I. Policy Statement and Purpose

The purpose of this policy is to provide guidance to University staff responsible for compliance with Conflict of Interest. It is the policy of FAMU that any university employee (including the employee’s spouse and dependent children) who is responsible for the design, conduct, or reporting of a sponsored Project implemented by funds awarded to the university must disclose significant financial interests (1) that would reasonably appear to be affected by the research or educational activities funded or proposed for funding or (ii) in entities whose financial interests would reasonably appear to be affected by such activities.

II. Definitions

Investigator means the principal investigator, co-principal investigator, and any other person at the institution, who is responsible for the design, conduct or reporting of research or educational activities funded or proposed for funding by an outside agency.

Significant financial interest means anything of monetary value, including, but not limited to salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights).

A. Inclusions:

1. Income (including salary) consulting payments; honoraria, reimbursement of expenses, royalty payments, dividends, or any other payment or consideration from a simple business entity, public entity, or non-profit entity exceeding $10,000 during the prior twelve months.
2. Equity (in the form of stock, stock options, real estate or any other investment of ownership interests) in any enterprise. (This does not apply in the case of stock
holdings such as diversified or mutual funds where the investigator is unaware of specific stock held).
3. A position as director, officer, partner, trustee, or member of the board of directors of any business entity.
4. Intellectual property interest on a patent filed or to be filed by a party other than the University.

B. Exclusions:

1. Salary, royalties or other remuneration from the applicant institutions;
2. Any ownership interests in the institution, if the institution is an applicant under the Small Business Innovation Research Program or Small Business Technology Transfer Program;
3. Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
4. Income from service on advisory committees or review panels for public or nonprofit entities;
5. An equity interest that, when aggregated for the investigator and the investigator’s spouse and dependent children, meets both of the following tests: does not exceed $10,000 in value as determined through reference to public prices or other reasonable measures to fair market value, and does not represent more than a 5% ownership interest in any single entity; or
6. Salary, royalties or other payments that, when aggregated for the investigator and the investigator’s spouse and dependent children, are not expected to exceed $10,000 during the next twelve month period.

**Designated University Official** is the university official designated by the President to complete the first level review of the investigator’s Disclosure of Interest Form and to determine if any reported interests reasonably appear to be affected by the project. The designated university official will be the individual with first line supervisory responsibility for the person submitting the Disclosure. In most cases, the designated university official will be the Dean of the College/School.

**Disclosure of Financial Interest Form** is to be completed by the investigator when a conflict of interest is declared. The completed form will show financial and other interest related to a research/education project. The Disclosure of Financial Interests Form must be updated on an annual basis during the conduct of the project. Please see the attached form.

**III. Approvals/Responsibilities**

If the university determines that such interest may affect the design, conduct, or reporting of the project, the university will take steps to manage or eliminate the conflict of interest. Records of financial disclosures and actions taken to manage conflicts of interest shall be retained at least three years beyond the termination or completion of the award to which they relate, or the resolution of any government action involving those records, whichever is longer.
It will be the responsibility of the Division of Research to file with the requisite Federal agency an inability of the university to satisfactorily manage a conflict of interest.

IV. Investigator’s Responsibility

A. Persons covered under this policy are expected to govern their professional activities in accordance with the University mission and with integrity.

B. Covered persons are expected to identify and, when possible, avoid financial conflicts of interest. If a conflict cannot be avoided, the Disclosure of Financial Interests Form must be completed to allow for elimination or management of the financial conflicts.

C. In accordance with III.(b) covered persons must disclose any significant financial interest that involves themselves, spouse, and dependent children in organizations or companies whose financial interests may reasonably appear to affect or be affected by their sponsored activities.

D. Covered persons shall ensure the disclosure of all significant financial conflicts of interests prior to the submission of their application to the Office of Sponsored Programs. Persons shall update the Disclosure of Financial Interests Form whenever a new significant financial interest evolves, or when the existing interest ends or is materially altered. In addition, disclosures shall be updated annually.

V. Disclosure Requirements

The principal investigator must fully disclose all significant interest for each sponsored research/education project prior to the time a proposal is submitted. The principal investigator must ensure that all investigators in the proposal disclose significant financial interests.

A. Each covered person is obligated to disclose real or apparent conflicts of interest.

B. Covered persons shall disclose annually all significant financial conflicts which are covered under this policy. Covered persons shall also update their disclosure forms whenever a new significant financial interest evolves, or when the existing interest ends or is materially altered.

C. Prior to submission of an application to the Office of Sponsored Programs, covered persons shall ensure that all significant financial interests have been disclosed.

D. Disclosure should be made to the Dean of the affected College/School.

E. Disclosure documents shall be destroyed at the end of the retention period.

VI. Review and Appeal Process

When a conflict of interest is declared, the Disclosure of Financial Interests Form should be submitted to the appropriate Dean of the College/School. If a potential conflict of interest is identified in the initial review, the Disclosure material will be reviewed by the Conflict of Interest Committee (COIC), a standing committee appointed by the Vice President for Research and managed by the Office of Research Services. The committee will offer recommendations for compliance to the principal investigator. The principal investigator may appeal the decision of the COIC to the Vice President for Research and, ultimately, to the President of the University if the recommendations are deemed to be unjustified.
VII. Management of Conflicts of Interest

An investigator has a conflict of interest when the COIC reasonably determines that a significant financial interest could directly and significantly affect the design, conduct, or reporting of sponsored research/educational activities. In such circumstances, the COIC may recommend that the proposal shall not be submitted for funding (or terminated, if funded prior to the development of a conflict). In situations where reasonable doubt may exist about the conflict of interest, certain conditions or restrictions may be imposed. These may include, but are not limited to:

A. public disclosure of significant financial interests;
B. monitoring of research by independent reviewers;
C. modification of research plan;
D. disqualification from participation in the portion of the funded research/education that would be affected by the significant financial interest;
E. divestiture of significant financial interest(s); or
F. severance of relationships that create conflicts.

If the COIC determines that imposing conditions or restrictions would either be ineffective or inequitable, and that the potential negative impact that may arise from a significant financial interest are outweighed by interest of scientific progress; technology transfer, or the public health and welfare, then the COIC may allow the research/educational activity to go forward without imposing such conditions or restrictions.

Failure to file a complete Disclosure of Financial Interest for a sponsored project, or adhere to the guidelines developed by the COIC will be grounds for disciplinary action under the BOR contract (Article 16.1, Disciplinary Action, pp 31-32). In addition, sponsors may terminate current awards and/or contracts and may determine an investigator ineligible to receive future awards if university policy is violated.

VIII. Sanctions

Failure to file a complete Disclosure of Financial Interest for a sponsored project, or adhere to the guidelines developed by the COIC will be grounds for disciplinary action under the BOR contract (Article 16.1, Disciplinary Action, pp 31-32). In addition, sponsors may terminate current awards and/or contracts and may determine an investigator ineligible to receive future awards if university policy is violated.
Florida A&M University
Board of Trustees Policy

Board of Trustees Policy Number:  Date of Adoption/Revision:

Subject: Consultant Services
Applicability: Administration of Sponsored Projects

I. Policy Statement and Purpose

The purpose of this policy is to provide guidance to Florida A & M University (University) staff responsible for the procurement, management and payment of consultant services charged to sponsored projects. Such use of consultants for sponsored projects shall first conform to the policies of the sponsor and the University and must be in direct support of the work to be performed under the sponsored project.

It is the policy of the University to comply with federal, state and university regulations governing the charging of consultant services to sponsored projects. The allowable charge for consultants on sponsored projects is limited to the federal funding agency’s maximum daily rate.

II. Establishing Consulting Services Association

If prior approval of the sponsor is necessary for the use of consultant services, confer with the Office of Sponsored Programs (OSP) for such prior approvals and the required documentation. When specific consultants are required for a sponsored project, confer with OSP to determine the appropriate procedures and obtain the required documents.

Consultants must enter into a university consulting services agreement, which clearly outlines the nature of services to be provided, and which may be obtained from the OSP.

The Federal Government may limit the participation or term of a consulting engagement and the employment of non-citizen/foreign nationals. Consult with the Human Resources Department and the OSP regarding such employment.

III. Definitions

Consultant is an independent contractor and not an employee of the University. Consultant services are rendered by persons who are members of a particular profession or possess a special skill or expertise. Such services may be advisory and are customarily temporary or intermittent.
Florida Agricultural & Mechanical University
Board of Trustees Policy

Board of Trustees Policy Number: 2005-11
Date of Adoption/Revision: June 30, 2005

Subject  Cost Sharing for Sponsored Agreements
Applicability  Senior Administrators, Deans, Directors, Department Heads, Principal Investigators, Finance Staff and Research staff

I.  Policy Statement and Purpose

The University receives a significant amount of funding from the federal government, specifically in the form of direct support for sponsored projects and reimbursement for indirect costs of federally sponsored grants and contracts. Cost sharing is that portion of the total project costs of a sponsored agreement borne by Florida A & M University (University), rather than by the sponsor. Thus, cost sharing of direct expenditures represents a possible redirection of departmental or school resources from teaching or other departmental and school activities to support sponsored agreements. It is essential that the use of cost sharing does not overburden departmental resources and facilities and administrative recoveries. Therefore, it is a policy of the University to offer cost sharing only to the extent it is required by the sponsoring agency or the sponsored award.

All committed cost sharing and matching/in-kind expenses must conform to the University and federal policies regarding allowability, allocability, and reasonableness and must be verifiable through documentation.

II.  Definitions

A. **Cost Sharing** refers to that portion of the total project or program costs not borne by the sponsor. The University or third parties may contribute these costs.

B. **Mandatory Cost Sharing** is a contribution to a sponsored project or program required by the sponsor as a condition of obtaining the award. Such contributions are binding commitments and must be accounted for in accordance with this policy.

C. **Voluntary Cost Sharing** is a contribution to a sponsored project or program offered by the University but not required by the sponsor as a condition of obtaining the award. Voluntary cost sharing is either committed or uncommitted.

D. **In-Kind Contribution** refers to costs borne by the University or a third party, for example when individuals at another organization volunteer their time or another organization donate the use of an off-campus meeting space for which a fee is usually charged. Third party in-kind contributions must be evidenced by a letter of
E. **Matching** is a type of cost sharing, wherein a contribution to a sponsored project or program that is pledged to match some portion of funds provided by the primary sponsoring agency. Matching contributions may be in any form acceptable to the sponsor, including cash and third party in-kind.

### III. Cost Sharing Commitment

Prior to the commitment of University resources for cost sharing, a Principal Investigator shall ensure that:

- All necessary reviews and approvals are secured.
- If funds are committed, such funding is available and approved.
- The University’s cost share is verified and documented at the time of submission of any proposal.
- Committed cost sharing is not applied retroactively.
- Cost sharing is not used as a method of covering unexpected project expenses or accommodating cuts in a budget proposal.

After the receipt of a sponsored award, grant or agreement that the University has provided a cost share commitment, the Principal Investigator shall ensure that:

- Cost-shared committed are accounted for in a separate University accounts.
- Allowable costs are charged timely and accurately to the appropriate cost-sharing account.
- Expenditures on cost sharing accounts are certified in accordance with cost share procedures.

### IV. Reporting Cost Sharing

The University is responsible for maintaining and providing information to sponsoring agencies that demonstrates the University has fulfilled the cost sharing commitments that it made as a condition to receiving the award or grant. To ensure that the University will be able to provide all necessary reports regarding the University’s cost sharing:

- Cost sharing must be captured in the accounting and effort systems of sponsored projects and be included in the indirect cost base.
- Cost sharing must be specifically documented for each sponsored grant or contract.
- The Office of Research is responsible for maintaining all cost sharing reports.
- Departments must provide the necessary information on the cost sharing authorization form as provided by the Office of Research at the time of the award and follow all applicable accounting procedures related to cost sharing.
- Principal Investigators and departments should maintain strong documentation of the appropriateness and justification of any cost share.
- During the financial close out of a sponsored project or program, cost-sharing commits must be reviewed and documented.
The Vice President for Research and the Vice President for Finances shall develop whatever forms and reports are needed to properly capture all costs allowable, allocable and reasonable for the purposes of meeting the requirements of any federal sponsoring or other sponsoring agency.

IV. Development of Cost Sharing Procedures

The Vice President for Research, in conjunction with the Vice President for Finance, shall develop cost sharing procedures to achieve the following purposes:

- To provide guidance regarding the circumstances in which the University permits cost sharing, including what kind of services, expenditures, or assets may be cost shared.
- To provide information to the University regarding the contractual, financial and administrative implications that result from the commitment to cost share.
- To establish procedures that give the University the ability to provide information to sponsoring agencies that demonstrate the University has fulfilled any cost sharing commitments it has made as a condition of obtaining such sponsored projects or programs.
- To establish procedures for recording cost-shared expenditures in the University’s accounting system in order to segregate cost sharing as required by federal regulations.
- To ensure the University can track, report and certify its cost sharing efforts.
- To provide for the roles and responsibilities of principal investigators, Department Chairs and/or Deans, Office of Research, Vice Presidents for Research and Financial Services, and the Provost and Vice President for Academic Affairs.
I. Policy Statement and Purpose

It is the policy of Florida A&M University that costs should be charged to the appropriate federal award when first incurred. Any errors in the allocation of direct costs to sponsored agreements shall be identified, corrected and documented in a timely and consistent manner. Cost transfers shall be kept to a minimum and shall not be a routine method of account management. If an individual sponsored agreement has more stringent requirements than this policy and related procedures adopted pursuant to this policy, the requirements of the agreement shall govern.

To be allowable, cost transfers must be timely, be fully documented, be allowable under the terms and conditions of the specific sponsored agreement, and have appropriate authorizing signatures. Timeliness and completeness of the explanation of the transfer are important factors in supporting allowability and allocability in accordance with the principles of OMB Circular A-21. The purpose of this policy is to ensure that the University has a uniform method of handling cost transfers that complies with federal agency, state, university and audit requirements.

At no time should a sponsored account be used as a holding account for charges that should be expensed to a different project or program.

II. Definition

Cost Transfer is a transfer to a federally funded sponsored account of a charge previously recorded elsewhere. Examples of cost transfers include, but are not limited to error corrections, transfer of pre-award costs from departmental account(s), reallocation of effort to reflect actual effort, and reallocation of shared services that were previously charged elsewhere.

III. Initiation of Cost Transfers

Cost transfers should be authorized by the Principal Investigator responsible for the sponsored project. Prior approval from Sponsored Programs is required.

IV. Responsibility for Compliance

The primary responsibility for recording charges to the correct sponsored account is at the academic department level when the costs are incurred and recorded. Suitable fiscal practices at
the department level should permit identification of any errors in a timely manner, allowing cost transfers to be processed within the required time period. Therefore, responsibility for following this policy lies with the Principal Investigator, the Department Chair or Director and the fiscal/financial personnel. Sponsored Programs is responsible for the review and approval of the cost transfers, and shall review the backup documentation and the specific sponsored agreement terms and conditions to verify the allowability of a cost transfer. The Principal Investigator and the relevant department or division should maintain documentation of the appropriateness of any cost transfer.

V. Permitted Exceptions

A. Recognizing that legitimate reasons can exist for the transfer of expenses, certain exceptions will be permissible. It is considered appropriate to transfer expenses under the following circumstances:

1. **Correction of Technical or Clerical Errors.** Since the timeliness and appropriateness of costs may be subject of specific audits by a sponsor, an error in cost transfer in charging costs to a sponsored account should be moved only once. All errors must be corrected as soon as detected. This provision anticipates errors as typographical errors or transposition of digits in an account code and expenditure type, or a Peoplesoft record was not updated, an individual’s effort was redirected, or a purchase was charged to a sponsored project other than the sponsored project that ultimately benefited from the use of the item purchased or such similar acts.

2. **Transfer of Pre-award Costs.** For the economical conduct of a sponsored project, it is sometimes necessary for costs to be incurred before the award document has been received. The University will permit pre-award costs only if it is provided in the solicitation or the sponsored award. In such cases, the Principal Investigator must request Sponsored Programs to set up a sponsored project. Upon the receipt of the award, the costs are transferred to the permanent sponsored project.

3. **Transfer of Unallowable or Unallocable Expenses.** Principal Investigator must be careful to manage and monitor their sponsored accounts to not incur costs that are not reimbursable. In the event an expense is determined to be unallowable or unallocable to a sponsored project, the expense must be transferred to a non-sponsored department account. If permitted by the sponsored award, the costs must be treated in same manner as cost sharing.

4. **Cost Benefiting More Than One Project.** When a particular charge to a sponsored project benefits another sponsored project, that charge may be transferred to the other project account, provided that:

   a. The initial charge could appropriately have been made to the other sponsored project account:

   b. The charge is contemplated in the approved budgets of both sponsored projects; and

   c. The explanation for the transfer makes it clear why the particular charge is appropriate to either of the sponsored project accounts.

Transferring a cost more than once shall require a written request accompanied by a written explanation that must be submitted for the review and approval of the Vice President for Research and Vice President for Financial Services.
VI. Time of Cost Transfers
   A. 90 Day Rule. It is the responsibility of the Principal Investigator to make sure that cost transfers are made promptly after the error is discovered and within 90 days of the original charge, unless close out requirements necessitate a shorter period of time.
   B. Transfers Made After 90 Days. Cost transfers after 90 days should be extremely rare and only processed under extenuating circumstances. Approvals for cost transfers submitted later than 90 days will be granted only in extenuating circumstances. Acceptable extenuating circumstances:
      1. Late issuance of a notice of grant award;
      2. Full execution of a subcontract subsequent to the start of the budget year or period of performance; and
      3. Failure of another department to take action on a properly submitted payroll distribution change request.

Cost transfers submitted after 90 days requires the written submission and justification signed by the Principal Investigator, the Department Chair or Division Director, and administrative person over Contracts and Grants.

VII. Managing Cost Overruns and Overdrafts
   A sponsored account cannot be closed out until a deficit balance is eliminated. Unless the sponsoring agency increases the funding on the specific sponsored project which benefits from the sponsored account, a deficit balance must be removed immediately from the sponsored account and transferred to a nonsponsored account in a department or division.

VIII. Certification/Signatures
   A. A certification is required on cost transfers to a grant or contract to indicate that the cost to be transferred in an appropriate expenditure for the sponsored project and that it complies with the terms and restrictions governing that sponsored grant or contract, as:
      “I certify that the cost transferred is an appropriate expenditure for the sponsored project charged and that the expenditure complies with the terms and restrictions governing that sponsored project.”
   B. Authorized signatures for the purposes of cost transfers shall be as follows:
      1. For transfers within 90 days, the signatures of the Principal Investigator and Contract and Grants.
      2. For transfers after 90 days, the signature of the Principal Investigator, Dean and Contract and Grants.

IX. Procedures
   The Vice President for Research and Vice President for Financial Services shall formulate cost transfer procedures consistent with this policy.
Florida Agricultural & Mechanical University
Board of Trustees Policy

Board of Trustees Policy Number: 2005-12
Date of Adoption/Revision: June 30, 2005

Subject Effort Reporting Policy
Authority OMB Circular A-21, Cost Principles for Educational Institutions – Compensation for Personal Services
Applicability Senior Administrators, Dean, Director, Department Chair or Directors, Faculty, Finance Personnel, Human Resources Personnel and Sponsored Projects Personnel

I. Policy Statement and Purpose

Florida Agricultural and Mechanical University requires employees to certify the accuracy of the percentage of time (i.e., effort) that they charge to sponsored projects, as personnel costs generally comprise the majority of direct costs. Therefore, each University department has the primary responsibility to ensure compliance with this policy. If effort is not properly certified, salary charges must be removed from the sponsored project account. Since severe penalties may be imposed by the University from inaccurate, incomplete or untimely effort reporting, this policy is to:

- Ensure an accurate and reasonable system is maintained for reporting the percentage of time (i.e. effort) that employees devote to federally sponsored projects, as required by OMB Circular A-21.
- Assure external sponsors, public or private, that funds are properly expended for the salaries and wages of those individuals working on the projects they sponsor.
- Provide a mechanism to certify the salaries and wages charged to sponsored projects consistent with the employee’s effort contributed.
- Provide a means for sponsors and auditors to verify fund(s) allocated for cost sharing was provided as promised.

II. Definitions

A. **Committed Cost Sharing** - Mandatory or voluntary cost sharing that is pledged in the proposal budget, budget justification or stated in award documents.

B. **Cost Sharing** - Terms "cost sharing," "matching," and "in-kind" refer to that portion of the total project costs borne by the University. The University generally refers to cost sharing as labor costs.

C. **Effort** - Work or the proportion of time spent by an employee on an activity and expressed as a percentage of total university time.

D. **Payroll Charges** - Salaries and fringe benefits charged to a sponsored project.
E. **Sponsored Project** - Externally funded activity that is governed by specific terms and conditions and must be separately budgeted and accounted for subject to terms of the sponsoring organization. A sponsored project may be a grant, contract, or cooperative agreement for research, training, and other public service activities.

### III. Effort Reporting and Certification

A. It shall be the responsibility of Contracts and Grants to generate the effort reporting forms based upon an employee’s actual salary paid during the effort period.

B. Effort reporting forms shall be distributed to the principal investigators for review and certification.

C. The employee, principal investigator, or responsible official(s) using suitable means of verification that the work was performed, must sign all effort reporting forms.

D. Certifications must be prepared for professorial and professional staff at least every six months. For other employees, the reports will be prepared at least monthly.

E. All executed and corrected effort reporting forms shall be certified and returned to the Office of Contracts and Grants for filing and audit purposes.

### IV. Effort Reporting and Payroll

University employees must comply with university, state and federal regulations governing the charging of payroll to sponsored projects. In this regard, payroll distributions for employees must be:

- Reasonable
- Allocable
- Allowable
- Accurately based on all functions and activities of the employee
- In compliance with any specific requirements of a sponsored project; and
- In compliance with any specific requirements of the University.

Payroll distributions must be corrected, after the fact, based on the actual effort performed by the employee on the sponsored project, as validated on the effort certification. Such corrections shall occur as soon as it is known that the actual effort does not match the payroll distribution.

If an employee devotes work effort to a sponsored project but is not paid under the sponsored account, the employee’s work effort should be provided as cost sharing effort.

### V. Duties and Responsibilities

A. **Principal Investigator** shall ensure the appropriateness and accuracy of all effort expended on the sponsored project in compliance with this policy; certify direct-charged and committed cost-shared effort in conformance with the effort proposed.

B. **Department Chair or Division Director** shall establish effective processes and controls that will ensure compliance; assign an individual to oversee the certification of effort; and provide local oversight.
C. **Contracts and Grants Accounting nevermind-this should be included**: assist with development of educational programs for all employees involved in the effort certification process; ensure that the effort system produces accurate effort statements in a timely manner; monitor effort reporting system to ensure compliance; monitor the effort process for timely submission and report findings to departments; and report questionable practices and recurring problems to the dean, department chair, Vice President for Research, Provost and Vice President of Academic Affairs, and the Compliance Office.

D. **Dean** shall provide general oversight and problem resolution.

E. **Sponsored Programs** shall review the proposed cost sharing during the development of the sponsored project proposal, input proposed effort information into the automated financial system, and submit necessary documentation to the Contracts and Grants Accounting.

VI. **Related Procedures**

The Vice President for Research shall create procedures in furtherance of this policy to govern sponsored program activities.
Florida A&M University
Board of Trustees Policy

Board of Trustees Policy Number: Date of Adoption/Revision:

Subject: Expenditure Review of Non-Payroll Charges


Applicability: Administration of Sponsored Projects

I. Policy Statement and Purpose

The policy of the University is to be in compliance with university, state, and federal regulations governing the acquisitions of goods, travel, services and equipment for sponsored projects. All subrecipient agreements that are contracted under sponsored projects at FAMU will be in compliance with federal, state and university regulations governing the procurement, management and monitoring of subrecipients services. FAMU will ensure that all subrecipients are in compliance with the provisions of the funding agency’s award. The purpose of this policy is to provide guidance to University staff responsible for expenditure review of non-payroll charges to sponsored projects.

II. Definitions

Non-Payroll charges are goods, travel, services (other than consultant services and subrecipient services) and equipment charged to a sponsored project.

II. Approvals/Responsibilities

A. Principal Investigator (PI) is responsible for determining that there is a need for goods, travel, services and equipment to meet the requirements of the sponsored project. The PI is responsible for ensuring adequate use of sponsored funds and for requesting the encumbrance of funds for goods, travel, services and equipment. The PI is responsible for ensuring that non-payroll charges are in compliance with applicable regulations.

B. Dean is responsible for the reviewing and approving proposed non-payroll budget.

C. Supervisor is responsible for reviewing and approving travel requests.

D. Office of Sponsored Programs (OSP) is responsible for reviewing and approving proposed budget for goods, travel, services and equipment according to the sponsoring agency’s guidelines and for adequately reviewing expenditure requests for goods, travel, services and equipment according to the sponsoring agency’s approved budget and contract terms and conditions. The OSP is responsible for reviewing and approving revisions of budget and program plans and ensuring compliance with university, state, and federal regulations governing acquisition of goods, travel, services and equipment.

E. Purchasing is responsible for procuring the goods, services and equipment and determining that they conform to University policies and procedures.
F. The University Controller’s Office is responsible for procuring travel requests, processing cost transfers and processing non-payroll payments in accordance with University policies and procedures. The Office of Contracts & Grants is responsible for invoicing to the sponsoring agency and preparation of fiscal reports.
Board of Trustees Policy Number: Animal Welfare and Research Integrity

Date of Adoption/Revision: Section 1001.74, FSPHS Policy, Guide for Care and Use of Laboratory Animals, AAALAC Accreditation Standards

Subject: Animal Welfare and Research Integrity

This policy governs Florida A&M University (University) research, teaching and service activities involving animals when conducted by the University faculty, staff or students or when using University facilities or equipment.

