, negotiation points typically include areas such as intellectual property, confidentiality, publication, and payment.

Intellectual Property: See the Christopher Newport University Handbook regarding Policy on Ownership of Intellectual Property.

International Sponsors

A number of additional considerations are involved with international sponsors. It is very important that a principal investigator considering application to, or collaboration with, a foreign entity contact OSP as soon as possible so that appropriate measures can be taken to ensure the PI and University's interests are protected. Many of the same negotiation points that apply to contracts with domestic entities also apply to international agreements. However, additional issues may arise such as governing law and venue, currency exchange, IRB or IACUC. As with other types of agreements, OSP consults with the PI/PD and University Counsel where these types of complex terms and conditions apply. The vast majority of negotiations conclude to the satisfaction of all parties. Favorable outcomes are more likely when areas of potential concern are addressed early in the process. As always, OSP will be available to help in sorting through the complexities of these issues.

Chapter 5: Project Start-Up

Notice of Grant Award (NOGA)

Upon official receipt of an award, OSP will issue a Notice of Grant Award (NOGA) email. If a contract, or cooperative agreement or supplement, that will be indicated rather than award. This notice is sent to the PI, Co-PI(s), Chair, Dean, Provost's Office, Business Office, Office of Procurement, Communications and Public Relations, IT Services, Payroll, University Advancement, Environmental Health and Safety, Planning and Budget, Human Resources and the Comptroller. The award document is attached to the NOGA email. It is important that the PI reviews the document and becomes familiar with the sponsor's expectations including budgetary or programmatic restrictions and technical or programmatic reporting requirements. Upon receipt of the NOGA, the PI must schedule an appointment with OSP for a PI orientation meeting after a Banner account has been established by the Business Office.

Below is the checklist for the PI Orientation:

Principal Investigator (PI) / Co-Investigator (Co-I) Sponsored Program Training:

PI/Co-I: _____ Project Number: _____ Date: _ / _ / _

- Award Documentation:** You have been provided with a copy of all award documentation. Please review this in order to familiarize yourself with sponsor requirements to include reporting as well as other terms and conditions.
- Award Budget:** You have been provided with a copy of your award's specific budget. Please review this budget and any flexibility allowed by your specific sponsor.
- CNU Live:** You have been provided with a copy of our CNU Live power point demonstration. CNU Live will assist you with maintaining your budget balance. Please let OSP know if you have any questions regarding CNU Live access and/or information.
- Do you plan on **publishing** your results? If you are collecting data from students/individuals, you should seek IRB approval. This cannot be done retroactively.
- IRB/IACUC Protocols:** For any human subjects or animal research, Principal Investigator/Co-Investigators are responsible for maintaining active IRB/IACUC protocols throughout the life of the research project. If a protocol expires, RESEARCH MUST IMMEDIATELY STOP until the protocol is active again. Any subject data collected outside of IRB/IACUC approval will not be usable for any purpose.
- Responsible and Ethical Conduct of Research (RECR) Training:** Principal Investigator/Co-

Investigators are responsible for ensuring RECR certification is obtained by all students being financially supported on their award. This training must be completed and the certificate provided to OSP within the first semester that the student begins work and is good for four years. Training may be obtained via CITI. If your award is with NIH, the PI is required to also complete RECR Certification.

- Senior Personnel and RECR Training:** All senior personnel listed on a research award must provide the RCR training certificate from CITI Training. A link is available on the OSP page through my.cnu.edu.
- Nurturing a Safe and Inclusive Off-Campus or Off-Site Working Environment Research Safety Plan:** If your research program requires students to be off-campus or off-site, you must complete the Research Safety Plan and return a copy to Sponsored Programs. The form is located on the Sponsored Programs Website under the Helpful Resources tab.
- Effort Reporting:** Principal Investigator/Co-Investigators who have proposed/exerted effort on a project will receive effort certification forms from OSP via email at the conclusion of each semester. Recipients are responsible for completing the forms to certify their effort within two weeks of request.
- Conflict of Interest:** Principal Investigator/Co-Investigators and all key personnel must complete CITI or NIH Conflict of Interest training and submit certificate to OSP prior to expending grant funds. Certificates are good for four years. Any actual or perceived conflicts that arise during the life of the award must be reported to OSP. NIH training is located at: https://grants.nih.gov/grants/policy/coi/tutorial2018/story_html5.html. CITI training is located at: www://citiprogram.org.
- I do not have any financial conflicts of interest or foreign relationships that have not been reported to the sponsor at this time and agree to notify OSP if this changes at any time, certifying to this once a year.
- Business Office overview:** Principal Investigator/Co-Investigators are responsible for adhering to CNU Business Office and Commonwealth of Virginia procurement policies and procedures. Please direct any grant travel, payroll, and balance inquiry types of questions to the Business Office for the most up-to-date information and requirements. When reaching out to the Business Office, please include Nicole.byrum@cnu.edu, ewoodruff@cnu.edu and laura.reid@cnu.edu in your request for information.
- PI understands that all payments charged to the grant, including payroll, student payroll, purchasing, travel, etc. are initiated by the PI and are the sole responsibility of the PI to ensure are completed properly.
- Subrecipient Monitoring: PI is responsible for monitoring and approving the scope of work and invoice/billing of any subrecipient that might be included in award.
- Office of Sponsored Programs Internal Controls document:** Online at <https://interweb.cnu.edu/sponsoredprograms/policies/>.
- Research Misconduct:** Principal Investigator/Co-Investigators are responsible for disclosure of any misconduct that occurs during the life of the award. Any misconduct must be reported to OSP immediately upon discovery.
- Sexual Harassment Notification Policy:** As a condition of acceptance of this award, the PI

understands and agrees that the sponsor will be promptly notified if (1) the PI is placed on administrative leave while under investigation for a possible violation of CNU's Discrimination, Harassment and Sexual Misconduct Policy and/or (2) if the PI is found responsible for violating CNU's Discrimination, Harassment and Sexual Misconduct Policy. Initial here: _____

- The Principal Investigator is responsible for timely completion of Project reports including Interim Reports, Technical Reports and Project Outcome Reports, among other non-financial reports. Note that it is the responsibility of the Business Office to provide Financial Reports to the sponsor, to include interim invoicing, final invoicing and cost share reporting.

- Final Report Requirements:** Most sponsors require a final programmatic or technical report. They often require reporting on property purchased or intellectual property developed. These reports are required to be completed by the PI as a term of accepting the award and must be submitted to OSP as well as the sponsor. Final reports will be shared with the Tribble Library for access.

The Office of Sponsored Programs has provided an overview of each of the topics along with an opportunity for me to ask any questions. I understand these areas and agree to comply with PI Responsibilities.

PI Name (printed): _____ PI Signature: _____ Date: __ / __ / __

Once the PI has completed the orientation and obtained the necessary certifications, they are ready to begin the work of the funded project. The Chair of the recipient department provides access to the account in the CNU Live/Banner system.

Issuing Agreements to External Collaborators

Upon notice of award, OSP will begin issuing appropriate agreements to any external collaborating entities.

When CNU is the prime recipient of a grant that has one or more subrecipients, OSP prepares a subaward agreement in accordance with the terms and conditions of the prime award, then sends it to the subrecipient's institutional contact for execution. Funds are released annually according to the prime sponsor's guidance, although if a program/project is fully funded up front, a subaward can be issued for the entire project period. It is the responsibility of the lead PI/Co-PI to monitor the performance of the subrecipient to ensure that project work is proceeding as planned and meets the standards anticipated in the proposal.

Where one or more institutions of higher education are concerned, the subaward negotiation

process is generally quite smooth. OSP will work directly with the Sponsored Programs Officers at each institution to facilitate the process. Note that requirements for IRB/IACUC must be satisfied by the subrecipient's institution if the subrecipient will perform any human and/or animal subject use.

Typical components of a Subaward:

Cover Page: The cover page identifies the subcontracting parties, the project title, budget or performance period, subcontract number, prime award number, and signature lines for each party's authorizing officials.

Contact Page: Identifies the appropriate institutional technical, financial, and administrative contacts at each organization/institution.

Terms & Conditions: Incorporates in full or by reference those terms and conditions to which the subrecipient must comply in the performance of the sponsored agreement. Some examples might include technical and financial reporting requirements, disposition of tangible (equipment) or intangible (intellectual property) property, termination, provisions for changes or modifications of the budget, key personnel, scope of work, and other amendments.

Attachments: The attachments section most often includes the final statement of work, final approved budget and the prime agreement.

Subrecipient Monitoring

When fully executed, the subaward becomes an extension of the prime award, with the PI and CNU functioning on behalf of the sponsor. All terms and conditions of the prime award are applicable. The subrecipient will have a budget, scope of work and deliverables. Invoicing instructions are included in the subaward document.

The PI is expected to work with this organization as closely as necessary to make sure that the work they do on the project is performed to the standards of the PI, in line with the budget and timeframe while complying with the same terms and conditions with which the PI is expected to comply.

The PI is acting as a fiduciary of the prime sponsor regarding the subrecipient. Therefore, the PI may have to visit the location of the subrecipient, question expenses or quality of work supplied by the subrecipient. When the subrecipient submits invoices, ***the PI must approve*** not only the amount, but also that the work being invoiced is within the scope of work, meets with the PI's initial expectations and is complete. Budget deviations must be addressed and justified.

The PI, in conjunction with OSP and the Business Office, is responsible for the oversight of subrecipient monitoring and ensuring that the college's subrecipient monitoring procedures are compliant with federal and other applicable regulations. These responsibilities include:

- ✿ Identifying the subrecipient the federal award information (e.g., CFDA title and number, award name, name of federal agency) and applicable compliance requirements, including any appropriate flow-down provisions from the prime agreement.
- ✿ Determining whether the subrecipient or its PIs are debarred or suspended from receiving federal funds, prior to issuing a subaward agreement and at least annually thereafter.
- ✿ Reviewing invoices from subrecipients to ensure invoices are within the parameters of the subaward budget, and questioning expenditures if necessary and reflect the work completed by the sub.
- ✿ Requesting clarification and/or documentation from the subrecipient if there are any unusual or excessive charges invoiced by the subrecipient.
- ✿ Complying with FFATA reporting.

Chapter 6: Research Compliance

Federal regulations stipulate that institutions applying for federal funds must provide assurance that certain policies and procedures are in place at the applicant institution. Federal funding is at risk university-wide if individuals do not comply.

Institutional Review Board (IRB):

If applicable, the IRB must approve any human subjects' research protocol prior to the PI initiating research. Any use of human subjects without IRB approval will result in severe

penalties and the inability to use any data collected. An active protocol is required for the life of the funded project.

Institutional Animal Care and Use Committee (IACUC):

For any research, testing, or teaching project involving the use of live vertebrate animals, the IACUC is in place to ensure compliance with the Animal Welfare Regulations and Public Health Service Policy. Every animal use protocol must be reviewed and approved by the IACUC prior to initiation of work. Any use of live vertebrate animals without IACUC approval will result in severe penalties and the inability to use any data collected. An active protocol is required for the life of the funded project.

Responsible and Ethical Conduct of Research (RECR)

Faculty/PI(s) agree to ensure students complete the required training and to supply the OSP with certifications of completion for all students financially supported by external funds for research-related activities. For NSF proposals submitted on or after July 31, 2023, all **faculty and other senior personnel** named on the proposal must complete an approved form of RCR training before any funding can be awarded. Postdocs, grad students and undergraduates are also still required to complete RCR training before conducting NSF-supported research. This RECR training must be completed within the first semester the student begins work and is good for 4 years. With the goal of facilitating and preserving the culture of ethical and responsible conduct of research established by CNU faculty, the Office of Sponsored programs offers Faculty/PI(s) a subscription to Collaborative Institutional Training Initiative (CITI) to provide online training, testing, and documentation of RCR training to students. Go to <https://about.citiprogram.org/en/homepage/>, click on “register,” then enter Christopher Newport University in the “Search for Organization Field”. In the enrollment questions, learners can select the course under question 3 (response 1).

