# West Virginia University Office of Sponsored Programs



# **Grant Proposal Guide**

February 2017

#### West Virginia University Office of Sponsored Programs Grant Proposal Guide

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### Chapter 1: General Overview

# I. Mission Statement: Office of Sponsored Programs (OSP)

The staff of the OSP is committed to helping faculty seek and obtain funding, submit proposals, administer awards, and comply with all federal, state and institutional requirements and policies. Please contact the OSP at (304) 293-3998, if we can help you in any way.

The OSP functions in close collaboration with the West Virginia University Research Corporation, a private nonprofit 501(c)(3) corporation formed to administer project funds on behalf of the University: and, with the WVU Research Office, an administrative unit that helps faculty develop and enhance their research and scholarly activities and thereby enhancing the student experience.

#### II. Services Provided by the OSP

- Provide information on funding opportunities for general and specific areas of interest.
- Train faculty and staff regarding local, state, and federal government and agencies' rules and regulations, as well as, procedural information and issues.
- Review incoming proposals as to form/format, checking budgets, and comparing submission dates or deadline dates to ensure that proposals are submitted to the sponsor by the required time frame.
- Initiate all sponsored project awards in the University financial systems.
- Negotiate terms and conditions of awards and contracts with agencies.
- Work with the PI to adhere to terms and conditions.
- Coordinate any and all award-closing actions that may need to take place.
- Give assistance to PI with management of active research projects.
- Act as a liaison between various work units (University departments, organizations, etc.) to ensure proper contract administration.
- Maintain University sponsored project database with management information.
- Review terms and conditions of confidential/non-disclosure agreements, material transfer agreements, teaming agreements, and any other agreements related to collaborative endeavors.
- Prepare and issue sub-awards needed under a sponsored project.

#### III. Purpose of the Guide

This guide is a compilation of proposal submission procedures and practices for persons authorized to submit proposals through West Virginia University and the WVU Research Corporation. While the primary purpose of the guide is to help persons who are unfamiliar with West Virginia University procedures concerning proposal submission, it also includes important post award information and guidance. It may also be useful for those project directors who have submitted proposals in the past. Please note that references to West Virginia University also mean the WVU Research Corporation and vice versa.

#### IV. Kinds of Proposals

The classification of proposals is done in a variety of ways (By competition, function, and anticipated award instrument.)

#### By Competition:

- New: For a new project that must compete with other proposals.
- Renewal: For a previously funded project that must now compete with other proposals in order to be re-funded.
- Non-competing Renewal (Continuation): For an established project that, at the time of original funding, listed one or more additional years of recommended support. Applications for these additional years must be submitted to the agency, but they do not compete with other proposals and usually are not reviewed outside the agency.

#### By Function:

- Research: Most West Virginia University projects involve basic research that fits within the mission of the funding agency. However applied, demonstration, and clinical research are also performed.
- Training: A training project involves training students in a special manner or for a specific purpose that is approved by the funding agency.
- Fellowships: A fellowship is support for an individual, usually a graduate professional student, postdoctoral research associate, or faculty member, who is selected by the funding agency.
- Public Service: These are projects related to research or instructional activities that benefit a community outside West Virginia University.

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#### By Anticipated Award Instrument:

- Grant (Grant-in-aid): A grant is support of an activity in which West Virginia University is the primary beneficiary and in which the funding agency has an interest but plays no active role in conducting the project.
- Cooperative Agreement: An award in which the agency has a cooperative interest and participates in the project at designated points.
- Contract: This is a legal tool in which the contractor performs a designated task or service at the direction of the funding agency. It may be solicited [under a Request for Proposal (RFP)] or unsolicited. It may be in the form of a purchase order or letter agreement.

#### V. Sponsored Project vs. Gift

Sponsored Project (routed through OSP and administered by WVU or WVURC):

- Binds WVU to a specific line of scholarly or scientific inquiry.
- Source of the funding is usually a government entity, corporation, or company.
- Submission of a budget is required that specifies what funds need to received to accomplish the research objective.
- Funds are used for only the pre-specified activities within the identified time frame.
- Often there are intellectual property, confidentiality, and/or publication conditions associated with receipt of the funds.
- Involves regulatory matters such as human subjects and animal usage.

#### Gift (routed through and administered by the WVU Foundation):

- Also referred to as donations, endowments, and bequests.
- Source of the funding is usually an individual or foundation, but could also be a corporation or company.
- Unrestricted source for support for a West Virginia University program or activity.
- Gifts carry very general restrictions that are typically set by the donor but are usually funded without expectations or restrictions on how to be administered and require no technical or financial reports.

#### VI. Who may submit a proposal?

The Principal Investigator (PI)/ Project Director (PD) must be an employee (faculty or staff) of West Virginia University or the WVU Research Corporation. Students are not typically Pl's. However, approval is granted on a case-by-case basis when students or other non-employees are interested in becoming a PI or PD on any given project.

