

Lewis & Clark College
College of Arts & Sciences
Sponsored Research/Post-award Grant Handbook

Table of Contents

- I. **The New Award**
 - A. *Accepting the Award*
 - B. *Advertising an Award*
- II. **Getting Started**
 - A. *Internal Grant Account Number*
 - B. *New Award Notification Form*
- III. **Money Matters**
 - A. *Pre-award costs*
 - B. *Multiple Grants*
 - C. *Getting Paid Salary from a Grant*
 - 1. *Personnel Action Form (PAF)*
 - 2. *Internal Training and Effort Certification Requirements*
 - D. *Spending the Money: Processing Payments and Reimbursements*
 - E. *Allowable Costs*
 - F. *Procurement of Supplies and Equipment*
 - G. *Subcontracts and Procurement of Services*
- IV. **Hiring Employees with Grant Funds**
- V. **Reporting Requirements**
- VI. **Changes to Project and/or Budget**
- VII. **Published Research & NIH Public Access**
- VIII. **Award Closeout**
- IX. **Campus Contacts**

I. The New Award

A. Accepting an Award

Funding agencies award grants to Lewis & Clark College on behalf of the individual Principal Investigator (PI). As such, oftentimes the notice of award is sent to the Institutional Official or the Sponsored Research Office (SRO). If the award documents are sent directly to a PI, the PI should notify the SRO immediately. An institutional signature may be required; in no case can the award be accepted by the PI.

All institutional awards are made to Lewis & Clark College, not to an individual*. In order for Lewis & Clark to accept an award, specific information must be contained within the award document(s) issued by the sponsor. This includes the:

- 1) Period of Performance, the period from the authorized start date to the authorized end date of a project
- 2) Scope of Work, a narrative description of the work to be completed under the agreement
- 3) Award Amount, the dollar value of the award
- 4) Sponsor Contact and Billing Information, the point of contact, including mailing address, telephone number, and any invoicing procedures.

* Please note that this process does not apply to awards that are paid directly from the sponsoring agency to an individual (e.g. most fellowships).

The SRO will coordinate formal review of the award terms and conditions, assist with negotiations and publicity, and work with the Business Office to establish a separate, restricted grant account.

The PI is ultimately responsible for all aspects of the sponsored project — both the scholarly activity and the proper fiscal administration. Primary responsibilities of the PI include Project Management, Expenditure Management, Employee Management, Reporting, and Subcontract Management (if applicable). The Sponsored Research and Business Offices at Lewis & Clark have established administrative systems and processes to support the PI throughout the life of an award. Please contact us with any questions or if assistance is needed.

B. Advertising an Award

Congratulations! An external grant is fantastic news for the PI, the department, Lewis & Clark students, and the College as a whole. This is important information that should be shared with various constituencies. When a grant is awarded to Lewis & Clark on behalf of a faculty or staff member, the Sponsored Research Office will

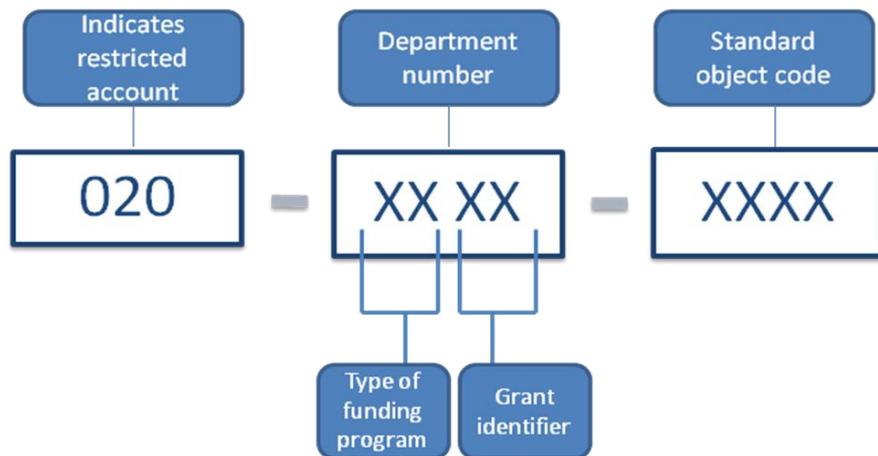
post this information on the SRO website and inform the department chair, the Dean of the College of Arts & Sciences, the Business Office, and the Office of Public Affairs & Communication. The Dean of the College may notify other constituencies on and off campus. Occasionally, the Office of Public Affairs & Communication will write a feature article for *The Source* or *The Chronicle*, or write a press release for wider distribution. Please contact the Director of Sponsored Research for more information.