I. Policy Statement and Commitment

Florida A&M University Board of Trustees recognizes the importance of the use of animals in its research and teaching programs, and is committed to the highest standards for their humane use and care. The University, including its investigators and researchers, accepts responsibility for determining that research and teaching involving the use of animals fulfill this policy. In performing their duties University faculty, staff and students shall adhere to the following principles:

- Procedures involving animals shall be designed and performed with due consideration for their relevance to human or animal health, the advancement of knowledge, of the good of society; and
- The proper use of animals requires avoidance or minimization of discomfort, distress, and pain.

This policy applies to all research and teaching irrespective of whether the research is funded from external or internal resources.

II. Definitions

A. Institutional Animal Care and Use Committee shall mean the committee established by the President or President’s designee in accordance with federal regulations to review University protocols, animal facilities and uses of animals.

B. Institutional Official shall mean the Vice President for Research who shall be responsible for overseeing all aspects of the University’s animal care and use programs.
III. Compliance with Federal and State Law

As required by federal law, the President or President’s designee shall appoint an Institutional Animal Care and Use Committee (IACUC) to ensure that activities covered under this policy meet federal requirements. The President or President’s designee is responsible for overseeing the IACUC. University employees may not approve an activity covered under this policy if it has not been approved by the IACUC. Activities approved by the IACUC nevertheless may be subject to further review and approval by University officials.

All activities covered by this policy must comply with applicable federal and state regulations and guidelines, including but not limited to the National Institutes of Health (NIH) Guide for the Care and Use of Laboratory Animals (Guide); the Public Health Service Policy on the Humane Care and Use of Laboratory Animals (PHS Policy); the federal Animal Welfare Act; and the United States Department of Agriculture regulations.

All facilities in which animals are housed shall be accredited by the American Association for the Accreditation of Laboratory Animals (AAALAC).

IV. Institutional Animal Care and Use Committee

A. Establishment of Committee - The President or President’s designee shall be responsible for establishing the Institutional Animal Care and Use Committee (IACUC) in accordance with current PHS policy requirements. Specifically, the policy requires that at least one (1) member shall be a licensed Doctor of Veterinary Medicine with training or experience in laboratory animal science and medicine who has direct or delegated program responsibility for activities involving animals at the University; at least one (1) practicing scientist experienced in research involving animals at the University; at least one (1) member who primary vocation is in a nonscientific area; and one (1) member shall be unaffiliated with the University and not a member of the immediate family of a person who is affiliated with the University.

B. Functions of the Committee - The IACUC shall oversee the provisions for the care and well-being of animals used for research and educational purposes at Florida A&M University. The IACUC shall assess the University’s animal care program and assure that any proposed research is evaluated according to the Guide, the Animal Welfare Act, and PHS Policy. As necessary, the IACUC shall recommend to the President or President’s designee changes and improvements regarding the University’s animal program or facilities. In the conduct of its duties, the IACUC at a minimum shall:

1. Review, at least every six months, the University’s program for humane care and use of animals, using the Guide as a basis for evaluation of laboratory animal programs;
2. Inspect, at least every six months, the University’s animal facilities to insure that facilities meet space and care requirements as specified in the Guide and that all animals used for research and teaching are being used as specified on approved animal use forms;
3. Review protocols for the use of animals in research and teaching activities and approve, modify or reject these requests as appropriate;
4. Prepare reports to the Institutional Official regarding the results of facility inspections, animal use in research and teaching, animal care personnel training and recommendations on improving the University’s animal care program;
5. Conduct continuing review of previously approved activities at least once a year;
6. Review and investigate complaints of noncompliance;
7. Promptly report to the Institutional Official and Vice President for Compliance any alleged serious or continuing noncompliance with federal laws or University policies and procedures; and any corrective actions taken in response to noncompliance;
8. Make recommendations to the Institutional Official regarding any aspect of the University’s animal program, facilities, or personnel training;
9. Modify or suspend research activities that are inconsistent with University and federal regulations and policy on the humane care and use of animals.

In fulfilling its duties, the IACUC has the authority to gain access to all facilities used for the care and research of animals; and to obtain University records and other relevant information related to the use of animals.

V. Administrative Procedures

The IACUC, with responsible oversight by the President or President’s designee, shall maintain appropriate administrative policies and procedures to implement this policy.
Subject  Cost Policy-Direct and Indirect Costs (Facilities and Administrative Costs)

Authority  Sections 1001.74 and 1001.75, Florida Statutes, Office of Management and Budget (OMB) Circular A-21, OMB Circular A-133, and 2 CFR Part 215

Applicability  Administration of Sponsored Projects

I. Policy Statement and Purpose

This policy is to ensure compliance with federal, state and university regulations governing the consistent treatment of direct and indirect costs to sponsored projects. The purpose of this policy is to ensure that expenditures are consistent with the intent of the awards as well as any contractual requirements and governmental regulations that govern the use of such funds.

II. Definitions

A. Direct Costs- OMB Circular A-21 states that “Generally, if a cost can be identified specifically with a particular cost objective, such as a grant or cooperative agreement, project, service, or other activity of an organization, it is a direct cost.”

B. Indirect Costs- If a cost has been incurred for common or joint objectives of an organization and cannot be readily identified with a particular cost objective, it is an indirect cost. The cost principles do not dictate whether a particular cost should be treated as direct or indirect; treatment is determined by the recipient’s accounting system definitions.

C. Consistent Treatment of Costs- Costs incurred for the same purpose in like circumstances must be handled in the same manner.

III. General Information

OMB Circular A-21 states that “direct costs are those costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or F&A costs. Where an institution treats a particular type of cost as a direct cost of sponsored agreements, all
costs incurred for the same purpose in like circumstances shall be treated as direct costs of all activities of the institution.”

IV. Direct Costs (OMB A-21)

Typical costs charged directly to a sponsored agreement are:

- The compensation of employees for performance of work under the sponsored agreement, including related fringe benefit costs.
- The costs of materials consumed or expended in the performance of the work;
- Other items of expense incurred for the sponsored agreement, including extraordinary utility consumption.
- The cost of materials supplied from stock or services rendered by specialized facilities or other institutional service operations.

In most cases, administrative and clerical costs (including clerical salaries, office supplies, postage, local telephone costs, and memberships) may not be charged as direct costs on federally funded projects.

The Office of Sponsored Programs is responsible for reviewing and approving all requests for direct charges to be expended on the award.

V. Indirect Costs (Facilities and Administrative Costs)

Indirect Cost or F&A (Facilities and Administrative Cost) - is a means by which the University obtains from funding agencies a portion of the expenses associated with supporting the research of its faculty and their associates.

A. Funds received directly from Federal agencies- All grant and contract applications to and awards from Federal agencies must include indirect costs at the agreed upon rate as set forth in the University/DHHS Negotiation Agreement, except as provided otherwise by Federal regulations. The faculty and staff are notified of the agreed upon rates by the Division of Research.

B. Federal funds not received directly from Federal agency- Indirect costs on pass-through funds, commonly referred to as non-direct Federal grants and contracts (except those funds passed through other governmental units) must be included at the appropriate Federal rate currently in effect.

VI. Indirect Cost (Facilities and Administrative Costs) Waivers

An Indirect Cost (facilities & administrative cost) waiver is an institutional agreement that the University will charge indirect cost at a lower rate than the appropriate negotiated rate. All indirect cost waivers must be approved by the Vice President for Research. Waivers are normally only granted when the Request for Proposal (RFP),
Request for Application (RFA), or proposal instructions mandate that a particular rate or base be charged. A copy of the RFP, RFA or application instructions must be sent to Sponsored Programs when the proposal is processed for submission. In instances when proposal instructions consist of a letter from the sponsor, the letter must be issued by a fiscal officer.

VII. Distribution of Indirect Cost (Facilities and Administrative Costs)

The University has a policy of distributing a portion of the recovered indirect costs back to the principal investigator. These costs are distributed on an annual basis. As an incentive, the appropriate parties shall receive a percentage or earned indirect cost recovery of the projects(s) for which he/she is responsible. The funds are to be used to enhance or develop the research capability and infrastructure of the university. The funds will be distributed by the Division of Research. The projects(s) must be in good standing and without deficit or programmatic concerns. The remaining recovered indirect costs will be distributed by the President for the purposes of supporting the operation of the Division of Research as well as supporting the faculty research enterprise throughout the University.
I. Policy Statement and Purpose

The Institutional Review Board (IRB) will ascertain the acceptability of ALL proposed research in terms of institutional commitments and regulations, applicable law, and standards of professional conduct and practice. The IRB will be primarily concerned with the protection (level or risk) of human subjects in research. The IRB will conduct its activities, according to and as required by FDA guidelines (21CFR-Part 56).

In order to increase the effectiveness of the IRB, copies of the IRB Manual will be made available to the Office of Sponsored Programs, Deans, Department Chairs and active principal investigators. The Manual is available on the web at www.famu.edu/research.

II. Definitions:

Principal Investigator - Any full time tenure earning faculty at Florida A&M University.

III. Composition:

The Florida A&M University IRB includes members that have expertise in a wide range of medical and social research areas, familiarity with applicable regulations and laws and with relevant standards of professional conduct and practice, and knowledge of vulnerable or special populations such as children, prisoners, pregnant women, and disabled persons. The committee strives for a balance of men and women with representation from minority populations.

The following criteria apply to the IRB:

1. The IRB board is composed of at least five members with varying backgrounds. Every nondiscriminatory effort is made to assure that the board is composed entirely of either men or women.
2. At least one member (the Community Representative) has no affiliation, other than IRB membership, with the University and is not an immediate family member of anyone affiliated with the University. Whenever the primary Community Representative is unable to attend an IRB meeting, every attempt is made to appoint an alternate Community Representative to serve.

3. Typically, at least one IRB board member has primary professional expertise in a scientific field relevant to the type of research reviewed, and at least one member has primary concerns in a nonscientific field.

IV. Appointment and Length of Service Terms

In the selection new members, the Director of the Animal Care and Research Compliance works with department heads and other University officials to seek candidates for nomination with consideration for maintaining the diversity and specialty requirements of the board. Each appointee outside of the community member must be a tenure track faculty at the University.

When an appropriate candidate is found, an invitation letter is sent requesting confirmation of intention to serve. The formal appointment of new members is made by the designated Institutional Official for Human Subject Protection (Vice President for Research).

Each member is appointed to a three-year renewable term.

V. Duties and Responsibilities

A member of the IRB has the primary duty of protection of the rights and welfare of individuals who serve as the subjects of research. The members are serving as a link between the investigator and the research subjects.

A. Regular Members

Scientific members are expected to contribute to the evaluation of a study on its scientific and statistical merits and standards of practice. These members should also be able to advise the IRB if additional expertise in a scientific area is required to assess if an application adequately protects the rights and welfare of subjects.

B. Nonscientific Member

Nonscientific members are expected to provide input on areas germane to their knowledge, expertise and experience, professional and otherwise. Example: Non scientific members who are lawyers should present legal views of specific areas that may be discussed.

C. Community Representative
Community representative are expected to provide input regarding their knowledge about the local community and be willing to discuss issues and research from that perspective.

D. IRB Chairperson

In addition to the above duties, the chairperson is responsible for chairing the meetings. The IRB Chairperson performs, or delegates to appropriate voting IRB members authority to perform, expedited and exempt review when appropriate. The IRB chairperson is also empowered, pending IRB review to suspend the conduct of a study if he/she determines that an Investigator is not following IRB requirements. The IRB Chairperson may also delegate to the IRB Vice Chairperson to assist or act on behalf of the IRB Chairperson at IRB meetings.

E. Obtaining an IRB Review

All principal investigators proposing to conduct research involving human participants should seek an IRB review as soon as possible in the following manner:

1. Complete the Application for IRB Review and answer all questions in the manner in which the same information appears in the proposal.
2. Attach a copy of the Informed Consent to the IRB Review Form, when appropriate.
3. Submit one copy of the following to the IRB Administrative Office:
   a. Full proposal
   b. Informed Consent
   c. When appropriate, submit copy of all instruments to be administered and data collection sheets.
4. The IRB staff shall deliver copies of the application and Informed Consent to each member of the Board for review.
5. The project will be reviewed at the next scheduled meeting of the IRB. The principal investigator or a designee may attend the meeting to present the risk implications involved in the proposed research. If needed, principal investigators who are unable to attend the meeting should be available for a teleconference.
6. Faculty advisors to graduate students’ research shall always be listed as the principal investigator.

F. Expedited Review Procedure

A less than formal IRB review, expedited, can be conducted for minimal risk and for minor changes in approved research. Minimal risk means that the risks of harm anticipated in the proposed research are not greater, considering probability and magnitude, than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests.

The procedure for an expedited review is as follows:
1. May be carried out by the IRB chairperson or one or more experienced reviewers
designated by the chairperson as authorized by Section 56.110 of the FDA regulations.

2. Chairperson or the IRB member(s) may exercise all of the authorities of the full Board except that the reviewer(s) may not disapprove the research. (A majority of the IRB members is needed to disapprove a research activity).

3. All IRB members must be apprised of an expedited review.

4. FDA may restrict the use of expedited reviews by an institution when the restriction is seen as needed to protect the rights of human participants.

G. Approval Notification

Written notification of approval will be sent by the IRB secretary to the principal investigator.

1. Notifications will include, as appropriate, approval of the:
   a. informed consent
   b. protocol
   c. investigators
   d. limitations imposed by the Board
   e. dates of approval for the protocol

2. Written notification will include the following responsibility by the investigators during the research period:
   a. promptly report to the Board any changes in research activities,
   b. no changes without Board review and approval unless “apparent immediate hazard to human participants” is being eliminated
   c. promptly report any unanticipated problems involving risks to the subjects or others

H. Modification of Projects

1. When modifications of pre-approved projects are necessary, the principal investigator will submit a memo to the IRB office.

2. The memo should contain:
   a. the original approval date
   b. the nature of the changes to the protocol
   c. rationale for the changes

I. Informed Consent

1. All research projects will include an Informed Consent which meets FDA guidelines 21CFR-Part 50. An Informed Consent shall provide the following information:
   a) A statement that the study involves research
   b) An explanation of the purpose of the research
   c) The expected duration of the participant’s participation
   d) A description of the procedures to be followed
   e) Identification of any procedures which are experimental

2. A description of any reasonable foreseeable risks or discomforts to the participant.

3. A description of any benefits to the participant or to others, which may reasonably be expected from the research.
4. A disclosure of appropriate alternative procedures or courses of treatment, if any, that might be advantageous to the participant.

5. A statement describing the extent, if any, to which confidentiality of records identifying the participant will be maintained and that notes the possibility that the Food and Drug Administration may inspect the records.

6. For research involving more than minimal risk, an explanation of any compensation and an explanation of any medical treatments that are available if injury occurs and, if so, what they consist of, or where further information may be obtained.

7. An explanation of whom to contact for answers to pertinent questions about the research and research participants’ rights, and whom to contact in the event of a research-related injury to the subject.

8. A statement that participation is voluntary, that refusal to participate will involve no penalty or loss of benefits to which the participant is otherwise entitled, and that the subject may discontinue participation at any time without penalty or loss of benefits to the participant is otherwise entitled.

9. When appropriate, one or more of the following elements of information shall also be provided in the consent.

10. A statement that the particular treatment or procedure may involve risks to the participant (or to the embryo or fetus, if the participant is or may become pregnant) which are currently unforeseeable.

11. Anticipated circumstances under which the participant’s participation may be terminated by the investigator, without regard to the participant’s consent.

12. Any costs to the subject that may result from participation in the research.

13. The consequence of a subject’s decision to withdraw from the research and procedures for orderly termination of participation by the participants.

14. A statement will be provided to the participant indicating findings developed during the course of the research which may be related to participant’s willingness to continue participation.

15. The approximate number of participants involved in the study.

16. Documentation of informed consents:
   a. Written approval of the IRB must be on record.
   b. Copy shall be given to the persons signing the form.
   c. The consent that will be read to the participants or their legally authorized representatives or they shall have adequate opportunity to read the consent before it is signed.
   d. If consents are to be used with verbal explanations the Board will approve a written summary of what is said to the participant or the representative:
      1) only the form itself is signed by the participant/representative,
      2) the witness shall sign the form and a copy of the summary (person actually obtaining the consent shall sign a copy of the summary), and
      3) A copy of the summary shall be given to the participant or representative.

J. Exempted Research
Exemption from full IRB approval which involve human participants may be possible when the following conditions are met:
1. Research is for educational projects. The research can involve educational techniques, tests, classroom methods, and interview procedures.
2. Responses will be recorded in such a manner that the human subjects cannot be identified directly or through identifiers linked to the participants. The only exemption to non-identification will be participants which are elected or appointed public officials or candidates for public office.
3. If invasive procedures, pathological specimens or diagnostic specimens are necessary these sources must be collected through existing participant records.
4. Research involves adult participants. Studies of children require consent or involvement of parents.
5. Researchers will submit a written protocol for IRB approval. IRB members will review and vote for or disapproval of the exemption. Approval for the project exemption is achieved by a majority vote of the committee.
6. Studies must include approval from designated institutional site areas (i.e., hospitals, agents or clinics).

J. Research request from outside of University

Research that is requested from outside of the University must adhere to the following procedures:
1. Those requesting to perform research form outside of the university must first contact the IRB Administrative Office.
2. the Administrative office will pair the requestor with a principal investigator (see definition) at the university
3. The faculty person at Florida A&M University will serve as the Pi for the project and the outside requestor the Co-PI.
4. The application will follow the current procedure noted above for presentation and approval from the IRB
Subject: Administration, Review and Approval of Participant Support Costs


Applicability: Administration of Sponsored Projects

I. Policy Statement and Purpose
   This policy is to ensure compliance with federal, state and university regulations governing the allowability of Participant Support costs charged to sponsored projects. The purpose of this policy is to provide guidance to University staff responsible for the administration, review and approval of participant support costs charges to sponsored projects.

II. Definitions
    Participant support costs are direct costs for items such as stipends or subsistence allowances, travel allowances and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with meetings, conferences, symposia or training projects.

III. Duties and Responsibilities
    A. Principal Investigator (PI) is responsible for determining that there is a need for participant support costs to meet the requirements of the sponsored project. The PI is responsible for ensuring adequate use of sponsored funds and for requesting the encumbrance of funds. The PI is responsible for ensuring that participant support charges are in compliance with applicable regulations.
    B. Dean is responsible for the reviewing and approving proposed participant support budget.
    C. Office of Sponsored Programs (OSP) is responsible for reviewing and approving proposed budget for participant support costs according to the sponsoring agency’s guidelines. After the award is received OSP is responsible for adequately reviewing expenditure requests for participant support costs according to the sponsoring agency’s approved budget and contract terms and conditions. The OSP is responsible for reviewing and approving revisions of budget and program plans and ensuring compliance with university, state, and federal regulations governing participant support costs.
    D. The Purchasing Office is responsible for procuring the goods, services and equipment and determining that they conform to University policies and procedures.
    E. The University Controller’s Office is responsible for procuring travel requests, processing cost transfers and processing non-payroll payments in accordance with University policies and procedures.
    F. The Office of Contracts & Grants is responsible for invoicing to the sponsoring agency and preparation of fiscal reports.
    G. The Payroll Office (PO) is responsible for reviewing and processing all payroll requests and for the payroll payment process.
Subject: Payroll Charges
Applicability: Administration of Sponsored Projects

I. Policy Statement and Purpose

The policy of the University is to be in compliance with university, state and federal regulations governing the charging of payroll to sponsored projects. The portion of all FAMU payroll charges to sponsored projects will be allowable and reasonable and allocable to the sponsored project to which they are charged. The distribution of payroll charges must reasonably reflect the activity for which the employee is compensated by FAMU and encompass both sponsored and all other activities on an integrated basis. The purpose of this policy is to provide guidance to University staff responsible for the request, approval and review of payroll charges to sponsored projects.

II. Definitions

Payroll charges are salaries and fringe benefits charged to a sponsored project.

III. Approvals/Responsibilities

A. Principal Investigator (PI) is responsible for determining that there is a need for employees to meet the requirements of the sponsored project and for ensuring adequate use of sponsored funds. The PI is responsible for requesting approval for the encumbrance of funds for payroll. The PI is responsible for ensuring that personnel effort is satisfactory and in accordance with the statement of work and that payroll charges are in compliance with applicable regulations.

B. Dean is responsible for the reviewing and approving proposed payroll budget.

C. Office of Sponsored Programs (OSP) is responsible for reviewing and approving proposed payroll budget according to the sponsoring agency’s guidelines and for reviewing and approving payroll expenditure requests according to the sponsoring agency’s approved budget and contract terms and conditions. The OSP is responsible for reviewing and approving revisions of budget and program plans and ensuring compliance with university, state, and federal regulations governing the charging of payroll to sponsored projects.

D. Academic Affairs (AF) is responsible for reviewing and approving payroll requests for Academic Departments.

E. The Payroll Office (PO) is responsible for reviewing and processing all payroll requests. PO is responsible for the payroll payment process.

F. The University Controller’s Office, Office of Contracts and Grants is responsible for the invoicing to the sponsoring agency and the preparation of fiscal reports.
I. Policy Statement and Purpose

When a Principal Investigator accepts sponsored funding, the person does so on behalf of Florida A & M University (University) under the terms and conditions of the award. Thus, we as an academic community must never take our responsibility for prudent stewardship of sponsored funding for granted.

The status of Principal Investigator (PI) is granted as a matter of privilege to the academic faculty, and therefore certain procedures must be instituted to ensure that a faculty member granted such status understands clearly the University’s expectations in the fulfillment of such role.

II. Definitions

A. Principal Investigator means the individual primarily responsible for and in charge of a sponsored project.
B. Administrative and Professional Employees (A&P) mean those individuals appointed to the University.
C. Regular Faculty means a faculty member with a tenure or non-tenure appointment.
D. Sponsored Project means a project funded with grants, contracts and cooperative agreements, including not limited to training, public service, research and cooperative projects.
E. Faculty With Limited Appointments means a faculty member with an appointment as adjunct or visiting.

III. Eligibility To Be Principal Investigator

A. Regular Faculty

Eligibility to act as a PI or co-PI on externally funded projects is a privilege limited to members of regular rank of the faculty. A request for PI status shall be signed by the relevant department chair to the dean, and the Provost and Vice President for Research.

B. Adjunct and Visiting Faculty

Adjunct and visiting faculty are eligible to serve as co-PI on research grants and contracts and other sponsored projects upon approval by the Department Chair, Dean,
Provost and Vice President for Academic Affairs and Vice President for Research.

C. Graduate Students

Graduate students or students with professional training academic appointments are eligible to serve as principal investigators on sponsored projects that the funding agency has specified as programs for which students are eligible. Persons in this category must receive the approval of the department head and dean of the school or college in which the school is registered, the Provost and Vice President for Academic Affairs, and the Vice President for Research. The student must also have a PI as Faculty Advisor/mentor. NOTE: In some instances, the student will be the key personnel, but a faculty member must be the PI.

D. Other Academic and Non-Academic Employees

A & P and Other Non-Academic Employees under certain circumstances, employees holding non-academic titles may serve as principal investigators, subject to the approval of the Department Chair and Dean in which the employee is employed, the Provost and Vice President of Academic Affairs and the Vice President of Research.

IV. Department Assurance

A request or approval should include an endorsement and an assurance that the department and college/school will assume responsibility for the conduct of the grant or contract.

V. Roles and Responsibilities of the PI

A PI’s roles and responsibilities shall be further provided for in procedures as established by the Division of Research.

VI. Principal Investigator Training

All PI’s, existing and potential, shall attend a mandatory certification training course as a criteria for PI eligibility.

VII. Relationships between PI, University and Sponsored Project

A. Sponsored Project Awarded to University

Sponsored projects and their funding are awarded to the University, rather than to PIs. If a PI should leave the University prior to the completion of a sponsored project, the future of that project shall be governed by the University, as is appropriate in the specific circumstances.
B. Relationship of PI to University

The PI’s relationship to the University is governed by the University’s appointment/employment contract document. The approval of individuals as PI or Co-PIs in no way affects the rights, claims and duties of such individuals as may be specified in University rules and other documents governing the individual’s employment. In particular, responsibilities as PI or co-PI do not imply any commitment on the part of the University to any subsequent appointment beyond the term of appointment than in effect.

C. Rescinding PI Status

An individual status as a PI may be rescinded for just cause, but the individual may appeal the decision in accordance with applicable University policies and procedures.

Recommendation: Approval of the Principal Investigator Eligibility Policy
10.142  Works and Inventions.

(1)  *Policy Statement.*  The Board of Trustees hereby establishes this rule to encourage research and innovation, clarify ownership of intellectual property rights, and provide for the equitable distribution of monetary and other benefits derived from intellectual property.

(2)  *University Authority and Responsibilities.*  Section 1004.23, F.S., authorizes the University to establish rules and procedures regarding patents, copyrights, and trademarks. This regulation and the procedures stated herein are supplemented by the terms of the FAMU BOT/UFF Collective Bargaining Agreement for employees who are members of the collective bargaining agreement.

(3)  For the purposes of this regulation, the following definitions shall apply.

(a)  *Creator* means a member of the University personnel who invented, authored, or were otherwise responsible for the creation of a work or invention.

(b)  *Independent Efforts* with regards to a work means that the ideas for the work came from the creator, the work was not made with the use of University support; and the University is not held responsible for any opinions expressed in the work.

(b)  *Instructional technology material,* includes video and audio recordings, motion pictures, film strips, photographic and other similar visual materials, live video and audio transmissions, computer programs, computer assisted instructional course work, programmed instructional materials, three dimensional materials and exhibits, and combinations of the above materials, which are prepared or produced in whole or in part by an employee, and which are used to assist or enhance instruction.

(c)  *Intellectual Property* includes all works and inventions.

(d)  *Invention.*  An “invention” includes any discovery, invention, process, composition of matter, article of manufacture, know-how, design, model, technological development, variety, culture of any organism, or portion, modification, translation, or extension of these items, and
any mark used in connection with these items. An invention is defined as “instructional technology material” as defined above is included in this definition.