Training records for the Responsible and Ethical Conduct in Research (i.e. certificates) must be retained for 5 years in accordance with the Library of Virginia Records Management statute, GS-111-101198.

Faculty/PI(s) who do not supply the required certifications are reported to the Associate Provost for Research.

Components of RCR Training

Requirements for:

Laboratory Students	Non-Laboratory Students
Using Animal Subjects in Research	
Research Involving Human Subjects	Research Involving Human Subjects
Plagiarism	Plagiarism
Authorship	Authorship
Collaborative Research	Collaborative Research
Conflicts of Interest and Commitment	Conflicts of Interest and Commitment
Data Management	Data Management
Mentoring and Healthy Research Environments	Mentoring and Healthy Research Environments
Peer Review	Peer Review
Research Misconduct	Research Misconduct

Misconduct in Research

Research Misconduct is the fabrication or falsification of data, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the academic or research community for proposing, conducting or reporting research or scholarly activity. It does not include honest error or differences in interpretation or judgments of data. Additionally, this definition includes violations of University policy pertaining to research, including the failure to obtain proper review and approval by the University committees responsible for research involving human subjects, animal care and use, radioactive materials, biohazards, as well as the failure to comply with rules and guidelines set forth by the committees responsible for these areas.

All employees or individuals associated with Christopher Newport University are required to report observed, suspected, or apparent misconduct to the Research Integrity Officer (the Dean of the appropriate College). If an individual is unsure as to whether a suspected incident falls within the definition of research misconduct, he/she may call the Research Integrity Officer (Associate Provost for Research) to discuss the suspected misconduct informally. Such

consultation a kept confidential to the extent permissible by law.

All allegations of misconduct shall be made in writing, signed by the Complainant, and made in confidence directly to the Research Integrity Officer. Upon receipt of a written complaint, the Research Integrity Officer shall inform the Provost, the University Counsel, and the Respondent of the allegation. Every effort should be made to resolve the situation at this level. In the event that the person making the allegation considers the Research Integrity Officer and/or the Provost to have a conflict of interest, the allegation may be reported directly to the President.

Following unsuccessful attempts to resolve the situation, the Research Integrity Officer shall review the written complaint and consult with the University Counsel to determine whether probable cause exists to conduct an Initial Inquiry, whether PHS, NSF or NEH support is involved, and whether the allegation falls under the PHS, NSF, or NEH definition of misconduct. There is not always sufficient evidence or information to permit further inquiry into an allegation. If the issue involved is found not to warrant further inquiry, satisfactory resolution through means other than this policy should be sought and to the extent possible, the identity of the Complainant(s) shall remain confidential.

Initial Inquiry

Following the preliminary assessment and determination that the allegation provides sufficient information, the Research Integrity Officer, in consultation with the Provost and the University Counsel, shall notify in writing with return receipt the Respondent's College Dean and the Respondent, and immediately begin the Initial Inquiry. At this point, if outside funding is involved, the funding agency is notified that an investigation has been initiated. The purpose of the Initial Inquiry is to make a preliminary evaluation of the available evidence and testimony of the Complainant, the Respondent, and key witnesses to determine whether there is sufficient evidence of possible research misconduct to warrant an investigation. The purpose of the Inquiry is NOT to reach a conclusion about whether misconduct definitely occurred or who was responsible. If it is determined that an Initial Inquiry is necessary, every reasonable effort shall be made to protect the identity of the individual(s) involved. (If the process reaches the investigative phase, however, the right of the Respondent to confront the Complainant requires

that the identity of the Complainant be revealed). The Research Integrity Officer is responsible for forming an Inquiry Committee, the membership of which shall be determined by the Research Integrity Officer and the Provost.

[Inquiry Committee](#)

If it is determined that the formation of an Inquiry Committee is necessary, the Committee and Committee chair will be appointed within 10 days of the initiation of the Inquiry. The Inquiry Committee shall consist of a minimum of three persons who do not have real or apparent conflicts of interest in the case, are unbiased, and have the necessary and appropriate expertise to carry out a thorough and authoritative evaluation of the relevant evidence, interview the principals and key witnesses, and to conduct the Inquiry. These individuals may be faculty, subject matter experts, administrators, lawyers, or other qualified persons, and they may be from inside or outside the University.

Members of the Committee and experts will agree in writing to observe the confidentiality of the proceeding and any information or documents reviewed as part of the Inquiry. Outside of the official proceedings of the Committee, they may not discuss the proceedings with the Respondent, Complainant, witnesses, or anyone not authorized by the Research Integrity Officer to have knowledge of the Inquiry.

[Notification of the Appropriate Parties](#)

Upon initiation of the Inquiry, the Research Integrity Officer shall notify the Respondent in writing, with return receipt, that a complaint of misconduct has been received and advise the Respondent of the Inquiry. The notification shall identify the research project in question, and the specific allegations; define misconduct; identify PHS, NEH or NSF funding, if involved; list the names of the members of the Inquiry Committee (if appointed) and experts (if any); explain the Respondent's opportunity to challenge the appointment of a member of the Committee or expert for bias or conflict of interest, to be assisted by counsel, to be interviewed, to present evidence to the Committee, and to comment on the Inquiry report; address the Respondent's obligation as an employee of the University to cooperate; describe the University's policy on protecting the Complainant against retaliation; and the need to maintain the Complainant's

confidentiality during the Inquiry, and any subsequent proceedings.

Respondent's Right to Object to Committee Members

The Research Integrity Officer will notify the Respondent of the proposed Committee membership within five (5) days of its formation, in writing, with return receipt. If within five (5) days of notification, the Respondent submits a written objection to any appointed member of the Inquiry Committee or expert based on bias or conflict of interest, the Research Integrity Officer will immediately determine whether to replace the challenged member or expert with a qualified substitute.

Sequestration of Records

Research records produced under federal grants, cooperative agreements, and most contracts are the property of the University, and employees cannot interfere with the University's right of access to them. The documents and materials to be sequestered shall include all of the original items (or copies, if originals cannot be located) that may be relevant to the allegations.

Additionally, records from other individuals, such as co-authors, collaborators, or Complainant(s), may need to be sequestered. The Research Integrity Officer shall obtain the assistance of the Respondent's supervisor and University Counsel in this process, as necessary. If the Respondent is not available, sequestration may begin in the Respondent's absence. The Respondent shall not be notified in advance of the sequestration of research records.

To protect the rights of the Respondent and all other involved individuals, as well as to enable the University and its representatives to meet their institutional, regulatory, and legal responsibilities, documentation of custody must be ensured and maintained, with the originals kept intact and unmodified. Therefore, a dated receipt should be signed by the sequestering official and the person from whom an item is collected, and a copy of the receipt should be given to the person from whom the record is taken.

If it is not possible to prepare a complete inventory list at the time of collection, one should be prepared as soon as possible, and then a copy should be given to the person from whom the items were collected within ten working days of the request. If the copy cannot be delivered to the individual within ten working days, a written explanation of the relevant circumstances, along

with the anticipated delivery date, shall be transmitted in confidence to that individual. This explanation shall become a part of the Inquiry records. When the requested copy is delivered to the person from whom the original item has been taken, a dated receipt shall be signed by that person and Investigation Official with copies given to both individuals. The Research Integrity Officer shall be responsible for maintaining files of all documents and evidence and for the confidentiality and the security of the files.

The Research Integrity Officer and Provost, in consultation with appropriate (including legal) advisor(s), shall determine what additional notification(s) is necessary, including if and when external funding agencies should be notified. Any such notification shall include a complete description of the evidence and shall be provided by the Provost. The Research Integrity Officer, the Provost and/or the Inquiry Committee may meet separately with the Respondent and Complainant and shall review all pertinent and reasonable documentation to determine if a formal Investigation should be recommended. Refusal on the part of the Respondent to cooperate shall be grounds for the recommendation for an Investigation.

[Charge to the Committee and the First Meeting](#)

The Research Integrity Officer, or his or her designee, will prepare a charge for the Inquiry Committee that states the purpose of the Inquiry, describes the allegations and any related issues, outlines the appropriate procedures for conducting the Inquiry, assists the Committee with organizing plans for the Inquiry, and answers any questions raised by the Committee. The Research Integrity Officer, his or her designee, and the University Counsel will be present or available throughout the Inquiry to advise the Committee as needed. The first meeting must take place within 10 days of the committee's appointment.

[Conducting Interviews](#)

The purpose of an interview at the Inquiry stage is to allow each Respondent, Complainant, or witness to tell his or her side of the story. Before an interview, the Committee should provide each witness with a summary of the matters or issues intended to be covered at the interview. If the Committee raises additional matters, the witness should be given an opportunity to supplement the record in writing or in another interview. Interviews with the Respondent will be

transcribed or tape-recorded. Interviews with anyone else will be summarized, tape-recorded, or transcribed. A transcript or summary of the interview will be provided to each witness for review and correction of errors. Witnesses may add comments or information and return them to the committee within 5 days of receipt. Changes to the transcript or summary will be made only to correct factual errors.

Respondent and witnesses may be accompanied and advised by legal counsel or by a non-legal advisor who is not a principal or witness in the case. However, the counsel or advisor may only advise the respondent or witness and may not participate directly in the interview. Respondent and witnesses will respond directly to the interview questions.

Admission of Misconduct

If the Respondent admits to the misconduct, the Respondent should be asked immediately to sign a statement attesting to the occurrence and extent of the misconduct. Normally, an admission is a sufficient basis to proceed directly to an Investigation. However, the admission may not be a sufficient basis for closing a case. Further investigation may be needed to determine the extent of the misconduct or to explore additional issues. If an admission is made, the Research Integrity Officer, in consultation with University Counsel and other appropriate persons, will determine whether there is a sufficient basis to close a case, after the admission is fully documented and all appropriate procedural steps are taken.

Committee Deliberations

The Inquiry Committee will evaluate the evidence and testimony obtained during the Inquiry. After consultation with the Research Integrity Officer, Provost, and University Counsel, the Committee members will decide whether there is sufficient evidence of possible misconduct to recommend further investigation. The scope of the Inquiry does NOT include deciding whether misconduct occurred or conducting exhaustive interviews and analyses.

The Inquiry Report

The Inquiry shall be completed and a written report of the findings shall be prepared and submitted to the Provost within 45 days following its first meeting, unless the Research Integrity Officer approves an extension for good cause. If the Inquiry cannot be completed within 60 days,

a report shall be made to the Provost citing progress to date, the reasons for the delay, and the estimated completion date. The Respondent and any other individual(s) involved shall be informed of the delay.

The final report shall contain the name and title of the committee members and experts, if any; the allegations; whether a PHS, NEH or NSF funded project; a summary of the Inquiry process used; a list of the records reviewed; summaries of any interviews; a description of the evidence in sufficient detail to demonstrate whether an Investigation is warranted or not; and the Committee's determination as to whether an Investigation is recommended and whether any other actions should be taken if an Investigation is not recommended. University Counsel will review the Report for legal sufficiency. The Respondent shall be provided a copy of the Inquiry Report, with return receipt. The Complainant will be provided with those portions of the draft report that address the Complainant's role and opinions in the Investigation. The Research Integrity Officer may establish reasonable conditions for review to protect the confidentiality of the draft report. Within 15 days of the receipt of the draft report, the Respondent and Complainant will provide their comments, if any, to the Inquiry Committee. Any comments that the Respondent or Complainant submits on the draft report will become part of the final report and record. Based on the comments, the Inquiry Committee may revise the report as appropriate.

[Inquiry Termination](#)

If the University plans to terminate an Inquiry of an allegation of misconduct on a PHS, NEH, or NSF funded project, for any reason, without completing all relevant requirements under the applicable subparts or sections (e.g., 50.103 (d) for PHS and 689.3 for NSF), a report of such planned termination, including a description of the reasons for such termination, shall be made to the agency's cognizant office, which will then decide whether further Inquiry should be undertaken.