II. Getting Started

A. Internal Grant Account Number

Each PI will receive an account number to be used for all transactions related to the grant budget. The first three digits will be 020, indicating that it is a restricted account in the College of Arts and Sciences. As a restricted account, it may only be used for the purposes defined in the award documents. The following four digits represent the "department number", which is unique to each particular grant.

Within each departmental account, there are several specific account lines to which expenditures are charged, depending on the nature of the expense. Each of these lines is designated by a four digit object code. For example, Lab Supplies are charged to object 6170 and all salary and benefit charges are made to objects beginning with 5.



Therefore, the grant/departmental account is made up of multiple 11-digit account numbers. In the case of a federal research grant, the suite of accounts will look something like this:

- | | |
|---------------|--|
| 020 12XX 4210 | Federal Grants: for the receipt of funds |
| 020 12XX 5255 | Adjunct Faculty: for the PI Salary |
| 020 12XX 5420 | Student Labor |
| 020 12XX 55XX | Various benefit accounts |

020 12XX 6170	Lab Supplies
020 12XX 6220	Equipment
020 12XX 8600	Administrative Allowance

In order for a transaction to be posted to the grant account, a complete account number of 11 digits is required.

PIs should request access to Infonet, a web-based tool, where all charges and credits posted to the grant account can be reviewed. Requests for access should be directed to Robert Nayer. (x7814 or nayer@lclark.edu)

Any credit balance shown in the 4210 object code line represents funds received from the awarding agency. For most federal agencies, the Business Office requests reimbursement of posted expenditures at the end of each calendar quarter. Therefore, the balance shown in Infonet represents the total expenditures posted to the account since the end of the previous quarter, **not the amount remaining in the award**. In order to determine the award balance remaining, please contact Marietta Lawson in the Business Office. (x7821 or lawson@lclark.edu)

If any questions arise regarding the activity in the grant account, please contact Marietta Lawson, Director of Accounting.

B. New Award Notification Form:

Once the Business Office has set up the restricted grant account, the Sponsored Research Office will generate a New Award Notification Form specific to the grant. This Form will be sent electronically to the PI and any co-investigators at Lewis & Clark, and copied to the Director of Accounting and the departmental Administrative Coordinator. This electronic notification will contain relevant grant information, including the Lewis & Clark grant account number, the agency award number and contact information, the approved budget, and reporting requirements.

III. Money Matters

A. Pre-award Costs

Some funding agencies will allow the College to incur allowable and allocable **pre-award costs** 90 calendar days prior to the award start date.

Pre-award expenditures are made at the College's risk. The funding agency has no obligation to reimburse the College if an award is not subsequently made or is made for a lesser amount than expected.

The College will permit the expenditure of funds within this 90 day period only for costs that are absolutely necessary for the start-up of a research project. This mechanism may not be used for the normal expenditure of funds.

Pre-award expenditures must be approved by the Business Office before incurring or obligating the College to incur any pre-award costs. Requests to incur pre-award costs should be submitted in writing to the Business Office and should include an explanation as to why the expenditure is necessary for the effective and economical conduct of the project.

B. Multiple Grants

Co-mingling of grant funds is expressly prohibited. If a PI is the recipient of more than one grant award, separate restricted accounts will be established for each one. It is the responsibility of the PI to ensure that expenses and effort are charged to the appropriate grant account and that there is no mixing of funds.

C. Getting Paid Salary from a Grant:

1. Personnel Action Form (PAF)

A Personnel Action Form (PAF) must be completed and approved before any salary can be paid from a grant budget. Including the PI's signature, four approvals are required on the PAF.

At the request of the PI, the PAF form originates in the Office of the Dean of the College. In order to initiate a PAF, the PI should provide the following information to Terri Banasek (banasek@lclark.edu) in the Office of the Dean: the internal grant account number, amount of the salary, and period over which the salary is to be paid. The PI signs as Budget Manager and attaches any required documentation (e.g. Time and Effort Report & Responsible Conduct of Research; see "Internal Training and Effort Certification Requirements, below"). The signature of the Dean of the College is required, and then the PAF will be sent to the Business Office for secondary approval.