(e) *University Personnel* shall include full-time and part-time employees of the University, including Faculty and other academic personnel, Executive Services employees, Administrative and Professional employees, University Support Personnel System (USPS), and Other Personnel Services (OPS) employees; appointees of the University, including certain faculty members and all volunteers; persons paid by or through the University, including fellows; and anyone working under University auspices. Students who are encompassed within any of these categories shall be considered University Personnel.

(f) *University Support* includes the use of University funds, personnel, facilities, equipment, materials, or technological information, and includes such support provided by other public or private organizations when it is arranged, administered or controlled by the University.

(g) *University-supported work* shall mean a work of a creator not made in the course of “independent efforts” as defined herein. The work in this instance is the property of the University and the creator shall share in the proceeds therefrom. Notwithstanding this provision, “University-supported work” does not include academic research or scholarly study, such as books and articles published in journals independent of the University and electronic media; works developed without the use of University support and used solely for assisting or enhancing the employee’s instructional assignment; and theses or dissertations of graduate students.

(h) *Works.* A “work” shall include any copyrightable material, such as printed material, computer software or databases, audio and visual material, circuit diagrams, architectural and engineering drawings, lectures, musical or dramatic compositions, choreographic works, pictorial or graphic works, and sculptural works. A work is defined to also include “instructional technology material”, as defined herein.

(4) *Works* – A work which is made in the course of independent efforts is the property of the creator. If the work is a university-supported work, the work is the property of the University. In this instance, the creator of the work shall share in the proceeds of the work subject to preexisting commitments to outside sponsoring agencies. Upon creation of a university-supported work and prior to any publication, the creator shall disclose to the President or the President’s designee the work, together with an outline of the project and the conditions under which the work was done. Within 60 days after receiving such report, the President or
President’s designee will inform the creator whether the University seeks an interest in the work, and a written contract shall thereafter be entered into consistent with this regulation and to reflect the interest of both parties. All such agreements shall comport with and satisfy any pre-existing commitments to outside sponsoring agencies, but the creator shall not commit any act which would tend to defeat the University’s interest in the matter and shall take any necessary steps to protect such interest.

(5) Inventions.

(a) University personnel shall disclose to the University any inventions made or discovered by them promptly. With respect to discoveries or inventions made during the course of approved outside employment, the creator may delay such disclosure, when necessary to protect the outside employer’s interest, until the decision has been made whether to seek a patent.

(b) All discoveries or inventions made outside the field or discipline in which the creator is employed by the University and for which no University support has been provided are the private property of the creator. The creator and the University may agree that the patent for any such discovery and invention be pursued by the University and the proceeds shared.

(c) Except for inventions made during the course of approved outside employment, an invention which is made in the field or discipline in which the creator is employed by the University or made by using University support, is the property of Florida A & M University and the creator shall share in the proceeds therefrom, subject to preexisting commitments to outside sponsoring agencies.

(d) Although University personnel may, in accordance with Regulations 10.122 (Outside Employment/Activities; Financial Interests and Other Conflicts) and 10.110 (Additional Employment) engage in outside employment pursuant to a consulting agreement requiring waiver of the creator’s rights to any inventions which arise during the course of such outside employment, the University personnel shall not, in doing so, sell or assign patent rights to inventions conceived or developed as University personnel. Any University personnel who proposes to engage in such outside employment shall furnish a copy of this regulation to the outside employer prior to or at the time the consulting agreement is executed.

(e) Reporting Procedures – All University personnel shall report to the President or President’s designee the nature of the invention together with an outline of the project and the conditions under which it was done. If the University wishes to assert its interest in the invention, the
President or President’s designee shall inform the employee within 60 days. The University shall designate a representative to conduct an investigation which shall assess the respective equities of the creator and the University in the invention, and determine its importance and the extent to which the University should be involved in its protection, development, and promotion. The division of proceeds between the University and the creator generated by the licensing or assignment of patent rights or trade secrets shall be reflected in a written contract between the University and the creator consistent with this regulation. All such agreements shall comport with and satisfy any pre-existing commitments to outside sponsoring agencies, but the employee shall not commit any act which would tend to defeat the University’s interest in the matter and shall take any necessary steps to protect such interest.

(f) A decision as to whether the University will apply for the patent will be made within 120 days from the date of the disclosure to the President or President’s designee. In the event a contractor had been offered the option to apply for the patent, the University will use its good offices in an effort to obtain such a decision within 120 days. At any stage of making the patent application, or in the development of a patent secured, if it has not otherwise assigned to a third party the right to pursue its interests, the University may withdraw and shall return the patent rights to the creator, in which case the patent shall be the creator’s property and none of the costs incurred by the University or on its behalf shall be assessed against the creator. All assignments of or release of patent rights by the University to the creator shall contain the provision that such invention, if patented by the creator, shall be available royalty-free for governmental purposes of the State of Florida.

(6) **Distribution of Net Income from Works and Inventions.**

(a) With regard to any work or invention owned by the University, net income less any foreseeable development expenses the University deems necessary to defend or to maintain the work or invention, the income will be distributed as follows:

1. 40% to the individual creator(s);
2. 10% to the creator’s department, division, or center that supported the creation of the intellectual property to be spent in support of the creator’s research or other directly related University work;
3. 10% to the creator’s college or school that supported the creation of the intellectual property; and
(4) 40% to the Division of Research to support the University’s Office of Technology Transfer and to support research and scholarly activity at the University.

For schools or colleges without departments, twenty percent (20%) will be distributed to the school or college.

(b) The President or President’s designee shall determine when a distribution of income will be made annually, so as to ensure that all applicable licensing and related expenses have been accounted for. The President or President’s designee may, at sole judgment, withhold or delay distribution of any income if there is a foreseeable development expense yet to be incurred. In instances where funds are held because of foreseeable development expenses or where expenses exceed revenue, an accounting of such will be sent to the creator’s department and college/school indicating the amounts received and the amount of the anticipated expense or deficit. When expenses have been ascertained, any excess withholding will be distributed.

(c) In the event there are multiple creators for an invention or work, the creators’ share will be divided equally among all creators, unless otherwise agreed upon in a written agreement among the creators. If the creators agree among themselves to a different split, the University’s Office of Technology Transfer and Vice President for Research shall be notified and provided with a copy of the written agreement prior to the first income distribution.

(d) The portions distributed to academic units, which are the academic units of the creator(s) at the time of the creation of the invention or work, will be pro-rated when more than one unit is involved. The President or President’s designee will make the final decisions on the pro-ration of such portions to academic units.

(7) **Compliance**

Failure to comply with the provisions of this regulation may result in discipline of University personnel in accordance with applicable University regulations and policies.

(8) **Administrative Procedures**

The President or the President’s designee shall adopt procedures to implement this regulation.

Specific Authority 1001.74(4), FS.

Law Implemented 1001.74(6), (19),(26); 1004.23, FS.
THE FULL TEXT OF THE RULE IS:
6C3-1.020 Misconduct in Research.

(1) **University Policy** - It is the policy of Florida A&M University (University) that each individual faculty and staff member and student is expected to maintain high ethical standards in the conduct and reporting of his/her research. Should alleged incidents of misconduct in research occur, reporting of such possible violations is a shared responsibility, and it is the duty of the faculty, staff members and students to respond in a fitting manner to resolve issues arising from such alleged misconduct.

(2) **Faculty, Staff, and Student Responsibilities** - Faculty, staff and students at the University are expected to maintain ethical standards in the conduct and reporting of scientific and scholarly research. Faculty, staff, and students who create scholarly products or works of art must guarantee that originality of their work and provide credit for the ideas of others upon which their work is built. All authors on published works are responsible for the accuracy and fairness of the presented information. It is expected that faculty, staff, and students consider individuals for inclusion as authors on work submitted for publication if they have contributed substantially and intellectually to the work. Special care must be taken to clarify authorship with entry level professional persons such as graduate students and trainees, preferably before the work is begun.

   (a) Falsification, fabrication and non-acknowledgement of use of data of others by faculty, staff and students is unethical and prohibited. At the outset of any research project all participants are expected to discuss and agree upon data management, access and retention procedures including procedures for having participants join or leave the project. Privacy of collected data and rights to intellectual property must be protected. Student rights to data are expected to be clearly specified.

(3) **Definition of Misconduct** – Misconduct or research misconduct means fabrication, falsification, plagiarism or other practices that seriously deviate from accepted standard of scientific or scholarly research within the scientific community for proposing, conducting or reporting research. It does not include honest errors or honest differences in interpretation or judgments of data or honest errors in the recording, selection or analysis or data. Acts of failure to comply with federal guidelines or requirements or University research policies and procedures do not fall within the definition but are addressed under other University policies and procedures.

(4) **Procedures for Reporting Allegations of Misconduct in Research, Research Training or Research Related Activities** - Allegations of misconduct in research, research training or research related activities should be summarized in writing, providing appropriate information and filed by any individual who has reason to believe that such misconduct has occurred. Relevant documentation supporting the allegation should be included with the summary. Normally this report will be submitted to the Office of the Inspector General or any successor office or reported via the University’s Compliance Hotline for assignment of an investigator(s). However, any University official who receives such a report shall communicate the report to the Office of the Inspector General or any successor office.
(5) Procedures Governing Inquiries into Allegations of Misconduct in Research –

(a) Initial/Informal Inquiry - It is the responsibility of the assigned investigator(s) to promptly initiate an informal inquiry into the allegation of misconduct to determine if there an informal resolution is possible. The investigator shall meet with the complainant as soon as possible to discuss the misconduct allegation. If the misconduct allegation is found to be mistaken, unjustified, without basis, unsubstantiated or frivolous, the allegation shall be dismissed. This informal review shall be completed within 10 working days. A complete record of the allegation, steps taken to review such allegations and the reasons for dismissal shall be maintained by the Office of the Inspector General or any successor office. Upon a determination or evidence that the misconduct allegation may have basis, the investigator(s) must proceed with a formal inquiry of the allegation.

(b) Formal Inquiry - The investigator(s) shall commence formal inquiry within (10) working days of completion of the informal inquiry.

1. The investigator(s) shall inform the Provost and Vice President for Research of the initiation of the formal inquiry.
2. The accused shall be informed of the allegations and initiation of the formal inquiry by certified mail, return receipt requested and will be provided an opportunity to respond. A copy of this rule will be provided to the accused, and the accused will be advised of the procedures used by the University. The accused has the right to retain legal counsel.
3. All original research data or other information related to the allegation should be secured by the assigned investigator(s), to preserve the data. In advance of securing the data, the accused shall be informed of the reasons for securing the data unless there is a concern that data or information will be lost, altered, or made inaccessible.

(c) The formal inquiry shall be completed and the detailed, final written report, which includes comments and information provided by the accused, submitted to the Provost and Vice President for Research within 45 days of report of the allegation, unless a longer period is clearly warranted and adequately documented. Final reports shall indicate the evidence reviewed, include a summarization of the interviews conducted and must state conclusion of the inquiry, such as, the allegations are unsubstantiated or does not fall within the definition of misconduct or that an investigation is warranted based upon on finding of specified credible evidence. The final report of the inquiry must be maintained in accordance with subparagraph (10) below.

1. Upon the investigator(s)’s finding that no investigation is warranted, the inquiry shall be terminated, unless the Provost and the Vice President for Research has additional concerns. If the inquiry is terminated, the accused shall be so notified.
2. Upon the investigator(s)’s finding that an investigation is warranted, a formal investigation shall commence in accordance with subsection (6) below.

(6) Procedures Governing Investigations into Allegations of Misconduct in Research –

(a) If the investigator(s) concludes an investigation is warranted or the Provost and Vice President for Research determine an investigation is necessary, such investigation shall commence within fifteen (15) business days of the conclusion of the inquiry. The Office
of the Inspector General or any successor office or the University’s Compliance Office shall also conduct the investigation.

(b) **Notifications** –

1. The accused shall be informed of the initiation of the investigation by certified mail, return receipt requested. Upon initiation of the investigation, a record of the proceedings will be made available to the accused.

2. **Notification to External Agencies** - The University will comply with the regulations of its funding agencies.
   (i) **Federally-funded research.** On or before the date the investigation commences, the decision to initiate an investigation shall be reported, in writing, to the appropriate office of the sponsoring agency or agencies, such as the Office of Scientific Integrity (OSI) of the National Institute of Health and/or the Office of Scientific Integrity (OSIR) Review of the Public Health Service by the Vice President for Research. Such written notice must include, at a minimum, the following: name(s) of the individual(s) against accused, general nature of the allegations, proposal/application or award numbers. A copy of the notice shall be provided to the accused.
   (ii) Sponsors will be notified in writing, by the Vice President for Research, at any stage of the investigation if any of the following condition are discovered: (i) an immediate health hazard, (ii) an immediate need to protect federal funds or equipment, (iii) an immediate need to protect the interests of the person(s) making the allegations or of the accused, co-investigators or colleagues, (iv) probability that the allegations will be reported publicly, or if there is indication of possible criminal violation, in which case notification within 24 hours of obtaining that information is required.
   (iii) The Vice President for Research shall also keep the designated agency official informed of any development during the course of the investigation which discloses facts that may affect current or potential agency funding for the individual(s) under investigation or that the agency needs to know to ensure appropriate use of federal funds and otherwise protect the public interest. The Vice President for Research shall take interim administrative actions, as appropriate, to protect federal funds and insure that the purposes of the federal financial assistance are carried out.
   (iv) If the Vice President for Research plans to terminate an inquiry or investigation for any reason prior to completing all relevant requirements, a report of such planned termination, which includes the reasons for such termination.

(c) The investigation shall be completed and a report forwarded to the Provost and Vice President for Research within 90 days after initiation of the investigation; however, no later than 120 days after initiation of the investigation. This 120 day period includes conducting the investigation, preparing the report of findings, making the report available for comment by subject of the investigation and making the report available to the ORI or other federal funding agency, as appropriate. If the Office of the Inspector General or the University’s Compliance Office determines that the investigation cannot be completed within 120 days, it must notify the Provost and the Vice President for Research. The Vice President for research must submit a written request to ORI or the appropriate federal
funding agency, for an extension and an explanation for the delay that include an interim report on the progress to date and an estimated date of completion of the report.

(d) Upon completion of the investigation, the investigation shall submit a written report of its findings and recommendations to the Provost and Vice President for Research. A copy of the final report will be provided to the accused, and the accused will be provided an opportunity to respond. If a federally-sponsored project is involved, the final report submitted to the agency official shall include a description of the procedures under which the investigation was conducted, the parties interviewed, how and from whom information was secured, a summary of the records compiled during the investigation, the finding, the basis for the finding and a copy of accused written comments.

(7) **Actions Following Investigation** –

(a) **Findings of No Misconduct** - If the investigator(s) does not find evidence of that the accused engaged in misconduct, the Vice President for Research must inform the accused and all appropriate parties of the investigator’s findings, including the sponsoring agencies. The University will make diligent efforts to restore the reputation of the accused when allegations are not confirmed.

(b) **Determination of Discipline in Finding of Misconduct** - If the investigator finds evidence that the accused has engaged in misconduct, the Provost, Vice President for Research or appropriate administrator responsible for appointment or discipline shall, within 10 business days of the investigator’s report, make a preliminary determination as to the action to be taken by the University. The accused shall promptly be informed of such action to be taken and the reasons for such actions. The Vice President for Research shall provide a copy of the investigation report and inform federally sponsor of official actions and sanctions taken by the University. Thereafter, formal action will be taken in accordance with applicable University rules, collective bargaining agreements and student disciplinary codes. The accused shall have appeal rights as set forth in the applicable University rule, collective bargaining agreement, or disciplinary code.

(8) **Rights and Protection of Individuals Reporting Misconduct** -

(a) Florida A&M University will endeavor to protect the rights and reputation of faculty, staff and students who make good faith reports of alleged misconduct in research as well as the rights of those accused of misconduct in research from job-related disciplinary reprisals, retaliatory conduct, recrimination during the inquiry and investigatory process and while employed with the University. Any job-related disciplinary reprisals, retaliatory conduct, recrimination against an individual making reporting alleged misconduct in research is subject to disciplinary action in accordance with University rules and policies and applicable collective bargaining agreement.

(b) **Confidentiality** - To the greatest extent permitted by State of Florida and federal law, confidentiality shall be maintained during the inquiry and investigative process. All individuals involved in the investigation shall be informed of the requirements of confidentiality. Except as required in the preceding provisions, only those directly involved in an inquiry or investigation should be aware of the process or have access to
information obtained throughout the process. Any improper distribution, in any manner, of information relating to alleged misconduct shall be subject to disciplinary action in accordance with University rules and policies and applicable collective bargaining agreement.

(c) Precautions shall be taken to avoid real or apparent conflicts of interests of individuals involved in a research misconduct inquiry or investigation.

(9) **Actions Related to False Reporting** - Any false allegations or allegations made in bad faith shall be subject to disciplinary action in accordance with University rules and policies and applicable collective bargaining agreement.

(10) **Records** - Records pertaining to the allegation, inquiry and investigation of the misconduct in research shall be maintained for a period of at least three years by the Office of the Inspector General or any successor office after the termination of the inquiry or investigation and shall, upon request, be provided to the federal sponsoring agency. If a federally-sponsored project is involved, the records shall be maintained in accordance with applicable federal regulations.

*Specific Authority 1001.74(4) FS. Law Implemented 1001.74( ), 1004.22, 1004.23, 1012.92., FS. History–New.*
I. Authority

Pursuant to Section 1004.22, F.S., the president’s designee shall formally accept sponsored grants and contracts on behalf of the Board of Trustees of the Florida A&M University (Board of Trustees).

II. Compliance with Existing Policies

To be accepted, grants and contracts must adhere to applicable University rule and relevant federal laws and regulations and the terms and conditions of the specific sponsored grant or contract policies and internal operating memorandum procedures.

III. Reporting

The president or the president’s designee shall report to the Board of Trustees annually on the status of the University’s research, including sponsored grant and contract activity. Significant individual grants individual grants having a substantial impact on the academic plan or budget of the University shall be reported to the Board of Trustees on an ad hoc, but timely basis.
Subject: Subrecipient Procurement, Management and Monitoring


Applicability: Administration of Sponsored Projects

I. Policy Statement and Purpose

Awards issued to the Florida A & M University (University) may provide and/or allow for the sub-contracting of research to other organizations, universities or designated entities.

The purpose of this policy is to provide guidance to University staff responsible for the procurement, management and monitoring of subrecipient services charged to sponsored projects. It is the policy of the University to comply with federal, state and university regulations governing the procurement, management and monitoring of subrecipient services charged to sponsored projects.

Florida A & M University recognizes that subcontract management is an important aspect of sponsored project administration and will ensure that a formal subrecipient agreement is prepared. All subrecipient agreements that are contracted under sponsored projects will comply with federal, state, and university regulations governing the procurement, management and monitoring of subrecipient services charged to sponsored projects. The University will also ensure that all subrecipients are in compliance with provisions of the award.

II. Definitions

A. **Awards** are funds that have been obligated by a sponsor for a particular project.

B. **Subcontracts** are independent agreements for the acquisition of programmatic, technical, or scientific services from a third party under an award made to the University.

C. **Subrecipient** means a non-Federal entity or third party that expends Federal awards received from the University to carry out a designated portion of a Federally sponsored program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.
(1) **Applicability.** This Code of Conduct applies to the following members of the University community: a) faculty, staff and students who are paid for working for the University; b) consultants, vendors and contractors and other individuals using University resources or facilities, or receiving funds administered by the University; and c) individuals who perform services for the University as volunteers and who assert an association with the University. Any reference to the University community as provided in this policy shall refer to all of the above persons.

(2) **Preamble.** As members of the Florida Agricultural and Mechanical University (University) community, all faculty, staff, students, members of the Board of Trustees, University officers and affiliates are responsible for sustaining the highest ethical standards of professional conduct and integrity for this institution, and for the broader community in which we function. We share responsibility for this institution and of its enterprises. The values we hold as essential to responsible professional behavior include: integrity, honesty, respect and fairness in dealing with other people, and loyalty toward the ethical principles espoused by the Florida Code of Ethics for Public Officers and Employees in Chapter 112, Part III, Florida Statutes. Therefore, adherence by officers, faculty, staff, student employees and others acting on behalf of the University to standards set forth in this Code of Conduct is an integral part of the University’s goal of attracting quality students, faculty and staff, ensuring the use of hazardous materials. Members also have an obligation to report any noncompliance of regulations that are observed. We are cognizant of and shall comply with the applicable standards, policies, rules, regulations and state and federal laws that govern and guide our work. This Code of Conduct describes standards to guide us in our daily University activities and provides guidelines for those acting on behalf of the University.

(3) **Compliance With Laws and University Rules and Policies.** All members of the University community will strive to ensure that all activity conducted by, at or on behalf of the Institution is in full compliance with applicable federal, state and local laws, and the official rules and policies of the University. Administrators, supervisors and managers are responsible for teaching and monitoring compliance.

The acceptance of an agreement, including sponsored project funding, may create a legal obligation on the part of the University to comply with the terms and conditions of the agreement and applicable laws and regulations. Therefore, only individuals who have authority delegated by an appropriate University official are authorized to enter into agreements on behalf of the University.

(4) **Conflict of Interest and Commitment.** Faculty and staff of the University owe their primary professional allegiance to the University and its mission to engage in education, scholarship and research. The University has obligations to parents and students, government, external organizations, and donors to use its resources responsibly and, where required, for designated purposes. Thus, all officers, faculty, principal
investigators, staff, student employees and others acting on behalf of the University hold positions of trust, and the University expects them to carry out their responsibilities with the highest level of integrity and ethical behavior. In order to protect the University’s mission, members of the University community with private or other professional or financial interests which conflict with applicable State of Florida’s, state or federal laws and University rules and policies must disclose them in compliance with the University’s conflict of interest/conflict of commitment policies and the Florida Code of Ethics for Public Officers and Employees.

(5) Confidentiality and Privacy. The University community shall use confidential information acquired in the course of University affiliation only for official or legal purposes, and not for personal or illegal advantage, during or after such affiliation. It is imperative that each community member complies with all federal laws, state laws, agreements with third parties, and University policies and procedures pertaining to the use, protection and disclosure of such information, and such policies apply even after the community member’s relationship with the University ends.

(6) Protection of Assets. The University community will strive to preserve, protect and enhance the University’s assets by making prudent and effective use of University resources and property and by accurately reporting its financial condition. All funds provided for research must be spent in ways consistent with funding requirements and in compliance with guidelines on allowable costs.

(7) Reporting Suspected Violations.
   a. Reporting to management. The University community should report suspected violations of applicable laws, regulations, government contract and grant requirements of this Code. This reporting should normally be made initially through normal management channels, beginning with one’s immediate supervisor. If it is not appropriate to report to the immediate supervisor, e.g., the suspected violation is by the manager, individuals may go to a higher level of management with the college or department.
   b. Other Reporting. Violations may be reported internally to the Office of the Inspector General, or its successor office, or the Office of the General Counsel. In addition, any suspected violations of state and federal laws may also be reported to the Florida whistleblower’s Hotline.
   c. Confidentiality. Such reports may be made confidentially, and even anonymously.
   d. Cooperation. All employees are expected to cooperate fully in the investigation of any misconduct.

Specific Authority 120.54, 1001.74, FS. Law Implemented 120.54, 1001.74 FS. History–
# FAMU Research Roles and Responsibilities

**Executive Summary:** The Roles and Responsibilities document outlines the responsibilities of individuals and organizational units that conduct or support research at Florida A & M University.