If the Inquiry does not produce substantial evidence of misconduct, the Provost shall so inform the person who made the allegation, the Respondent, the University Counsel and the President, and any other individual(s) involved in the Inquiry to whom the identity of the Respondent was disclosed, and the matter shall be closed. The University shall make diligent efforts to restore the

reputation of the Respondent by providing all relevant parties with a factual report of the outcome and the conclusions of the Inquiry. The University shall maintain sufficiently detailed documentation of the Inquiry to enable it to respond to potential requests to review the reasons for determining that an Investigation was not warranted. Such records will be maintained in the Office of the Provost in a secure manner in accordance with Library of Virginia Records Retention Policies.

Inquiry Findings

If the Inquiry reveals substantial evidence of misconduct, the Research Integrity Officer will transmit the final report and any comments to the Provost who will make the determination whether findings from the Inquiry provide sufficient evidence of possible research misconduct to justify conducting an Investigation. The Inquiry is completed when the Provost makes this determination.

The Provost, in consultation with the Research Integrity Officer, the University Counsel, and other appropriate parties, shall reach his/her determination on a case by case basis, considering all relevant factors, including, but not limited to: (1) the accuracy and reliability of the source of the allegation of misconduct; (2) the seriousness of the alleged misconduct; (3) the scope of the alleged incident, and the context in which it became known; and (4) other information obtained during the Inquiry. If an Investigation is initiated, any outside sponsoring agency that may be involved or have an interest in the alleged misconduct shall be notified. The Provost, in consultation with the Research Integrity Officer and University Counsel, shall determine what such notification will include and to whom it will be directed. The Complainant and the Respondent shall be notified in writing, with return receipt, when an Investigation will follow.

Retaliation

If the allegation had been made in good faith, the University shall make diligent efforts to protect against retaliation the positions and reputations of the Complainant(s) and other individuals who have cooperated with the University's Inquiry. Any alleged or apparent retaliation will be reported immediately to the Research Integrity Officer or Provost. If either the Research Integrity Officer or Provost is considered to have a conflict of interest, the alleged or apparent retaliation

will be reported directly to the President.

Interim Administrative Actions

Upon recommendation of the Research Integrity Officer, the Provost and the University Counsel may meet with the Respondent for the purpose of imposing temporary interim administrative actions prior to the completion of an Inquiry or Investigation if necessary to safeguard the integrity of the research or scholarly activity, prevent inappropriate use of sponsored funding, or otherwise protect the interests of a sponsor, the University or the public. If temporary suspension of duties is imposed, such suspension shall be without loss of pay, pending the conclusion of the process described herein. The Respondent shall be informed of the reasons for such action taken and afforded the opportunity to oppose such action.

Formal Investigation

The purpose of the formal Investigation is to explore in detail the allegations, to examine the evidence in depth, and to determine specifically whether misconduct has been committed, by whom, and to what extent. The Investigation will also determine whether there are additional instances of possible misconduct that would justify broadening the scope beyond the initial allegations. This is particularly important where alleged misconduct involves clinical trials or potential harm to human subjects or the public or if it affects research that forms the basis for public policy, clinical practice, or public health practice.

Investigation Committee

The Research Integrity Officer is responsible for conducting or designating others to conduct the Investigation. In cases where the allegations and apparent evidence are straightforward, such as an allegation of plagiarism or simple falsification or an admission of misconduct by the Respondent, the Research Integrity Officer may choose to conduct the Investigation directly or designate another qualified individual to do so. In such cases, the Investigation Official will obtain the necessary expert and technical advice to consider properly all scientific issues.

In complex cases, the Research Integrity Officer shall appoint an Investigation Committee (herein the “Investigative Committee”) within 10 days of the notification to the Respondent that an investigation is planned. The Research Integrity Officer will be a member of the Committee

and will serve as Chairperson. The Investigative Committee should consist of at least three individuals who do not have real or apparent conflicts of interest in the case, are unbiased, and have the necessary expertise to evaluate the evidence and issues related to the allegations, interview the principals and key witnesses, and to conduct the investigation.

These individuals may be scientists, administrators, subject matter experts, lawyers, or other qualified persons, and they may be from inside or outside the University. Individuals appointed to the Investigative Committee may also have served on the Inquiry Committee.

Members of the Committee and experts will agree in writing to observe the confidentiality of the proceedings and any information or documents reviewed as part of the Inquiry. Outside of the official proceedings of the Committee, they may not discuss the proceedings with the Respondent, Complainant, witnesses, or anyone not authorized by the Research Integrity Officer to have knowledge of the Inquiry.

The Research Integrity Officer will notify the Respondent of the proposed Committee membership within five (5) days of its formation, in writing with return receipt. If within five (5) days of notification, the Respondent submits a written objection to any appointed member of the Investigative Committee or expert based on bias or conflict of interest, the Research Integrity Officer will immediately determine whether to replace the challenged member or expert with a qualified substitute.

The Respondent may consult with legal counsel or a non-lawyer personal advisor (who is not a principal or witness in the case) to seek advice and may be accompanied by legal counsel or a non-lawyer personal advisor to any meeting on this matter. The Respondent's legal counsel's role, as well as the personal advisor's role, is limited to advising the Respondent. Neither the legal counsel nor the personal advisor may participate in any administrative proceedings. Once formed, the Investigative Committee shall, in consultation with the University Counsel, establish the procedures to be followed in conducting the Investigation. The Complainant and Respondent shall be fully informed of the procedures. The Investigative Committee shall initiate the Investigation within 30 days of the completion of the Inquiry, and shall take no more than 60 days to complete the Investigation, prepare a report of its findings, including recommended

action(s), and submit the report to Provost and President. In undertaking this investigation, the Investigation Committee shall act promptly, ensure fairness to all, secure the necessary and appropriate expertise to carry out a thorough and authoritative evaluation of the relevant evidence, and take precautions against real or apparent conflicts of interest.

Notification of Respondent

The Research Integrity Officer will notify the Respondent, in writing, with return receipt, as soon as reasonably possible after the determination is made to open an Investigation. The notification should include a copy of the Inquiry Report; the specific allegations; the sources of funding, if any; the definition of research misconduct; the procedures to be followed in the Investigation, including the appointment of the Investigation Committee and experts; and, the opportunity of the Respondent to be interviewed, to provide information, to be assisted by counsel, to challenge the membership of the committee and experts based on bias or conflict of interest, and to comment on the draft report.

The Research Integrity Officer will immediately sequester any additional pertinent research records that were not previously sequestered during the Inquiry. This sequestration will occur before or at the time the Respondent is notified that an Investigation has begun. The procedures to be followed for sequestration during the Investigation are the same procedures that apply during the Inquiry.

Charge to the Committee and the First Meeting

The Research Integrity Officer, with the assistance of the University Counsel, will convene the first meeting of the Investigation Committee. The Research Integrity Officer will define the subject matter of the Investigation in a written charge to the Committee that describes the allegations and related issues identified during the Inquiry, define research misconduct, and identify the name of the Respondent.

The Investigation

The Investigation may consist of a combination of activities including but not limited to: (1) examination of all documentation including, but not necessarily limited to, relevant research records, computer files, proposals, manuscripts, publications, correspondence, memoranda, and

notes of telephone calls; (2) review of the report from the Inquiry; (3) interviews of parties and witnesses who may have been involved in or have knowledge about the case. Interviews of the Respondent should be tape recorded or transcribed. All other interviews should be transcribed, tape recorded, or summarized. Summaries or transcripts of all interviews should be prepared, provided to the interviewed party for comment or revision, and included as part of the investigatory file. The Investigative Committee shall provide the Respondent an opportunity to comment on the allegations and shall include his or her comments in its report. The Respondent must submit comments to the Committee within 5 days of receipt. Members of the University community who are involved in, or learn of, an Investigation of the alleged research misconduct will protect, to the maximum extent possible, the confidentiality of information regarding the Complainant, the Respondent, and other affected individuals.

Admission of Misconduct

If the Respondent admits to the misconduct, he or she should be asked immediately to sign a statement attesting to the occurrence and extent of the misconduct, acknowledging that the statement was voluntary, and stating that the Respondent was advised of his or her right to seek the advice of counsel. The Committee should consult with the University Counsel on the specific form and procedure for obtaining this statement. The admission may not be used as a basis for closing the Investigation, unless the Committee has adequately determined the extent and significance of the misconduct and all procedural steps for completion of the Investigation have been met. The Investigation should not be closed unless the Respondent has been appropriately notified and given an opportunity to comment on the Investigative Report. Completion of the Investigation shall include conducting the Investigation, preparing the Report of the findings, making the draft report available to the Respondent for comment, and submitting the final report to the Provost. If the case is considered complete, it should be forwarded to the Provost with recommendations for appropriate University actions and to any outside funding agencies, as appropriate.

Conflict of Interest

Conflict of Interest and Commitment for Research and Sponsored Programs

Christopher Newport University

Date: Revised 12/4/12

Responsible Office: Office of Sponsored Programs

A. PURPOSE

The purpose of this policy is to set guidelines and procedures for officers, faculty, staff, and other employees at Christopher Newport University in reviewing and managing the disclosure and resolution of conflicts of interest and/or commitment, whether real, apparent, or potential. This policy is compliant with the National Institute of Health Financial Conflict of Interest Policy required to be implemented by August 24, 2012.

B. INCLUDED POPULATIONS

This policy pertains to all full-time and part-time faculty and staff members who are in any way associated with sponsored projects, programs, services, or contracts.

C. CONFLICT OF INTEREST & COMMITMENT

Conflicts of interest are defined as situations in which faculty or staff members may have the opportunity to influence the CNU's business decisions in ways that could lead to personal gain or give improper advantage to members of their families, dependents, or associates.

A conflict of interest exists when a faculty member's responsibility for teaching, research, or service is threatened or harmed because of an external relationship which directly or indirectly affects the significant financial interest (SFI) of the faculty member, a family member, or associate. For the purposes of this policy, "family" includes but is not necessarily limited to spouse, domestic partner, children, parents, parents-in-law, siblings, and other relatives. Similarly, "associate" includes but is not necessarily limited to both business and domestic associates. In addition, a conflict of interest exists when a family member makes more than a de minimus use of university academic, administrative, or other resources, or influences CNU decisions in such a way that could or does lead to personal gain or improper personal advantage or advantage to a family member or associate.

D. Conflicts of commitment are defined as situations in which external activities of faculty members or staff members interfere or appear to interfere with their paramount obligations to their students, colleagues, and CNU. Use of institutional resources for the

purposes of consulting or other external activities without remuneration to the institution constitutes a conflict of commitment.

This policy will be flowed down to all subrecipients.

E. VIRGINIA STATE AND LOCAL GOVERNMENT CONFLICT OF INTEREST ACT

No information in this policy may supersede Virginia's State and Local Government Conflict of Interest Act. The current Act states that a potential conflict of interest exists whenever a faculty, administrative, or professional staff member has a significant personal (or family) financial interest in a business enterprise that could bias the design, conduct, or reporting of research or educational activities of CNU. A financial interest is defined as anything of monetary value or benefit (other than salary paid by CNU), including ownership, equity, intellectual property rights, and salary or other compensation. A significant personal or family financial interest is defined as more than three-percent ownership, equity, or intellectual property rights in a business enterprise, or income from other compensations, or benefits that exceed, or may be expected to exceed \$5,000 annually when aggregated for the staff member and any other person residing in the household.

In addition and in compliance with the NIH's Financial Conflict of Interest Policy (FCOI), CNU provides that included population members must "disclose the occurrence of any reimbursed sponsor travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available.), related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education." The included population member will specify details of this disclosure, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. CNU officials will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI.

F. DISCLOSURE AND REVIEW PROCESS

Each faculty or staff member participating in a sponsored project, program, service, or contract covered by this policy must disclose whether he or she has external affiliations that may constitute a conflict according to sections "C" or "D" of CNU's policy on

Conflict of Interest and Commitment for Research. A request will be made annually to all externally funded faculty for disclosure of Financial Conflicts of Interest.