#### VII. Responsibilities of Principal Investigator (PI)

The PI is responsible for the coordination and preparation, management, and technical reporting of all proposal and submission materials. Although the institution signs sponsored agreements and is legally responsible to the sponsor, it is the PI that is responsible for the proper fiscal management and conduct of the project. The PI is also responsible for compliance with all terms and conditions of a sponsored agreement, for efficiently and effectively managing project funds within approved budgets, and for completing the project in a diligent and professional manner.

#### VIII. Responsibilities of Dean and Department

Projects are conducted as a department or college function. The Chair and Dean acknowledge their approval and the use of University personnel, facilities, and students by their signatures on the WVU Application Approval Sheet.

\*\* If a project is over expended or if expenditures are disallowed, the department or college is expected to cover this cost.

#### IX. Compliance

West Virginia University promotes, through policy and process, the highest standards of regulatory compliance in all areas of sponsored projects, including but not limited to:

- Protection of human subjects;
- Appropriate use of animals in research and teaching;
- Appropriate handling of radioactive, hazardous and toxic materials and wastes;
- Bio-safety;
- Conflict of interests:
- Export controls; and
- Integrity in research.

In addition, the reporting of research results, compliance with federal and international laws, assurance that charges to sponsored projects are allowable and allocable, and documentation of cost sharing are critical issues in University

audits. Listed below are short pieces of information concerning each of these areas.

It is important that PI or PD inform the University if their project includes any areas covered by these compliance issues. To facilitate this, it is important that the WVU Application Approval Sheet (sometimes referred to as the blue sheet), which pertains to these compliance issues, be filled out completely. This form can be found at http://osp.research.wvu.edu/files/d/85ca6eea-bd9f-4ef5-9111-dbb8e18445d6/wvu-and-wvurc-application-approval-sheet.pdf

# Institutional Review Board for the Protection of Human Subjects (IRB)

Programs involving human subjects require review and approval in accordance with University policies and guidelines prior to any involvement with human subjects. Ideally, Pl's seeking support from agencies outside the University should submit protocols to the IRB prior to submitting the proposal to an agency. However if that is not possible or practical at the time of proposal submission, if funded, the project funds will be restricted until IRB approval has been granted.

Some human subjects are remunerated because of the nature of their service to projects. Since the method of payment to subjects requires special arrangements, PI's who wish to pay subjects are asked to contact the manager of Payroll and Tax Accounting to discuss such arrangements.

For more information on the IRB guidelines and forms involved please refer to: http://oric.research.wvu.edu/services/human-subjects/irb-policies-guidelines

# **Institutional Animal Care and Use Committee** (IACUC)

Any project or class involving the use of a living vertebrate animal must have the prior approval of the IACUC Committee. This committee is charged with ensuring the humane use of animals in research, teaching, and compliance with national policies, procedures and regulations. The services provided include:

- 1. Review of animal use protocols
- 2. Assistance in ensuring appropriate housing and facilities for animals
- 3. Training of investigators and other individuals involved with housing a research involving animals

<sup>\*</sup> IACUC approval is not necessary in the case of insects.

For more information on guidelines and regulations please refer to the information contained in: http://oric.research.wvu.edu/services/iacuc

#### **Institutional Biohazard Committee (IBC)**

It is the PI's responsibility to adhere to the University's controls and safe handling practices for microorganisms, toxins, recombinant DNA (r-DNA) molecules, human blood or tissues, and animal cell cultures. This applies to all WVU research performed at the medical center, main campus, or at off campus facilities. Students, as well as part and full time employees, must comply with these controls and practices.

It is the Principal Investigators responsibility to:

- Receive approval from IBC before obtaining or working with unfixed human sera or tissue.
- Receive approval from the IBC before obtaining or working with potentially infectious agents that could impact people, agriculture, or the environment.
- Receive approval from the IBC prior to conducting r-DNA research that is not exempt from the NIH Guidelines. (With the exception of genes encoding certain dangerous products, gene cloning in standard vectors and strains is exempt. For questions contact Biological Safety at 304-293-7157.)
- Receive approval from the IBC before working with wild mammals or unfixed wild mammalian carcasses or tissues.
- Maintain and annually review laboratory specific standard operating procedures.
- Enforce compliance with the approved standards and policies of the University.
- Promptly report any work-related infections to Environmental Health and Safety.
- Promptly report any other incidents to IBC.
- As applicable, advise the IRB, IACUC, and IBC of any significant changes in approved protocols involving use of biological agents and/or toxins.
- Comply with shipping requirements for bio-hazardous substances and toxins. All such shipments should be made through Health Sciences Center Shipping and Receiving (304-293-5579), which has expertise in packaging, labeling, and permitting.

It is the Researchers', Technicians' and Students' responsibility to:

 Adhere to the established policies, standard operating procedures, and guidelines for biological safety as trained.

- Inform immediate supervisor of any unsafe practice or conditions in the work area.
- Report any change in health status to the supervisor if there is a possibility it may be work related.
- Report all biological spills and incidents to the supervisor.