Marietta Lawson, Director of Accounting, signs as the "Budget Director" on PAF forms for all restricted accounts, including grant accounts. The PAF form is then sent to Human Resources for final approval.

Once the PAF has received all the required signatures, Human Resources will forward the form to Payroll for processing. In order for the grant salary to be paid at the end of the month, the form must be completed, signed by all parties and received by Payroll by the 15th of the month.



2. Internal Training & Effort Certification Requirements

Before any salary or wages will be paid from a grant, the PI and all researchers* must complete the following:

- 1) Responsible Conduct of Research (RCR) Training
- 2) Effort Certification Requirements

*Required for any individual receiving or cost-sharing salary or wages on a grant-sponsored project.

Responsible Conduct of Research Training: As of January 2010, as required by federal regulations, Lewis & Clark College requires the completion of RCR training by specified individuals. The required RCR Training must be completed, and a copy of the certificate of completion should be attached to the PAF requesting payment. Lewis & Clark's Responsible Conduct of Research Training Policy is available at: http://www.lclark.edu/offices/human_resources/employee_resources/policies/institutional/general/responsible_conduct_of_research/index.php

Effort Certification Requirements: A completed Time & Effort report should be submitted to the appropriate supervisor for review and then attached to the PAF requesting payment. Lewis & Clark's Time and Effort Reporting (also known as "Effort Certification") Policy is available at: http://www.lclark.edu/offices/human_resources/employee_resources/policies/institutional/general/time_and_effort_reporting/

The Time & Effort Reporting Form is available for download at: http://www.lclark.edu/college/offices/sponsored_research/policies/

D. Spending the Money: Processing payments and reimbursements

All purchases must be allowable. Please see F, "Allowable Costs," for more details.

Payments to vendors for purchases

The departmental Administrative Coordinator will help process orders and payments to vendors. For purchases over \$1,000, a Purchase Order is required. If the purchase is made with a Purchasing Card, a purchase order is required if the cost is greater than either the single transaction limit on the card or \$1,000, whichever is greater. For detailed policy and procedural information, please go to: http://www.lclark.edu/offices/business/accounts_payable/purchases/index.php

Before making a purchase of computer hardware or software, it is a good idea to verify with Information Technology that the specific items are currently supported.

Payments to independent contractors for services

The departmental Administrative Coordinator will help process payments to independent contractors for services performed. An IRS form W-9 is required. Do **not** pay out-of-

pocket for services. Do **not** use a purchasing card to pay for services. For detailed policy and procedural information, go to:

http://www.lclark.edu/offices/business/accounts_payable/independent_contractors/index.php

If the individual to be paid is from a foreign country, please contact the Business Office as soon as possible and prior to hiring them to perform any work. US Department of Homeland Security, Department of Labor, and Internal Revenue Service regulations govern the entry, visa status, payment and taxation of these individuals. Lewis & Clark abides by these regulations in all cases. It may take several weeks to complete the paperwork necessary to pay nonresident aliens. For more information, please go to:
<http://www.lclark.edu/offices/international/guestbasics/>

Getting reimbursed for out-of-pocket expenditures

The departmental Administrative Coordinator will help complete and submit a request for reimbursement of out-of-pocket expenditures. Original itemized receipts are required. The reimbursement request must be submitted to the Business Office within 60 days of incurring the expense. Do **not** pay out-of-pocket for services. For detailed policy and procedural information, please go to:

http://www.lclark.edu/offices/business/accounts_payable/expense_reimbursements/index.php

Travel

The departmental Administrative Coordinator may help to plan travel and complete Expense Reports. Reimbursement for travel expenses is received after the trip is completed and a detailed Travel & Entertainment Expense Report is submitted to the Business Office, with itemized receipts attached. (Entertainment expense is **not** an allowable cost for federal grants). Travel advances are available to defray any costs incurred prior to the trip, such as conference registration. The Travel & Entertainment Expense Report must be submitted within 60 days of return from a trip. For detailed policy and procedural information, please go to:

http://www.lclark.edu/offices/business/accounts_payable/travel_and_entertainment/

Subject Payments

If a supply of funds is required to compensate human subjects for their participation in a research project, the PI can request a "travel" advance. As with standard travel advances, the request will be approved if the PI does not have any advances outstanding more than 60 days after the completion of a trip. In order to clear the advance (which is essentially a loan to the PI) and have the subject payments charged to the grant account, the PI must submit a participant list with the name, date, signature and amount received for each participant, and a summary total. If the names must remain confidential, submit the list as Participant 001, Participant 002, etc. with an initial from each participant.