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<th>PI = Principal Investigator</th>
<th>CH = Department Chair or Director</th>
<th>DN = Dean</th>
<th>PV = Provost and Vice President of Academic Affairs</th>
<th>VPA = Vice President for Administrative and Financial Affairs</th>
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## Proposal- PI Eligibility

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<td>If not regular faculty, submits request for PI eligibility</td>
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<td>Reviews and endorses requests for PI eligibility to Vice President for Research</td>
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<td>Obtains copy of current RFP or other proposal submission requirements and monitors sponsor for updates, corrections, or addenda</td>
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<td>Discloses any potential conflicts of interest</td>
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<td>Prepares and revises the proposal including technical portion, budget and other related matters</td>
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<td>Provides administrative support for proposal preparation for PIs</td>
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## Proposal- Technical

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<td>Sends to appropriate oversight committee for approval of the proper use of human subjects, live animals as subjects, recombinant DNA, infectious agents, narcotics or biological toxins, human blood or body fluids, radioactive materials and/or ionizing or nonionizing radiation-producing equipment and/or hazardous materials</td>
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<td>Proposal- Submission</td>
<td>Provides proposal submission information</td>
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<td>X</td>
<td>Completes required compliance documents and attaches same to proposal</td>
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<td>X</td>
<td>Submits final proposal to sponsor and sends copy to PI</td>
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<td>Project Management- Technical</td>
<td>Requests any changes in project scope</td>
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<td></td>
<td>X</td>
<td>Submits request for change in scope to sponsor if necessary</td>
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<td></td>
<td>X</td>
<td>Completes sponsored project in accordance with University and sponsor/award regulations and appropriateness</td>
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<td></td>
<td>X</td>
<td>Requests approval from sponsor for use of consultants and subrecipients if necessary</td>
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<td>X</td>
<td>Conducts sponsored project in accordance with University and sponsor/award regulations and appropriateness</td>
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<td></td>
<td>X</td>
<td>Requests, receives and reviews proper technical reports to ensure quality and timeliness performance of consultants and sub-recipients</td>
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<td>Conducts project properly as it relates to the use of human subjects, live animals as subjects, recombinant DNA, infectious agents, narcotics or biological toxins, human blood or body fluids, radioactive materials and/or ionizing or nonionizing radiation-producing equipment, and/or hazardous materials</td>
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<td>Monitors proper conduct of the project as it relates to the use of human subjects, live animals as subjects, recombinant DNA, infectious agents, narcotics or biological toxins, human blood or body fluids, radioactive materials and/or ionizing or nonionizing radiation-producing equipment, and/or hazardous materials</td>
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<td></td>
<td>X</td>
<td>Prepare and submit project technical reports to sponsor and Vice President for Research</td>
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<td>X</td>
<td>Requests and receives technical reports from PI</td>
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<td></td>
<td>X</td>
<td>Disclose inventions, discovering improvements</td>
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<td>X</td>
<td>Provides assistance to capitalize on inventions and improvements. These services include securing patents, finding licensing partners, marketing innovations, and incubating new technologies into viable companies</td>
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<td>X</td>
<td>Safeguards research technical data</td>
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<td>Maintains project files including technical reports</td>
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<td>Project Management- Training</td>
<td>Approves all training activities, formulates training policies, assesses needs of University research personnel</td>
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<td></td>
<td>X</td>
<td>Develops programmatic and financial training templates</td>
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<td>X</td>
<td>Provides subject matter experts for programmatic and financial training templates</td>
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<td>X</td>
<td>Conducts programmatic and financial training modules</td>
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<td>X</td>
<td>Identifies faculty and staff needing training</td>
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<td>X</td>
<td>Attends, participates and applies provided knowledge from programmatic and financial training modules</td>
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**Project Management- Programmatic**

- Receives terms and conditions of an award/grant from sponsor and distributes as necessary
- Reviews, negotiates, and executes sponsored program agreements as the authorized signatory for sponsored program agreements. In addition, all proposed contracts and grants are forwarded to the General Counsel Office to be examined and approved or appropriateness and legal compliance prior to their execution.
- Receives from VP for Research and reviews and understands the terms and conditions of an award/grant
- Manages and monitors work of personnel as supervisor as appropriate
- Requests extension if necessary to complete the project
- Approves request of extension and forwards to sponsor
- Proposes change in PI and/or recommends new PI if appropriate
- Reviews and submits request for change in PI to agency
- Reports new PI to all relevant offices
- Changes relevant records to reflect new PI
- Provides administrative support for PIs

**Project Management- Financial- Administrative**

- Creates and maintains financial management and oversight systems
- Approves processes cost transfers
- Initiates budget revisions
- Approves and revises budget revisions
- Disclose any financial conflicts of interest.
- Maintains records of financial transactions for grant and contract funded projects
- Prepares/revises project financial reports
- Distributes project financial reports to PIs in a timely manner
- Reviews financial reports. In certain cases the PI may also review and endorse financial report
- Submits request to sponsoring agency for reimbursement or payment
- Initiates internal audits of projects
- Cooperates with all internal and external audits of project

**Project Management- Financial- Cost Sharing**

- Establishes proper procedures for accounting and documenting cost sharing
- Ensures cost sharing is properly reflected in the award
- Provides proposed cost sharing, including commitment for in-kind cost share where appropriate
- Uses and documents use of cost sharing
- Monitors cost sharing expenditures in relation to cost sharing commitments
- Appropriately documents cost sharing in required agency fiscal reports
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**Project Management- Financial- Payroll Charges**

- Determines need for personnel
- Initiates and approves hiring of personnel
- Reviews and approves hiring of personnel for university appropriateness
- Reviews and approves proposed payroll costs according to the sponsoring agency’s guidelines
- Reviews and processes all employment documents
- Monitors effort of personnel
- Prepares necessary effort reporting certification statements and gives them to PI
- Ensures personnel effort is satisfactory and completes necessary effort reporting certification statements
- Requires personnel to complete time sheets if necessary and signs timesheets

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**Project Management- Financial- Travel**

- Determines need for travel to meet the requirements of the sponsored project
- Initiates travel requests for project appropriateness
- Endorses travel requests of personnel as supervisor where appropriate
- Approves international travel
- Approves travel requests for sponsor/proposal budget and university appropriateness
- Initiates travel reimbursements project appropriateness
- Endorses travel reimbursements of personnel as supervisor where appropriate
- Reviews and processes travel reimbursements subject to appropriate regulations
- Pays travel vendors

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**Project Management- Financial- Purchasing**

- Determines that there is a need for goods, services and equipment to meet the requirements of the sponsored project
- Initiates purchase of goods and/or service
- Provides PI with prompt feedback on purchase of goods and services
- Approves purchase requests for project budget appropriateness
- Encumbers funds and creates purchase orders
- Pays vendors
- Confirms receipt of goods and/or services
- Reports location of equipment as necessary
- Tags and tracks equipment as necessary
- Requests disposal of equipment
- Approves disposal of equipment
- Disposes of equipment

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**Project Management- Financial- Consultant Services**

- Determines the need for consultant services to meet the requirements of the sponsored project and proposes such services
- Establishes deliverables to be included in the consultant agreement. The deliverables must include an explanation of the services and the dates the deliverables are due
- Advises PIs on the appropriate procedure and requirements for consultant services
- Completes consultant agreement using the University form prior to the beginning date
- Reviews and approves request for the consultant agreement to determine that all required approvals have been received and the University and sponsoring agency guidelines have been followed; funds are available in the grant award to cover the entire cost of the agreement, the services are within the effective date of the sponsoring agreement and forwards proposed agreements to the General Counsel Office to ensure University compliance

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**Project Management- Financial- Subprocurement**

- Reviews and approves of consultant agreements being charged to a contract and grant account
- Determines that the consultant agreement conforms with the University’s procedures and specifically to the procedures outlined in the Purchasing Department, Contractual Services Manual
- Encumbers the funds for consulting services
- Reviews and approves invoices to ensure compliance with the submission of reports as well as to determine if milestones are being met and delivered on a timely basis
- Processes consultant invoices for payment and costs transfers in accordance with University policies and procedures

**Project Management- Closeout**

- Prepares technical portion of the final closeout report
- Prepares programmatic portion of the final closeout report
- Reviews final closeout report
- Sends appropriate closeout notice to relevant entities
- Reviews closeout notice from VP or Research
- Manages project documents to comply with document retention policies of the agency and University
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Review and Approval of Revisions of Budget and Program Plan to Sponsored Projects


Date Related References 2 CFR Part 215, Office of Management and Business (OMB) Circular A-133 and OMB Circular A-21, FAMU Office of Sponsored Programs Manuals (Pre and Post Award Units)

Purpose

The purpose of this procedure is to provide guidance to University staff responsible for the review and approval of revisions of budget and program plan to sponsored projects.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1 The budget plan is the financial expression of the sponsored project as approved during the award process. It may include either the Federal and non-Federal share, or only the Federal share, depending upon the Federal awarding agency requirements. It shall be related to performance for program evaluation purposes whenever appropriate. FAMU is required to report deviations from budget and program plans, and request prior approvals for budget and program plan revisions, in accordance with contract terms and conditions of the agreement and federal provisions in 2 CFR 215.25.

1.2 All revisions of budget and program plans for sponsored projects have to be reviewed and approved by the Office of Sponsored Programs (OSP).

2.0 DEFINITIONS

2.1 Budget revisions are modifications to the budget, as approved during the award process.

2.2 Program Plan Revisions are modifications to the scope of work, key personnel and contracting of part of the work as approved during the award process.

2.3 Federal Demonstration Partnership (FDP) is a cooperative initiative among 10 federal agencies and 98 institutional recipients of federal funds. The purpose of FDP is to reduce the administrative burdens associated with research grants and contracts.
2.4 **Expanded Authority** is a term commonly used to describe the governing rule in 15 CFR Part 14 Subpart C 14.25 that provides the waiver of prior approvals for cost related and administrative requirements as listed below:

- **2.4.1** Incur pre-award cost 90 days prior to award.
- **2.4.2** Initiate a one-time no-cost extension of the expiration date of the award of up to 12 months, subject to conditions indicated in 15 CFR Part 14 Subpart C 14.25 (e).
- **2.4.3** Carry forward of unobligated funds.

2.5 **Amendment** is a term commonly used for revisions to budget and program plans. Below is a list of revisions to budget and program plan that require either approval from the sponsoring agency or notification to the sponsoring agency.

- **2.5.1** Change in the scope of the project – Requires sponsoring agency approval.
  - **2.5.1.1** No cost extension – Requires sponsoring agency approval, unless waived by the federal awarding agency up to 12 months, in which case requires notification to the sponsoring agency at least 30 days prior to the expiration date of the project.
- **2.5.2** Change in key personnel – Requires sponsoring agency approval.
- **2.5.3** The need for additional funds form the sponsoring agency - Requires sponsoring agency approval.
- **2.5.4** Transfer of funds from indirect costs to absorb increases in direct costs and vice versa – Requires sponsoring agency approval.
- **2.5.5** Transfer of funds among direct cost categories – Agreement between the University and the sponsoring agency must be reviewed to determine whether there is a need for prior approval from the sponsoring agency.
- **2.5.6** Inclusion of costs that require prior approval in accordance with OMB Circular A-21 – Requires sponsoring agency approval, unless waived by the sponsoring agency.
- **2.5.7** Transfer of funds allotted for training allowances (direct payment to trainees) to other categories of expenses – Requires sponsoring agency approval.
- **2.5.8** Transfer or contracting out part of the work – Requires sponsoring agency approval, if not described in the proposal and not included in the awarded budget.

3.0 **Responsibilities**

3.1 **Principal Investigator (PI)** is responsible for requesting approval to the sponsoring agency, through the OSP, for revisions to budget and program plans. A justification must be provided along with any other required documents.

- **3.1.1** Projects awarded under FDP and Expanded Authorities require notification to the agency for the no-cost extensions and carry forward funds. The notification must be sent to the sponsoring agency through the OSP and must include a justification. Notifications to the sponsoring agencies must be received in the OSP 30 days prior to the expiration date of the project.
  - **3.1.1.1** PI is responsible to provide to the OSP no-cost extension and carry forward requests from subrecipients under Expanded Authority. Request from the subrecipients must be received in the OSP 45 days prior to the expiration date of the subagreement.
3.2 **Office of Sponsored Programs (OSP)** is responsible for reviewing and approving revisions of budget and program plans and ensuring compliance with university, state, and federal regulations. OSP is responsible for the preparation and notification of the revisions to the Office of Contracts and Grants (C&G) and the PI.

3.2.1 **Office of Contracts and Grants (C&G)** is responsible for inputting the budget and program plan revisions into PeopleSoft.

3.3 **Training Team** is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the review and approval of budget and program revisions to sponsored projects, including but not limited to PIs, OSP staff, C&G staff and grants administrators.

### 4.0 Procedures

#### 4.1 General Procedures

4.1.1 PI submits a request for budget or program plan revision to the OSP.
4.1.2 The OSP reviews the request to determine whether the revision requires prior approval from the sponsoring agency and whether the revision is in accordance with contract terms and conditions and federal regulations, specifically 15 CFR Part 14 Subpart C 14.25.

4.1.2.1 If the revision requires prior approval, the request is endorsed by the Vice President for Research and sent to the sponsoring agency.

4.1.2.1.1 At the receipt of the approved budget or program plan revision, the OSP prepares an internal amendment.

4.1.2.2 If the revision does not require prior approval, the OSP staff reviews and approves/disapproves the amendment.

4.1.2.2.1 If approved, the OSP prepares an internal amendment.

4.1.2.2.2 If disapproved, the OSP returns the request to the PI with an explanation on why the amendment was not approved.

4.1.3 The amendment is distributed to:

4.1.3.1 Contracts and Grants

4.1.3.2 PI

4.1.3.3 Dean

4.1.4 C&G inputs the amendment in PeopleSoft and ensures accuracy of journal entries.

### 5.0 Records

The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Close Out of Contracts and Grants

Date

Authority: Sections 1001.74 and 1001.75, Florida Statutes, FAMU

Policy entitled “Sponsors Grants and Contracts Policy”

Date

Related References 2 CFR Part 215, Office of Management and Business (OMB) Circular A-133 and OMB Circular A-21, FAMU Office of Sponsored Programs Manuals (Pre and Post Award Units)

Purpose The purpose of this procedure is to provide guidance to University staff responsible for the close out of activities of sponsored projects.

Signature of
Approving Authority

1.0 GENERAL INFORMATION

1.1 The close out of a grant/contract involves fairly routine administrative actions completed by both the awardee and the awarding agency. Contract Terms & Conditions on each grant/contract specifies the requirements to close out the account at the end of the funding period.

1.2 Documentation of all Sponsored Research Accounts is compiled in files prepared for each account. Files are kept in the File Room, in the order by FAMU account number and PeopleSoft project number. Closeout requirements are listed in the Contract Terms & Conditions of each project.

1.3 The award is not typically “closed-out” until the project period is concluded and FAMU has submitted all required reports.

1.4 Most federal sponsors require final financial, invention, property, and technical reports. Other sponsors require at least a financial and technical report. Generally, these reports are due within 30-90 days from the expiration date shown on the award document. Failure to submit the reports in a complete and timely manner can delay payment for final project expenses and result in unfavorable consideration of pending proposals. Some sponsors will withhold future awards to individual delinquent faculty as well as to any investigator.

1.5 Once the work on the project is completed and all final reports are completed and submitted as required by the terms of the agreement, the project is considered closed, and the record retention period begins (generally three years).
2.0 **DEFINITIONS**

2.1 **Close out** is the act of completing all internal procedures and sponsor requirements to terminate or complete a research project.

3.0 **RESPONSIBILITIES**

3.1 **Principal Investigator (PI)** is responsible for determining the validity of encumbrances. In addition the PI is responsible for completion of the final technical report.

3.2 **Office of Sponsored Programs (OSP)** is responsible to ensure that all required closing documents are completed by the appropriate areas and sent to the sponsoring agency on a timely manner and according to the sponsoring agency’s guidelines. The OSP is responsible for assisting in the proper management and retention of documents.

3.3 **Office of Contracts and Grants (C&G)** is responsible for the preparation of required fiscal reports in a timely manner and according to the sponsoring agency’s guidelines. C&G is responsible for coordinating and facilitating the PIs closing activities as they relate to the financial aspect of the contract/grant. This process includes coordinating with the appropriate areas regarding deleting invalid encumbrances.

3.4 **Purchasing** is responsible for assisting in the proper management and retention of documents and insuring that all purchase orders are processed timely.

3.5 **The Controller’s Office (CO)** is responsible for ensuring proper management and retention of documents.

3.6 **Training Team** is responsible for the development and coordination of training on regulatory requirements for all individuals with close out responsibilities on contracts and grants, including but not limited to PIs, OSP staff, C&G staff and grants administrators.

4.0 **PROCEDURES**

4.1 **OFFICE OF SPONSORED PROGRAMS**

- Consult the program regulations governing the grant/contract to ensure that all reporting requirements will be met.
- Verify the information on the disposition of equipment. If the Agency did not include language about the disposition of equipment in the Contract Terms & Conditions, contact the Agency to request written disposition regulations.
- Coordinate the submission of the final fiscal & financial reports, final technical report, final property report, and the final patent report.

4.2 **FINAL FISCAL & FINANCIAL REPORTS – CONTRACTS AND GRANTS**

A Summary Report of Expenditures (fiscal report or financial status report) is prepared by the Office of Contracts and Grants. In most cases, financial status reports must be submitted to the sponsoring agency no later than 90 days after the close of each budget period. Failure to meet financial report deadlines may result in the loss of funds that would otherwise be available for future budget periods.

- C&G consults with sponsored programs to determine whether an extension has been formally requested or granted.
C&G runs an outstanding encumbrance report to determine whether all encumbrances have been paid or cancelled. For all outstanding encumbrances, the PI is contacted and informed of the encumbrance status.

C&G faxes or emails the PI a copy of the encumbrance report and requests that the PI mark an “R” to indicate goods received and paid, “C” for encumbrances that should be cancelled, and “P” for goods received, but not paid.

For goods received, but not paid, C&G will contact the respective Accounts Payable employee to ensure all necessary documentation is received to properly pay the outstanding liability.

NOTE: To minimize delays in effectively closing out grants, the PI is contacted twice to identify all encumbrances which have been received, or cancelled. As the grace period for closing grants approaches, if the PI has been contacted twice but encumbrances remain, the PI will receive a memorandum from the Vice President for Research informing them that no additional charges can be made from the specific grant and that all outstanding encumbrances will be cancelled. Depending on the grantor agency, some grants have 30, 45, 60, or 90 days to: 1) pay all outstanding obligations previously encumbered, 2) reconcile the revenues and expenditures, and 3) request additional funds to ensure the University receives all funds for which expenditures were incurred during the grant period.

The Accounting Coordinator will run a life-to-date management report to reconcile revenues and expenditures for each account. If expenditures exceed revenues, an immediate electronic draw funds will be initiated or the required “Request for Reimbursement or Advance” or “Invoice” will be prepared to request the funds to ensure the cash balance is zero.

The Accounting Coordinator will prepare a final report of expenditures in accordance with the project requirements. The method of funding is important in determining the method for closing out a grant or agreement. All required data is contained in the management report for the specified projects. There are seven types of funding categories:

* reimbursable
* letter-of-credit
* scheduled payment
* fixed price
* percentage of completion/task order
* lump sum payment
* fixed schedule

To prepare a final report of expenditures, the Accounting Coordinator: 1) prepares a supporting worksheet to identify expenditures, per category 2) calculate workers’ and unemployment compensations by adding all salaries (711XXX object codes) and OPS (712XXX object codes) together and then multiplying them by .003. These charges are overhead charges for personnel related activities. 3) Calculates Indirect cost (F&A) at the rate approved in the agreement.

Copies of vouchers or other supporting documentation are attached, as required by the grantor agency (i.e., Florida Departments of Transportation, Health and Children & Families).
• A copy of the final report is sent to the PI for review before being submitted to the grantor agency. The PI is asked to review the report and contact the respective Accounting Coordinator with any questions on amounts being reported before final submission to the grantor agency.
• The required copies are submitted to the grantor agency, PI, the Office of Sponsored Programs, and a copy placed in the grant file.
• For all grant types, except fixed priced, if funds remain after grant expiration, a refund must be made to the grantor agency.
• Final reports may be an SF 269 (Financial Status Report), SF 272 (Financial Cash Transactions Report), FA 499 (Report of Budget and Expenditures for Florida DOE grants, only), or other format as required by the grantor agency.
• The report, supporting worksheets, management reports, and outstanding encumbrance reports are reviewed and approved by the Director of Financial Services to ensure timeliness and accuracy.

4.3 PEOPLESOFT CLOSE-OUT PROCESS:
• Immediately after the award expiration, the Accounting Coordinator is required to place the project in stage “1.” This stage prevents any new requisitions, travel requests and purchase orders from being created on the project.
• Thirty days after the award has expired, the Accounting Coordinator is required to activate stage “2.” This stage adds an additional restriction to prevent any new payroll charges from being recorded.
• Forty-five days after the award has expired, the Accounting Coordinator will place the project in stage “3.” In addition to previous restrictions, this stage does not allow any accounts payable processing against the specific project.
• Sixty days after the award has expired, the Accounting Coordinator will place the project in stage “4.” In addition to previous restrictions, this stage does not allow any General Ledger adjustments.
• After all cash has been collected and recorded, the Accounting Coordinator will inactivate and place the project in “closed” status.

4.4. FINAL TECHNICAL REPORT - PRINCIPAL INVESTIGATOR
• Some sponsoring agencies require use of their own forms for final technical reports. These forms are often included in the sponsor’s application package, with the award document, or are available directly from the sponsoring agency. Follow the sponsor’s instructions for the preparation of technical reports, which should include a list of publications, published or in press, resulting from the sponsored project.
• Some sponsoring agencies require submission of technical reports electronically. The OSP can assist with any questions.
• A copy of the final report should be forwarded to the OSP. It is recommended that the OSP mail the final technical reports as some sponsoring agencies require additional institutional forms to be included with the report. This also ensures that the official file contains a copy of this report. When submitted electronically by the PI to NSF, the OSP receives an automatic email informing us that a technical report has been submitted.
4.5 **FINAL PROPERTY REPORT - PROPERTY MANAGER**
- The OSP coordinates the completion of the property report. A property/inventory report on property acquired under the contract/grant is requested to the FAMU property manager. The information in the report is used to prepare the final property report, which is signed by the VP for Research.

4.6 **PATENT REPORT – OFFICE OF TECHNOLOGY TRANSFER**
- The OSP will work with the PI on the completion of the final invention form. The OSP is responsible for endorsing and mailing the appropriate invention form to the Sponsor.
- Review and compile the documents for correctness of data.
- Mail the documents to the sponsoring agency. Ensure that the documents are mailed to the appropriate address. A copy of all documents should be kept in the project file.

5.0 **RECORDS**
- The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.
- Federal regulations including 2 CFR Part 215; Internal Revenue Service requirements; Federal Acquisition Regulations (FAR) require grantees and contractors to prepare, maintain, and keep adequate records of sponsored project activities. For government grants and contracts, academic units must maintain original copies of budget documentation expenditure statements signed by the Principal Investigator, and all source documents and invoices which are used to charge direct costs on a grant or contract, for a period of three years following the date of submission of the final expenditure report for the grant or contract, except when there is an audit or litigation in process.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Review and Approval of Consulting Services

Authority: Sections 1001.74, 1001.75 and 1004.22, Florida Statutes, Date
FAMU Policy entitled “Consultant Services”

Related References 2 CFR Part 215, Office of Management and Business (OMB) Circular A-133 and OMB Circular A-21, FAMU Office of Sponsored Programs Manuals (Pre and Post Award Units)

Purpose The purpose of this procedure is to provide guidance to University staff responsible for the procurement, management and payment of consultant services charged to sponsored projects.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1 Review and approval of sponsored project expenditure requests is a crucial process in the administration of sponsored programs. Costs must be in accordance with the approved budget and must meet the allowability test. Four general tests for allowability of costs are:
   - Cost must be reasonable;
   - Cost must be allocable to sponsored agreements under the principles and methods provided in the circular;
   - Costs must be given consistent treatment through the application of generally accepted accounting principles appropriate to the circumstance; and
   - Cost must conform to any limitations or exclusions set forth in the Circular or in the sponsored agreement as to types or amounts of cost items.

1.2 All expenditure requests from sponsored projects have to be reviewed and approved by the Office of Sponsored Programs (OSP), prior to their referral to the processing area.

1.3 The OSP staff is also responsible for facilitating the execution of the agreement.

1.4 Average turnaround period of 5 business days for review, approval/denial and referral of the document to appropriate area.

DEFINITION

Consultant is an independent contractor and not an employee of the University. Consultant services are rendered by persons who are members of a particular profession or possess a special skill. Such services may be advisory and are customarily temporary or intermittent.
2.0 RESPONSIBILITIES

2.1 Principal Investigator

The Principle Investigator (PI) is responsible for:

2.1.1 Determining that there is a need for consultant services to meet the requirements of the sponsored project and that there is no University staff available with the required expertise. Normally this is known at the time the proposal is developed. In this case, the proposal should include the following information:

2.1.1.1 Letter of Intent on official letterhead signed by a designated official authorized to commit the organization’s resources.

2.1.1.2 Rate of pay for services to be provided. Cost analysis must be provided to determine reasonableness of cost.

2.1.1.3 Statement of work must be provided, including any required travel for the completion of the services.

2.1.1.4 If the need for a consultant becomes known after the submission of the proposal the PI must request approval from the sponsoring agency for the use of a consultant. The request must be accompanied by a budget and budget justification and it must be submitted to the sponsoring agency through the OSP.

2.1.2 If there is any potential for a conflict of interest with any proposed consultant, the PI must inform the OSP of the details prior to preparing and executing any agreement.

2.1.3 Establishing a period of performance, scope of work and deliverables to be included in the consultant agreement. The deliverables must include an explanation of the services and the dates the deliverables are due and how the consultant is to invoice the University (e.g. monthly, quarterly, by set schedule). The consultant shall be paid for work performed.

2.1.4 Completing a consultant agreement, using the University form, prior to commencing performance. This form should be prepared in time to allow for all required approval, prior to the rendering of services. The PI cannot execute the consultant agreement on behalf of the University.

2.1.5 Reviewing and approving invoices to ensure compliance with the submission of reports as well as to determine if milestones have been met/delivered on a timely basis. If consultant has not performed as required by the agreement, the PI shall not approve the invoice for payment. Confer with the Office of Sponsored Programs and Office of General Counsel to demand compliance or terminate the Agreement as necessary.

2.2 Office of Sponsored Programs (OSP)

The OSP is responsible for:

2.2.1 Reviewing and approving the consulting services to be included in the proposal.

2.2.1.1 Reviewing and approving documents provided by the PI.

2.2.1.2 Ensuring that all appropriate information regarding the use of consultants is included in the proposal, including the consultant’s resume, according to the sponsoring agency’s proposal guidelines.

2.2.1.3 Ensuring that rates of the consultant included in the proposal are in compliance with the funding agency requirements.

2.2.1.4 Verifying consultant has not been debarred or suspended.

2.2.2 Advising PIs on the appropriate procedure and requirements for consultant services.
2.2.3 Determining if agency/University approval is required and if so, reviewing and approving the request from the PI.

2.2.4 Review/approval of the consultant agreements being charged to a contract and grant account.

2.2.5 Reviewing and approving the e-requisitions request for the consultant agreement to determine that all required approvals have been received and the University and sponsoring agency guidelines have been followed; funds are available in the grant award to cover the entire cost of the agreement and the services are within the effective date of the sponsoring agreement.

2.2.6 Ensuring proper management and retention of documents.

2.3 **Controller Office**

2.3.1 The Accounts Payable section is responsible for processing the consultant invoices for payment and costs transfers in accordance with University policies and procedures.

2.3.2 The Controller’s Office must ensure proper management and retention of documents.

2.4 **Purchasing**

The Purchasing Office (PO) is responsible for:

2.4.1 Determining that the consultant agreement conforms with the University’s procedures and specifically to the procedures outlined in the Purchasing Department, Contractual Services Manual.

2.4.2 When appropriate, preparing a solicitation, bid/solicitation exemption form or sole source justification, in consultation with the PI and OSP, if consulting agreement exceeds the University’s bid threshold amount, in accordance with Florida Statutes and University Rules.

2.4.3 Procuring consulting services.

2.4.4 Encumbering the funds for consulting services.

2.4.5 Ensuring proper management and retention of documents.

2.5 **Training Team**

2.5.1 The training team is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the procurement, management and payment of consultant services charged to sponsored projects, including but not limited to PIs, OSP staff, C&G staff and grants administrators.