For more information on IBC federal regulations please refer to the information in: http://ehs.wvu.edu/biosafety

#### **Radiation Safety and Hazardous Materials**

Radiation Safety Services, along with members of the Human Use, Non-Human Use and Radiological Safety Committees, is committed to the ongoing development and implementation of the current radiation safety program that includes WVU Campuses, the Robert C. Byrd Health Sciences Center and WVU Hospitals Inc. for all research activities involving the use of radioactive materials, radiation producing devices and/or the diagnostic or therapeutic use of radiation in humans, non-humans and or animals. In managing this program, Radiation Safety Services Staff will provide guidance and enforcement to guarantee the safe handling and use of radioactive materials and radiation producing machines and provide a safe environment for faculty, staff, students and visitors within WVU and WVUH facilities.

Projects involving the use of radioactive material must be reviewed and approved by the Radiological Safety Committee before any materials can be ordered and work begun. University policy also requires training for personnel, which must be completed before a project utilizing radioactive material can start. Any further questions pertaining to policy and procedures can be answered by referring to: <a href="http://www.hsc.wvu.edu/rsafety/">http://www.hsc.wvu.edu/rsafety/</a>.

#### **Environmental Health and Safety**

Administrative guidelines and University policies, coupled with regulations set forth by federal, state, and local health and safety agencies, provide the scope and structure of the Environmental Health and Safety program at West Virginia University.

The West Virginia University safety program is founded on the following objectives:

- 1. To ensure compliance with all provisions and standards of environmental and occupational health and safety laws.
- 2. To ensure compliance with the safety requirements of state and local departments of public health, Fire Marshal, Department of Natural

- Resources, and other agencies having safety and health requirements which affect the campus environment.
- 3. To ensure compliance with other legal requirements set forth by applicable local, state, or federal regulatory bodies concerned with reporting injuries/illnesses on campus.
- 4. To ensure that the health and safety needs of handicapped persons are met by compliance with the provisions set forth in governmental codes that require accessible facilities to be safe.
- 5. To ensure that the human factors of accident prevention, health, and loss control are applied.
- 6. To recognize that emergency situations may arise causing activities to be taken outside the guidelines of these policies.

In the absence of appropriate local, state, or federal regulations in any given subject area, publications by nationally recognized safety organizations have been used as guides in determining the applicable standards for West Virginia University's safety program.

#### RESPONSIBILITIES GENERAL

West Virginia University works to maintain a campus environment for students, faculty, staff, and visitors free of unsafe or hazardous conditions.

The responsibility for the administration of the University safety program is assigned to the University Department of Environmental Health and Safety under a Director who reports to the Associate Vice President for Facilities and Services. The implementation of safety policies is the responsibility of faculty, staff, students, and all individuals associated with the University. The President's Council on Health and Safety Affairs, appointed within the University, shall serve in an advisory and consultative capacity in all areas of safety to the Department of Environmental Health and Safety, and act as an investigating panel at the request of the Director of Environmental Health and Safety.

The responsibility for policies and procedures regarding license, procurement, and use of radioactive materials and sources of ionizing radiation is vested in the Radiation Safety Committee; the implementation of the Radiation Safety Program is delegated to the Radiation Safety Office located at Health Sciences Center.

The University shall comply with the intent of all appropriate federal and state legislation which applies to the University's Safety Program. This legislation, along with supporting rules and regulations issued by the Department of Environmental Health and Safety, will provide the necessary standards under which the University will conduct its Safety Program.

For Additional information go to: <a href="http://www.ehs.wvu.edu/">http://www.ehs.wvu.edu/</a>

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#### **Conflict of Interest**

Given the diverse nature of the University's goals, potential and actual conflicts of interest are inevitable. The purpose of this policy is to:

- Provide guidelines for identifying and addressing perceived, potential, and actual conflicts of interest in research
- Maintain the highest standards of objectivity, freedom from bias, and integrity of research data
- Protect human subjects who participate in research from risks and provide them with information that they can use in reaching their decisions about entering or remaining in research protocols
- Protect investigators, staff, students, and the University from even the appearance of bias in the creation, analysis, interpretation, and publication of data
- Provide clear guidance on responsibilities and procedures to investigators and employees to assist them in reaching decisions about the activities in which they engage, in view of their research and commitment to the University
- Assist employees and agents with the management of potential conflicts
  of interest in a way that facilitates and encourages the full professional
  and personal development of investigators through their research, as long
  as their relationships with industry and their personal financial and other
  rewards do not adversely affect their objectivity, integrity, or professional
  commitment; and
- Reduce or eliminate conflicts wherever possible

For more information on conflict of interest please refer to the information on the web page at: <a href="http://oric.research.wvu.edu/services/conflict-of-interest">http://oric.research.wvu.edu/services/conflict-of-interest</a>

#### **Scientific Misconduct**

The concept of integrity in research and scholarship embraces a wide range of issues and practices, although it is concerned primarily with markedly irregular practices in research and other scholarly activities, commonly known as "scholarly misconduct." Specific definitions are found in the policy but may be summarized as fabrication, falsification, plagiarism, and other actions which seriously deviate from accepted standards; material failure to comply with federal, state, or other requirements associated with the conduct of research or scientific research (which includes failure to obtain appropriate compliance approval).