Indirect Costs

The Director of Accounting calculates indirect costs monthly, by applying the indirect cost rate for each individual grant to the actual salaries and wages charged to each grant that month. The resulting indirect costs for the month are posted to the grant accounts by journal entry. For reference, Lewis & Clark's current Cost Rate Agreement with the Department of Health and Human Services, dated April 23, 2007, is 50% of salaries and wages and is effective for the period June 1, 2007 through May 31, 2011.

E. Allowable Costs

OMB (Office of Management and Budget) Circular A-21, *Cost Principles for Educational Institutions*, establishes principles for determining costs applicable to grants, contracts, and other agreements.

OMB Circular A-21 lists four general tests for allowability, which are:

Costs must be reasonable.

A cost may be considered reasonable if the nature of the goods or services acquired, and the amount involved, reflect the action that a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made. Major considerations involved in the determination of the reasonableness of a cost are:

- 1) Whether or not the cost is recognized as necessary for the operation of the College or the performance of the sponsored agreement.
- 2) The restraints or requirements imposed by such factors as arm's-length bargaining, Federal and State laws and regulations, and sponsored agreement terms and conditions.
- 3) Whether or not the individuals concerned acted with due prudence in the circumstances, considering their responsibilities to the College, its employees, its students, the Federal Government, and the public at large.
- 4) The extent to which the actions taken with respect to incurrence of the costs are consistent with established institutional policies and practices applicable to the work of the College generally, including sponsored agreements.

Costs must be allocable to sponsored agreements under the principles and methods provided in the circular.

Allocability of a cost involves an assessment of the relative benefits received from the incurrence of the cost. Direct costs charged to a grant account must be specifically identified with that grant project. At the first level of allocability, a cost is incurred solely to advance work under a sponsored agreement. These costs can be assigned to a particular sponsored agreement with a high degree of precision.

At the second level of cost allocability, a cost is incurred in a manner that benefits both the sponsored agreement and other work of the College in proportions that can be approximated through the use of reasonable methods.

A third level of allocability involves costs necessary for the overall operation of the institution and, under OMB Circular A-21, deemed to be assignable in part to sponsored projects. (These are the indirect costs).

Costs must be given consistent treatment through the application of generally accepted accounting principles appropriate to the circumstances.

For all sponsored agreements, the College must determine which types of costs it wishes to maintain as direct charges and which are to be indirect. All costs incurred for the same purpose, in like circumstances, are either direct costs only or facility and administrative costs (indirect costs) only.

If the cost principles are silent about the treatment of a particular type of cost, the institution will have to rely on generally accepted accounting principles in order to determine the allocability of the costs.

Costs 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.

In some cases, the cost principles or the terms and conditions of a specific sponsored agreement will establish limitations or exclusions as to types or amounts of cost items. If an authorization statute or an appropriation statute states that there is a specific limitation on the payment of a particular type of cost, and OMB Circular A-21 is silent on the subject or states something else, the statutory provision takes precedence.

Another limitation on the allowability of costs is that all vendor discounts, credit memos, rebates and other cost adjustments must be applied to the cost of the project.

Selected Items of Cost

OMB Circular A-21 identifies 54 items of cost to be used in establishing cost allowability. The list does not include every possible type of cost an institution might incur. OMB selected items for the list based on two main criteria: (1) if the cost is of a type that routinely arises in the administration of sponsored agreements by educational institutions; or (2) if the cost is of a type for which OMB seeks to have a specific policy.

The following costs from OMB Circular A-21 are listed as not allowable:

- Alcoholic Beverages
- Alumni Activities
- Bad Debt
- Commencement and Convocation Costs
- Contingency Provisions
- Costs of Criminal and Civil Proceedings
- Donations and Contributions

- Entertainment Costs
- Fines and Penalties (failure to comply with federal, state or local laws & regulations)
- Fundraising and Investment Costs
- Goods or services for personal use of college employees
- Housing and personal living expenses
- Interest
- Lobbying
- Meals, other than budgeted travel costs
- Student Activities, unless specifically provided for in the sponsored agreement
- Travel: airfare costs in excess of the customary standard commercial airfare (coach or equivalent) are not allowed except under very specific conditions such as the medical needs of the traveler. These conditions must be documented.