2.6 **General Counsel Office**

2.6.1 The General Counsel Office is responsible for the review and approval of consulting services agreements to ensure their compliance with University regulations, Florida Statutes and any other applicable law.

2.7 **Vice President for Research**

2.7.1 The Vice President for Research is the authorized signatory of the University, designated by the President, for the approval of subrecipient agreements funded by sponsored projects.
3.0 PROCEDURES
3.1 GENERAL PROCEDURES
3.1.1 Pre-Award
3.1.1.1 Review and approve proposed consulting services:
   3.1.1.1.1 Review rate of pay.
   3.1.1.1.2 Review scope of work.
   3.1.1.1.3 Ensure that all appropriate information regarding the use of consultants is included in the proposal, according to the sponsoring agency’s proposal guidelines.
   3.1.1.1.4 Review consultant rates included in the proposal to be in compliance with the funding agency requirements.
   3.1.1.1.5 Ascertain that consultant is not on the list of debarred or suspended vendors.

3.1.2 Post-Award
3.1.2.1 Review approved budget and agreement to determine allowability of cost.
3.1.2.2 Review available balances through PeopleSoft (PS) to determine availability of funds.
3.1.2.3 All expenditure requests must be signed/approved by the Principal Investigator (PI).
3.1.2.4 If the document cannot be processed, the staff must call the PI and let him/her know that the expenditure request will be returned. Explanation for the decision to return must be provided to the PI.
3.1.2.5 The consultant should normally not be an employee of the State during the time period covered by the Agreement.
3.1.2.6 Faculty cannot be paid as consultants.
3.1.2.7 All parties prior to the initiation of any work must approve the consultant agreement (see attachments 1 and 2). Any contracts initiated after services have begun are subject to non-approval by the OSP. It is recommended that the agreement be submitted to the OSP at least ten (10) working days prior to its effective date.
3.1.2.8 If the services are initiated prior to the execution of the agreement an After-the-Fact justification form must be completed by the PI and submitted to the OSP along with the agreement.
3.1.2.9 The PI must enter an e-requisition for the consulting services in PS.
3.1.2.10 A “short form” (consulting services agreement – attachment 1) must be completed for services under $5,000. A “long form” (consulting services agreement – attachment 2) must be completed for services in an amount equal or higher than $5,000.
3.1.2.11 When the cost of services exceed $25,000, the contract will be subject to competitive solicitation requirements by the Purchasing Department or a Sponsored Research Purchase Exemption is required (see attached Sponsored Research Purchase Exemption form – attachment 3).
3.1.2.12 If the document cannot be processed, the Staff must call the PI and let him/her know that the document will be returned.

3.2 PAYMENT OF INVOICES
3.2.1 Invoices must be submitted to the PI by consultant, in order to receive payment.

3.2.2 Invoices must be reviewed and approved by the OSP and the PI.

3.2.2.1 Invoice must be in accordance with the deliverables and due dates included in the agreement.

3.2.2.2 Deliverables must be met prior to the approval of the invoice.

3.2.3 If OSP receives an invoice from the consultant, the invoice is clocked by the receptionist and referred to the staff in charge of the account.

3.2.4 The staff reviews the invoice to verify allowability and availability of funds.

3.2.5 The staff completes the Consulting Invoice Review and Payment Authorization Form (CIRPA) – (attachment 1) and refers it to the PI for review and approval.

3.2.6 PI sends back the approved and signed invoice and (CIRPA) to OSP staff.

3.2.7 Staff approves invoice and refers it to Accounts Payable for payment.

3.2.8 The Office of Contracts & Grants (C&G) is responsible for invoicing to the sponsoring agency and preparation of fiscal and financial reports.

4.0 DISTRIBUTION OF DOCUMENTS

4.1 To return documents, the staff will either place them in the pick-up tray in the front desk or refer them to the Grants Specialist to mail them back to the PI. Documents that are picked-up must be logged-out in the Tracking System by the staff in charge of the account. A letter signed by the OSP Director accompanies documents that are returned through campus mail. The staff uses the return letter template available in the DSR-Post Award Database.

4.2 Approved/disapproved consulting service requests are referred to the Grant Specialist for referral to the Purchasing Office or Department/PI.

5.0 RECORDS

5.1 A copy of the agreement is kept in the project file.

5.2 Copies of the signed CIRPAs are kept in the project file.

5.3 The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Cost Sharing Procedures

Authority: Internal Revenue Service, Department of Financial Services, OMB Circular A-21 and 2 CFR Part 215

Date

Related References OMB Circular A-21 and 2 CFR Part 215

Purpose To establish procedures for documenting and maintaining documentation to evidence the satisfaction of all cost sharing requirements.

Signature of Approving Authority

I. DEFINITIONS

A. **Cost sharing** is the portion of the grant or contract not borne by the sponsor. The terms “cost sharing” and “matching” are often used interchangeably.

B. **Cash Contributions** involve the payment for services/goods from the University’s own funds or from non-federal sources provided to the University.

C. **F&A (Facilities and Administrative)** is the indirect costs of the University. F&A costs include: use of University space and equipment; library services; general, departmental and sponsored administration; utilities, janitorial, etc.

D. **In-Kind Contributions** are non-cash third-party contributions such as volunteer services, donated equipment, donated space, etc.

E. **OSP** – Office of Sponsored Programs

F. **OCGA** – Office of Contracts and Grants Accounting

G. **CS** - Contract Specialist

H. **GS** – Grants Specialist

I. **PI** – Principal Investigator

J. **CFR** – Code of Federal Regulations

K. **OMB** – Office of Management and Budget

L. **AOR** – Assignment of Responsibility

M. **PAAD** – Post Award Associate Director

N. **OPS** – Other Personal Service

O. **PACF** - Personnel Action Change Form

P. **E&G** – Educational and General (General Revenue Funds)

II. RESPONSIBILITIES AND DUTIES

The **Office of Sponsored Programs** is responsible for ensuring that cost sharing:

- is appropriate and is properly reflected in the proposal and award,
• complies with OMB Circular A-21 and 2 Code of Federal Regulations (CFR) 215, agency and program/award-specific regulations and University policy, and
• has been approved by the Dean, Department Chair, Provost, President and Vice President for Research.

The Office of Contracts and Grants Accounting is responsible for:
• establishment of proper procedures for accounting and documenting cost sharing,
• calculating and documenting the cost sharing and
• appropriately reflecting cost sharing in required agency fiscal reports.

III. PRE-AWARD
Cost sharing commitments should be made only when required by the sponsor and then to cost share only to the extent necessary to meet the specific requirements of the sponsor. Cost sharing may be in the form of cash or in-kind contributions and must be established at the time of proposal submission.

When proposals are submitted with match requirements, the Office of Sponsored Programs (OSP) reviews the proposal transmittal form to ensure that the dean has approved the cash and/or in-kind match. The PI must provide the department number which indicates the source that the match is to be charged.

A. Agency guidelines are reviewed by OSP to determine the match requirements.
B. The proposal is reviewed to ensure that the match is consistent with the agency’s guidelines, and is appropriate. Once the match requirement is satisfied, a copy of the proposal transmittal form, abstract, budget and budget justification is sent to the provost for review and approval of the matching and release time/percent of effort.
C. Once the Provost has approved the cost sharing, the proposal is submitted to the Vice President for Research for signature.
D. Once the signed proposal is returned from the Vice President for Research, the OSP forwards the proposal to the President for final approval.
E. Once the signed proposal is returned from the President, OSP make copies and submit the original and copies to the sponsor.

IV. POST-AWARD
A. Agreements are received and clocked in by the OSP receptionist and referred to the Contract Specialist (CS) in the post-award section.
B. The CS identifies the pre-award file of the project in the pre-award database and retrieves the file from the file room.
C. If there is no Pre-Award file, the CS requests the PI to submit the following information:
   1) Transmittal Form
   2) Budget
   3) Budget Justification
   4) Scope of Work
   5) Proposal Guidelines, if applicable
D. Documents are referred to the pre-award for:
   1) Review
   2) Request to the PI of any missing documents and/or clarification of information.
3) After the pre-award documents are reviewed and approved, the file is returned to the CS for further processing.
E. CS logs the file in the tracking system and returns the file to pre-award for input in PeopleSoft.
F. CS compares the Approved Agreement with the proposal:
   1) The Contract Review Log is completed.
   2) Language of the agreement is reviewed.
   3) Cost-share (matching) is reviewed for completeness and documentation.
G. Input of Agreement in PeopleSoft
   1) CS retrieves the proposal information from PeopleSoft Version 1 (V1), copies the information to Final 1 (F1) and, if necessary, makes appropriate changes in accordance with approved budget and contract terms and conditions.
   2) Participant costs are segregated from other costs related to the sponsored project. A project and budget is set-up for all other costs and a separate project and budget is set-up for participant costs.
   3) Cost share information is entered in the “Budget Summary” tab.
   4) In-kind - department numbers are identified and entered in PeopleSoft. Percentage effort is indicated in corresponding field.
   5) Cash - department numbers are identified and entered in PeopleSoft.
   6) Third party - information is manually kept in the award file.
   7) CS refers the new award to the Post-Award Associate Director (PAAD) for review.
   8) PAAD reviews information in F1 to ensure that budget and other information have been correctly input in the system and submits the Final Version (F1) to Contracts and Grants.
   9) The Budget Summary Screen, Personnel Detail Screen, and the approved award documents are submitted to Contracts and Grants for award generation, contract activation and budget posting.
   10) PAAD completes the Cost Review Checklist that includes information about potential charges and required documentation to support those charges.
   11) PAAD logs new award in Excel table to keep record of all awards received.
   12) PAAD drafts the letter from the Director to the PI, which will include a request for the AOR to be submitted to the Office of Academic Affairs and specify that information must be received within five (5) business days, prints the header, project and budget summary screens, assigns the account number and returns the documents to CS.
   13) If project has cost-share requirements, the following screens are also printed:
       a) Budget Line Summary,
       b) Personnel Detail,
       c) Summary Cost Sharing, and
       d) Overall Cost Sharing
CS prepares the letter from the VP of Research to the PI and refers documents to the Grants Specialist (GS).

V. CONTRACTS AND GRANTS ACCOUNTING
A. Awards with cost sharing budgets are received in Contracts and Grants from the post-award section within the OSP. The award is logged in, generated and assigned to a Coordinator for input into PeopleSoft.
   1. To input an award into PeopleSoft the following steps are followed:
a) On the PeopleSoft, menu, select Grants— Awards— Project Budget.
b) Enter the project number and select search.
c) Click the Lookup button next to the budget type and select the type “CBU”.
d) Select the Resource Detail Tab and verify that the information is correct. (This information is usually entered by the OSP).
e) Select the General Ledger Tab and enter the Department Number, Fund Code, Account Number and the Program Code. The fund code for Education & General cost sharing will be “205”. All other cost sharing will be identified by fund code “207”.
f) Select the Grants Detail Tab and check the Cost Sharing Box for each category.
g) Check the Posting Options Box and Click Save.
h) A folder is then prepared for the award and filed.
i) The award information is given to the Director of Contract and Grants to set the organization code up in the legacy system for payroll.
j) The award information, including the legacy payroll organization code, for the E&G cost share is forwarded to Academic Affairs and the Budget Office for transfer of the budget from fund 101 to 205.

2. Financial Reporting – during the preparation of required fiscal reports, the C&G will obtain supporting documentation to evidence that cost sharing commitments have been satisfied in compliance with the award’s terms and conditions. This documentation will be filed and maintained in the contract/grant award file within C&G.

VI. ACADEMIC AFFAIRS
A. Generated award Budget Summary and Personnel Detail screens, which identify all cost sharing required are received from Contracts and Grants for revision of contracts in Academic Affairs to identify the in-kind match.
B. Contracts are revised based on the information provided to separate the percentage of in-kind in fund 101 to fund 205 (both are E&G funds only).
C. Once the revised contract is prepared, an amendment is also prepared to move the budget from fund 101 to fund 205. The contract and the amendment should be submitted to the Budget Office at the same time to ensure that the proper amount is moved which includes salaries and employer paid benefits. The amendment should include all costs that must be transferred (i.e., salaries, expenses and equipment).
D. Academic Affairs will maintain a source database to track all effort commitments to ensure current AOR’s are timely submitted. If not received, Academic Affairs will send a follow-up request for the AOR to the respective Dean.
E. Contract and copy of amendment is received back from Budget Office. Amendment is filed and contract is submitted to Payroll for further processing.

VII. BUDGET OFFICE
A. Contract and amendment is received from Academic Affairs to transfer budget from fund 101 to fund 205.
B. The contract information is entered into the system to establish the in-kind position in fund 205.
C. Amendment is processed to reduce funds in 101. This information is then forwarded to Contracts and Grants to post the respective budget into Fund 205. A copy of the
processed amendment and the initialed contract is returned to Academic Affairs for further processing.

VIII. OFFICE OF PAYROLL PROCESSING
A. The procedure to pay a cost sharing by paying account number as a result of new hire is as follows:
   1. A new hire contract, OPS Appointment or Personnel Action Change Form (PACF) will be considered complete if signed by all appropriate individuals and processed as follows:
      a) The Payroll Office will input all necessary information from those documents to initiate the cost sharing.
      b) The Payroll Office will add the new hire along with Current Year Rate, Total for the Appointment, Biweekly Rate, Hourly Rate, Biweekly Hours, Beginning Date, Ending Date, Budgeted Weeks, Full-time Equivalency (FTE), Class Code, Class Title, Paying Account Number and Working Account Number.
   2. The new hire, OPS Appointment or PACF will be paid as follows:
      a) The Payroll Office receives a Payroll Certifying Official Authorization Form completed and signed by the certifying official.
      b) The Payroll Office receives the Payroll Certification signed by the certifying official and/or principal investigator.
B. The procedure to pay a cost sharing by paying account number as a result of continuing contract, appointment or PACF.
   1. A continuing contract, appointment or PACF will be considered complete if signed by all appropriate individuals and processed as follows:
      a) The Payroll Office will input all necessary information from those documents to initiate the cost sharing.
      b) The Payroll Office will input the continuing contract, appointment or PACF along with Current Year Rate, Total for the Appointment, Biweekly Rate, Hourly Rate, Biweekly Hours, Beginning Date, Ending Date, Budgeted Weeks, Full-time Equivalency (FTE), Class Code, Class Title, Paying Account Number and Working Account Number.
   2. A continuing contract, appointment or PACF will be paid as follows:
      a) The Payroll Office receives a Payroll Certifying Official Authorization Form completed and signed by the certifying official.
      b) The Payroll Office receives the Payroll Certification signed by the certifying official and/or principal investigator.
C. The procedure to transfer past charges and current/future charges due to cost sharing with a new account number.
   1. A revised contract, appointment or PACF will be considered complete if signed by the appropriate individuals and processed as follows:
      a) The Payroll Office will input all necessary information from the revised documents in order to initiate the cost sharing.
      b) The Payroll Office will input the revised documents along with any changes to Current Year Rate, Total for the Appointment, Biweekly Rate, Hourly Rate, Biweekly Hours, Beginning Date, Ending Date, Budgeted Weeks, Full-time Equivalency (FTE), Class Code, Class Title, Paying Account Number and Working Account Number.
2. A revised contract, appointment or PACF will be paid as follows:
   a) The Payroll Office receives a Payroll Certifying Official Authorization Form completed and signed by the certifying official.
   b) The Payroll Office receives the Payroll Certification signed by the certifying official and/or principal investigator.

D. All new hire, continuing or transfer payroll documents will be placed in the employee’s personnel files for fifty years from the date of employee’s last employment.

VIII. Document Retention
   A. All Payroll Certification documents will be filed and stored for 20 years after the receipt date and/or signature date.
   B. Other documents will be retained as required in the award terms and conditions, but no less than three (3) years after award expiration.
   D. Detailed document retention policies and procedures are included under separate cover.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Cost Transfers
Authority: Sections 1001.74 and 1001.75, Florida Statutes

Related References OMB Circulars A-21

Purpose The purpose of this procedure is to provide guidance to the University staff responsible for processing cost transfers on sponsored projects.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1.1 Cost transfers to sponsored program accounts may be made only within 60 days from the date of the month end Financial Status Report on which the charge first appears. Any erroneous charges identified after 60 days can only be transferred to a non-sponsored program account. In addition, once an account closes and the final financial report has been submitted to the sponsor, no expenses may be charged to the closed account but must be funded elsewhere.

1.1.2 Federal regulations require additional documentation to support cost transfers to sponsored program accounts. Costs may not be shifted to other research projects or from one budget period to the next period solely to cover cost overruns. Cost transfers based on funding considerations are prohibited (i.e., cannot transfer costs to use up remaining funds).

2.0 DEFINITION

OMB Circular A-21, C. b. Basic considerations states “Any costs allocable to a particular sponsored agreement under the standards provided in this Circular may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored agreement, or for other reasons of convenience.

3.0 RESPONSIBILITIES

3.1 Principal Investigator is responsible for assisting in immediately determining that there is a need for a cost transfer due to an erroneous charge. When necessary, he/she must provide additional documentation required to support the cost transfer. The principal
investigator should also initiate the appropriate payroll documents for any requested salary cost transfer. The principal investigator is responsible for monitoring the timeliness of expenditures as well as the cost transfers for their projects on a regular basis.

3.2 **Office of Sponsored Programs** is responsible for approving all cost transfer requests and all payroll documents associated with salary cost transfers.

3.3 **The University Controller’s Office** is responsible for processing the necessary transactions to create a cost transfer (with the exception of revised salary documentation). The Controller’s Office will also coordinate with the appropriate offices to ensure that there is appropriate documentation to support the cost transfer.

3.3.1 **Payroll Department** is responsible for processing the revised payroll documents that are submitted as a result of salaries being charged incorrectly to a sponsored project.

4.0 **PROCEDURES**

4.1 **GENERAL PROCEDURES**

4.1.1 **Reasons cost transfers may be necessary:**
   a) A data entry error occurred when entering the account number for the original charge. The documentation must explain in detail how the error occurred.
   b) The incorrect account number was reflected on the expenditure request documentation.
   c) Charging a non-sponsored program alternative account because the University has not received the official award. Costs incurred prior to the start date of the award are considered "pre-award" costs. An "advance account" must be requested to charge allowable pre-award costs, which would eliminate the necessity for cost transfers.

4.1.2 **Processing cost transfers:**
   a) The principal investigator must initiate the necessary revised payroll documents to transfer salary costs. The documentation should be retroactive to the date of the error.
   b) The payroll department processes the revised payroll documents to transfer the salary costs.
   b) On-line University Inter-Departmental Transfer Voucher or Financial Inquiry/Request Form for non-salary charges.

4.1.3 **Required cost transfer documentation:**
   a) The expense must be recorded on a FRS account before it can be removed. Specific identification (PO number, invoice number, receipt number, etc.) of the original charge must be attached to or referenced in the on-line cost transfer.
   b) The same expense object code must be maintained between the two accounts.
c) A detailed explanation must be provided, which indicates why the transfer is needed and what caused the error to occur. The explanation "to correct an error" or "to transfer to correct account" is not acceptable.

c) In case of a salary transfer, the retroactive PAF must agree with the Effort Certification Report

4.1.4 Documentation for cost transfers:
Documentation for cost transfers must be maintained and furnished when requested during an audit. A charge set aside as "questionable" by auditors, even though it may be a proper charge to a grant or contract, may be disallowed in the absence of clear documentation to substantiate its propriety. The department must fund any disallowed charges. Close attention must be directed toward occurrences when cost transfers are made
a) During the final month of a budget period,
b) After the budget period has expired, or
c) More than three months after the actual costs were incurred.

4.1.5 Timeliness of cost transfers:
a) A cost transfer reimbursing a sponsored agreement must be processed as soon as the error is discovered, regardless of the date the error occurred. In the event an unspent balance results from this transaction, the residual funds will be returned to the sponsor. Exceptions are fixed price agreements and sponsored programs with carry-forward provisions.
b) It is important that principal investigators monitor the timeliness of expenditures and cost transfers for their projects on a regular basis. Frequent errors in the recording of costs may indicate the need for improvements in record-keeping and/or internal controls.

5.0 RECORDS

The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject:  Document Management and Retention

Authority:  Chapter 1001.74, 1001.75, Florida Statutes

Date

Related References  Chapter 1B-11, Florida Administrative Code--Use of Archives and Archives Facilities
Chapter 1B-24, Florida Administrative Code--Public Records Scheduling and Dispositioning
Chapter 1B-26.003, Florida Administrative Code--Electronic Recordkeeping
Chapter 1B-26.021, Florida Administrative Code--Microfilm Standards
Chapter 119, Florida Statutes--Public Records Law
Chapter 257, Florida Statutes--Public Libraries and State Archives

Purpose  It is the policy of the Florida A&M University to comply with applicable State Statutes, Federal Regulations, Florida Administrative Code/Rules and the Department of State’s policies and procedures on records management.

Signature of Approving Authority

10A.100 DEFINITIONS

A. Active Records: Those records which still have sufficient administrative, legal, fiscal or historical value that warrant their continued storage in an easily accessible area.

B. Custodian: The elected or appointed state, county, district, or municipal officer charged with the responsibility of maintaining the office having public records, or his or her designee, pursuant to Rule 1B-24, FAC. For the purpose of this policy, the University President will be the Custodian.

C. Department of State: A state agency charged with the statutory responsibility for administering and managing a records management program for the State of Florida. The Division of Library and Information Services is the office of primary responsibility. The operation of the records management program is assigned to the Bureau of Archives and Records Management.

D. Duplicate (or Convenience) Copy: Reproductions of record copies, prepared simultaneously or separately, which are designated as not being the official copy.
E. **General Records Schedules:** Retention requirements issued by the Department of State, Division of Library and Information Services to establish the minimum time that records must be kept. The schedules are standards for the retention of public records common to specified agencies within the State of Florida.

F. **Inactive Records:** Records which have lost some of their value or have been superseded by new records, but which have not reached their specified retention. These records can be stored off-site until final disposition is warranted.

G. **Public Records:** Chapter 119, Florida Statutes, Public Records Act, defines "public records" as "all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of physical form, or characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by an agency."

H. **Record (Master) Copy:** Public records designated by the Custodian or Records Custodian as the official record.

I. **Records Center:** A facility managed by the Bureau of Archives and Records Management, Department of State, especially designed and constructed for the low-cost and efficient storage and furnishing of reference service on semi-active records pending their ultimate disposition.

J. **Records Coordinator:** An individual designated by a Division Vice President, Dean or Director to serve as coordinator for a division, college, school, department or program.

K. **Records Custodian:** An individual designated by the President that performs the function of Vice President, General Counsel, Dean and Director. Such designation is hereby expanded to include Associates, Assistants and administrators as may be warranted and will take effect upon approval of the policy on records management.

L. **Records Disposition Document:** The document that, when properly completed and signed by the designated Records Custodian and approved by the Records Management Liaison Officer, authorizes the actual disposal of records.

M. **Records Inventory:** The systematic categorization of records inside an agency; this is an inventory performed by Records Coordinators, in cooperation with the Records Management Liaison Officer, toward the identification of retention periods associated with record series within University offices.

N. **Records Management Liaison Officer:** An individual designated by the University that serves as a contact person to the Division of Library and Information Services, Department of State pursuant to Rule 1B-24, FAC., and is assigned duties and responsibilities related to records management by the Custodian.

O. **Records Management:** A program instituted to achieve control over records from the time of their creation or receipt, through their organization and maintenance, and finally to their ultimate disposition.

P. **University Employee:** An employee duly employed by the University that performs approved functions within a division, college, school or department.

**10A.200 RESPONSIBILITY AND DUTIES**

**10A.201 Records Custodian:** The Records Custodian, as defined in this policy, will be responsible for:

A. Attaining familiarity and compliance with state statutes and rules, general records schedules, university policy and the processing of applicable documents related to records management and disposals.
B. Reporting to the Records Management Liaison Officer the name of the employee who will act as Records Coordinator within his or her area of responsibility.
C. Reviewing and signing the Records Disposition Form pertinent to records whose retention schedules have expired and are ready for disposal within their jurisdiction.
D. Ensuring that assigned storage areas meet safety regulations and initiating corrective action when deficiencies are noted.

10A.202 Records Coordinator: The Records Coordinator will have the following duties and responsibilities, including but not limited to:
A. Providing assistance to faculty and staff members regarding the retention and disposal of records.
B. Coordinating retention and disposal activities with the Records Management Liaison Officer.
C. Completing and maintaining the necessary documentation to support the retention and disposal of records.
D. Attaining familiarity and compliance with state statutes and rules, general records schedules, university policy and the processing of applicable documents related to records management and disposals.
E. Conducting records inventory to determine retention and disposal actions.
F. Ensuring that active records transitioning to an inactive status are stored in one-cubic feet boxes and identified using the state approved label.

10A.203 Records Management Liaison Officer: The Records Management Liaison Officer will have the following duties and responsibilities, including but not limited to:
A. Serving as the University contact with the Department of State, Bureau of Archives and Records Management.
B. Attaining familiarity and compliance with State statutes, Federal regulations, Chancellor’s Memoranda, Florida Administrative Code/Rules, Department of State’s policies and procedures and other applicable provisions, as it may be warranted.
C. Drafting, developing and implementing a University-wide policy and procedures on records management. Update such policy and procedures as warranted.
D. Providing direction and coordination of all University activities related to records management, retention and disposals.
E. Assisting University departments in the disposal of records whether by destruction, microfilming or other appropriate means such as incineration and recycling.
F. Developing materials for presentation to faculty and staff and for conducting training sessions.
G. Surveying university records storage facilities and recommending changes and improvements to management.
H. Compiling data on the disposal of records.
I. Completing the Annual Compliance Report to be submitted to the Department of State, Division of Library and Information Services in the format provided by said department.
J. Approving the Records Disposition Documents that are prepared by requesting departments and maintaining support documentation on records retention and disposals.
K. Developing and maintaining special retention schedules when established for campus departments
L. Maintaining a list of Records Custodians and Records Coordinators
M. Posting and maintaining publications and forms in the University’s Internet site.
N. Providing guidance and support to Records Coordinators when they conduct records inventory.
P. Designing and implementing forms, checklists or other tools for use in conjunction with the records management function.