When to Disclose

Disclosures should be made prior to the submission of a proposal from CNU and must be completed prior to CNU's acceptance of the sponsored project or issuance of a purchase order or subcontract for the acquisition of goods and services. During the period of an award, updating financial disclosures will take place annually and **within 30 days of acquisition or discovery of new significant financial interests (SFI)**. It is the responsibility of the lead Project Director/Principal Investigator to make sure each member of the project team has read the Conflict of Interest and Commitment for Research and Sponsored Programs policy, receives training in the CNU FCOI Policy, understands this policy, and has disclosed any real or potential conflicts of interest. Training all included populations on FCOI will be undertaken every four years or if CNU revises its FCOI policy, the included population member is new to CNU or CNU finds that the included population member is in violation of this policy.

Positive disclosures will be reviewed by a Conflict of Interest (COI) Review Committee. The Committee will be established by the Provost on an as needed basis. The Associate Provost will chair the Committee with other committee members consisting of the Academic Deans of the Colleges and one faculty member, appointed by the Provost.

In reviewing the positive disclosures, the COI Review Committee will be guided by the following practices and apply them as may be appropriate.

1. Assure adherence to relevant CNU and Commonwealth policies such as the University Handbook, Virginia Conflict of Interest Policy, Intellectual Property Policy, and other CNU policies as the Committee deems appropriate.
2. Consider the nature and extent of the financial interest in the relationship of the faculty or staff member and the external organization.
3. Give special consideration to the terms and conditions of sponsored project agreements that may mitigate or complicate the given situation.
4. Consult with and obtain additional information from the faculty and staff member as either the Conflict Review Committee or the faculty or staff member feel may be helpful in resolving actual or potential conflicts.
5. Act in a timely manner so as not to delay unduly the conduct of the sponsored project.
6. Conclude that CNU may take one of the following actions:

- Accept the sponsored project award.
- Not accept the sponsored project award.
- Accept the sponsored project subject to suitable modifications in either the sponsored project award document or the external organizational affiliation with faculty or staff.

If a disclosure is made in an untimely manner or CNU has not reviewed a previously existing SFI during an ongoing NIH-funded project, CNU's Conflict of Interest (COI) Review Committee shall within 60 days:

Review the SFI; determine whether it is related to the NIH-funded research; and determine whether an FCOI exists. IF an FCOI exists, CNU must implement, at least on an interim basis, a management plan that shall specify the actions that have been or will be taken to manage such FCOI going forward and submit FCOI report to the NIH. In addition to the FCOI report, CNU must, within 120 days of its determination of noncompliance, complete a retrospective review of the Investigator's activities and the NIH-funded research project to determine whether any NIH-funded research, or portion thereof, conducted during the period of noncompliance, was biased in the design, conduct, or reporting of such research. Based on the results of the retrospective review, if appropriate, the Conflict of Interest (COI) Review Committee updates the previously submitted FCOI report, specifying the actions that will be taken to manage the FCOI going forward.

Bias identified in any reporting, design, or conduct of NIH-funded research must be reported to NIH along with the submission of a mitigation report if bias is found during the retrospective review. The mitigation report must include the key elements documented in the retrospective review and a description of the impact of the bias on the research project and CNU's plan of action or actions taken to eliminate or mitigate the effects of the bias. Thereafter, CNU must submit FCOI reports annually.

FCOI's previously reported to the NIH require annual FCOI reports from CNU's Conflict of Interest (COI) Review Committee stating the status of the FCOI and any changes to the management plan. The report will state whether the FCOI is still being managed or explain why the FCOI no longer exists. FCOI annual reporting will be maintained by CNU to NIH through the termination of the NIH project period.

G. APPEAL PROCESS

A faculty or staff member dissatisfied with the Conflict Review Committee's conclusion may appeal to the Provost in consultation with the University Counsel and with reliance

on the advice provided by legal counsel. The Provost may also consult with the faculty or staff member, the COI Committee, the Director of Sponsored Programs, and any others as deemed appropriate to the particular situation. The decision of the Provost shall be final, unless the University Counsel determines that a conflict exists with the Provost in which case, legal advice provided to the President and the Board, based on the law will take precedence over a decision by the Provost.

H. NON-COMPLIANCE

Non-compliance with the conflict of interest policy or these procedures may result in the suspension or termination of a sponsored project. Non-compliance could also result in restrictions on faculty, staff, or other employees with respect to future proposal submissions as well as other sanctions in accordance with CNU policies or other State or Federal laws and regulations.

I. REPORTING

Upon completion, copies of all conflict of interest forms submitted in connection with research and development relationships that are approved shall be filed with CNU's Office of Sponsored Programs. CNU will develop and maintain a file, available for public review, which will contain all approved relationships with applicable conflict of interest forms. For all disclosures of Significant Financial Interest (SFI) involving NIH funded research, the following information will be available publicly via the OSP website: the included population member's name; title and role with respect to the research project; name of the entity in which the SFI is held; nature of the SFI; and approximate dollar value of the SFI.

J. AUTHORITY

CNU reserves the right to revise, change, or eliminate these regulations as necessary without notice.

K. APPENDIX

The following list of examples serves as a set of guidelines for identifying potential conflicts of interest and commitment. It is not intended as a comprehensive list of all potential situations that could present faculty or staff members and CNU with difficulty.

1. ACTIVITIES INVOLVING SPONSORED PROJECTS THAT ARE CLEARLY PERMISSIBLE.
 - a. Acceptance of royalties for published works and patents, or of honoraria for commissioned papers and lectures.
 - b. Service as a consultant to outside organizations, provided that the time commitment does not exceed the then existing CNU policy, and that the arrangement in no way alters the faculty or staff member's commitments incurred in CNU's execution of a sponsored agreement on the faculty or staff member's behalf or uses institutional resources without institutional remuneration.
 - c. Service on boards and committees of organizations, public or private, that does not distract unduly from the faculty or staff member's obligations to CNU or that does not interfere or appear to interfere with a faculty or staff member's ability to conduct work under sponsored agreements objectively.

2. ACTIVITIES INVOLVING SPONSORED PROJECTS THAT PRESENT A POTENTIAL FOR CONFLICT.
 - a. Relationships that might enable a faculty or staff member to influence CNU's dealing with an outside organization in ways leading to personal gain or improper advantage for the faculty or staff member, or his or her associates or family members. For example, a faculty or staff member or family member could have a financial interest in an organization with which CNU does business and could be in a position to influence relevant business decisions. Ordinarily, making full disclosure of such relationships and making appropriate arrangements to mitigate potential conflicts would resolve such problems.
 - b. Situations in which the time or creative energy a faculty or staff member may devote to external activities appear substantial enough to compromise the amount or quality of his or her participation in the instructional, scholarly, or administrative work CNU.
 - c. Situations in which a faculty or staff member directs students into research area from which the faculty or staff member may realize a financial gain. In such situations, the ability of a faculty or staff member to render objective, independent judgment about the students' scholarly best interests may be diminished.

3. ACTIVITIES INVOLVING SPONSORED PROJECTS THAT ARE LIKELY TO PRESENT UNACCEPTABLE CONFLICTS.

- a. Situations in which a faculty or staff member assumes executive responsibilities for an outside organization that might seriously divert his or her attention from CNU duties. Faculty or staff members should consult with the appropriate dean or supervisor before accepting any outside management position. Use for personal profit of unpublished information emanating from sponsored agreements or confidential CNU sources, or assisting an outside organization by giving it exclusive access to such information; or consulting with outside organizations that impose obligations upon the faculty or staff member of CNU that conflict with the faculty or staff members or CNU's Intellectual Property Policy or with the CNU's obligations under sponsored projects.
- b. Circumstances in which a substantial body of research that could and ordinarily would be carried on within CNU is conducted elsewhere to the detriment of CNU and its legitimate interests.
- c. Any activity that a faculty or staff member may wish to undertake on an individual basis that: (a) involves or appears to involve CNU significantly through the use of its resources, facilities, or the participation of academic colleagues, students, and staff, (b) involves the use of CNU's name or implied endorsement, or (c) giving any outside organization the right to censor or prohibit publication rights for research, any part of which is performed under CNU domain.

Conflicts of commitment: Defined as situations in which external activities of faculty members or staff members interfere or appear to interfere with their paramount obligations to their students, colleagues, and CNU. Use of institutional resources for the purposes of consulting or other external activities without remuneration to the institution constitutes a conflict of commitment.

Virginia State and Local Government Conflict of Interest Act

The current Act states that a potential conflict of interest exists whenever a faculty, administrative, or professional staff member has a significant personal (or family) financial interest in a business enterprise that could bias the design, conduct, or reporting of research or educational activities of CNU. A financial interest is defined as anything of monetary value or benefit (other than salary paid by CNU), including ownership, equity, intellectual property rights, and salary or other compensation. A significant personal or family financial interest is defined as

more than three-percent ownership, equity, or intellectual property rights in a business enterprise, or income from other compensations, or benefits that exceed, or may be expected to exceed \$5,000 annually when aggregated for the staff member and any other person residing in the household.

In addition, and in compliance with the NIH's Financial Conflict of Interest Policy (FCOI), CNU policy requires included population members must disclose the occurrence of any reimbursed sponsor travel [i.e., paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available.], related to their institutional responsibilities. This disclosure requirement does not apply to travel reimbursed or sponsored by a federal, state, or local government agency, CNU. The included population member will specify details of this disclosure, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. CNU officials will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI.

Disclosure and Review Process

Each faculty or staff member participating in a sponsored project, program, service, or contract covered by this policy must disclose whether he or she has external affiliations that may constitute a conflict according to sections "C" or "D" of CNU's policy on Conflict of Interest and Commitment for Research. At any time, should a conflict arise, the faculty member is responsible to disclose the conflict immediately.

When to Disclose

Disclosures should be made prior to the submission of a proposal from CNU and must be completed prior to CNU's acceptance of the sponsored project or issuance of a purchase order or subcontract for the acquisition of goods and services. During the period of an award, updating financial disclosures within 30 days of acquisition or discovery of new significant financial interests (SFI). The Principal Investigator/s must pass the CITI conflict of interest training module and provide certification of that training prior to the project commencing. It is the responsibility of the lead Project Director/Principal Investigator to make sure each member of

the project team has read the Conflict of Interest and Commitment for Research and Sponsored Programs policy, receives training in the CNU FCOI Policy, understands this policy, and has disclosed any real or potential conflicts of interest. Training all included populations on FCOI will be undertaken every four years or if CNU revises its FCOI policy, the included population member is new to CNU or CNU finds that the included population member is in violation of this policy.

A Conflict of Interest (COI) Review Committee will review positive disclosures. The Provost on an as needed basis will establish the Committee. The Associate Provost for Research, Graduate Studies and Assessment will chair the Committee with other committee members consisting of the Academic Deans of the Colleges and one faculty member, appointed by the Provost. In reviewing the positive disclosures, the COI Review Committee will be guided by the following practices and apply them as may be appropriate the following:

1. Assure adherence to relevant CNU and Commonwealth policies such as the University Handbook, Virginia Conflict of Interest Policy, Intellectual Property Policy, and other CNU policies as the Committee deems appropriate.
2. Consider the nature and extent of the financial interest in the relationship of the faculty or staff member and the external organization.
3. Give special consideration to the terms and conditions of sponsored project agreements that may mitigate or complicate the given situation.
4. Consult with and obtain additional information from the faculty and staff member as either the Conflict Review Committee or the faculty or staff member feel may be helpful in resolving actual or potential conflicts.
5. Act in a timely manner so as not to delay the conduct of the sponsored project.
6. Conclude that CNU may take one of the following actions:
 - Accept the sponsored project award.
 - Not accept the sponsored project award.
 - Accept the sponsored project subject to suitable modifications in either the sponsored project award document or the external organizational affiliation with faculty or staff.
 - Modification of Award and/or Development of Mitigation/Management Plan

If a disclosure is made in an untimely manner or CNU has not reviewed a previously existing SFI during an ongoing funded project, CNU's Conflict of Interest (COI) Review Committee shall within 60 days:

Review the SFI; determine whether it is related to the funded research; and determine whether an FCOI exists. IF a FCOI exists, CNU must implement, at least on an interim basis, a management plan that shall specify the actions that have been or will be taken to manage such FCOI going forward and submit FCOI report to the sponsor. In addition to the FCOI report, CNU must, within 120 days of its determination of noncompliance, complete a retrospective review of the Investigator's activities and the funded research project to determine whether any funded research, or portion thereof, conducted during the period of noncompliance, was biased in the design, conduct, or reporting of such research. Based on the results of the retrospective review, if appropriate, the Conflict of Interest (COI) Review Committee updates the previously submitted FCOI report, specifying the actions that will be taken to manage the FCOI going forward.