For more information on policies and procedures please refer to the information on the web page at: <a href="http://osp.research.wvu.edu/policies/allegations-of-misconduct">http://osp.research.wvu.edu/policies/allegations-of-misconduct</a>

#### **Export Controls**

Export control laws, federal laws implemented both by the Department of Commerce through its Export Administration Regulations (EAR) and the Department of State through its International Traffic in Arms Regulations (ITAR), have been in existence for more than twenty years. They are the law of the land. As such, institutions of higher education and their employees are required to comply with these laws and regulations. If WVU research involves covered technologies, the EAR and/or ITAR may require WVU to obtain prior approval from State or Commerce before allowing foreign nationals to participate in the research, partnering with a foreign company and sharing research—verbally or in writing—with persons who are not United States citizens or permanent resident aliens.

Criminal sanctions (including money and/or prison sentences for individuals) can apply in the case of violations. Following the events of September 11, the export control regulations have become more prominent and scrutiny concerning the level of compliance with these regulations has heightened. It is important that faculty and other researchers in WVU departments, laboratories and centers understand their obligations under these regulations and adhere to them.

It is important to err of the side of caution in regards to these issues. Should you have any questions or require additional information, please contact Alan Martin at 304-293-7398. The Office of Sponsored Programs will take the lead in assessing whether or not export control laws apply to a particular situation. Information can also be accessed at <a href="http://exportcontrol.wvu.edu/">http://exportcontrol.wvu.edu/</a>.

### Chapter 2: Proposal Development and Submission Procedures and Processes

The OSP requests that all proposals, electronic or otherwise, be submitted in their complete and final form to an OSP representative FIVE WORKING DAYS PRIOR to an agency deadline with a hardcopy of the proposal and the WVU and WVURC Application Approval Sheet (often called the <u>blue sheet</u>) completed and signed by all appropriate parties. For electronic submissions, you must also include all electronic files on a CD at the time of submission.

Please note: Pre-proposals and/or "white papers" do not require OSP review and endorsement unless budgetary information is provided and/or institutional certifications/assurances are required (this includes submissions that require an electronic signature at the time of the pre-proposal submission).

All proposals and/or applications for external support should be received by the Office of Sponsored Programs (OSP) **5 days before** they are submitted to a sponsor. The primary reasons for this are:

- To assist the PI in creating and submitting a proposal that is within sponsor guidelines including: assistance with an appropriate and accurate budget, assistance with format, to ensure that the proposal is complete and that it represents the University and the Investigator in a positive way.
- Since the proposal document is submitted and the award is made to the University, not to the Principal Investigator (PI), OSP has the legal and fiduciary responsibility to ensure that all University, sponsor, state and federal regulations, laws, and policies are met.

Because the actual proposal development process can take days, weeks, and even months, we recommend that the PI contact the OSP very early in the proposal process, so the administrator can help facilitate the overall process.

Most federal agencies have plans in progress for full electronic submission of proposals. Our experience shows that there is generally a learning curve in the use of electronic systems and that it may take longer to submit proposals electronically than through the mail. Networks are frequently stressed during peak submissions times and technical errors may occur at the time of submission.

Therefore, OSP highly recommends providing access to electronic proposals at least **FIVE (5) WORKING DAYS** prior to deadline cutoff date and the final revised copy and final electronic files at least 48 hours prior to the deadline cutoff date. As long as the full and complete application materials arrive at OSP five working days prior to the deadline, OSP will make every effort to submit electronic applications prior to the agency defined deadline so there is ample time to respond to any errors or technical problems encountered during the submission.

Some sponsors do not require an authorized signature or have developed electronic systems that do not require the proposal be submitted through the OSP. University policy still requires that OSP review the proposal prior to submission.

Proposals that are given to OSP with less than five working days may not be properly reviewed and it may be difficult to obtain signatures because of the availability of the authorized signature authority. This may lead to proposals missing submission deadlines or being rejected by the sponsor for incomplete or improper information in the proposal.

For proposals that are either sent to sponsoring agencies without being reviewed and approved by OSP, or which have been given to OSP with less than five (5) working days to review, the following may occur:

- The OSP may not complete a thorough review of the application.
- The agency may reject the proposal if it contains incomplete or improper information.
- Grants.gov or other electronic submission systems may automatically reject the application if it is incomplete or contains improper information.
- The University reserves the right to withdraw the proposal, if after review, major problems are discovered.
- The University has the right not to accept the award if funded.
- The University has the right to renegotiate the terms and conditions, budget, resources etc., before accepting the award.