10A.204 University Safety Officer: The University Safety Officer will conduct period inspections of storage areas where records are kept. The Officer will be responsible for:
   A. Identifying areas of non-compliance with safety regulations.
   B. Reporting to the Records Management Liaison Officer and applicable Records Custodian areas where safety deficiencies are noted.

10A.205 University Employees: University employees will be responsible for:
   A. Attaining familiarity and compliance with state statutes and rules, general records schedules, university policy and the processing of applicable documents related to retentions and disposals.
   B. Conducting records inventory to determine retention and disposal actions.
   C. Coordinating retention and disposal actions with Records Coordinators.
   D. Ensuring that active records transitioning to an inactive status are stored in one-cubic feet boxes and identified using the state approved label.

10A.300 PROCEDURES
10A.301 Determining Retention Schedules: Records Custodians and Records Coordinators, in cooperation with the Records Management Liaison Officer, are required to use the approved records retention schedules published by the Bureau of Archives and Records Management to determine the retention schedule for the records maintained by their respective departments. Retention schedules establish the minimum amount of time that records must be kept prior to disposal.

The two publications frequently used in determining records retention are: General Records Schedule for Universities and Community Colleges GS5 and for State Government Agencies GS1-S. Additional retention schedules related to legal and medical records, law enforcement records and K-12 educational facilities can be found at this web site address: http://dlis.dos.state.fl.us/barm/genschedules/gensched.htm.

A. Individual Retention Schedules: If the above publications on retention periods do not contain an appropriate schedule for records in use, the Records Management Liaison Officer, in cooperation with the applicable Records Coordinator will draft a proposed retention schedule and submit it to the Bureau of Archives and Records Management for review and final approval. Upon approval by said Bureau, the individual retention schedule may be used by the University. The request is prepared using the Records Retention Schedule, Form LSSE105REF1-01. An electronic copy is available by accessing:
   http://dlis.dos.state.fl.us/barm/pubforms.html

B. http://dlis.dos.state.fl.us/barm/pubforms.html
C. Outside-Agencies Retention Schedules: Granting agencies, federal government, private organizations and other governmental entities may require longer retention periods. In such cases, Records Custodians and Records Coordinators will notify the Records Management Liaison Officer of such special needs and cooperatively establish outside-agency retention schedules to meet those needs. Such schedules do not require review and approval by the Bureau of Archives and Records Management. However, such retention schedules must be documented.

D. Record Keeping: The Records Management Liaison Officer will retain copies of individual retention schedules and outside-agency retention schedules that are implemented.
10A.302 Determining Disposal Actions: Public records are eligible for disposal when retention schedules expire and disposal activities are not suspended. For details on factors that may cause the suspension of disposals, refer to Section 10A.303, Factors Influencing Retentions and Disposals.

The sample forms provided in this section of the policy serve to establish disposal requirements and guide Records Custodians, Records Coordinators, employees and Records Management Liaison Officer in their efforts toward the disposal of records according to FAMU Policy No. 10A.000, RECORDS STORAGE AND RETRIEVAL. Blank forms and completion instructions are electronically available by accessing Section 10A.400, ATTACHMENTS of this policy.

A. Records Disposal Checklist. The checklist is used to plan and organize a records inventory activity. (ENTER LINK FOR SAMPLE FORM, Exhibit A)

B. Records Inventory Worksheet. The worksheet is used to document the general description of records being inventoried including their inclusive dates. This document serves as the basis for preparing the Records Disposition Document. (ENTER LINK FOR SAMPLE FORM, Exhibit B)

C. Records Disposition Document. The document is the official form that is used for the disposal of records. The form is prepared by Records Coordinators or departmental employees and is submitted to the Records Management Liaison Officer for review and approval. Once approved, records may be disposed of properly. (ENTER LINK FOR SAMPLE FORM, Exhibit C)

D. Record Label. The document is the official form for identifying boxes and contents. The labels are applied to the storage boxes. The information on the label serves to determine content and disposal of records with expired retention periods. (ENTER LINK FOR SAMPLE FORM, Exhibit D)

10A.303 Factors Influencing Retentions and Disposals: Record retentions may be extended and disposals may be delayed (‘on hold’) due to reviews, audits, investigations, litigation, accreditation activities or requests for information from the public or entities outside the University.

The following offices should be contacted to check if University records are “on hold”: Office of Inspector General, Office of General Counsel, Controller’s Office, Office of Equal Employment Opportunity and Auditor General. Other University officials such as Division Vice Presidents, Deans, Directors and Records Management Liaison Officer may be contacted, as warranted, to ascertain if there is any freeze on records disposals.

Extending retentions may apply to records whose retention schedules have not expired. Delays may apply to records whose retention schedules have expired and are ready for disposal. In either case, the records are put “on hold” until further notice.

When records are put “on hold”, the Records Custodian will:
A. Notify Records Coordinators and Records Management Liaison Officer when records are put “on hold”. Provide written documentation if available.
B. Ensure that records “on hold” are stored in a safe place.
C. Secure clearance from applicable University officials prior to requesting and authorizing further disposal action of records that was ‘on hold’.
D. Notify Records Coordinators and Records Management Liaison Officer when records are no longer “on hold”.

When records are put “on hold”, the Records Coordinators will:
A. Mark the record boxes with a label indicating that the disposal is “on hold”. Include name of contact person on the label for reference.
B. Secure the record boxes in a safe place.
C. Retain records “on hold” until written instructions are received from the Records Custodian and Records Management Liaison Officer authorizing further disposal action.

When records are put “on hold”, the Records Management Liaison Officer will:
A. Ascertain the source or authority for placing records “on hold”.
B. Maintain documentation of records “on hold”.
C. Secure clearance from applicable University officials prior to authorizing further disposal action of records that was ‘on hold”.

10A.304 Types and Length of Retention Periods: Retention periods may vary depending on the records series in use (Employee Records, Purchase Orders, Fiscal Reports, Legal Cases, Supporting Documentation, Investigation Documents, Board Meetings). The retention periods are contained in the General Records Schedules published by the Bureau of Archives and Records Management. The following Internet site provides access to them:
http://dlis.dos.state.fl.us/barm/genschedules/gensched.htm

One common retention period is expressed in years. The following are examples of retention periods:
A. Anniversary Year: From a specific date
   Example: Retention of 3 years. If a record has a “3 year” retention, the record needs to be retained for 3 years after the ending date of the record.
B. Calendar Year: January 1st thru December 31st
   Example: Retention of 3 calendar years. If a record has a “3 calendar year” retention, the record needs to be retained for 3 years after the end of the calendar year that the last record applies.
C. Fiscal Year: July 1 through June 30
   Example: 3 fiscal years. If a record has a “3 fiscal year” retention, the record needs to be retained for 3 years after the end of the fiscal year that the last record applies. Note: The fiscal year for records related to grant-funded projects may be dictated by the granting agency.

10A.305 Transitioning Active Files to Inactive Status: When Records Coordinators or departmental employees transfer records from an active status to an inactive status, the following boxing procedure should be followed:
A. Use one cubic feet box.
B. Apply the official State Records Label to boxes with records. Number the boxes.
C. Store documents within the same record series; do not mix record series.
D. Maintain a list showing box sequence number and general description of contents.
E. Departmental employees should coordinate the placement of record boxes in storage areas with their respective Records Coordinators.
F. Avoid using assorted types of storage boxes.
G. Consider using the State Records Center for storage and box management. The services are delivered for a fee. Consult with the Records Management Liaison Officer for additional details and benefits including the completion of labels and appropriate transmittal forms.

**Note:** Stackable cardboard drawers that come with braces and clips could be used for storing records. Braces and clips can help keep the drawers from collapsing.

**10A.306 Storage Areas and Safety:** Storage areas where records are stored must be kept clean and in good order. The following procedure will apply to storage areas:

A. Records Custodians will report periodically to the Records Management Liaison Officer the physical locations where inactive records are stored.
B. University employees are required to observe safety regulations within the storage areas.
C. Flammable materials must not be stored with records in storage areas.
D. Hallways and interior aisles in storage areas must be clear of obstructions.
E. Storage areas will be inspected by the University Safety Officer periodically.
F. University employees will maintain their assigned storage areas clean.
G. Trash and empty boxes must be placed in garbage containers.

**10A.307 Records Volume Conversion to Cubic Foot Measurements:** University employees should use the conversion table below to estimate the cubic feet of records being disposed of. If records are kept in other format (computer tapes, audio tapes), contact the Records Management Liaison Officer for further assistance on conversions.

The cubic footage is reported at the time when the Records Disposition Document is completed by a requesting department. The cubic footage serves as the basis for the preparation of the Annual Compliance Statement.

- Letter-size, drawer or box 1.5 cu. ft.
- Legal-size, drawer or box 2.0 cu. ft.
- Letter-size, 36” shelf 2.0 cu. ft.
- Legal-size, 36” shelf 2.5 cu. ft.

**10A.308 Data Collection and Reporting Requirements:** The Records Management Liaison Officer will collect data on the cubic footage of records disposed of and other data pertinent to records management. The collected data on cubic footage will serve to prepare the Annual Compliance Statement that is submitted to the Department of State, Bureau of Archives and Records Management.

**10A.309 Internet Web Site on State Records Management:** The Department of State, Division of Library and Information Services maintains an Internet site where publications and forms are found on records management: [http://dlis.dos.state.fl.us/barm/recordsmgmt.html](http://dlis.dos.state.fl.us/barm/recordsmgmt.html)

The information available at the Internet site covers the topics listed below. The Records Management Liaison Officer is available to assist Records Custodians, Records Coordinators and departmental employees if additional information or assistance is needed regarding the state publications and forms.
10A.400 Attachments: The following attachments apply to the University’s records management function.

- Exhibit A- Records Disposal Checklist. The checklist is used to plan and organize a records inventory activity. (ENTER LINK FOR BLANK FORM)
- Exhibit B- Records Inventory Worksheet. The worksheet is used to document the general description of records being inventoried including their inclusive dates. This document serves as the basis for preparing the Records Disposition Document. (ENTER LINK FOR BLANK FORM)
- Exhibit C- Records Disposition Document. The document is the official form that is used for the disposal of records. The form is prepared by Records Coordinators or departmental employees and is submitted to the Records Management Liaison Officer for review and approval. Once approved, records may be disposed of properly. (ENTER LINK FOR BLANK FORM AND INSTRUCTIONS)
- Exhibit D- Record Label and Instructions for Completion. The document is the official form for identifying boxes and their content. The information on the label serves to determine content and disposal of records with expired retention periods. (ENTER LINK FOR BLANK FORM AND INSTRUCTIONS)

(The pages that follow are the Exhibits A through D and completion instructions)
RECORDS INVENTORY CHECKLIST
EXHIBIT A

PURPOSE: This Records Disposal Checklist will assist University departments in preparing themselves for the disposal of public records according to FAMU Policy No. 10A-000, RECORDS STORAGE AND RETRIEVAL.

APPLICABILITY: This Records Disposal Checklist applies to records whose retention schedules have expired according to the state General Retention Schedules. Frequently used record schedules are found in the web site address: http://dlis.dos.state.fl.us/barm/genschedules/gensched.htm

( ) Check for requests for “public records” that might have come to the University from the media, individuals, organizations, local, state or federal agencies.

( ) Check for records “ON HOLD” due to reviews, accreditations, audits, investigations, litigation or disputes.

( ) Report records “ON HOLD” to supervisor.

( ) The sensitivity and confidentiality of each type of record may dictate the type of disposal. Consult with supervisor and Records Management Liaison Officer to determine the most appropriate method of disposal (trash, recycling, incineration, shredding).

( ) Prepare records for disposal whose retention schedules have expired. RECORDS MUST NOT BE “ON HOLD” in order to be disposed of.

( ) Store files within the same records series, do not mix series.

( ) Records in file cabinets must be transferred to boxes. Use 1 cubic feet boxes available from the State Records Center or Pride of Florida. Also, use transparent packing tape to seal the boxes. Do not use scotch tape. Boxes cost approximately $6.25 for a bundle of 25.

( ) Boxes must be labeled using the official State Records Label.

( ) ASSISTANCE: Please contact the University Records Management Liaison Officer when assistance is needed. Phone 599-3203, Fax 561-2160.
RECORDS INVENTORY CHECKLIST
EXHIBIT A (continued)

STEP 1 CONDUCT INVENTORY OF RECORDS. Identify type of records (purchase orders, vouchers, academic files, policies, employee recruitment, student files, administrative and program files, other files). Use the Records Inventory Worksheet to list description of records and inclusive dates.

Frequently used records schedules and records series are found in the following web site addresses: http://dlis.dos.state.fl.us/barm/genschedules/gensched.htm

STEP 2 COMPLETE BOX LABELS AND APPLY TO BOXES.

STEP 3 COMPLETE RECORD DISPOSITION DOCUMENT AND SUBMIT TO RECORDS MANAGEMENT LIAISON OFFICER FOR REVIEW AND APPROVAL

STEP 4 UPON RECEIPT OF APPROVAL; COORDINATE THE PICK UP OF APPROVED RECORDS FOR DISPOSAL WITH THE RECORDS MANAGEMENT LIAISON OFFICER.
- Prepare Purchase Requisition for the disposal services (shredding or recycling) to be provided by the State Records Center.
- State Records Center staff will pick up the boxes.
- State Records Center will shred or recycle the records approved for disposal
- Shredding services are also available from vendors for a fee.

STEP 5 RECEIVE PROOF (CD, PICTURES, CERTIFICATE) FROM THE STATE RECORDS CENTER THAT THE RECORDS WERE DESTROYED. MAINTAIN FOLDER WITH APPROVED RECORDS DISPOSITION DOCUMENTS AND COPIES OF LABELS
FLORIDA A&M UNIVERSITY
RECORDS INVENTORY WORKSHEET
EXHIBIT B

<table>
<thead>
<tr>
<th>BOX OR DRAWER NO.</th>
<th>GENERAL DESCRIPTION OF THE FILES</th>
<th>INCLUSIVE DATES</th>
<th>STATUS</th>
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COMPLETION INSTRUCTIONS

**Box or Drawer No.** - Enter numerical sequence (1, 2, 3, etc)

**General Description of Files** - Enter brief description that identifies your files (project files, grant files, purchase orders, employment applications, payroll certifications, administrative files, fiscal reports)

**Inclusive Dates** - Enter from mm/dd/yy through mm/dd/yy or from mm/yy through mm/yy

**Status** - Enter “Being retained” or “Disposed of”

**ASSISTANCE** - Contact the University Records Management Liaison Officer at 850-599-3203 office or 850-561-2160 fax.
FLORIDA A&M UNIVERSITY  
RECORDS INVENTORY WORKSHEET  
EXHIBIT C

RECORDS DISPOSITION DOCUMENT

1. AGENCY NAME and ADDRESS

2. AGENCY CONTACT (Name and Telephone Number)

( ) - Ext.

3. NOTICE OF INTENTION: The scheduled records listed in Item 5 are to be disposed of in the manner checked below (specify only one).
   a. Destruction  
   b. Microfilming and Destruction  
   c. Other

4. SUBMITTED BY: I hereby certify that the records to be disposed of are correctly represented below, that any audit requirements for the records have been fully justified, and that further retention is not required for any litigation pending or imminent.

   ________________________________________________________________
   Signature                      Name and Title                                                                       Date

5. LIST OF RECORD SERIES

<table>
<thead>
<tr>
<th>a. Schedule No.</th>
<th>b. Item No.</th>
<th>c. Title</th>
<th>d. Retention</th>
<th>e. Inclusive Dates</th>
<th>f. Volume In Cubic Feet</th>
<th>g. Disposition Action and Date Completed After Authorization</th>
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6. DISPOSAL AUTHORIZATION: Disposal for the above listed records is authorized. Any deletions or modifications are indicated.

7. DISPOSAL CERTIFICATE: The above listed records have been disposed of in the manner and on the date shown in column g.

   ________________________________________________________________
   Signature                      Date                      Name and Title

   _____________________________________________________________________
   Witness
1. **AGENCY** - Enter FLORIDA A&M UNIVERSITY and the name of your department.

2. **AGENCY CONTACT** - Enter the name of a contact person including phone number.

3. **NOTICE OF INTENTION** - Enter the appropriate action requested. Most disposals will involve "Destruction". If another type of action is needed, please consult with the Records Management Liaison Officer.

4. **SUBMITTED BY** - Signed and dated by the department head.

5. **LIST OF RECORD SERIES** - Complete the following information for each record series listed.
   a. **Schedule No.** - Enter the appropriate General Records Schedule number (GS1-S, GS5 or applicable schedule).
   b. **Item No.** - Enter the appropriate Item number and letter (a or b) of the record series (17a; 94b). The letter “a” means Record Copy. The letter “b” means Duplicate Copy.
   c. **Title** - Enter the title of the record series as listed in the records schedule.
   d. **Retention** - Enter the length of retention for the record series (3 yrs., 5 yrs.)
   e. **Inclusive Dates** - Enter the inclusive dates covered by the records mm/dd/yy – mm/dd/yy. Another sample is: mm/yy – m/yy.
   f. **Volume in Cubic Feet** - Enter the estimated number of cubic feet.
   g. **Disposition Action and Date** - Leave blank.

6. **DISPOSAL AUTHORIZATION** - This section will be use by the Records Management Liaison Officer to grant written approval to requests for disposals. NO DISPOSALS SHOULD TAKE PLACE WITHOUT WRITTEN APPROVAL.

7. **DISPOSAL CERTIFICATE** - Leave blank. This section will be completed by the department employee or Records Management Liaison Officer after receiving proof (CD, certificate, picture, video) that the records were destroyed.
RECORDS LABEL
EXHIBIT D

AGENCY INFORMATION

, Florida

RETENTION SCHEDULE NUMBER

ITEM NUMBER

RECORD SERIES TITLE:

DESCRIPTION OF RECORDS:

BOX No.

Assistance: Contact the University Records Management Liaison Officer, phone 850-599-3203, fax 850-561-2160.
RECORDS LABEL
COMPLETION INSTRUCTIONS
EXHIBIT D (continued)

AGENCY INFORMATION- Enter Florida A&M University and name of school, college or department.

WORK ORDER NUMBER- Leave blank.

RETENTION SCHEDULE NUMBER- Enter the schedule number (GS1-S, GS5 or other applicable schedule.

ITEM NUMBER- Enter the Item number assigned to the record series (example: 110a)

INCLUSIVE DATES- Enter the inclusive dates covered by the records mm/dd/yy – mm/dd/yy. Another sample is: mm/yy – mm/yy.

RECORDS SERIES TITLE- Enter the records series title for the files being disposed of (Grievance Files). Do not mix records series within a box.

DESCRIPTION OF RECORDS- Enter a brief description that will assist you in locating files when needed.

BOX NUMBER- Enter the box number. This number will assist you in locating boxes when they are placed in storage areas.

Assistance: If assistance is needed for completing the state label, contact the University Records Management Liaison Officer.

FHAC Room 208
850-599-3203 office
850-561-2160 fax
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Effort Reporting
Authority: OMB Circular A-21 and 2 CFR Part 215

Date

Related References

Purpose To establish procedures for documenting and reporting effort based on the federal requirements.

Signature of Approving Authority

I. Purpose

To establish procedures for documenting and reporting effort based on federal requirements.

II. Definitions

Effort: Effort is the amount of time spent on an activity and is expressed as a percentage of time.

Effort Reporting: Effort reporting is a purpose mandated by the federal government to verify that direct labor changes to federally approved projects/agreements are reasonable and reflect actual work performed.

III. General Information

A. According to OMB Circular A-21
   1. The payroll distribution system will be incorporated into the official records of the institution.
   2. Reasonably reflect the activity for which the employee is compensated by the institution.
   3. Encompass both sponsored and other activities on an integrated basis, but many include the use of subsidiary records. The method of allocating payroll costs must recognize the principle of the After-the-Fact confirmation or determination so that costs distributed represent actual costs.

B. Reporting cycles are as follows:
   1. Spring – January 1st to May 7th
   2. Summer – May 8th to August 7th
3. Fall – August 8\textsuperscript{th} to December 31\textsuperscript{st}

C. The effort reports are generated one month after the end of semester.
D. The reports are to be returned to Contracts and Grants within one week.

IV. General Procedure

A. Assignments of Responsibilities (AOR) forms are collected by the Academic Affairs office. Information is captured for Faculty, A&P, OPS, and USPS.
B. Academic Affairs inputs data into the system.
C. Payroll information will be obtained electronically by pay period with detail by employee and merged with the effort system.
D. The effort report is generated by the research system and operations office for compliance monitoring.
E. A control list of effort reports is generated by Sponsored Programs for the Office of Contracts and Grants.
F. The effort reports are delivered to the Deans’ offices for distribution to the Principal Investigators (PI) or chairperson (person who has knowledge of the time and effort spent on activities for certification).
G. The PI or employee or person with first hand knowledge of effort will verify and sign the report, certifying the employees reflected on the reports actually performed the work on the indicated accounts.
H. The certified effort reports are returned to the Office of Contracts and Grants for review, reconciliation, validation and data completion.
I. Any corrections to effort reports are reflected in the appropriate sections of the effort report. The PI will perform the following:
   1. Revise the appointment form and AOR.
   2. Repeat the procedure for payroll changes.
   3. Notify Contracts and Grants of the changes.
   4. Adjustments will be made in the payroll distribution system.
J. Certified and reviewed reports are returned to the Office of Contracts and Grants to be placed in official files.

V. Records

The Office of Contracts and Grants will maintain a perpetual age record of all reports generated, certified and outstanding. The appropriate record retention guidelines should be followed for retention and disposition of documents.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ___________

Subject: Preparation of Federal Cash Transactions Report
Authority: Grantor Terms and Conditions

Related References: OMB Circular A-21
Purpose: To establish procedures for the preparation of the Federal Cash Transactions Report

Signature of Approving Authority

DEFINITIONS

A. Standard Form (SF) 270, Request for Advance of Reimbursement
B. Standard Form (SF) 272, Federal Cash Transaction Report (FCTR)
C. Standard Form (SF) 269, Financial Status Report
D. Departmental Ledger – A report of cash allocated, encumbrances, and actual expenditures paid
E. PeopleSoft – The automated financial accounting system used by the University.

GENERAL

The National Science Foundation (NSF) required Florida Agricultural and Mechanical University to submit the SF 270 and SF 272. Form 269 is not required by NSF.

A SF s70 report is prepared and submitted to NSF following the end of each calendar quarter for all awards that have not been “financially closed” by NSF. Additionally, after all SF 270 reports are prepared for the quarter, the SF 272 FCTR is prepared and submitted to NSF.

All fiscal reports are prepared using the following procedures:

Example: Report is being prepared for the quarter ending 3/31/2005

The preparation steps are as follows:

1. Print a copy of the departmental ledger for the account as of the ending date of the current quarter.
2. Complete the standard Excel worksheet format (Attachment A).
EXPENDITURES FOR CURRENT QUARTER

- The Excel worksheet provides the amount of expenditures to reflect for the "current quarter". Current quarter expenditures are determined by entering into one column, the life-to-date expenditures from the departmental ledger (DL) as of 6/30/04, legacy payroll history report expenditures, and a query for all other expenditures, excluding payroll, from PeopleSoft for expenditures incurred subsequent to 6/30/04. In the second column, the prior period expenditures from the previous quarter's report are recorded. In the third column, all adjustments are recorded. This column would include the workers and unemployment compensation calculated as the sum of life-to-date salaries and OPS (temporary workers) expenditures times .3% each. Indirect (Facilities and Administrative F&A) amounts are also calculated through a formula in this column. These amounts are reduced by the prior period reported expenditures to obtain the current period amount to be reported. In the fourth column, there is a formula which subtracts from the life-to-date expenditures for the current reporting period, the prior reported expenditures, plus the current adjustments to obtain the current reporting period expenditures.

ADJUSTMENTS

- Also, included in the adjustment column are any unallowable, inappropriate, incorrect, unreported, etc. amounts. Normally, the only adjustments on a report for a project that has not expired are for unemployment, workers compensation and indirect costs (F&A) or any late payment interest penalties.

Revenues received as of the reporting date are included at the bottom of the worksheet to determine the amount currently due (Attachment A).

As FAMU is currently on a cost reimbursement basis, the SF 270 requests payment for the current quarter expenditures only.

A sample SF 270 and SF 272 report is attached (Attachments B and C).
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Indirect Grantor Letters

Authority: Sections 1001.74 and 1001.75, Florida Statutes, FAMU

Policy entitled “Sponsors Grants and Contracts Policy”

Date

Related References 2 CFR Part 215, Office of Management and Business (OMB) Circular A-133 and OMB Circular A-21, FAMU Office of Sponsored Programs Manuals (Pre and Post Award Units)

Purpose The purpose of this procedure is to provide guidance to University staff responsible for submitting Indirect Grantor letters.

Signature of Approving Authority

1.0 GENERAL INFORMATION

OMB Circular A-133, Section .320(e) states in part “...auditees that are also subrecipients…shall provide written notification to the pass-through entity that: an audit of the subrecipient was conducted in accordance with this part (including the period covered by the audit and the name, amount, and CFDA number of the Federal award(s) provided by the pass-through entity)…”

2.0 RESPONSIBILITIES

2.1 Office of Sponsored Programs (OSP) is responsible for submitting letters to nonprofit and out of state grantors to provide notification of the completion of the A-133 audit.

2.2 Office of Contracts and Grants (C&G) provides the audited SEFA report to the Office of Sponsored Programs to be used to obtain the necessary information to be included in the letters.

3.0 PROCEDURES

CONTRACTS AND GRANTS

3.1 Provide audited SEFA report to the Office of Sponsored Programs.
3.2 Obtain the audited SEFA report from the Office of Contracts and Grants.
3.3 Use the SEFA report to send letters to the nonprofit and out of state grantors notifying these agencies of completion of the University’s A-133 Audit. The attached letter is an example of the letter requirements.