Bias identified in any reporting, design, or conduct of funded research must be reported to the sponsor along with the submission of a mitigation report if bias is found during the retrospective review. The mitigation report must include the key elements documented in the retrospective review and a description of the impact of the bias on the research project and CNU's plan of action or actions taken to eliminate or mitigate the effects of the bias. Thereafter, CNU must submit FCOI reports annually.

FCOIs previously reported to the sponsor require annual FCOI reports from CNU's Conflict of Interest (COI) Review Committee stating the status of the FCOI and any changes to the management plan. The report will state whether the FCOI is still being managed or explain why the FCOI no longer exists. FCOI annual reporting will be maintained by CNU to sponsor through the termination of the project period.

[Appeal Process](#)

A faculty or staff member dissatisfied with the Conflict Review Committee's conclusion may

appeal to the Provost in consultation with the University Council and with reliance on the advice provided by legal counsel. The Provost may also consult with the faculty or staff member, the COI Committee, the Director of Sponsored Programs, and any others as deemed appropriate to the particular situation. The decision of the Provost shall be final, unless the University Council determines that a conflict exists with the Provost in which case, legal advice provided to the President and the Board, based on the law, will take precedence over a decision by the Provost.

Non-compliance

Non-compliance with the conflict of interest policy or these procedures may result in the suspension or termination of a sponsored project. Non-compliance could also result in restrictions on faculty, staff, or other employees with respect to future proposal submissions as well as other sanctions in accordance with CNU policies or other State or Federal laws and regulations.

Reporting

Upon completion, copies of all conflict of interest forms submitted in connection with research and development relationships that are approved shall be filed with CNU's Office of Sponsored Programs. CNU will develop and maintain a file, available for public review, which will contain all approved relationships with applicable conflict of interest forms. For all disclosures of Significant Financial Interest (SFI) involving NIH funded research, the following information will be available publicly via the OSP website: the included population member's name; title and role with respect to the research project; name of the entity in which the SFI is held; nature of the SFI; and approximate dollar value of the SFI.

Authority

CNU reserves the right to revise, change, or eliminate these regulations as necessary without notice. The following list of examples serves as a set of guidelines for identifying potential conflicts of interest and commitment. It is not intended as a comprehensive list of all potential situations that could present faculty or staff members and CNU with difficulty:

Activities involving Sponsored Project that are clearly acceptable

- ✿ Acceptance of royalties for published works and patents, or of honoraria for commissioned papers and lectures.
- ✿ Service as a consultant to outside organizations, provided that the time commitment does not exceed the then existing CNU policy, and that the arrangement in no way alters the faculty or staff member's commitments incurred in CNU's execution of a sponsored agreement on the faculty or staff member's behalf or uses institutional resources without institutional remuneration.
- ✿ Service on boards and committees of organizations, public or private, that does not distract unduly from the faculty or staff member's obligations to CNU or that does not interfere or appear to interfere with a faculty or staff member's ability to conduct work under sponsored agreements objectively.

Activities involving Sponsored Projects that present a potential for conflict.

- ✿ Relationships that might enable a faculty or staff member to influence CNU's dealing with an outside organization in ways leading to personal gain or improper advantage for the faculty or staff member, or his or her associates or family members. For example, a faculty or staff member or family member could have a financial interest in an organization with which CNU does business and could be in a position to influence relevant business decisions. Ordinarily, making full disclosure of such relationships and making appropriate arrangements to mitigate potential conflicts would resolve such problems.
- ✿ Situations in which the time or creative energy a faculty or staff member may devote to external activities appear substantial enough to compromise the amount or quality of his or her participation in the instructional, scholarly, or administrative work CNU.
- ✿ Situations in which a faculty or staff member directs students into research area from which the faculty or staff member may realize a financial gain. In such situations, the ability of a faculty or staff member to render objective, independent judgment about the students' scholarly best interests may be diminished.

Activities involving Sponsored Projects that are likely to present unacceptable conflicts:

- ✿ Situations in which a faculty or staff member assumes executive responsibilities for an outside organization that might seriously divert his or her attention from CNU duties.

Faculty or staff members should consult with the appropriate dean or supervisor before accepting any outside management position. Use for personal profit of unpublished information emanating from sponsored agreements or confidential CNU sources, or assisting an outside organization by giving it exclusive access to such information; or consulting with outside organizations that impose obligations upon the faculty or staff member of CNU that conflict with the faculty or staff members or CNU's Intellectual Property Policy or with the CNU's obligations under sponsored projects.

- ✿ Circumstances in which a substantial body of research that could and ordinarily would be carried on within CNU are conducted elsewhere to the detriment of CNU and its legitimate interests.
- ✿ Any activity that a faculty or staff member may wish to undertake on an individual basis that:
(a) involves or appears to involve CNU significantly through the use of its resources, facilities, or the participation of academic colleagues, students, and staff, (b) involves the use of CNU's name or implied endorsement, or (c) giving any outside organization the right to censor or prohibit publication rights for research, any part of which is performed under CNU domain.

Export Controls

It is Christopher Newport University's policy to comply fully and completely with all **United States export control laws and regulations**, including those implemented by:

The Department of Commerce through its Export Administration Regulations ([EAR](#)),
The Department of State through its International Traffic in Arms Regulations ([ITAR](#)), and
The Treasury Department through its Office of Foreign Assets Control ([OFAC](#)).

That being said, *most* CNU research is considered fundamental research and is therefore excluded from export control laws.

The Office of Sponsored Programs has received permission by Stanford University for our faculty to use the Stanford External Controls Decision Tree located at <https://doresearch.stanford.edu/tool/export-controls-decision-tree>.

Fundamental Research: Defined in National Security Division Directive 189 as follows: "basic and applied research in science and engineering, the results of which ordinarily are published and shared broadly within the scientific community, as distinguished from proprietary research and from Industrial development, design, production, and product utilization, the results of which ordinarily are restricted for proprietary or national security reasons."

Although most typical academic research activities fall under the fundamental research exclusion, there are certain conditions under which the export of a technology (including technical data and know-how) either is prohibited or requires a license.

Important Information

We will assist you in complying with export control laws, but the primary responsibility rests with the researcher. Do not provide incomplete information in the hope that the university will give sanction to activities that violate export control laws. The ultimate responsibility is yours, and the penalties for breaking the laws can be severe. Also, please note that the definition of "export" includes disclosing technical information to foreign nationals, whether abroad *or in the United States*.

Export Control Training certification

Training in export control is available at [CITI Training Courses](#). Simply register using Christopher Newport University as your organization. For more information, please visit the Office of Sponsored Programs website.

Malign Foreign Recruitment Programs

The [Creating Helpful Incentives to Produce Semiconductors \(CHIPS\) and Science Act of 2022](#) prohibits federal employees, contractors, and awardees—including institutions, individual investigators, and other key personnel—from participating in Malign Foreign Government Talent Recruitment Programs.

Foreign Talent Programs

Defining Foreign Talent Programs

Many countries sponsor talent recruitment programs for legitimate purposes of attracting researchers in targeted fields, and many programs utilize legitimate means of attracting talent, including offering research fellowships and grants to incentivize researchers to physically relocate.

However, some programs encourage or direct unethical and criminal behaviors. "**Malign foreign talent recruitment**" programs include any foreign-state-sponsored attempt to unethically or unlawfully acquire U.S. scientific-funded research or technology through foreign government-run or funded recruitment programs that target scientists, engineers, academics, researchers, and entrepreneurs of all nationalities working or educated in the United States.

If you suspect you have been contacted by or become associated with a malign foreign talent program, contact the Associate Provost of Research and Graduate Studies.

Impact on Researchers and CNU

Association with a malign foreign talent program can lead to ineligibility to receive federal funding for your research. Currently there is no due process to challenge such a determination or a limit to the time interval over which it is imposed. Past associations may also be concerning to the U.S. government, and participation in some foreign talent recruitment programs has led to criminal investigation and/or loss of employment, please see Science Magazine article <https://www.science.org/content/article/fifty-four-scientists-have-lost-their-jobs-result-nih-probe->

[foreign-ties](#). Using MIT's tool, learn more about [assessing and mitigating the risks](#) posed by foreign talent programs.

Recognizing Malign Foreign Talent Recruitment Programs

Guidelines issued by the Federal Government, located here <https://www.whitehouse.gov/wp-content/uploads/2024/02/OSTP-Foreign-Talent-Recruitment-Program-Guidelines.pdf> define malign foreign talent recruitment programs, as well as foreign talent recruitment programs generally.

Sponsoring Country or Academic Institution

Programs sponsored by or based in [government-identified countries of concern](#) (China, Russia, Iran, or North Korea) are presumed to be malign. However, a malign foreign talent recruitment program can be based in any country.

Features of Malign Foreign Talent Recruitment Programs

A malign foreign talent recruitment program does at least one of the following:

- Requires unauthorized transfer of IP, materials, data products or other nonpublic information to a foreign government or entity
- Requires recruitment of trainees or researchers to enroll in the program
- Requires individual to establish lab or company, or accept a faculty position or other appointment, in the foreign country
- Prevents individual from terminating the talent program contract or agreement except in extraordinary circumstances
- Limits individual's capacity to carry out a research and development award, or requires individual to duplicate federal research and development award
- Requires individual to apply for funding from the foreign government with the sponsoring foreign organization as the recipient
- Requires individual to omit acknowledgment of MIT or the federal research agency sponsoring the research and development award
- Requires individual to omit the talent program from federal or MIT disclosures
- Requires individual to maintain conflict of interest contrary to federal awards

Other Warning Signs

- Incentives to physically relocate to the foreign state. **Of particular concern are those programs that allow for continued employment at U.S. research facilities or receipt of US federal research funds while concurrently receiving compensation from the foreign state.**
- Focus on individual researcher instead of project/subject matter

- Remuneration (salary, stipend, research funding, etc.) significantly above “market” for expected activities
- Foreign entity title for researcher implies greater connection than underlying facts
- Foreign residency application encouraged or facilitated
- Requires changing of researcher’s primary institute affiliation for purposes of journal citations
- Fundamental research purpose unclear or undefined
- Requirements to recruit or train other talent recruitment plan members, circumventing merit-based processes

Slides 17-19 of the Office of Science Technology and Policy presentation “[Enhancing the Security and Integrity of America’s Research Enterprise](#)” provide examples and explanations of problematic contractual clauses and behavioral practices. If something appears to be too good to be true, you should question it.

Chapter 7: Award Management

Financial management of the sponsored project is an effort between the Principal Investigator and grants personnel in the Business Office. The Business Office is primarily responsible for post award financial compliance to include: expense approval, subrecipient monitoring, invoicing, financial reporting, cash collection, cost transfers, application and distribution of indirect costs, maintenance of accounts receivable and program closeout. The PI is responsible for expenditure/budget compliance and the preparation and submission of programmatic reports. OSP develops and disseminates internal controls to ensure compliance post award non-financial compliance. Questions the PI/PD may have regarding the financial management of their sponsored projects (i.e., fund set-up, balances, cost allowability, invoicing, etc.) should be addressed directly to the Nicole Hunter, James Woodruff & Laura Reid in the Business Office.

OSP staff assists faculty with the management of their awards, to include internal and external procedures, sponsor approvals, regulations and policies governing sponsored agreements. OSP has the expertise necessary to assist Principal Investigators/Project Directors (PIs/PDs) in conducting their sponsored projects efficiently and in compliance with the terms of the proposal, and all appropriate federal, state, sponsor, and university regulations. OSP and the grant personnel of the Business Office work together to assist CNU faculty and staff in carrying out their sponsored project’s “day-to-day” activities, ensuring compliance with applicable University

policies.