F. Procurement of Supplies and Equipment

The federal government imposes a set of standards for the acquisition of supplies, equipment and real property purchased with federal funds. The purchasing process followed by the College must comply with the minimum standards imposed by OMB (Office of Management and Budget) Circular A-110. Colleges can establish thresholds at which different standards apply.

Regardless of the cost of the acquisition, the following **Code of Conduct** applies:

No employee, officer, or agent of the college shall participate in the procurement of goods and equipment supported by federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization that employs or is about to employ any of these parties, has a financial or other interest in the firm selected for an award or purchase. The officers, employees, and agents of the college shall neither solicit nor accept gratuities, favors, or anything of monetary value from vendors or contractors.

Regardless of the cost of the acquisition, grant recipients are required to avoid purchasing unnecessary items.

Purchasing procedures per threshold amounts

The threshold amounts below refer to the total cost of the purchase. For example, the purchase of three \$900 laptops for a lab is considered to be a \$2,700 purchase, not three items under \$1,000. A \$90,000 equipment purchase with a \$5,000 delivery and set-up fee and \$8,000 in ancillary parts would be a purchase over \$100,000.

Below \$1,000: There is no formal quotation or documentation requirement. The College expects that vendors will be selected based on their ability to meet quality standards and to be the lowest cost provider at the specified quality level.

Please note the following for all purchases over \$1,000: A purchase order is required for all purchases over \$1,000. If the purchase is made with a Purchasing Card, a purchase order is required if the cost is greater than either the single transaction limit on the card or \$1,000, whichever is greater. Further, any purchase over \$1,000 requires documented or written quotations, which the PI should keep on file. A quotation is a statement from a vendor regarding the price for a specific good or service. Based on any quotes received, the vendor that meets the quality standards at the lowest cost should be selected.

Acquisitions from \$1,001 to \$9,999: Two or more quotations should be solicited, either in writing, via the Internet or by telephone. If a competitive market does not exist for the specific item being acquired, this fact should be documented by the PI of the project.

Acquisitions from \$10,000 to \$99,999: Three or more written quotations should be solicited from vendors. The quotations should detail the specifications of the item(s) to be purchased and should include other qualifying characteristics being considered in the selection of a vendor, such as delivery and time frame. If the market for the specific item being acquired does not allow for three competitive quotations, this fact should be documented by the PI of the project.

Acquisitions over \$100,000: Three competitive written quotations should be solicited.

An acquisition over the threshold amount of \$100,000 made in whole or part with federal funds must comply with the procurement standards established in OMB Circular A-110. Among the standards for this threshold of procurement are:

- An analysis of lease and purchase alternatives to determine the most economical and practical procurement for the federal government.
- Solicitations should include a clear and accurate description of the technical requirements, specifications and all other factors that will be used in evaluating bids. The description should not contain features which unduly restrict competition.
- Preference, to the extent practicable and economically feasible, for products that preserve natural resources, protect the environment and are energy efficient.
- Positive efforts to utilize small businesses, minority owned firms and women's business enterprises whenever possible.
- No contract shall be made to parties listed on the General Service Administration's (GSA) list of Parties Excluded from Federal Procurement or Non-Procurement Programs (<https://www.epls.gov/>). This list contains the names of parties debarred, suspended, or otherwise excluded by agencies, and contractors declared ineligible under statutory or regulatory authority.
- Procurement records and files for purchases must contain at least three elements under federal rules:
 1. **Basis for the contractor selection.** Information showing how the College arrived at the decision to accept the bid of or award the contract to that particular vendor.
 2. **Justification for lack of competition when competitive bids or offers are not obtained.** A departure from the "free and open competition" standard imposed by the federal government requires justification. Unique

- capacity or ability on the part of the contractor (such as specialized research services from a skilled party) is frequently sufficient justification. Nevertheless, because the action represents a departure from normal practice, it is one that is likely to receive close scrutiny in audits or other reviews conducted by awarding agency officials.
3. **Basis for the award cost or price.** The cost and price analysis should be documented to establish that the institution has obtained a fair price.