4.0 RECORDS

The appropriate record retention guidelines should be followed for the retention of the Indirect Grantor letters and disposition of the supporting documentation.

Federal regulations including 2 CFR Part 215; Internal Revenue Service requirements; Federal Acquisition Regulations (FAR) require grantees and contractors to prepare, maintain, and keep adequate records of sponsored project activities. For government grants and contracts, academic units must maintain original copies of budget documentation expenditure statements signed by the Principal Investigator, and all source documents and invoices which are used to charge direct costs on a grant or contract, for a period of three years following the date of submission of the final expenditure report for the grant or contract, except when there is an audit or litigation in process.
Dear : 

In accordance with Office of Management and Budget (OMB) Circular A-133, Section .320(e)(2), this letter serves as notification that an audit of the State of Florida reporting entity was conducted in accordance with that OMB Circular for the fiscal year ended June 30, 2004. The audit included the following Federal awards provided by your entity (or may refer to an attachment):

<table>
<thead>
<tr>
<th>Name of Federal Award</th>
<th>Catalog of Federal Domestic Assistance Number</th>
<th>Amount of Award Expended</th>
</tr>
</thead>
<tbody>
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</table>

The audit report’s Schedule of Findings and Questioned Costs did not disclose any findings regarding the Federal funds provided by your entity to the (Institution). In addition, the Summary Schedule of Prior Audit Findings accompanying the audit report did not include any prior audit findings relating to Federal awards that your entity provided to the (Institution).

The audit of the State of Florida reporting entity for the fiscal year ended June 30, 2006, can be viewed at the Auditor General’s Web site (http://www.state.fl.us/audgen/). A printed copy of the audit-reporting package can be requested through that Web site.

Sincerely,
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Review and Approval of Non-Payroll Expenditure Requests

Authority: Sections 1001.74 and 1001.75, Florida Statutes, FAMU

Policy entitled “Expenditure Review of Non-Payroll Charges”

Date

Related References 2 CFR Part 215, Office of Management and Business (OMB) Circular A-133 and OMB Circular A-21, FAMU Office of Sponsored Programs Manuals (Pre and Post Award Units)

Purpose The purpose of this procedure is to provide guidance to University staff responsible for expenditure review of non-payroll costs charged to sponsored projects.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1 Review and approval of sponsored project expenditure requests is a crucial process in the administration of sponsored programs. Costs must be in accordance of the approved budget and must meet the allowability test. Four general tests for allowability of costs are:

- Cost must be reasonable;
- Cost must be allocable to sponsored agreements under the principles and methods provided in the circular;
- Costs must be given consistent treatment through the application of generally accepted accounting principles appropriate to the circumstance; and
- Cost must conform to any limitations or exclusions set forth in the Circular or in the sponsored agreement as to types or amounts of cost items.

1.2 If an expense does not meet the above criteria, it is not eligible for inclusion in the indirect cost rate, regardless of the purpose. These costs must be identified and considered unallowable by the Principal Investigator and the Office of Sponsored Programs. The Contracts and Grants Office also reviews the award and fiscal reports when preparing financial reports to verify that all charges are allowable in accordance to the specified agreement.

1.3 All expenditure requests from sponsored projects have to be reviewed and approved by the Office of Sponsored Programs (OSP), prior to their referral to the processing area.

1.4 The average turnaround period is three business days for review, approval/denial and referral of the document to appropriate area.
2.0 DEFINITIONS

2.1 Non-Payroll charges are goods, equipment, and travel charged to a sponsored research project.

3.0 RESPONSIBILITIES

3.1 Principal Investigator is responsible for determining that there is a need for goods, services and equipment to meet the requirements of the sponsored project. He/she is also responsible for submitting the request to encumber the funds and for identifying any unallowable costs and ensuring that these requests are not forwarded to the Office of Sponsored Programs for review.

3.2 Office of Sponsored Programs (OSP) is responsible for the review and approval of proposed goods, services, equipment and travel costs according to the sponsoring agency’s guidelines, the sponsoring agency’s approved budget, contract terms and conditions, as well as applicable state and other federal regulations and laws.

3.3 The Purchasing Office is responsible for procuring the goods, services and equipment and determining conformity to University’s procedures. The Purchasing Office is also responsible for ensuring proper management and retention of documents.

3.4 The Controller’s Office (CO) is responsible for procuring travel requests, processing cost transfers and processing all vendor payments in accordance with University policies and procedures.

3.5 The Office of Contracts & Grants is responsible for invoicing the sponsoring agency and preparing/submitting all fiscal and financial reports to the funding agency.

3.6 Training Team is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the review and approval of non-payroll expenditures charged to sponsored projects, including but not limited to PIs, OSP staff, C&G staff and grants administrators.

4.0 PROCEDURES

4.1 GENERAL PROCEDURES

4.1.1 Review approved budget and agreement to determine allowability of cost.

4.1.2 Review the “Consistent Treatment of Direct and Indirect Costs of Sponsored Agreements” documents to determine whether the purchase of goods or equipment is allowable.

4.1.3 Review of available balances through PeopleSoft (PS).

4.1.4 All expenditure requests must be signed/approved by the Principal Investigator (PI). TAR’s must also be signed/approved by the traveler’s supervisor.

4.1.5 To purchase equipment the PI must provide quotes, as indicated in Section 3.2.

4.1.6 If the document cannot be processed, the staff must call the PI and let him/her know that the expenditure request will be returned. Explanation for the decision to return must be provided to the PI.
4.2 **EQUIPMENT**

4.2.1 Purchases of equipment from $1,000 to $4,999 require two quotes; from $5,000 to $24,999 require 3 quotes; over $25,000 competitive solicitation or Sponsored Research Exemption.

4.2.2 Equipment should be purchased 60 days prior to the ending date of the agreement, without prior approval of sponsoring agency.

4.3 **GOODS**

4.3.1 All requisitions accompanied by an invoice require an After-the-Fact justification.

4.4 **TRAVEL AUTHORIZATION REQUESTS (TARs)**

4.4.1 TARs must also be signed by the supervisor.

4.4.2 TAR’s paid from Grants/Contracts from Florida State Agencies for out-of-state, require prior approval from the Agency. The PI is required to complete a form prior to the trip.

4.4.3 Requests for advance travel funds must be received by the University Travel Office at least 14 working days prior to the departure date.

4.4.4 All foreign travel must have prior approval from the funding agency, FAMU Office of International Services and FAMU President.

4.5 **REIMBURSEMENT VOUCHERS (OTHER THAN TRAVEL)**

4.5.1 A justification letter is required for the approval of Reimbursement Vouchers.

4.5.2 Original receipts are required.

4.5.3 Maximum amount of $100.

5.0 **DISTRIBUTION OF DOCUMENTS**

5.1 To return documents, the staff will either place them in the pick-up tray in the front desk or refer them to the Grants Specialist to mail them back to the PI. Pick-up documents must be entered by the staff as returned in the Tracking System. Documents returned through campus mail must be accompanied by a return letter, signed by the OSP Director, using the template in the DSR-Tracking System/FAMRATS.

5.2 Approved/disapproved expenditure requests are referred to the Grant Specialist for distribution to the different areas.

6.0 **RECORDS**

6.1 The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Administration, Review and Approval of Participant Support Costs

Authority: Sections 1001.74 and 1001.75, Florida Statutes, FAMU Date
Policy entitled “Administration, Review and Approval of Participant Support Costs”


Purpose The purpose of this procedure is to provide guidance to University staff responsible for the administration, review and approval of participant support costs charged to sponsored projects.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1 Expenditures for grants are governed by the Federal cost principles and must conform with sponsoring agency policies, grant special provisions and the University internal policies. FAMU must ensure that costs claimed under grants are allowable, allocable, and reasonable. In the event FAMU anticipates charging an item of direct cost that might subsequently be disputed, an authorized FAMU official should discuss the matter with the sponsoring agency Grants Officer and document the conditions or factors surrounding the item in order to avoid possible subsequent disallowance.

1.2 Review and approval of sponsored program’s expenditure requests is a crucial process in the administration of sponsored programs. Costs must be in accordance of the approved budget and must meet the allowability test. Four general tests for allowability of costs are:

1.2.1 Cost must be reasonable;
1.2.2 Cost must be allocable to sponsored agreements under the principles and methods provided in the circular;
1.2.3 Costs must be given consistent treatment through the application of generally accepted accounting principles appropriate to the circumstance; and
1.2.4 Cost must conform to any limitations or exclusions set forth in the Circular or in the sponsored agreement as to types or amounts of cost items.

1.3 Funds provided for participant support may not be used by FAMU for other categories of expense without the specific prior written approval of the sponsoring agency program officer.
1.4 Participant support allowances may not be paid to trainees who are receiving compensation, either directly or indirectly, from other Federal government sources while participating in the project.

1.5 All expenditure requests from sponsored research programs have to be reviewed and approved by the Office of Sponsored Programs (OSP), prior to their referral to the processing area.

1.6 A non-sponsoring agency Federal employee may receive participant support allowances from grant funds provided there is no duplication of funding of items and provided no single item of participant cost is divided between his/her parent agency and the sponsoring agency grant funds.

1.7 All expenditure requests must have all required signatures and approvals according to the applicable OSP procedures.

1.8 Average turnaround period of 24 hours for review, approval/denial and referral of the document to appropriate area.

2.0 DEFINITIONS

Participant support costs are direct costs for items such as stipends or subsistence allowances, travel allowances and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with meetings, conferences, symposia or training projects.

3.0 RESPONSIBILITIES

3.1 Principal Investigator (PI) is responsible to ensure that participant support costs are only used as specified in the approved budget and in accordance with the statement of work.

3.2 Office of Sponsored Programs (OSP) is responsible for the review and approval of participant support costs according to the sponsoring agency’s guidelines, approved budget and contract terms and conditions. The OSP is responsible for reviewing and approving revisions of budget and program plans and ensuring compliance with university, state, and federal regulations governing the charging of participant support costs to sponsored projects. The OSP is responsible to ensure proper management and retention of documents.

3.3 Dean is responsible for the reviewing and approving proposed participant support costs budget.

3.4 Office of Contracts and Grants (C&G) is responsible for the invoicing to the sponsoring agency participant support costs of sponsored projects and the preparation of fiscal and financial reports. C&G is responsible to ensure proper management and retention of fiscal documents.

3.5 The Payroll Office (PO) is responsible for reviewing and processing all payroll requests. PO is responsible for the payroll payment process.

3.6 The Purchasing Office is responsible for procuring the goods, services and equipment and determining that they conform to University policies and procedures.

3.7 Training Team is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the review and approval of participant support costs charged to sponsored projects, including but not limited to PIs, OSP staff, C&G staff and grants administrators.
4.0 **GENERAL PROCEDURES**

4.1 The contract specialist in the OSP reviews and coordinates the execution of new awards. In the review process it is determined whether there are funds awarded for participant support costs.

4.2 In those instances that the new award includes budget for participant costs, the contract specialists establishes two projects in PeopleSoft. One project and its corresponding budget for all costs, except participant support costs; and another separate project and budget for participant support costs. The separation of budgets into two projects makes possible the monitoring of participant support expenditures.

4.3 The new award is electronically submitted to C&G and hard copies are mailed to the PI, C&G and the Dean.

4.4 The PI uses the unique project and account number assigned to the participant support cost budget to submit expenditure requests.

4.5 The OSP staff follows the applicable procedures for the review and approval of payroll and non-payroll expenditure requests as well as for any other related activity.

5.0 **DISTRIBUTION OF DOCUMENTS**

5.1 To return documents, the staff will either place them in the pick-up tray in the front desk or refer them to the Grants Specialist to mail them back to the PI. Documents that are picked-up must be logged-out in the Tracking System by the staff in charge of the account. A letter signed by the OSP Director accompanies documents that are returned through campus mail bust. The staff uses the return letter template available in the DSR-Post Award Database.

6.0 **RECORDS**

The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.
Subject: Payroll Charges

Authority: Sections 1001.74 and 1001.75, Florida Statutes, FAMU

Policy entitled “Payroll Charges”

Date

Related References 2 CFR Part 215, Office of Management and Business (OMB) Circular A-133 and OMB Circular A-21, FAMU Office of Sponsored Programs Manuals (Pre and Post Award Units)

Purpose The purpose of this procedure is to provide guidance to University staff responsible for the review of payroll charges to sponsored projects.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1 Review and approval of expenditure requests is a crucial process in the administration of sponsored programs. Costs must be in accordance of the approved budget and must meet the allowability test. Four general tests for allowability of costs are:
   1.2 Cost must be reasonable;
   1.3 Cost must be allocable to sponsored agreements under the principles and methods provided in the circular;
   1.4 Costs must be given consistent treatment through the application of generally accepted accounting principles appropriate to the circumstance; and
   1.5 Cost must conform to any limitations or exclusions set forth in the Circular or in the sponsored agreement as to types or amounts of cost items.
   1.6 All expenditure requests should be reviewed and approved by the Office of Sponsored Programs (OSP), prior to their referral to the processing area.
   1.7 Average turnaround period of three working days for review, approval/denial and referral of the document to appropriate area.

2.0 DEFINITIONS

2.1 Payroll charges are salaries and fringe benefits charged to a sponsored research project.
3.0 Responsibilities

3.1 **Principal Investigator (PI)** is responsible for determining that there is a need for employees to meet the requirements of the sponsored project and the submission and initial approval of payroll requests. The PI is also responsible to ensure that personnel effort is satisfactory and in accordance with the statement of work and approved sponsoring agency budget.

3.2 **Office of Sponsored Programs (OSP)** is responsible for the review and approval of proposed payroll costs according to the sponsoring agency’s guidelines; review and approval of payroll expenditure requests according to the sponsoring agency’s approved budget, contract terms and conditions. The OSP is responsible for reviewing and approving revisions of budget and program plans and ensuring compliance with university, state, and federal regulations governing the charging of payroll to sponsored projects. The OSP is responsible to ensure proper management and retention of documents.

3.3 **Academic Affairs (AA)** is responsible for the review and approval of employment for Academic Departments. AA is responsible to ensure proper management and retention of documents.

3.4 **The Payroll Office (PO)** is responsible for review and processing all employment documents. The PO is responsible for the payroll payment process. The PO is responsible for proper management and retention of documents.

3.5 **Office of Contracts and Grants (C&G)** is responsible for the invoicing to the sponsoring agency for payroll charges of sponsored projects and the preparation of fiscal and financial reports. C&G is responsible to ensure proper management and retention of documents.

3.6 **Training Team** is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the review and approval of payroll charged to sponsored projects, including but not limited to PIs, OSP staff, C&G staff and grants administrators.

4.0 General Procedures

4.1 Review of approved budget and agreement to determine allowability of cost.

4.2 Review of available balances through PeopleSoft (PS).

4.3 All employment requests must be signed/approved by the Principal Investigator (PI). In addition, the Dean of the department must also sign the employment papers as well as the Dean of Graduate Studies for graduate students with class codes 9181-9185.

4.4 If the document cannot be processed, the staff must call the PI and let him/her know that the expenditure request will be return. Explanation for the decision to return must be provided to the PI.
4.5 A justification letter is required for the approval of employment papers received at OSP on or after the beginning date of the appointment. Employment papers should be received in the OSP at least 7 days prior to the beginning date.

4.6 Faculty overload cost is not allowable, unless it is specifically provided in the agreement or approved in writing by the sponsoring agency.

4.7 Assignment of Responsibilities Form should accompany all employment papers for Faculty and Graduate Assistant appointments.

4.8 Review of approved budget to determine allowability of cost.

4.9 The PI, Dean and VP should approve and sign employment papers. The Dean of Graduate Studies should also sign employment papers of graduate students with class codes 9181-9185.

4.10 In those instances that the positions are listed in the approved budget and the salary per position is provided, the employment paper should conform to the approved budget. If the position is not listed in the approved budget, further review and approval may be necessary. Additionally, positions listed in the approved budget at a lower salary amount also merits further review and approval, unless the salary amount is modified in accordance with the approved budget. If the names of the employees are listed in the approved budget, the staff should ensure that the employment paper conforms to the approved budget.

4.11 Nine month Faculty can work in a sponsored project during summer and be paid from the sponsored project, if it is indicated in the approved budget.

4.12 Twelve month Faculty can work in a sponsored project during summer and be paid a portion of their salary, if it is indicated in the approved budget.

4.13 Faculty should not be paid as consultants.

4.14 If the document cannot be processed, the Staff must call the PI and let him/her know that the employment paper will be returned.

4.15 The staff should review the calculation of the salaries. All salary information should be correctly calculated (bi-weekly amount, hourly amount, etc.).

4.16 Employment papers for projects set-up in PeopleSoft, should have an account number comprised of nine digits. This account number is created by C&G and used for processing employment papers.

4.17 If the employment paper is correct and should be approved for further process, the staff initials in the space indicated and refer the document to the Director (or representative) for signature.
5.0 **DISTRIBUTION OF DOCUMENTS**

5.1 To return documents, the staff will either place them in the pick-up tray in the front desk or refer them to the Grants Specialist to mail them back to the PI. Documents that are picked-up must be logged-out in the Tracking System by the staff in charge of the account. A letter signed by the OSP Director accompanies documents that are returned through campus mail bust. The staff uses the return letter template available in the DSR-Tracking System-FAMURATS.

5.2 Approved/disapproved employment papers are referred to the Grant Specialist for referral to Academic Affairs, Personnel or Department/PI.

6.0 **RECORDS**

6.1 All relevant documentation generated for a Sponsored Account should be kept in the Account file. The appropriate record retention guidelines should be followed for the retention and disposition of documents.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Principal Investigator Eligibility
Authority: Sections 1004.22, Florida Statutes, FAMU Rule 6c3-1.019

Date
Related References FAMU Office of Sponsored Programs Pre-Award Manual
Purpose The purpose of this procedure is to provide guidance to University faculty and administrative staff seeing project support from either Federal or private sources.

Signature of Approving Authority

1.0 GENERAL INFORMATION
Full time or tenure earning faculty may serve as Principal Investigators/Project Directors on sponsored projects. Any exceptions must be approved by the Vice President for Research. The request must be received by the Division of Research five working days prior to any required submission date for the affected proposal. The Office of the Vice president will notify the administering Department/Center regarding the approval or denial of the request.

2.0 RESPONSIBILITIES
2.1 Principal Investigator is responsible for determining that there is a need for goods and equipment to meet the requirements of the sponsored project and the submission of request to encumber funds for non-payroll goods, equipment and travel.

2.2 Office of Sponsored Programs is responsible for the review and approval of proposed budget to ensure compliance with the sponsoring agency’s guidelines, state and university rules and regulations and laws.

3.0 PROCEDURES
3.1 General Procedures (See Pre-Award Manual)
OSP will review proposal for:
- Required signatures
- PI eligibility
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Procedure for Review and Approval of Program Income
Authority: Sections 1001.74 and 1001.75, Florida Statutes Date
Purpose The purpose of this procedure is to provide guidance to the University regarding the treatment of program income for sponsored agreements.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1 Per 2 CFR Part 215; Grant recipients are encouraged to earn income to defray program costs. Program income includes income from fees for services performed, from the use or rental of real or personal property acquired with grant funds, from the sale of commodities or items fabricated under a grant agreement, and from payments of principal and interest on loans made with grant funds. Except otherwise provided in regulations of the Federal agency, program income does not include interest on grant funds, rebates, credits, discounts, refunds, etc. and interest earned on any of them.

2.0 DEFINITIONS

2.1 Program Income means gross income received by the grantee or sub-grantee directly generated by a grant supported activity, or earned only as a result of the grant agreement during the grant period. “During the grant period” is the time between the effective date of the award and the ending date of the award reflected in the final financial report.

3.0 RESPONSIBILITIES

3.1 Principal Investigator is responsible for following the program income guidelines as specified in the awarded agreement. The principal investigator should contact the Office of Sponsored Programs immediately upon initiating a program income activity. The Principal Investigator is also responsible for correctly depositing and accounting for program income.
3.2 **Office of Sponsored Programs (OSP)** is responsible for reviewing and approving program income activities. OSP also sets up the program income account, ensuring that these funds are accounted for separately from the award monies.

3.3 **The Controller’s Office (CO)** is responsible for ensuring that program income funds are properly receipted. The Office of Contracts and Grants also generates the program income account in PeopleSoft. This office is responsible for appropriately reporting program income on the financial reports, as stated in the awarded agreement.

3.4 **Training Team** is responsible for the development and coordination of training related to program income and the reporting requirements as stated in 2CFR Part 215.

### 4.0 Procedures

#### 4.1 General Procedures

4.1.1 Principal investigator determines the need for a program income activity and immediately contacts the Office of Sponsored Programs for review and approval.

4.1.2 The Office of Sponsored Programs reviews the terms and conditions of the award and approves the program income initiative in accordance with the terms and conditions of the award and 2CFR Part 215 and sets up the program income account in PeopleSoft.

4.1.3 The Office of Contracts and Grants generates the award in PeopleSoft.

4.1.4 The Principal Investigator correctly deposits the program income through the Controller’s Office.

4.1.5 The Controller’s Office correctly receipts the program income into the program income account.

4.1.6 The Office of Contracts and Grants reports the program income on the financial status report.

4.1.7 Program income should be retained by the grant recipient. Common treatment shall be in accordance with the awarding agencies requirements. Common treatment alternatives include:

- **Additive method** - Authorized program income may be added to the funds committed to the grant agreement by the Federal agency and the grantee. The program income shall be used for the purposes and under the conditions of the grant agreement and is used to supplement the awarding agency’s funds to continue program objectives.

- **Cost Sharing or matching** - When authorized, program income may be used to meet the cost sharing or matching requirement of the grant agreement. The amount of the federal grant awards remains the same.
- Deduction- Program income shall be used to reduce the Federal agency and grantee contributions rather than to increase the funds committed to the project.

5.0 **RECORDS**

The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Review and Approval of Proposals, White Papers, Letters of Intents

Authority: Sections 1004.22, Florida Statutes, FAMU Policy entitled, Date
“Principal Investigator Eligibility”

Related References FAMU Office of Sponsored Programs (OSP) Pre-Award Manual

Purpose The purpose of this policy is to provide guidance to University faculty seeking Principal Investigator eligibility.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1 The intent of this policy is to ensure that the responsibility for establishing the direction of research at Florida A&M University rests with the faculty, who are primarily responsible for the quality of the research and reputation of the University. Research directions are charted by University Faculty with a view towards the impact on the education of undergraduate and graduate students. To maintain a careful balance between scholarship and education, the responsibilities of being Principal Investigators must be primarily reserved to the University Faculty.

1.2 Full-time tenured or tenure-earning faculty may serve as Principal Investigators/Project Directors on sponsored programs. Individuals with certain other titles may serve under special circumstances with the approval of the Vice President for Research.

1.3 Requests for such approval should be made to the Vice President for Research. The request must be made in writing and received by the Division of Research five working days prior to any required submission date for the affected proposal. The Office of the Vice President for Research will notify the administering Department/Center regarding the approval or denial of the request.

2.0 APPROVALS/RESPONSIBILITIES

2.1 Departmental Chair is responsible for initiating the Principal Investigator eligibility request to the Dean for approval.

2.2 Dean is responsible for reviewing and endorsing the Principal Investigator eligibility request.

2.3 Provost is responsible for reviewing and approving the eligibility request from the Dean.

2.4 Vice President for Research is responsible for the final approval of the request.
3.0 GENERAL PROCEDURES
OSP will review the proposal for:
• Required Signatures
• PI Eligibility
Subject: Subrecipient Procurement, Management and Monitoring

Authority: Sections 1001.74 and 1001.75, Florida Statutes, FAMU

Date

Policy entitled “Subrecipient Procurement, Management and Monitoring”

Related References 2 CFR Part 215, Office of Management and Business (OMB) Circular A-133 and OMB Circular A-21, FAMU Office of Sponsored Programs Manuals (Pre and Post Award Units)

Purpose The purpose of this procedure is to provide guidance to University staff responsible for the procurement, management and payment of subrecipient services charged to sponsored projects.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1 Awards issued to the University may provide and/or allow for the sub-contracting of research to other organizations, universities or designated entities. This category excludes vendors who supply goods and services for which a departmental requisition and/or purchase order is submitted. Sub-contracts are independent agreements for the acquisition of programmatic, technical, or scientific services with a party external to the University.

1.2 Specific prior approval of the sponsor is generally required before an activity on a sponsored project may be subcontracted to a third party. Subcontract arrangements are formalized in a written agreement between the University and the subrecipient.

A subrecipient relationship exists when a third party:

- Performs a substantive portion of the programmatic, technical or scientific work, which is defined as project activities that support the primary purpose of the prime award;
- Has responsibility for programmatic decision making;
- Uses the funds provided to carry out a program of the subrecipient as opposed to providing goods or services for a program of the University;
- Is responsible for helping the University meet the requirements of the prime award;
- Determines who is eligible to receive financial assistance under the award;
- Has its performance measured against whether the objectives of the program are met; or
- Has responsibility for adherence to applicable program compliance requirements.
2.0 Definitions

2.1 Federal award means Federal financial assistance and Federal cost-reimbursement contracts that non-Federal entities receive directly from Federal awarding agencies or indirectly from pass-through entities. It does not include procurement contracts, under grants or contracts, used to buy goods or services from vendors.

2.2 Federal awarding agency means the Federal agency that provides an award directly to the recipient.

2.3 Local government means any unit of local government within a State, including a county, borough, municipality, city, town, township, parish, local public authority, special district, school district, intrastate district, council of governments and any other instrumentality of local government.

2.4 Management decision means the evaluation by the Federal awarding agency or pass-through entity of the audit findings and corrective action plan and the issuance of a written decision as to what corrective action is necessary.

2.5 Non-Federal entity means a State, local government, or non-profit organization.

2.6 Non-profit organization means:
   (1) any corporation, trust, association, cooperative, or other organization that:
      (i) Is operated primarily for scientific, educational, service, charitable, or similar purposes in the public interest;
      (ii) Is not organized primarily for profit; and
      (iii) Uses its net proceeds to maintain, improve, or expand its operations; and
   (2) The term non-profit organization includes non-profit institutions of higher education and hospitals.