Principal Investigators are responsible to adhere to all sponsor, Federal and State rules and regulations. PI's must follow activities such as texting and driving as addressed by Executive Order 13513— Federal Leadership on Reducing Text Messaging While Driving and those assigned to work on grants.

Day-to-Day Management of a Sponsored Project

Once an award is made, the PI is responsible for post-award management of both the scholarly and administrative aspects of the award. Administration of an award includes responsible processing and approving of charges. Ensuring that sponsor terms, conditions, and any limitations are respected in the administration of an award helps to expedite expenditures. Program expenses must adhere to the essence of the award and the award budget. Your Department Chair Administrator is your resource for processing expenditures.

In an effort to aid faculty in financially tracking awards, OSP has created a PowerPoint presentation on how to use CNU Live, the interface to Banner. In addition, OSP created a PowerPoint presentation to help maintain a spreadsheet fiscally tracking grants. These presentations are part of PI orientation.

Faculty may use these tools to track their budget balance(s). If an expense is anticipated that exceeds the budget balance, the PI needs refer to their award to determine if prior approval is required. OSP is also available to assist. If prior approval is required, OSP will aid in requesting a budget modification from the sponsor. Once a modification is received, OSP will transmit it to the Business Office. If no prior approval is required, then the expense can be charged without any further action on the PI's part.

Personnel Expenses:

Summer Salary: In an effort to ensure the proper amount is charged to your grant, OSP will prepare an AP14a form for the PI indicating the budgeted amount of summer effort and the proper dollar amount. The PI is asked to review the effort and dollar amount, then complete the form with the faculty member's id, the pay periods that the summer salary should be paid (in accordance with the project timeline) and a description of the work that is being compensated.

This information is needed so that payments, according to the Business Office's Schedule, meet with the timing of the effort. The AP14a requires the Dean's and OSP's signature before it goes to the Provost's Office for processing.

Release Time: If the awarded budget includes academic year release time, OSP will coordinate with the Director of Finance and Administration for Academic Affairs to charge the sponsored project for the release time.

Student Payroll on Sponsored Projects:

It is the policy of the University to employ qualified CNU students to fill temporary part-time personnel needs within university departments. Students can be hired to either perform clerical duties on an hourly basis or may be paid for educational experiences through stipend support.

Hourly Student Work: Hourly employment is intended to be financially helpful clerical duties performed on an hourly basis. In this type of employment, hours are tracked and timesheets are submitted. A PI/PD who has the available student funds and wishes to hire an hourly student on their sponsored program can contact the Center for Career Planning at <https://my.cnu.edu/ccp/>.

Process to hire uniquely qualified students on externally-funded research projects.:

Uniquely qualified is defined as a student that has worked with a faculty member on a similar project via (1) enrollment in research for credit (e.g., Independent Study or UG Research), (2) the Summer Scholars Program, and/or (3) Research Apprentice Program (RAP). The attached form will need to be completed, along with all applicable student hiring paperwork, and submitted to the Associate Provost for Research and Dean of Graduate Studies for review and approval. Once approved, the paperwork will be forwarded to payroll for processing and hiring. Student hiring documents are located on myCNU under Payroll.

Non-student / Non-faculty Payroll on Sponsored Projects:

Full-time Employees: PI/PDs who have available personnel funds and wish to hire a part or full time, non-student employee must contact CNU Human Resources department for assistance.

Student Wages after graduation: If a student has been working on an externally funded grant and graduates and the PI wishes the graduate to continue to work on the grant, an assessment of what the student will be doing is necessary. If the student will be continuing the work that they had been doing, then the PI must work with Human Resources to create a wage position for the student. If the grad will be doing something completely different than when a student, an Individual Services Contract may be used.

Subrecipient Monitoring

The CNU Subrecipient form will be used to collect any information on potential subrecipients in addition to the FDP Risk Assessment form. They will be verified on the SAM.gov site to confirm no debarment and suspension. Principal Investigators (PIs) have the primary responsibility for monitoring subrecipients to ensure compliance with federal regulations of both prime and subrecipient award terms and conditions. The federal government places the primary responsibility for management of federally funded projects with the PI. This includes:

- Monitoring subrecipient's technical and programmatic activities related to the subaward
- Performing site visits as necessary to observe program operations and to review financial records
- Reviewing technical/performance reports as required
- Verifying the subrecipient work is conducted in a timely manner and that the results delivered are consistent with the proposed statement of work
- Reviewing and approving subrecipient invoices. This includes reviewing expenditures to ensure the charges are allowable, allocable, reasonable, and that the charges are within the period of performance
- Maintaining regular contact with the subrecipient
- Offering technical assistance to the subrecipient as needed to help ensure compliance as well as successful programmatic performance

Send annual additions to subaward along with letter certification of audit and no findings, SAM.gov using Annual subaward Audit update found in Contracts folder

During PI orientation, the responsibility of the PI regarding subrecipient monitoring is reviewed. No invoices will be approved until the PI has approved, the indication that the above requirements have been met.

Subrecipient Monitoring

Non-Personnel Grant Expenditures:

Tax Exempt Status: Sponsoring agencies require proof of Tax-Exempt Status by the IRS in order to make tax-deductible awards to our institution. Since CNU is tax exempt by the Commonwealth of Virginia, sales taxes are unallowable expenses on grants. The sales tax-exempt form can be obtained from the Business Office. This form should be completed and brought to a vendor along with a CNU Identification card. If the vendor does not accept the exemption, the purchaser should follow purchasing policies and procedures using eVA.

Student Stipends: Stipends are not compensation and cannot be paid for services rendered. A stipend is distinct from wages or salaries because it is not intended to compensate a student for work performed. Rather, it is intended to free up a student to undertake a role in connection with educational studies or research that would normally be uncompensated, without having to assume other compensated employment to pay his/her bills. Students usually receive benefits from the academic studies or research toward their education. For this reason, stipends are often paid to students who are not required to report “hours” associated with the activities performed.

Subrecipient: If, during the application process, the PI identifies an organization that will support the scope of work of the proposed project and included this organization in the awarded proposal, then at time of award, a subaward will be issued. When fully executed, the subaward becomes an extension of the prime award, with the PI and CNU functioning on behalf of the sponsor. All terms and conditions of the prime award flow to the subrecipient. The subrecipient will have a budget, scope of work and deliverables. Invoicing instructions are included in the

subaward document.

Equipment: The federal government defines equipment as a single item costing over \$5,000 and having more than one year of useful life. Many sponsors restrict the purchase of equipment on a sponsored project. OSP suggests that a PI/PD contemplating an equipment purchase contacts Procurement as soon as possible.

Travel Expenditures: Travel expenses in excess of \$500 required pre-approval with the use of Chrome River, located on the Business Office site. Keep in mind that the sponsor may have their own restrictions regarding travel, so it is important that the PI/PD review their grant's guidelines as they contemplate travel.

Fly America Act: This [act](#) requires the use of U.S. flag airlines in economy class for all air travel, including travel on grants and contracts funded by the U.S. Federal Government. This mandate is in effect even if the cost of the U.S. flight is the foreign carrier costs less. There are certain exceptions to this rule (open skies agreements <https://2009-2017.state.gov/e/eb/tra/ata/index.htm> or the absence of a U.S. carrier to your destination). If you have any questions, please contact OSP or refer to the websites above.

Cost Transfers: A cost transfer is an after-the-fact reallocation of costs associated with a transaction from one account to another. Costs should be charged to the proper account for the benefitting sponsored project when first incurred. However, at times it may be necessary to transfer a cost to a sponsored project subsequent to the initial recording of that cost. The Business Office monitors these transfers for compliance with federal, state, sponsor, and university regulations. If a PI/PD notices an expense that was charged improperly, please contact the Business Office as soon as possible to correct the error. Federal regulations require that cost transfer inconsistencies be corrected within 90 days of finding the error. Cost transfers should never take place more than 60 days past the project end date. All cost transfer requests must be supported by documentation that fully explains how the error occurred, and approved for correctness by Grants Accounting. An explanation merely stating "to correct an error" or "to transfer to a correct project" is not sufficient. Transfers solely to cover cost overruns are not allowable.

Generally Allowable Expenses (not an exhaustive list) *

Conference charges	Field supplies
Honoraria	Lab (servicing) fees
Participant support costs	Publication costs
Research-related materials and supplies	Salaries & fringe benefits (PI, direct staff)
Stipends	Student wages
Travel costs (outside 26 mile radius of CNU)	Vendor payments

*Allowable expenses must directly benefit and enhance the specific and sponsored-approved goals of the project.

Generally Unallowable Expenses (not an exhaustive list) **

Advertising	Alcohol
Audiovisual equipment and supplies	Books
Clerical supplies	Communications (local, cellular, internet)
Copier, copies, service, and supplies	Donations and contributions
Depreciation	Entertainment
Equipment***	Fines and penalties
Furniture	Gifts of any kind
Lobbying	Maintenance/Repair
Office supplies (including printers and supplies)	Shipping/postage

Subscriptions	Taxes from which the institution is exempt
Food (inside a 26 mile radius)	

**If the item you are considering is not listed or you have any questions, please contact CNU OSP prior to making your purchase.

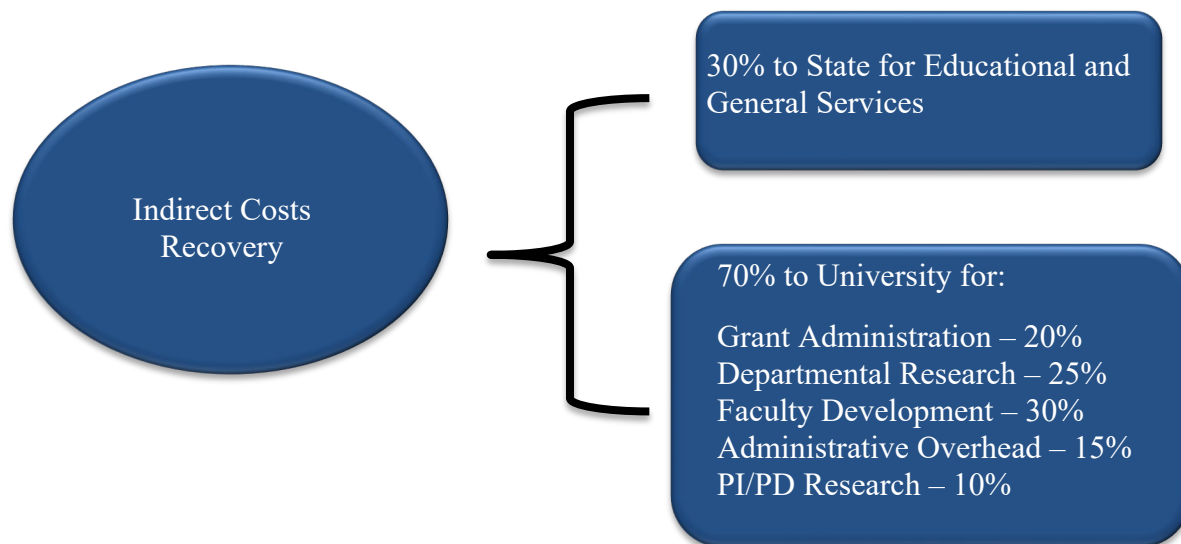
***For the purposes of this policy, equipment is an item costing more than \$5,000 and having more than one year of life.

Effort Reporting Certification

Federal regulations require that an effort and payroll certification system be supported by a system of internal controls that provides reasonable assurance that the charges are accurate, allowable, and properly allocated. CNU guidelines called for effort certification to be completed twice per academic year (Fall and Spring) and once per summer.

Three times a year, effort/payroll certification forms that list the budgeted percentage effort and the corresponding dollar amount for the project will be distributed to Faculty committing effort on sponsored projects. Although payroll does not link with semesters, the PI should be able to verify the correct rate is being charged to their grant using CNULive. Faculty must review, make any necessary adjustments, sign, and have their Department Chair or equivalent verify the effort. Completed forms must be returned to OSP within two weeks.