Capital Equipment

Capital Equipment is defined by the OMB as "tangible nonexpendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit." If the purchase of equipment is allowable under the terms of the grant, it is the responsibility of the PI to purchase the equipment in accordance with the established purchasing practices of the College and to ensure the proper receipt, inventory tracking identification and proper operational condition and maintenance of the equipment. Equipment acquired with external support becomes the property of Lewis & Clark unless restricted by the sponsor.

G. Subcontracts and Procurement of Services

The federal government imposes a set of standards regarding subcontracting and procurement of services with federal funds. The process followed by the College must comply with the minimum standards imposed by OMB (Office of Management and Budget) Circular A-110. Colleges can establish thresholds at which different standards apply.

Regardless of the cost of the acquisition, the following **Code of Conduct** applies:

No employee, officer, or agent of the College shall participate in the selection or administration of a contract or the procurement of goods and equipment supported by federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization that employs or is about to employ any of these parties, has a financial or other interest in the firm selected for an award or purchase. The officers, employees, and agents of the College shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements.

Contracting procedures per threshold amounts

Below \$1,000: The College expects that the quality and cost of available contractors will be researched, but there is no formal quotation or documentation requirement.

A W9 is required before the contractor can be paid.

For any contract amount: Lewis & Clark's General Council will review or prepare any contract that is required. The General Counsel must be contacted by the PI or Sponsored
CAS Sponsored Research Post-Award Handbook

Version 1: April 2010

Page 12

Research Office before entering into any contract agreement. A W-9 is required before any contractor can be paid.

From \$1,001 to \$9,999: Offers should be solicited from at least two potential contractors. The requirements of the work being solicited and the basis for selection should be documented by the P.I of the project.

From \$10,000 to \$99,999: Three or more written offers should be solicited from potential contractors. The offers should be detailed in their descriptions of the services provided, and should include other qualifying characteristics being considered such as references, time frame and other specifications.

Over \$100,000: Three or more competitive bids should be solicited from potential contractors. Lewis & Clark's General Counsel will review or prepare the contract. Contact the General Counsel before entering into any contract agreements.

A contract or sub-award over the threshold amount of \$100,000 made in whole or part with federal funds must comply with the procurement standards established in OMB Circular A-110. Among the standards for this threshold of procurement are:

Competition. OMB Circular A-110 states, "All procurement transactions shall be conducted in a manner to provide, to the maximum extent practical, open and free competition." Employees making procurement decisions must be alert to conflicts of interest as well as to noncompetitive practices among contractors that may restrict competition. Contractors that develop or draft specifications, requirements, statements of work and/or requests for proposals should be excluded from competing for those contracts. Awards shall be made to the contractor whose offer is responsive to the solicitation and is most advantageous to the project with price, quality and other factors considered.

Cost and Price Analysis. As part of the selection process, some form of cost analysis must be made and documented for all significant contract awards. Cost analysis is the process of reviewing the elements of cost that together represent the total price offered. Offers should be received according to various breakdowns such as staff time and effort, supplies to be used, equipment utilization and so on. The purpose of the cost analysis is to determine whether each element of cost is necessary to the performance of the work and is reasonable in its nature and amount

Source Evaluation and Selection. Requests for proposals should establish the criteria against which offers will be judged, including ones which may have to do with quality as well as price. Solicitations should include a clear and accurate description of the technical requirements, specifications and all other factors that will be used in evaluating proposals. The description should not contain features that unduly restrict competition. Documentation should be retained to show how the selection was accomplished. Contracts are to be awarded only to responsible contractors who have the potential ability to perform successfully under the terms and conditions of the procurement. Actions such as checking past performance, and verifying availability of financial and technical resources offered are appropriate steps during this stage.

Debarment and Suspension No contract shall be made to parties listed on the General Service Administration's (GSA) list of Parties Excluded from Federal Procurement or Non-Procurement Programs (<https://www.epls.gov/>). This list contains the names of parties debarred, suspended, or otherwise excluded by agencies, and contractors declared ineligible under statutory or regulatory authority.

Small, Minority-Owned, and Women's Business Enterprise Utilization. Colleges and universities expending federal funds are required to make positive efforts to use small businesses, minority-owned firms, and women's business enterprises whenever possible

Procurement Records. Procurement records and files for service contracts must contain at least three elements under federal rules:

1. **Basis for the contractor selection.** Information showing how the college arrived at the decision to award the contract to that particular vendor.
2. **Justification for lack of competition when competitive bids or offers are not obtained.** A departure from the "free and open competition" standard imposed by the federal government requires justification. Unique capacity or ability on the part of the contractor (such as specialized research services from a skilled party) is frequently sufficient justification. Nevertheless, because the action represents a departure from normal practice, it is one that is likely to receive close scrutiny in audits or other reviews conducted by awarding agency officials.
3. **Basis for the award cost or price.** The cost and price analysis should be documented to establish that the institution obtained a fair price.