2.7 Pass-through entity means a non-Federal entity that provides a Federal award to a subrecipient to carry out a Federal program.

2.8 Recipient means a non-Federal entity that expends Federal awards received directly from a Federal awarding agency to carry out a Federal program.

2.9 Subrecipient means a non-Federal entity that expends Federal awards received from a pass-through entity to carry out a Federal program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

3.0 Responsibilities

3.1 Principle Investigator (PI) Responsibility
   3.1.1 Determining when it is necessary to subcontract with another entity to perform a portion of the effort under an award.
   3.1.2 Requesting approval of the sponsoring agency, when required, to subcontract a portion of the effort to another entity.
   3.1.3 Obtaining necessary information from the subrecipient to be included in the subcontract document and reviewing and approving the subrecipient’s proposed budget and scope of work.
      3.1.3.1 If matching is required, the PI must ensure that the required matching information is included in the proposed budget.
   3.1.4 Having the Pre-Qualifying form completed and submitting the form to Pre-Award for review and approval.
3.1.5 Initiating a purchase requisition through the University accounting system to encumber the funds.
   3.1.5.1 Account code 93000000 should be used for the 1st $25,000
   3.1.5.2 Account code 93100000 should be used for the remaining contract amount
3.1.6 Assisting with the execution of the subcontract. The Principal Investigator should not execute the contract on behalf of the University.
3.1.7 Contacting the Office of Sponsored Programs to initiate any subcontract modifications, including incremental funding.
3.1.8 Monitoring the subrecipient’s performance to ensure proper and timely completion of activities, including but not limited to the completion of technical and fiscal reports.
3.1.9 Reviewing and approving invoices from the subrecipient for reasonableness and compliance with subcontract budget. If subrecipient has not performed as required by the subcontract, the PI should not approve the invoice for payment. In such cases, the PI should confer with OSP and the subrecipient to develop a plan for compliance.
   3.1.9.1 If matching is required, the PI must verify and certify that subrecipient has provided the matching documentation to support the matching commitment.

3.2 Division of Research Responsibilities
3.2.1 Reviewing all documents from the subrecipient to be incorporated in the proposal and Pre-Award File.
   3.2.1.1 If matching is required, OSP should ensure that the required cost sharing information is included in the proposed subrecipient budget.
3.2.2 Pre-qualification of subrecipient. Review and approval of Pre-Qualifying Form.
3.2.3 Preparing and executing the subcontract between the University and the subrecipient which shall include University and State required terms and sponsor flow-down provisions, as well as applicable sponsor certifications and assurances of compliance required of subrecipients. (The OSP employees responsible for the execution of the subcontract are subject to the provisions in Section 112.313 Florida Statutes, Standards of conduct for public officers, employees of agencies, and local government attorneys. Also, these employees are subject to the University policy located in section 1.7 of the Purchasing Manual on Fraudulent and Other Dishonest Acts).
3.2.4 Determining that the required flow-through clauses are included in the subrecipient’s proposal to the University.
3.2.5 Preparing, in consultation with the PI, and processing subcontract modifications including obtaining the Vice President and GCO approvals.
3.2.6 Monitoring the subrecipient’s compliance with A-133 audit requirements.
3.2.7 Reviewing and approving revisions of budget and program plans of subrecipients and ensuring compliance with university, state, and federal regulations governing subrecipient relationships.
3.2.8 Reviewing and approving of the subcontractual obligation. The review includes determining that:
   • Agency approval has been obtained, if required,
   • Funds are available in the prime agreement to cover the total cost of the subcontract,
   • Effective dates of the subcontract are within the effective dates of the prime award.
3.2.9 Approving of subrecipient’s invoices/financial reports to include the following:
   • Invoice is proper and received in a timely manner,
• If matching is required, verify that subrecipient has provided the matching documentation to support matching commitment,
• Costs invoiced/claimed are compliant with applicable agency, award specific, state and University requirements,
• Payment is made in a timely manner,
• Final invoice/financial report are received prior to preparation of the University’s final financial report on the prime award to the sponsor.

Office of Contracts and Grants responsibilities:
3.2.10 Processing cost transfers and invoicing to the sponsoring agency and for the preparation of fiscal and financial reports.
3.2.11 Ensuring proper management and retention of documents.

3.3 Controller Office
3.3.1 Accounts Payable is responsible for processing the subrecipient invoices for payment in accordance with University policies and procedures.
3.3.2 Ensure proper management and retention of documents.

3.4 Purchasing Office
3.4.1 The Purchasing Office is responsible for assigning a control number to all subrecipient subcontracts. This enables the subcontract commitment to be encumbered in the University accounting system.
3.4.2 When applicable, preparing appropriate solicitation, bid/solicitation exemption form or sole source justification in accordance with Florida Statues and University rules.
3.4.3 Ensuring proper management and retention of documents.

3.5 Training Team
3.5.1 The training team is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the procurement, management and payment of subrecipient services charged to sponsored projects, including but not limited to PIs, OSP staff, C&G staff and grants administrators.

3.6 General Counsel Office
3.6.1 The GCO is responsible for the review and approval of consulting services agreements to ensure compliance with University regulations, Florida Statutes and any other applicable laws.

5.0 PROCEDURES

5.1 Pre-Award
5.1.1.1 by a designated official who is authorized to commit the subrecipient’s resources to the completion of the project.
5.1.1.2 Statement of Work (SOW) that clearly outline the extent of involvement of the subrecipient. The SOW should indicate what work is to be done, who (personnel) will perform the work, where the services will be performed, when the work is to begin and when it is to be completed.
5.1.1.3 Budget, itemized by major budget category, such as salaries and wages, employee benefits, supplies, equipment, travel, consultants, subcontracts, and other direct costs. Budget itemization should be provided in the format required by the sponsor. A budget must be provided for each year of the project. If a multi-year budget is required, a cumulative budget must also be provided.

5.1.1.4 Budget justification must provide a narrative explanation of each budget item. If a multi-year budget is provided, a detailed explanation of costs must also be provided for each year’s cost. If the subcontractor is a Federal grantee, compliance with Federal cost principles and audit requirements provide assurance of personnel rates, competitive pricing for materials, supplies, equipment and services. A review of reasonableness of budget in relation to proposed work should suffice. (PI needs to concur with reasonableness).

5.1.1.5 Facilities and Administrative Costs (Indirect Costs) must be provided in Letter of Commitment and should be calculated using the subrecipient’s current rate. A copy of the subrecipient’s negotiated rate agreement must be included. If the proposed subrecipient does not have a negotiated federal indirect rate, the entity must provide detailed documentation to substantiate the proposed overhead.

5.1.1.6 Fringe Benefits Rates should also be provided and included in the Letter of Commitment.

5.1.4 Complete the Subrecipient Pre-Qualifying Questionnaire for Non-University subcontracts.

5.2 Post-Award

5.2.1 Preparation and Execution of Subcontract

5.2.1.1 Obtain subrecipient’s legal entity name, mailing address, federal employer identification number (FEID); contact name, mailing address, email address and telephone number; PI name, telephone number, mailing address and email address; subcontract beginning and ending dates (cannot be greater than prime award dates and may need to be less in order for FAMU to meet agency reporting deadlines); scope of work and budget, if different from proposed; and description of deliverables.

5.2.1.2 Verify total amount of subcontract and payment terms (Normally advance payments are not made to subrecipients. This option should not be volunteered. If requested, need is valid and the sponsoring agency permits, it can be done but should be limited to FAMU’s ability to obtain funds from sponsor. Advance funds should not exceed amount permitted by sponsoring agency.

5.2.1.3 The subcontract agreement must include all provisions necessary to define a sound and complete agreement as well as the following provisions:

- Equal Employment Opportunity
- Copeland “Anti’Kickback” Act, where appropriate
- Davis-Bacon Act, as amended, where appropriate
- Contract Work Hours and Safety Standard Act, where applicable
- Rights to Inventions Made Under a Contract or Agreement
- Clean Air Act and the Federal Water Pollution Control Act, as amended, where appropriate
- Byrd Anti-Lobbying Amendment, where appropriate
- Debarment and Suspension
• Administrative, contractual or legal remedies in instances of subcontractor’s violation or breach of the contract terms and provide for remedial actions as may be appropriate
• Termination by the recipient, including the manner by which termination shall be effected and the basis for settlement
• Description of conditions under which the contract may be terminated for default as well as conditions where the contract may be terminated because of circumstances beyond the control of the contractor
• Required flow-down clauses
• Invoicing, technical and financial reporting requirements (normally, at a minimum, same as requirements of FAMU)
• CFDA title and number, award name, name of Federal agency and applicable compliance requirements
• Access to the records and financial statements
• Notification clause of developments that have a significant impact on the award-supported activities, including delays or adverse conditions which materially impair the ability to meet the objectives of the award
• Compliance with applicable federal regulations, i.e., if State, Local or Indian Tribal Governments, A-87, A-102 and A-133; if non profit organizations, A-122, 2 CFR Part 215 and A-133; if colleges and universities, A-21, 2 CFR PART 215 and A-133; and, if hospitals and care facilities, 45 CFR 74, 2 CFR PART 215 and A-133.
• Subcontract are prepared according to the type of subrecipient, type of payment, method of payment and other special considerations (i.e. FDP awards budgets are prepared in accordance with FDP contract terms and conditions).

5.2.1.4 Determine the type of subcontract that will be issued—fixed price or cost reimbursable (generally research effort is procured on a cost reimbursement basis due to the inability to define the “product” and/or the cost thereof).
5.2.1.5 Modify subcontract terms and conditions according with type of subrecipient (different sub-recipients i.e. foreign entities, commercial organizations, small businesses).
5.2.1.6 Obtain legal counsel review and approval of the subcontract.
5.2.1.7 Send subcontract to subrecipient for signature and return to OSP.
5.2.1.8 Obtain signature of FAMU VP for Research.
5.2.1.9 Send fully executed subcontract to PO for the assignment of a control number and return to OSP.
5.2.1.10 Send copy of fully executed subcontract to subrecipient and FAMU PI.
5.2.1.11 Assist and advise FAMU PI with initiating a purchase requisition through the University Accounting system for the encumbrance obligation of funds.

5.2.2 Invoices and Financial Reporting
5.2.2.1 If OSP receives an invoice from the subrecipient, the invoice is clocked by the receptionist and referred to the Subcontract Specialist (SS) to:
• Verify that invoice contains a certification which has been signed by subrecipient official.
• Compare actual costs to subrecipient budget/if expenditures exceed line item budget amounts and prior approval is required, determine that approval has been given.
• Verify completeness and mathematical accuracy of invoice.
• Determine allowability of costs.
• Determine that F&A and fringe benefit costs are in agreement with subcontractor’s rates and that they have been properly calculated.
• Determine that the sum of current invoice amount and amounts of previous invoices is within subcontract ceiling.
• Determine that period covered by invoice is within subcontract effective dates.

5.2.2.2 OSP logs invoice is Access database, sends invoice and the Subrecipient Invoice Review and Payment Authorization Form (SIRPA) to PI for review and approval/signature.

5.2.2.3 PI certifies that the invoice is acceptable for payment by:
• Reviewing progress reports and other communication means to ascertain that work is being conducted timely, as proposed.
• Performing other reviews if necessary to provide reasonable assurance that subrecipient is administering funds in a manner consistent with laws and provisions of subcontract and those performance goals are being met.
• Reviewing the costs to determine the appropriateness and reasonableness in relation to work performed.
• If matching is required, reviewing that subrecipient has provided the matching documentation to support the matching commitment.
• Signing invoice certifying the work being billed has been satisfactorily performed.
• Returning the invoice to OSP for payment processing.

5.2.2.4 PI sends back the approved and signed invoice and the SIRPA to SS.

5.2.2.5 SS approves invoice and refers it to AP for payment.

5.2.3 Monitoring Compliance with A-133
5.2.3.1 OSP will monitor the subrecipient’s compliance with A-133 using the following means:
• Establish an electronic database of all federally funded subcontracts. Enter the subrecipient’s information into the database at the time the University enters into the subcontractual arrangement.
• A review of all records in the database will be performed monthly to determine items that require actions and perform follow-up as necessary.
• If the subcontract is to a state government, local government or non-profit organization and the subrecipient expended $500,000 or more in Federal awards during the subrecipient’s fiscal year, the subrecipient will be required to have an A-133 audit. Letters will also be forwarded to subrecipients upon execution of incremental funding.
• The subrecipient shall send a copy of the A-133 “reporting package” to the University, if the subrecipient’s schedule of findings and questioned costs disclosed audit findings relating to the Federal award(s) that the University provided and the summary schedule of prior audit findings included the status of
audit findings relating to the Federal award(s) that the University provided. If the subrecipient’s schedule of findings and questioned costs did not disclose audit findings relating to the Federal award(s) that the University provided and the summary schedule of prior audit findings did not include the status of audit findings relating to the Federal award(s) that the University provided, in lieu of the subrecipient sending a copy of the A-133 “reporting package” to the University, the subrecipient may provide written notification to the pass-through entity that: an audit of the subrecipient was conducted in accordance with A-133 (including the period covered by the audit and the name, amount, and CFDA number of the Federal award(s) provided by the University) and there were no schedule of findings and questioned costs disclosed relating to the Federal awards that the University provided and the summary schedule of prior audit findings did not report on the status of any audit findings relating to the Federal award(s) that the University provided.

- When applicable, OSP shall review the audit report and issue a management decision on audit findings within six months of the subrecipient's audit report and ensure that the subrecipient takes appropriate and timely corrective action.
- Prior to issuing the management decision, the OSP may request additional information or documentation from the subrecipient, including a request for auditor assurance related to the documentation, as a way of mitigating disallowed costs.
- If the subrecipient’s expenditures for a fiscal year are less than $500,000, the subrecipient shall provide a certified statement to the University to this effect.

### 5.2.4 Subrecipient Compliance Monitoring Plan

5.2.4.1 OSP will monitor the performance of the subrecipient by taking the following actions:

- Advise subrecipients of all applicable federal laws and regulations, appropriate flow-down provisions from the prime agreement.
- Request, receive and review technical performance reports.
- Receive, review, approve and monitor subrecipient expenditures requests/invoices.
- Obtain the annual sub-recipient A-133 audit verification letters, forms and reports.
- Follow-up with subrecipients that do not respond to the audit requests.
- Establish criteria to identify when subrecipient audit findings are significant enough to warrant further review, on-site visits, and/or sanctions.
- Identify subrecipient organizations that will receive on-site monitoring visits.
- Conduct periodic on-site visits, or regular contact to review performance.
- Prepare a final report of the results of the monitoring activities to be submitted to OSP management.
- Review any corrective actions.
- Enforce any sanctions as a result of continued non-compliance.
5.2.5 **Closeout**

5.2.5.1 OSP will:

- Confirm that subrecipient has submitted final fiscal report/invoice.

- Confirm that subrecipient has submitted final technical report/invoice.
  
  i. Verify that required matching information has been provided by the subrecipient.

- Complete disposition of any property purchased.

- Obtain statement of inventions.

- Determine A-133 requirements have been met.

- Determine if an independent audit is warranted, if A-133 is not applicable (for profit entities).

### 6.0 Records

6.1.1 A copy of the subcontract is kept in the subcontract files and a copy in the project file. Copies of the signed SIRPAs are kept in the project file.

6.1.2 Records pertaining to audits of subrecipients shall be maintained for three years following receipt of subrecipient’s audit report/notification.

6.1.3 The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Monitoring of Technical Reports

Authority: Division of Research Office of Animal Welfare & Research Integrity

Date

Related References 2 CFR Part 215, Office of Management and Business (OMB) Circular A-133 and OMB Circular A-21, FAMU Office of Sponsored Programs Manuals (Pre and Post Award Units)

Purpose The purpose of this procedure is to provide guidance to University staff responsible for monitoring of the submission of technical reports for sponsored projects.

Signature of Approving Authority

1.0 GENERAL INFORMATION

1.1 The submission of a technical report is a routine actions completed by an awardee to the awarding agency. Contract terms and conditions on each grant/contract specifies the requirements for submission of technical reports for the life of the award.

1.2 Most federal sponsors require final financial, invention, property, and technical reports. Other sponsors require at least a financial and technical report. Generally, these reports are due within 30-90 days from the expiration date shown on the award document. Failure to submit the reports in a complete and timely manner can delay payment for final project expenses and result in unfavorable consideration for future funding. Some sponsors will withhold future awards to individual delinquent investigators.

1.3 Once the work on the project is completed all reports must be completed and submitted as required by the terms and conditions of the grant/contract.

2.0 DEFINITIONS

2.1 Technical Reports are the reporting of progress made on the project for which funding was provided.
3.0 RESPONSIBILITIES

3.1 Principal Investigator (PI) is responsible for submission of the technical report on the specified date.

3.2 Office of Sponsored Programs (OSP) is responsible for ensuring that a copy of the technical report is placed in the appropriate file for auditing purposes.

3.3 Office of Animal Welfare and Research Integrity (OAWRI) is responsible for contacting the PI once the notification of the report is past due.

4.0 PROCEDURES

4.1 OFFICE OF ANIMAL WELFARE AND RESEARCH INTEGRITY

4.1.1 Contact the PI via email when the notice of a past due technical report is received from the funding agency.

4.1.2 Some sponsoring agencies require submission of technical reports electronically. The OSP can assist with any questions.

4.1.3 When the PI submits the report electronically to the funding agency, the OSP receives an automatic email confirmation that a technical report has been submitted.

4.1.4 If the report has not been submitted within 14 days from notification by the OAWRI then notification is sent to the Vice President for Research.

4.1.5 The Vice President for Research will contact the OSP to place a hold on the PI’s Indirect Cost Account until the technical report has been submitted to the agency.

4.1.6 If within 30 days the technical report has not been submitted to the funding agency then the Vice President for Research will instruct the OSP to freeze all the PI’s current accounts until the PI is in compliance with the funding agency and there are no outstanding reports.
INTERNAL OPERATING MEMORANDUM

Memorandum No. ____________

Subject: Organizational Development and Training
Authority: Human Resources

Purpose: The purpose of this procedure is to provide guidance for Division of Research Grants Management Training Programs. These procedures outline principles to ensure that training development opportunities are equitable to all Principal Investigators, Co-Principal Investigators, Grant Administrators and Division of Research staff to maintain the maximum level of productivity and services in achieving the skills necessary to operate effectively and efficiently in the processing of sponsored contracts and grants.

Signature of Approving Authority

1.0 GENERAL INFORMATION
The Florida A&M University Human Resources Organizational Development and Training Department serves as an intellectual clearinghouse, providing programs and services to foster educational opportunities to access the necessary professional development and functional skills to empower the Division of Research, by increasing employees' proficiency, strengthening financial management, and promoting intellectual collaborative partnerships. The Training Procedures cover Organizational Development and the Training Department's overarching practices. It identifies training programs procedures and processes relevant to the efficient and effective analysis, design, development, implementation, and evaluation of employee training. The programs will link faculty and staff, researchers, and practitioners to explore new intellectual avenues for enhancing theories and methods pertaining to empowering organizational development. Therefore, the programs shall be designed to:
A. Create, implement and conduct period assessments of the professional development training clearinghouse for faculty and staff;
B. Provide internal and external training opportunities to assist in strengthening financial management and fiscal and functional support;
C. Promote intellectual collaborative partnerships; and
D. Maintain a seamless learning enterprise training database.

2.0 DEFINITIONS
A. Effective - ready for increase productive services or action through the accomplishment of new knowledge skill-sets
B. **Efficient** - providing quality training and desire effects on job performance.
C. **Equity** - ensuring that all employees have equal education and training opportunities, access, and parity for success at the University and in today's culturally diverse workplace.
D. **Learners** - individuals gaining knowledge or understanding of or skill in by study, instruction, or experience.
E. **Responsibility** - the quality or state of being reliable to all required mission essential training programs.
F. **Training** - using a process of developing and transitioning learning activities to facilitate efficient access to the rich and powerful resources of new knowledge skill-sets.

### 3.0 RESPONSIBILITIES

The department consists of FAMU Human Resources Organizational Development and Training staff.

A. **Vice-President, Human Resources** - is responsible for the overall approval of the training budget, policies and all training programs and services.

B. **Director, Organizational Development and Training** – is responsible for reviewing and formulating training policies and development. Additionally, the director is responsible for assessing training needs of the University faculty and staff, developing, delivering, coordinating, and monitoring Division of Research training programs while assessing the most appropriate method for providing services.

C. **Senior Administrators** – Ensures all identified faculty and staff receive appropriate mission essential training based on role and task related analysis.

D. **Deans** - Ensures all identified faculty and staff members attend appropriate mission essential training based on role and task related analysis.

E. **Directors** - Identify faculty and staff members requiring appropriate mission essential training based on role and task related analysis.

F. **Supervisors** - Identify, provide training opportunities, evaluate and monitor faculty and staff members requiring appropriate mission essential training based on role and task related analysis.

G. **Learner/s** - Attend, participate and apply new knowledge skill-sets appropriate for mission essential job performance based on role and task related analysis.

### 4.0 SCOPE

A. **General** - These procedures contain information and guidance that direct Organizational Development and Training programs and services.

B. **Applicability** - These provide broad guidance necessary to provide high quality, objective-oriented education for the Division of Research training initiatives. Additional education and training directives will be placed into effect based upon the University’s mission, objectives, goals, task, activity, or directed by University leadership.

C. **Additions** - Guidance of the PROCEDURES is supplemented by the 2005 FAMU Organizational Development and Training Strategic Plan.

### 5.0 DESCRIPTION OF PRIMARY PROCESS

5.1 **General**: Organizational Development and Training department schedules classes and posts class openings on the FAMU web site and the training website. The registration follows the process.
a) FAMU employees that meet the course prerequisites can contact the Organizational Development and Training registration office to register for requested course/s. Employees that arrive for training without appropriate or prior registration documents run the risk of not being able to have course materials or a seat in class. However, the training department will accommodate or reschedule learners and report activity to management.

b) All training activities will be coordinated with the Division of Research.

c) The department will coordinate registration and external training opportunities for the Division of Research.

d) Approval to attend external training must be coordinated with the employee’s supervisor.

e) Upon completion of all external training, proper documentation must be submitted to the training department accompanied by the employees’ supervisor’s signature.

f) Upon completion of training, the training administrator verifies all internal and external training and document employee information in the appropriate Training database.

g) The training department and the Division of Research will provide an annual comprehensive Grants Management training calendar, inclusive of internal and external training opportunities.

h) Division of Research staff members must complete at least 15 continuing education credits per academic year. Proper documentation must be submitted to the training department accompanied by the supervisors’ signature.

i) All University Principal Investigators, Co-Principal Investigators, Grant Administrators, and core functional staff must attend and complete all components of the Principal Investigators Enterprise Learning Program. Registration for the programs must be coordinated with the University training department.

5.2 Classroom Training: The training department will initiate and conduct training using this process:

a) All classroom training will be coordinated by the training department.

b) All Grants Management training will be comprised of an instructor/facilitator and the departmental subject matter expert specifically for adding value and ensuring high-quality delivery and content of training.

5.2 Evaluations: The training department in collaboration with Division of Research will evaluate the effectiveness of the training using the following process:

a) Learners Evaluation

1) The Instructor will administer pre-developed course assessment to course participants.

2) Learners must meet specific course criteria to pass the learning evaluation minimum requirement of 80%.

3) The Instructor is responsible for ensuring the learner results will be recorded in the Enterprise Learning Training database.

b) Course/Instructor Evaluation

Course evaluation will be conducted by the training department and results will be analyzed, and utilized to revise and plan for training enhancements.

5.3 Documentation and Training Development: The training department will prepare content for courses and develop training by the American Society for Training and Development
(ASTD) standards, the leading organization for the adult learning and employee training. The steps in the process include:

a) **Analyze**: The organization's needs and employee/training population needs are identified, performance objectives defined and the project scope is defined. The course outline is produced in this phase.

b) **Design**: Samples of the course materials are drafted before continuing with the full development of the course, the training department director must approve the samples.

c) **Develop**: Using all course development definition documents produced in the analysis and the design Samples; the training developer creates all course materials.

d) **Test**: The instructional developer or documentation specialist checks the total training package to validate and verify accuracy, as well as to ensure a quality delivery that meets the course learning objectives.

e) **Implement**: The implementation will be conducted consistent with the process defined for training in section IV.2.

5.4 **Online Training**: The Training Department will design, develop, and prepare online training to use the processes embraced by ASTD. Technologies that already exist or are consistent with the University's Information Technology (IT) will be employed as much as possible.

a) **Online Training**: Online training will be available to the Division of Research and its constituents 24 hours a day, 7 days a week via the University blackboard system.

5.5 **Post-Training Support**: The training department and Division of Research selected staff will ensure availability for a reasonable amount of time to provide post-training consultation via on-the-job training, telephonic assistance or the learner can make an appointment to obtain assistance from the Instructor during normal department business hours.

a) The Division of Research in collaboration with the training department will provide monthly Grants Management Support Workshops in support of Grants Management and shared departmental initiatives.

5.6 **Special Needs and accommodations**: The Division of Research and the training department will comply with Federal, State, Local, and University Americans with Disability Act (ADA) Standards:

a) Learners are responsible for notifying the training staff of their required special needs.

b) The Division of Research in collaboration with the training department will ensure that a qualified trainer and/or Equal Employment Opportunity staff is notified of informed special needs.

5.7 **Grants Management Training Reports**

a) **Types of Reports** - Quarterly Division training reports will be available for Senior Leadership by the fifth day of the month of the activity ending quarter.

b) **Purpose** - To maintain accountability, measure obtainable goals and objectives and keep leadership abreast of all training activities.

c) **Distribution** - Division of Research leadership

d) **Storage** - All reports will be kept via electronic file.

6.0 **ETHICS AND COMPLIANCE**: The training department will comply with University, state and federal requirements, policies, processes, and procedures.

7.0 **POSTING AND COMMUNICATIONS**: All training communications will adhere to the training communications plan.