#### I. Budget Process

West Virginia University is required to comply with the Government Cost Accounting Standards (CAS). These standards require that the University maintain consistency in budgeting and expending, consistency in allocating costs to activities, accounting for unallowable costs and costing periods, whether or not federal funding is involved. These standards, along with Office of Management and Budget (OMB) Circular A-21, State guidelines and University policy, dictate how the University budgets and expends externally supported projects, including both government and private sponsors.

Allowable costs are those categories of costs that can be charged to a grant or contract (i.e. salaries, equipment, travel, supplies, etc.). Certain types of costs, (i.e. cost of alcoholic beverages, etc.) are not allowable and may not be charged to a contract or grant.

The tests of allowability of costs are:

- 1. They must be reasonable.
- 2. They must be allocable to the sponsored agreement under the principles established.
- They must be given consistent treatment throughout application of those generally accepted accounting principles appropriate to the circumstances.
- They must conform to any limitations or exclusions set forth in established principles or in the sponsored agreement as to types or amounts of cost items.

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

Major considerations involved in the determination of the reasonableness of a cost are:

- Whether or not the cost is of a type generally recognized as necessary for the operation of the institution 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 circumstances, considering their responsibilities to the institution, its employees, its students, the Federal Government, and the public at large.
- 4. The extent to which actions taken with respect to the incurrence of the cost are consistent with established institutional policies and practices applicable to the work of the institution generally, including sponsored agreements.

Allocable costs are those allowable costs that actually benefit the grant or contract to which they are being charged. A cost is allocable to a sponsored agreement if:

1. It is incurred solely to advance the work under the sponsored agreement.

- It benefits both the sponsored agreement and other work of the institution, in proportions that can be approximated through use of reasonable methods.
- 3. It is necessary to the overall operation of the institution and, is deemed to be assignable in part to sponsored projects. Where the purchase of equipment or other capital items are authorized under a grant or contract, the amounts authorized for such purchases are assignable to the sponsored agreement regardless of the use that may subsequently be made of the equipment or other capital items involved.

Unallowable expenses are not allocated to sponsored projects as either a direct cost or as facilities and administrative (indirect) costs. The costs of unallowable activities are usually treated either as part of the Other Institutional Activities (OIA) base for determining facilities and administrative indirect cost rates, or are included in an administrative cost pool, neither of which is allocated to sponsored agreements. Generally, unallowable costs include:

- 1. Administrative and clerical salaries
- 2. Local telephone charges and installation
- 3. General office supplies
- 4. Entertainment Costs

The budget justification is an important section in any proposal. It should be used to state why an item costs what it does, and to indicate how each item relates to the research plan. The information should be sufficiently detailed to address all sponsor concerns with respect to cost and need. In general, explanations should be more detailed for competing than for non-competing applications. In some instances (example: NIH applications), non-competing proposals will not request any detailed budgetary information. While your Sponsored Project Administrators can provide you with advice as to the extent that you should justify various items, it is ultimately the responsibility of the Principal Investigator. Common sponsor requests include (but not limited to):

- 1. How project salary amount is calculated, including percent of effort and total salary base.
- 2. How fringe benefits were calculated
- 3. Explain what the travel is for and break it into number of persons traveling, airfare, lodging, per diem, etc.
- 4. How expenses were derived for supplies, analyses, and/or equipment (i.e., from past experience, quotes, etc.).
- 5. How the F&A rate was calculated

<sup>\*</sup> If a charge is unallowable as a direct cost, it is usually unallowable as a match or cost sharing unless prior agency approval is attained.

6. Justification of any restricted items (unallowable costs), specifying why they are unique to the particular project.

Some investigators mention in the budget justification that additional effort not listed in the budget will be provided. In other cases, they indicate that the funds requested in other budgetary categories are insufficient for the proposed research and will be supplemented from other sources. This is considered a cost-sharing commitment. In general the University strongly recommends that PI's only cost share if the sponsor requires it. (See the "cost Sharing" section of this Chapter)

#### II. Facilities and Administration Rates

The U.S. Department of Health and Human Services is West Virginia University and the WVU Research Corporation's federal cognizant agency for negotiating facilities and administration (F&A) rates (formerly known as indirect or overhead cost rates) and fringe benefits to be charged on all sponsored agreements.

These facilities and administration rates (F&A) must be charged for all sponsored programs unless a federal program or a federal agency has been granted a legislatively endorsed restriction on the F&A rate that is to be charged or, in the case of private agencies, an established written policy exists which limits F&A rates.

F&A is calculated on a Modified Total Direct Cost (MTDC) base consisting of all salaries and wages, fringe benefits, materials, supplies, services, travel and subgrants or sub-awards up to the first \$25,000 of each sub-grant or subcontract (regardless of the period covered by the sub-grant or subcontract). Modified total direct costs shall exclude equipment (items costing more than \$5000 per unit), capitol expenditures, charges for patient care, tuition remission, rental costs of off-site facilities, scholarships and fellowship as well as the portion of each subgrant and subcontract in excess of \$25,000.