Contract Administration and Sub-Recipient Monitoring. Lewis & Clark is expected to maintain a system of contract administration with respect to contracts and sub-awards financed with federal funds. Contract administration involves determination that contractors have met the terms and conditions of their contracts. This would include such actions as programmatic oversight, periodic assessment of performance, and site visits. PIs have the primary responsibility for monitoring sub-recipients to ensure compliance with federal regulations.

IV. Hiring Employees with Grant Funds

A. Hiring Process

Personnel are a key element of most grants. Specific personnel and their qualifications may have been identified in the proposal narrative, or the narrative may have described the responsibilities of a grant-funded position to be filled upon receipt of the award. In some cases the personnel are current Lewis & Clark employees whose duties will be expanded or cost-shared and in other cases the personnel are new hires that will be employed by Lewis & Clark and specifically assigned to the grant project. Employees hired with grant funds are typically said to be on "soft money," which means their employment is limited to the duration of the

grant. This section addresses how to hire employees into new, grant-funded positions.

As hiring supervisor, the PI has the responsibility to select the best-qualified candidate while adhering to all applicable laws and regulations. The same hiring process that applies to regular employees at the College is used when hiring grant-funded personnel. In general, the advertising and hiring process involves developing a job description, getting approval, advertising the position, interviewing applicants, and making a selection. For guidance, please see the department of Human Resources' Hiring Resources webpage:

http://www.lclark.edu/offices/human_resources/supervisor_resources/hiring_resources/

B. New Positions: Position Description Questionnaire (PDQ)

One possible exception to the standard hiring process is that a new Position Description Questionnaire (PDQ) may need to be created. The PDQ, once finalized, will determine the job classification (Exempt, Overtime Eligible Exempt (OEE), or Non-Exempt/Union) and wage structure. This form is available at:

<http://www.lclark.edu/livewhale/download/?id=739>

PLEASE NOTE: The PDQ can be completed anytime, even before the grant proposal has been submitted. The advantages of completing this process ahead of time include having a more accurate salary range for the proposal budget and being ready to hire when the grant award comes through!

Both the grant account number and the job classification determined by the PDQ are needed to create a hiring requisition (Step 3 on the aforementioned webpage). Please contact the Sponsored Research Office to obtain the grant account number, or see the New Award Notification Form provided by the Sponsored Research Office upon receipt of the award.

Once the PI has identified the person to be hired, Human Resources will conduct a background check and the PI, as hiring supervisor, will check references. Please allow sufficient time (at least a week) for the background check; this will impact the start date for the new hire.

C. Hiring Current L&C Students on Grants:

Please contact the Student Employment Coordinator in Student Financial Services. More information is available at:

http://www.lclark.edu/offices/student_financial_services/student_employment/supervisor/index.php

V. Reporting Requirements

Along with the programmatic component of grant-funded work, the PI has an administrative responsibility as well: reporting. The PI is responsible for the timely submission of all reports in accordance with the terms of the grant. Please refer to the award letter or agreement for reporting requirements specific to the funding agency or award. This information may also be included on the New Award Notification Form generated by the Sponsored Research Office. Generally, annual progress and financial reports will be required. In addition, a final narrative or technical and financial report will be required. Unless otherwise specified in the grant terms, final reports are typically due within 90 days of the termination of the grant.

Financial Reports:

The Director of Accounting will provide a complete financial report required by the sponsoring agency to the PI and/or Sponsored Research Office. Please work with the Sponsored Research Office to best determine how to submit these reports. A financial report completed by the PI/PD is not an official institutional report of expenditures.

Other Reports:

The Sponsored Research Office is available to review progress and narrative reports required by the sponsor. Copies of all narrative reports and correspondence related to the grant should be forwarded to the Sponsored Research Office.

VI. Changes to Project and/or Budget

Some changes require prior sponsor approval and others do not; please check with the agency guidelines and/or the Sponsored Research Office with specific questions. The following provides some answers to common questions with regard to project changes. Please note that changes *may* require that the PI provide the sponsor with written notification and/or obtain written approval from the sponsor for the changes.