Distribution of Indirect Costs: Indirect cost funds recovered from all sponsored programs are distributed according to the following schedule:



The Business Office periodically distributes indirect costs according to above distribution. An email is sent to PI's with the balance in their indirect cost recovery account. Allowable expenses to these accounts include research and research related expenses. The process for applying expenses against these accounts is the same for departmental or grant expenditures.

Departmental Chair Administrator charges to the specific account to the PI rather than the department or grant. Should a PI have questions about the allowability, they can direct those questions to the Director of Finance and Administration for Academic Affairs. Questions about current balance should be directed to the Business Office, Manager, Grants, and Fixed Assets & Capital.

Prior Approvals

During the course of a sponsored project, unexpected circumstances may arise. As a result, the PI/PD may need to request changes to his/her project. Each award is different, some cases require sponsor approval and some cases do not. The most common examples of when a sponsor's prior approval might be necessary are:

Budget Modifications: During the performance of the project, a PI/PD may discover that he/she needs to allocate funds approved for one purpose to another purpose. In some instances, this can be done without sponsor approval. OSP will work with the PI and the sponsor to handle re-budgeting.

No-Cost Extensions: The PI/PD may need more time to finish his/her project due to unanticipated circumstances. OSP will work with the PI/PD and the sponsoring agency to request a no-cost extension.

Change in Scope of Work: The PI/PD may find he or she needs to modify the tasks or work to be performed under the award. OSP will work the PI/PD and the sponsoring agency to request the change in scope.

Change in Senior/Key Personnel: Changes in key personnel, to include the PI and Co-PI, always requires sponsor approval. OSP will work with the PI/PD and the sponsor to remedy any situation that may arise.

Chapter 8: Award Close Out

As a sponsored project nears its end date, the Office of Sponsored Programs will work with the PI/PD to ensure that the award is properly closed. The sponsored award terms and conditions generally provide specific details of what will be required at award close out as well as the timeframe in which documentation must be submitted. Typically, this amounts to final technical and financial reports, but may also include property and invention reports and/or other documentation. Federal sponsors typically require that close out documents be filed and received within 90 days of the end date of the project.

30, 60, 90 Day Notice Emails

As the award nears its end date, the Office Sponsored Programs will remind the PI/PD and the Business Office by e-mail of the project's end date. The PI will be asked to review the grant programmatically and financially to ensure that they are in line with the proposed time line of the award..

90 days to end date: At this milestone, the PI/PD should be considering whether to pursue a no-cost time extension in order to finish any tasks associated with the project. If the PI is considering a no-cost extension, he/she should contact OSP as soon as possible upon receiving the 90-day expiration email. If the PI is not seeking an extension, this is the time to review the project to ensure that all program requirements have been met or will be met within the 90-day timeframe. A review of the budget is necessary as well to identify inconsistencies. The PI/PD should begin preparing any final reports or other paperwork that may be due soon. Note that NSF awards require final reports to be submitted 90 days prior to the end date of the award.

60 days to end date: At this milestone, the PI/PD should make his or her final decision on whether to seek a project extension. Some sponsors have deadlines for extension requests so keeping those in mind is critical. If a no extension is requested, the PI/PD should continue preparing final programmatic requirements, reports, or paperwork that may be due soon. A review of outstanding expenses will help to advise the PI if all costs associated with the project are captured.

30 days to end date: At this milestone, the PI/PD should be making final preparations to close out his or her account. Typically, it is too late to request a no cost extension unless circumstances outside of the PI/PD's control necessitate otherwise. Expenses applied within the final 30 days of an award will be heavily scrutinized. PIs should bear this in mind during the last 30 days of the award.

[Financial Reports/Invoices](#)

The Business Office is responsible for preparing all financial reports. The Authorized Financial Official needs to sign and certify each report, including cost share information which the PI may be required to provide, prior to sending to the sponsor.

[Technical/Programmatic Reports](#)

PIs are responsible for the completion and submission of all programmatic reports required by the terms and conditions of the award. Where questions arise, OSP can assist in this process. Some instances will allow the PI to submit the final technical report directly (i.e. NIH e-COMMONS). A copy of the final technical report must be sent to OSP to remain in the project

file. Per Virginia Library policy, all final technical/programmatic reports will be saved in perpetuity.

Property Reports

Invention Reports

Rights to inventions made under a federally sponsored grant or contract are governed by 37 CFR Part 401, “Rights to Inventions Made by Nonprofit Organizations and Small Business Firm,” more commonly known as the “Bayh-Dole Act.” The provisions apply to all inventions conceived or first actually reduced to practice in the performance of a federal grant, contract, or cooperative agreement. Universities are obligated under 37 CFR Part 401 to disclose each new invention to the federal funding agency within two months after the inventor discloses it in writing to the University. Under this act, the PI/PD and University must provide a final invention statement and certification prior to award close out, listing all subject inventions or, alternatively, stating that no inventions were created in the performance of the project.

Fixed Price Agreement Resolution

Following satisfaction of the work product with the sponsor, application of all related expenses and sixty days after the term date of the FPA, any residual balance in a fixed price agreement (FPA) Banner account will be transferred into the Principal Investigator’s Indirect Cost recovery account. The FPA Banner account is closed.

Record Retention

On federal awards, record retention is set forth in the Uniform guidance as 3 years after the final activity on the grant. However, as a state entity, the Commonwealth of Virginia Public Records Act that requires that records of awarded grants files be kept until their destruction is approved by the Library of Virginia and in accordance with the following schedule further restricts CNU:

Contract or Grant Files: This series documents the routine administration by the university of a contract or grant. This series may include, but is not limited to proposal application, award information, and interim reports. These files must be kept for at least 5 years after the end date in either electronic or hard copy format. Disposal must be through confidential destruction and

only with Library of Virginia approval.

Final Reports: This series documents the summary and/or completion of research under a contract or grant by a college or university. This series may include, but is not limited to final scientific or research report of results. These files must become a part of Office of Sponsored Programs permanent record in either electronic or hard copy format.

Effort Reporting Certifications: This series documents the time spent on a research project. This series may include, but is not limited to timesheets and effort reporting certification reports. These files must be kept for at least 10 years after end of the state fiscal year in either electronic or hard copy format. Disposal can be through non-confidential destruction and only with Library of Virginia approval.

Un-submitted/Unsuccessful proposals: This series documents the grant application packages that were submitted and not awarded. These files will be scanned into the electronic file and retained for one year after the negative funding decision. Hard copies (and electronic files > 1-year-old) will be destroyed through non-confidential procedures.

Files subject to litigation, claim, or audit finding: If the sponsored project file in question is the subject of any litigation, claims or audit findings, this paperwork will need to be kept until the disposal date or conclusion of such litigation or audit; whichever is later.

Disposition of Equipment

Under the Uniform guidance, title to equipment acquired under a Federal award will vest upon acquisition in the non-Federal entity. Unless a statute specifically authorizes the Federal agency to vest title in the non-Federal entity without further obligation to the Federal Government, and the Federal agency elects to do so, the title must be a conditional title.

A state must use, manage and dispose of equipment acquired under a Federal award by the state in accordance with state laws and procedures. Equipment must be used by the non-Federal entity in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the Federal award, and the non-Federal entity must not

encumber the property without prior approval of the Federal awarding agency.

When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency, in the following order of priority:

- ⊗ Activities under a Federal award from the Federal awarding agency that funded the original program or project, then
- ⊗ Activities under Federal awards from other Federal awarding agencies. This includes consolidated equipment for information technology systems.

During the time that equipment is used on the project or program for which it was acquired, the non-Federal entity must also make equipment available for use on other projects or programs currently or previously supported by the Federal Government, provided that such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by Federal awarding agency that financed the equipment and second preference must be given to programs or projects under Federal awards from other Federal awarding agencies. Use for non-federally-funded programs or projects is also permissible. User fees should be considered, if appropriate.

Roles and Responsibilities:

Proposal – Grant Lifecycle

		PI/PI Staff	Department	OSP	College	Provost	Business Office		
R	Responsible								
A	Accountable								
C	Consulted								
I	Informed								
Research Development									
	Develop Research Question	R	C	I/C					
	Perform Extensive Literature Review	R							
	Identify Potential Collaborators	R	C	C					
	Identify Funding Opportunities	A/R	C	R	C				
	Review Funding Opportunity	A/R		R					
	Develop Research Plan	R		C					
	Create OSP Soft File with all proposal elements and drafts			R					
	Obtain Salary & Fringe Information from HR			R					
	Develop Budget and Justification	A/R	C	A/R	C				
	Complete Non-Scientific Portions of Application Form	R/A		C/I					
	Edit Drafts of Proposal	A/R		A/R					
	Complete all Proposal Elements according to Sponsor Guidelines	A/R		A/R					
	Compile all Proposal Elements according to Sponsor Guidelines	A		R					
	Obtain Commitments /Cost Sharing Certifications	R/A	C	A	C	C			

	R	Responsible	PI/PI Staff PI/PI Staff	Department	OSP	College	Department Provost	Business Office	OSP
	A	Accountable							
	C	Consulted							
	I	Informed							
Complete Conflict of Interest Certification			A/R						
Complete & be knowledgeable about other Research Compliance			R		I				
Proposal Submission			A/R		R				
Enter on OSP Tracking					R				
Not Funded									
Obtain Reviewers Comments			R		C				
Update OSP Tracking spreadsheet					R				
Funded									
Review Award Notification			R		R				
Identify troubling clauses and unacceptable language			I		R				
Negotiate language			C		R				
Negotiate reduced Scope of Work/Budget			C/R		R				
Notice of Grant Award Issued to all necessary parties			I	I	R	I	I	I	
Generate Banner Account Number & Grant CNU Live Access			I		I	I	I	R	
New PI Training including assistance in tracking award			I/A		R			R	
Perform Risk Assessment of Sub's			R		I/R				
Establish Sub Awards and Contract			I/C		R				
Encumber Sub Awards and Contracts			I					R	

	R	Responsible	PI/PI Staff PI/PI Staff	Department	OSP	College	Department Provost	Business Office	OSP
	A	Accountable							
	C	Consulted							
	I	Informed							
Approve Certain Expenditures Applied to Grant			R		R			R/A	
Apply Expenditures to Correct Grant using Correct Exp Code								R	
Identify errors and omissions			R					R	
Create and Document Correcting Journal Entries			I/R					R	
Generate Indirect Cost and Apply to Grant Account Properly								R	
Generate Invoices per Sponsor Guidelines and Certify Expenses			I	C/A		C/	C/A	R	
Issue and Submit Technical and Annual Reports			A/R		I			I	
Issue Annual Financial Reports – Cost Sharing			R	C/A		C/A	C/A	R	
Ensure Research Compliance Protocols are Current			A/R		I/C			R	
Certify Student Responsible Conduct of Research Training			A/R		I				
Issue Payroll/Effort Distribution Certification			A/R		A/R				
Certify Cost Sharing or Ensure Certifications are in place			A/R		C			R	
Certify Payroll Distribution			A/R		I				
Initiate Programmatic Close Out Procedures -30-60-90-day notifications			I/C		R			I/C	
Ensure Project Completion			A/R						
Ensure Sponsor Required Close Out Activities are Complete-PubMed etc.			A/R		I				
Issue Final Invoice and Certify Expenses			C					R	
Shut Down Banner Account when Project is Complete and all Expenses and Revenue are Booked								R	
Audit					I/C			R	

	R	Responsible								
	A	Accountable	P/PI Staff		Department	OSP	College	Department Provost	Business Office	OSP
	C	Consulted	P/PI Staff							
	I	Informed	P/PI Staff							
Indirect Cost Negotiations									R	
Internal Annual Reports						R/A				
Identify and Bring Outside Speakers to Engage Faculty in External Research						R				
Maintain OSP intranet						R				
Manage OSP LinkedIn Page						R				
Collect and make available LinkedIn Connections						R				
Record Retention										
Proposal Documents: Not funded 1 year						R/A/I				
Proposals Awarded, Award Documents, Modifications, Extensions: 5 Years after last activity						R/A/I				
Financial Reporting and Documentation – 5 years past									R/A/I	
Technical & Final Reports- Forever			R/A			R/A/I				
Effort Reports- 10 years after end of the state fiscal year end						R/A/I				

Sponsored Programs Glossary

Agreement: A generic name for grant, contract or other sponsored agreement.