For the up-to-date F&A rates please contact the OSP or refer to our website at <a href="http://osp.research.wvu.edu/pre-award/facilities-and-administration-fringe-benefit-rates">http://osp.research.wvu.edu/pre-award/facilities-and-administration-fringe-benefit-rates</a>

#### III. Cost Sharing

**Cost sharing** is the portion of the project cost related to a sponsored agreement that is contributed by parties other than the primary sponsor and not directly charged to the sponsored agreement account(s).

Two types of cost sharing are as follows:

- Mandatory Cost Sharing is cost sharing that is part of the proposal budget and is mandated by the sponsoring agency. This can be in the form of a specified dollar amount or a certain percentage of total costs.
- Voluntary Committed Cost Sharing is cost sharing that the University contributes to a project by its own initiative and is included in the proposal budget or award. Once committed, this amount becomes a legal obligation on the part of the University.

Cost sharing represents a University commitment to provide resources to a sponsored agreement. The University wants to minimize cost sharing on sponsored projects. It is the general policy of West Virginia University and the West Virginia University Research Corporation that cost sharing should only be provided when required by the sponsor. Voluntary cost share should be avoided except in unusual circumstances and with the approval of the appropriate department chair and dean. Because cost sharing involves use of departmental and collegiate funds, department heads and/or deans must approve cost share in proposals and may impose limits on the amount of cost sharing volunteered by the faculty and staff in their units. The West Virginia University Research Corporation (WVURC) will provide cost sharing in only those circumstances where the agency or specific program requires that cost share be provided. Waiver of Facilities and Administrative (F&A) costs is not an acceptable method of providing cost share.

When cost share is required by a sponsor, the WVURC will provide cost share to projects in proportion to the distribution of F&A dollars collected. For example, where the F&A distribution model provides that 70% of the collected F&A is retained centrally and 30% of the collected F&A is distributed to the college, the WVURC will provide 70% of the required cost share and the college/department will provide 30% of the required cost share. The WVURC will not provide cost share dollars in excess of the F&A collected and retained centrally.

It is the responsibility of the principal investigator to monitor the cost sharing to ensure that the institutional obligation is met. When cost sharing is less than that agreed in the award agreement, a loss or return of project funds may result. In these instances, the principal investigator's college or school is required to cover the deficit.

Once committed, it is important to document the fulfillment of the University's responsibilities for cost sharing and maintain compliance with government regulations, primarily the Office of Management and Budget (OMB) Circulars A-21 and A-110, regarding allowability, allocability, and reasonableness and must be verifiable through documentation. Once an award is accepted by an agency, all types of cost sharing that are in the project proposal become a commitment of the University.

Cost sharing must meet **all** of the following criteria: WVU Office of Sponsored Programs Grant Proposal Guide

- Verifiable from the departments accounting records and/or appropriate documentation for in-kind cost sharing;
- Necessary and reasonable for proper and efficient accomplishment of project objectives;
- Represent types of charges that would be allowable under the applicable cost principles and institutional policy;
- Provided for in the approved budget when required by the Federal agency;
- Expended during the sponsored agreement project period;
- Not paid by the federal government under another assistance agreement (unless the agreement is authorized by federal law to be used for cost sharing); and
- Not included as contributions for any other sponsored agreement.

All requests for cost share support from the WVURC must be submitted in writing. The request must specify the following: name of agency or sponsor, cost share required, amount requested from WVURC, amount of cost share being provided by college/department. These requests should be forwarded to the Office of Sponsored Programs for approval before a proposal is submitted for review.

# IV. Frequently Requested Information for the WVU Research Corporation

The following represents data/information for the WVURC commonly requested by potential sponsors for proposals:

Institutional Representative: Alan B. Martin Secretary, WVU Research Corporation

Phone: 304-293-3998 Fax: 304-293-7435

Email: Alan.Martin@mail.wvu.edu

Financial Officer: Dan Durbin

Treasurer, WVU Research Corporation

Phone: 304-293-4008 Fax: 304-293-6856

Email: Dan.Durbin@mail.wvu.edu

#### **Mailing Address:**

WVU Research Corporation 886 Chestnut Ridge Road PO BOX 6845 West Virginia University Morgantown, WV 26506-6845

#### Mailing address for checks:

Financial Affairs and Research Accounting PO BOX 6001 West Virginia University Morgantown, WV 26506-6001

IRS Employer Identification Number (EIN/FEIN): 550665758

Dun & Bradstreet Number (DUNS): 191510239

Cage Code: 4B983

Federal Cognizant Agency: U.S. Department of Health and Human Services

(DHHS)

#### Regulatory Issues:

Federal Wide Assurance Number for the IRB: FWA00005078

Animal Welfare Assurance Number: A3597-01

Congressional District: First (WV-001)

County: Monongalia

#### For more frequently requested information, please see:

Frequently Requested Information for both the WVU Research Corporation and West Virginia University at <a href="http://osp.research.wvu.edu/proposal-essentials">http://osp.research.wvu.edu/proposal-essentials</a>.