Changes to the Budget:

In some cases, a grant budget may be modified from its proposed form without to meet unanticipated needs and to make other types of post-award changes. This will be approved by the Business Office and Sponsored Research Office if the requested change is allocable and reasonable. Some agencies allow a defined percentage variable, such as a 10% fluctuation between approved categories, before sponsor approval is required. For sponsors that do not allow the re-budgeting of funds without prior approval, the Sponsored Research Office will formally submit a request to the sponsor on behalf of the PI.

Please contact the Sponsored Research Office or Business Office if you foresee the need to change the original budget.

Other Project Changes:

Generally, prior approval by the sponsoring agency is required for the following situations: if the PI wants to change the project scope or objectives; if key personnel will be changed; if the PI will be absent for more than three months; if the PI's effort will be reduced by 25%

or more; if additional funds are required; if the grant will be transferred to a different institution (to or from Lewis & Clark); and if an equipment transfer is involved. "Prior" indicates that written sponsor approval must be obtained before undertaking any action.

Some external sponsors allow for a great deal of flexibility in the management of the grant to the College. This is called "expanded authority." Grants that include expanded authority permit the College (Sponsored Research Office or Business Office) to approve changes to the budget and certain administrative processes without seeking prior approval from the sponsor. Two examples of changes that may occur without prior approval include a one-time "no-cost extension" and carrying forward unobligated balances into subsequent funding periods.

No-Cost Extensions:

Most sponsoring agencies will allow an extension of the grant expiration date if more time is required to assure adequate completion of the original project scope. Although the requirements to apply for a "no-cost extension" (NCE) vary by sponsor, many federal agencies allow the College to authorize a one-time 12-month NCE for specific reasons, which must be provided in writing. Please be prepared to provide a written technical justification for an extension. Please note that the fact that funds will remain at the expiration of the grant is not, in itself, sufficient justification for an extension. In all cases, such extensions must be requested well in advance of the expiration date. Contact the Sponsored Research Office as soon as it is known that a grant extension will be necessary.

Agency-Specific Guidelines Regarding Changes:

NIH Changes in Project and Budget:

http://grants.nih.gov/grants/policy/nihgps_2003/NIHGPS_Part7.htm#_Toc54600127

NSF Guidelines on Changes in Grant Periods, including No-Cost Extensions:

http://www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/aag_1.jsp#ID3c

VII. Published Research & NIH Public Access

If the research has been supported by the **National Institutes of Health**, the PI is *required* to submit an electronic version of their final, peer-reviewed manuscripts upon acceptance for publication to the National Library of Medicine's PubMed Central. This must be made publicly available no later than 12 months after the official date of publication. NIH's Public Access Policy is available at: <http://publicaccess.nih.gov/policy.htm>

All other publications, whether they are grant-supported or not, are great news that the College wants to know about and share! Please inform Terri Banasek (banasek@lclark.edu) in the CAS Dean's Office and Shelley Meyer (smeyer@lclark.edu) in the Office of Public Affairs and Communication of any publications, so they can spread the word.

VIII. Award Closeout

The PI/PD is responsible for preparing and submitting the final technical report to the sponsor in a timely manner, according to the schedule outlined in the award. If additional time is needed, the PI/PD should contact the Sponsored Research Office in advance of the project expiration date to discuss requesting an extension of the project. Extension requests must be made for programmatic reasons, not financial reasons. The Director of Accounting will prepare and submit all final financial report and final property reports, as needed.

IX. Campus Contacts

Name	Contact regarding:	Office	Extension	Email
Terri Banasek	PAF forms, publications	Office of the Dean of the College	x7198	banasek@lclark.edu
Kelly Delfatti	General questions & all pre-award	Sponsored Research Office	x7211	delfatti@lclark.edu
David Ellis	Contracts	General Counsel	x7691	dgellis@lclark.edu
Marietta Lawson	Grant account & budget information (Post-award)	Business Office	x7821	lawson@lclark.edu
Shelley Meyer	Publications & advertisements	Office of Public Affairs and Communication	x7976	smeyer@lclark.edu
Robert Nayer	Infonet access	Business Office	x7814	nayer@lclark.edu
Human Resources	Hiring grant-funded employees, including students	Human Resources	x6235	hr@lclark.edu