Allocable costs: Allowable costs that directly benefit the grant or contract to which they are charged.

Applied Research: Systematic study to gain knowledge or understanding necessary to determine the means by which a recognized and specific need may be met.

Audit: A formal examination of an organization or individual's accounts or financial situation. An audit may also include examination of compliance with applicable award terms, laws, regulations and policies.

Authorized Official: The individual(s) authorized to bind the institution to grants, contracts, cooperative agreements and other agreements.

Award: The provision of funds by a sponsor, based on an approved proposal and budget, to an organizational entity or individual to carry out an activity or project.

Basic Research: Systematic study directed toward fuller knowledge or understanding of the fundamental aspects of phenomena and of observable facts without specific applications towards processes or products in mind.

Broad Agency Announcement (BAA): An announcement of a federal agency's general research interests that invites proposals and specifies the general terms and conditions under which an award can be made (e.g., Department of Defense agencies such as ONR, AFOSR and ARL issue BAA's).

Budget: A detailed financial statement of project costs that needed to support work described in a grant or contract proposal. The proposal budget is often called the "fiscal expression" of a sponsored project.

Budget Period: A time period of finding, usually expressed incrementally, e.g., Year 1 of an incrementally sponsored project, or the first 12 months.

Certification: A statement, signed by an applicant or recipient as a prerequisite for receiving federal funds, that (1) meets or will adhere to certain conditions and/or (2) will undertake or not undertake certain actions.

Closeout: The programmatic and administrative process during which the PI/PD, OSP and the grants personnel in the Business Office complete all required work of a sponsored project and undertake all necessary administrative duties to complete the project in accordance with university policy, sponsor requirements, and federal/state regulations.

Co-Investigator: The individual involved with the PD/PI in the development or execution of a project. The co-investigator (collaborator) may be employed by, or be affiliated with, the applicant/grantee organization or another organization participating in the project under a consortium agreement. A co-investigator typically devotes a percentage of time to the project and is considered senior/key personnel.

Consultant: An individual independently hired to provide routine professional services on a sponsored project for a fee, but generally not as a university employee. Consultants are typically not involved in the programmatic direction or management of a project.

Contract: A binding agreement between the sponsor and contractor for the provision or purchase of a product or service of direct benefit to the sponsor. Federal Acquisition Regulation governs the administration of federal contracts (FAR).

Cooperative agreement: An award similar to a grant, but in which the sponsor's staff may be actively involved in proposal preparation, and anticipates having substantial involvement in research activities once the award has been made.

Cost-share: Costs of a sponsored project not borne directly by the sponsor. Cost sharing, or matching, are either “in-kind” or “cash” contributions by the recipient of the sponsored project, or by a third party. Matching is a specific type of cost-share in which the contribution of the recipient is the same as the contribution made by the sponsor.

Direct costs: Costs that can be specifically identified and assigned to a particular project, program, or activity.

Effort: The time devoted to a particular sponsored activity, expressed as a percentage of the total time spent on CNU teaching, research and service activities.

Effort Certification: A self-attestation of an employee's university activities for a stated time period. Appropriately, certified effort provides auditable documentation to demonstrate to the university's sponsoring partners that the sponsor did in fact receive the level of effort committed through the award process and charge the proper amount of salary.

Effort Reporting: Primarily known as Documentation of Personnel Expenses. It is the proportional distribution of 100% of an employee's university effort across categories of activity for a stated time period. The federal government requires certification of reported effort. CNU conducts effort certification audits at least once per academic year.

Encumbrance: Those funds that have been set aside or “claimed” for projected expenses pending the actual expenditure of the funds.

End Date: The date signifying the end of the period of performance typically indicated on the notice of award; may also be called “Expiration Date.”

Equipment: A tangible article that has a useful life of more than one year and an acquisition cost of \$5,000 or more. Each piece of equipment requested should be described and justified fully in the budget justification section of a proposal. Quotes may be required.

Research.gov: Research.gov is the National Science Foundation’s electronic system for conducting business over the Internet. All NSF proposals and reports must be submitted using Research.gov.

Federal Acquisition Regulation (FAR): The system of federal rules and regulation that govern the administration of government procurement contracts.

Financial Conflict of Interest (FCOI): A significant financial interest that could directly and significantly impact the design, conduct, and reporting of the Research.

Financial Report: Periodic, scheduled financial reports required by the sponsor showing the financial status of awarded funds for a specific time period. PIs/PDs will work directly with OSP to ensure that periodic and final financial reports are submitted on time and in compliance with the sponsor’s guidelines.

Financial Status Report (FSR): A standard, government wide report recipients must submit to the Federal funding agency that identifies the status of funds for a specific grant or cooperative agreement. (40 CFR Part 31)

Fringe benefits: Employee benefits paid by the employer, e.g., health insurance, F.I.C.A., Worker's Compensation. Fringe benefit rates are calculated using fixed percentages that vary depending on the employee's classification and may change from year to year.

Grant: Financial assistance provided to complete a project, generally with a public purpose, need or "public good" in mind. There is usually limited involvement from the federal government in the project except to convey the funds. Policies governing the management of grants from federal sponsors are covered in the Code of Federal Regulations Title 2 Part 200.

Indirect Costs: Costs an organization incurs in the conduct of research or other externally sponsored activity, which cannot readily and specifically be identified with a particular sponsored project, or other institutional activity (e.g., facilities maintenance, plant operation, library services, utilities, general administration, and sponsored projects administration).

Institutional Animal Care and Use Committee (IACUC): Oversees the institution's animal research program, facilities, and projects involving the use of animals. Every research, testing, and teaching project involving the use of a live vertebrate animal must be reviewed and approved by the IACUC prior to initiation.

Institutional Review Board (IRB): An administrative body established to protect the rights and welfare of human research subjects recruited to participate in research activities conducted under the auspices of the organization with which it is affiliated. The Institutional Review Board has the authority to approve, require modifications in, or disapprove all research activities that fall within its jurisdiction.

Key Personnel: Personnel of primary importance in carrying out a research or other sponsored project, typically, senior personnel (e.g., Co-Investigator).

Mandatory Cost-Sharing Cost Sharing this is required, or mandated by the sponsor as a condition of receiving a sponsored award.

Match: A specific type of cost-share requirement in which the ratio is 1:1 so that the amount of funding contributed to a project or program by the institution is equal to the amount of the

federal grant award.

Modified Total Direct Costs (MTDC): The cost-base for calculating indirect costs incurred on a sponsored project. MTDC is a subset of direct costs and typically excludes equipment, tuition, scholarships/fellowships, renovations, space rental, and subawards in excess of \$25K.

No-Cost Extension: An additional period of time authorized by the sponsor to complete work on an approved grant or contract at no additional cost to the sponsor. An extension allows previously allocated, remaining funds to be spent during the extension period provided sufficient programmatic justification. On many federal awards, the university may authorize an extension unilaterally without sponsor prior approval for a one-time period of up to 12 months if the award terms allow for this action under “Expanded Authorities.”

Notice of Award: The official, legally binding document, signed (or the electronic equivalent of signature) by a Grants Officer and/or Program Officer that: (1) notifies the recipient of the award of a grant; (2) contains or references all the terms and conditions of the grant and funding limits and obligations; and (3) provides the documentary basis for recording the obligation of funds.

Period of Performance: Time interval between the approved start date and the end date of a project. This is the period in which the sponsor has authorized the conduct the scope of work. The period of performance may be made of one or more budget periods, typically of uniform length (e.g. 12 months).

Preliminary Proposal: a brief presentation by the PI of goals, methods, personnel, and overall budget submitted to a funding agency. Pre-proposals are used by funding agencies to determine the eligibility of the applicant and the suitability of the proposed project for support.

Prime Award: In the context of sub-awards or subcontracts, the prime award is the award made directly from the sponsor to the recipient institution. When a recipient institution makes a sub-award or subcontract under the terms and conditions of the award to a second organization, the sponsor's award is labeled the prime award and the terms and conditions are generally included as part of the agreement to the sub-award or subcontract site.

Principal Investigator (PI)/Project Director (PD): The PI/PD is that person primarily responsible for the technical and fiscal management of a sponsored project.

Prior approval: Written approval from the sponsor's designated Grants Officer. Sponsor approval may be required for specified post award changes in the approved project or budget. Such approval must be obtained before undertaking the proposed activity or spending funds.

Program Announcement: Describes the existence of a funding opportunity. A formal statement about a new or ongoing activity or program. It may serve as a reminder of continuing interest in a research area, describe modification in an activity or program, and/or invite applications for grant support.

Program officer: Program office staff person responsible for (1) developing program regulations, application notices, and application packages; (2) overseeing the review and ranking of applications submitted under their programs; (3) providing detailed funding recommendations to the Grants Division for applications; (4) participating in negotiations, as necessary; (5) providing technical assistance to applicants and recipients; (6) monitoring funded projects; and (7) making recommendations to the Grants Division about recipients' requests for revisions to project activities and budgets.

Progress Report: Periodic, scheduled reports required by the sponsor summarizing research or project progress to date.

Proposal: A set of documents containing a descriptive narrative of an idea and a budget to be submitted to a funding agency for sponsored support. Some agencies require that proposals be submitted on preprinted forms, while others have no specific format.

ePSF: This Form is an internal CNU document that is used to record, track and report on the proposed project. In addition, the ePSF is also used to obtain both the PI and Co-PI's certifications and the endorsement of the appropriate college Dean(s) and Department Chair(s). PI's complete the ePSF on-line and submit for approvals. The ePSF and required attachments are available on OSP's intranet. It is due to OSP two weeks before the proposal is due to the sponsor.

Re-budget: Re-budgeting refers to the process of transferring sponsor approved budgeted funds from one-line item to another, e.g., for a different purpose than originally intended. Re-budget requests are reviewed by OSP and in some cases sponsor prior approval may be necessary.

Recipient: Organizational entity or individual receiving a grant or cooperative agreement. Typically, the organizational entity is the legal recipient of a grant, contract or cooperative agreement.

Request for Applications (RFA): An RFA is a formal statement that solicits grant or cooperative agreement applications in a well-defined scientific area to accomplish specific program objectives. An RFA indicates the estimated amount of funds set aside for the competition, the estimated number of awards to be made, whether cost sharing is required, and the application submission date(s).

Request for Proposal (RFP): Announcements that specify a topic of research, methods to be used, product to be delivered and appropriate applicants sought. Proposals submitted in response to RFPs generally result in a contract award.

Request for Quotation (RFQ): A formal request from a sponsor for solicitation of a proposal to provide the sponsor a good, or service of direct benefit to the sponsor (e.g., a corporate or industry sponsor typically will issue an “RFQ”).

Research Terms and Conditions: The delegation of prior approval directly to the institution. Many federal agencies allow universities to exercise expanded authorities for specific actions, i.e., an initial request for a no-cost extension provided sufficient programmatic justification.

Sponsor: An external funding agency that enters into an agreement with the University to support research, instruction, public service, or other sponsored activities. Sponsors include private businesses, corporations, foundations and other not-for-profit organizations, other universities, and federal, state, and local governments.

Sponsored Program: externally (non-university) funded activity such as grant-funded research or program, a cooperative agreement, some contracts or subawards.

Statement of Work/Scope of Work: A summary description of the work to be performed and completed on a project or sponsored activity.

Subaward/ Subcontract: A document written under the authority of, and consistent with, the terms and conditions of an award (a grant, contract or cooperative agreement), that transfers a portion of the research or substantive effort of the prime award to another institution or organization.

Unsolicited Proposal: A proposal submitted to a sponsor that is not in response to an RFP, RFA, or program announcement.