#### V. Signatures

Most, if not all, funding agencies require the signatures of the principal investigator(s) and the authorized institutional representative on the proposal cover page. Some agencies also require the signature of your chairperson, dean, or director. In any event, the OSP at a minimum requires the signatures of the chairperson, and the dean, on the WVU Application Approval Sheet (blue sheet) before it will accept the proposal. These signatures are certification that the project furthers the divisions' purposes and priorities; includes all the costs to the University, including space, alterations, and renovations; and that the PI's time is available to supervise the project. It also confirms the PI's compliance with various West Virginia University Policies.

WVU Office of Sponsored Programs Grant Proposal Guide

Doc URL: <a href="http://osp.research.wvu.edu/r/download/38145">http://osp.research.wvu.edu/r/download/38145</a>

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#### VI. Helpful Hints

- Correct Application Package for Electronic Submission always pull a new application package from Grants.Gov when beginning your proposal. Agencies modify packages and an old application package may cause problems upon submission.
- Read your solicitation/guidelines thoroughly before preparing your application. Take special note of page limitations, margins, and other requirements that may not be obvious in the application package but our outlined in the guidelines.
- Some agencies require registration in their electronic system. While the Office of Sponsored Programs maintains registrations for the institution (i.e., Grants.Gov) there are requirements for individual registrations with others (i.e., NSF, eRA Commons). Please contact the Office of Sponsored Programs for assistance with the individual registrations.
- Please complete the Office of Sponsored Programs Application Approval Sheet (<u>bluesheet</u>) in its entirety. Addresses for the agency are often omitted if the proposal is being e-mailed. The address is required for preparation of the cover letter, even when being submitted electronically.
- When preparing budgets please adhere to the salary that is available in MAP as this is what is used in doing the salary verification at time of review. A 3-5% increase is acceptable on out years. If it is necessary to deviate from these guidelines please provide a justification as to why.
- If guidelines have language capping the F&A (see <a href="http://osp.research.wvu.edu/pre-award/facilities-and-administration-fringe-benefit-rates">http://osp.research.wvu.edu/pre-award/facilities-and-administration-fringe-benefit-rates</a>) please contact the Office of Sponsored Programs for assistance with calculating the F&A.
- If sub-recipients are involved in a project, please provide a letter of collaboration, statement of work, and budget with the proposal. See <a href="http://osp.research.wvu.edu/sub-award">http://osp.research.wvu.edu/sub-award</a> for more information about sub-awards.

Additionally please review these common errors in order to avoid them as you prepare your proposal:

- Incorrect (or different) spelling of your name
- Change in project title on a resubmission
- Incorrect information on the use of human subjects or animals
- Missing table of contents or incorrect page listings
- Failure to number pages consecutively
- Failure to fully justify budget items

- Failure to justify salary increases or equipment purchases after year 2
- Failure to use correct form pages
- Failure to include the PI's eRA Commons Username for NIH grants.gov submissions
- Proposed budget does not comply with program guidelines
- Number of budget years requested does not match proposed period of support
- Failure to include all necessary bio-sketches
- Bio-sketches placed incorrectly and do not follow required format
- Bio-sketch publications are not listed in chronological order (oldest first)
- Lack of adequate rationale for study
- Failure to support the hypothesis
- Failure to discuss potential obstacles or to provide alternate approaches
- Failure to discuss how data will be analyzed
- Failure to identify and acknowledge work already published
- Failure to adequately address inclusion of women, children, and minorities
- Exceeding page limits for research plan/description
- Failure to check for spelling and grammatical errors
- Inclusion of special characters or spaces in electronic attachment filenames

### Chapter 3: Proposal Review, Negotiation, and Award

#### I. Proposal Review

After the proposal is submitted, the potential sponsor may acknowledge receipt of the proposal by providing to the OSP an acknowledgment or assignment number. All further correspondence with the sponsor should refer to that assignment number. In most cases it takes six to nine months from the time a proposal is submitted to an agency to the notification of an award. Sometimes 24 months may pass before a decision is made on a project.

The proposed investigator should contact the OSP before he or she agrees to any modifications of the project recommended by the funding agency. If a revised budget must be submitted after negotiation, it must be approved by the OSP, which negotiates the terms and conditions of awards.

#### II. Negotiation

Working with the PI, the OSP will negotiate the terms and conditions of the sponsored agreement. The time required to negotiate the agreement depends on the complexity of the agreement, the responsiveness of the agency, the amount of support required from other University departments, and the type of award anticipated. As a general rule, negotiating contracts with private industry takes more time than grants from the Federal Government.

OSP administrators will keep the PI informed on the progress of the negotiations with the sponsor. If appropriate, the PI will be invited to participate in the discussions.

Under no circumstances should the PI sign a sponsored agreement or give the impression that he/she is negotiating on behalf of the University.

During the course of a sponsored agreement, there may be a need to change or modify the terms and conditions of the award. As with the initial negotiations, OSP will conduct these negotiations, in concert with the PI.

#### III. Rejection

Unfortunately, many proposals are rejected. If yours is one of these, you should try to determine why the proposal failed to win agency support. Most funding agencies are required to supply applicants with a copy of the reviewers' comments. If you correct the deficiencies noted in the reviewers' comments and resubmit the proposal, you may be eligible for an award at a later date. Revised proposals have a much higher success rate than new ones.

#### IV. Award

Awards are routinely transmitted by the sponsor to the OSP. If the document is sent to the PI, it should be immediately forwarded to the OSP.

The OSP provides final recommendations for acceptance of bilateral agreements, which are then executed by an authorized official. The OSP initiates all sponsored programs awards in the University's financial system.

# Chapter 4: Post Award

#### I. Post Award

All sponsored projects and awards (contracts and grants) are negotiated and signed by the OSP. Any correspondence proposing modification of the terms and conditions of the sponsored project, including changes to the scope of the work, the need for additional funds or an extension of the period of performance, must be forwarded by the OSP to the appropriate agency official.

The PI, Department Chairs, and/or Deans are not authorized to sign award documents on behalf of WVU. When an award is issued, the OSP establishes an account and sets up the controls to assure that funds are spent properly. Copies of the award and support documents are sent to the PI, Chair, Dean, and others.

OSP is responsible for the initial entry of an award in the University financial system, we wish to complete this process as speedily as possible but need certain information. Failure to supply OSP with any of this information means a delay in your receiving project funds.

#### II. Information Needed for Establishing an Award

The Office of Sponsored Programs is responsible for entering awards into the University's financial system, Mountaineer Administrative Processes (MAP), but must have the following information before processing an award. Failure to supply OSP with any of this information means a delay in your receiving project funds. If you have questions about any financial information, please consult with your expert business office (EBO) or your departmental budget officer.

Departmental Activity (DA) Number: This is a 9-digit number that translates to an expenditure organization such as "sponsored programs research" or "research cost-sharing" or "anatomy accounts" and is specific to your department and college. If your project includes cost-sharing, you will need to provide two DA numbers.

Note that there is no need to have a new DA number for every project. New DA numbers can take some time to process.

- Line Item Budget: If more than one department or college is involved in the project, OSP needs to know how many MAP "tasks" to establish and also needs the DA and line item budget for each.
- Cost-Sharing: OSP needs to know where your cost-sharing originates and the DA for the cost-sharing. Most cost-sharing is salary [CUFS fund 1300 or Oracle fund 11100037]. Note that it is not possible to release funds without cost-sharing information.
- Compliance Issues: If compliance issues (human subjects, animal use, biohazards, or radiation) are involved, OSP will not release funds until the appropriate review board has approved the protocol.

To receive information on the award process, administrative requirements and status of a particular award, contact the OSP.

The WVU Research Corporation is the fiscal agent for external awards; financial matters are under the Office of the Financial Affairs and Research Accounting; matters dealing with purchases are handled by the Office of Procurement Services.

#### III. Links to Federal Regulations

Frequently, federal and state awards will cite federal regulations as part of the terms and conditions of the award. While not exhaustive, the following links provide the description of the most frequently cited federal regulations.

### UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

http://www.ecfr.gov/cgi-bin/text-

idx?SID=ee873e1aa906cf3b0d7474d25be3b5a9&node=2:1.1.2.2.1&rgn=div5

Code of Federal Regulations (CFR) is a codification of the general and permanent rules published in the Federal Register by the Executive departments and agencies of the Federal Government. The CFR is divided into 50 titles which represent broad areas subject to Federal regulation. Each title is divided into chapters which usually bear the name of the issuing agency. http://www.access.gpo.gov/nara/cfr/cfr-table-search.html

#### National Institutes of Health Grants Policy Statement (NIHGPS)

The NIHGPS provides the policy requirement that serve as the terms and condition of the NIH grant awards.

http://grants.nih.gov/grants/policy/policy.htm

#### National Science Foundation (NSF) Grant and Agreement Conditions

This site provides information on topics such as awardee responsibilities, Federal requirements, pre-award costs, no-cost extension, travel, allowable costs, project reports final report requirements, and more. http://www.nsf.gov/awards/managing/

### US Department of Agriculture – Cooperative State Research, Education and Extension Services (CSREES)

This site provides information about the Office of Extramural Programs, Award Terms and Conditions, Intellectual Property and Invention Reporting as well as CSREES Transition to Electronic Grants.

https://www.usda.gov/wps/portal/usda/usdahome?contentid=cooperative\_researchextension\_services.xml

This guide's purpose has been to provide interested faculty and administrative members of West Virginia University as an informative summary of the processes and procedures of the Office of Sponsored Programs. Any questions not addressed by this guide or on the website at <a href="http://osp.research.wvu.edu/">http://osp.research.wvu.edu/</a> can be addressed to:

Office of Sponsored Programs 886 Chestnut Ridge Road PO Box 6845, Room 202 Morgantown, WV 26506 Phone: 304.293.3998

Fax: 304.293.7435