Office of Grants Development and Administration

Operating Manual
I. Introduction

The Office of Grants Development and Administration (OGDA) at Perimeter College is the designated office responsible for pre- and post-award administration of all externally funded grants and sponsored programs administered by the college in accordance with sponsors’ rules and regulations, the federal Office of Management and Budget (OMB) Circulars, award terms and conditions, and established GSU and University System of Georgia (USG) policies and procedures.

The staff in the Office of Grants Development and Administration (OGDA) at Georgia State University’s Perimeter College (PC) are the key resource to aid faculty in the pursuit and management of external funding awarded to the college. Since each proposal for external funding has the potential to become a legal document binding the College and the University to fulfill the conditions specified in the proposal, all Perimeter College faculty and staff are required to work through OGDA when developing and submitting a proposal. When a proposal is submitted to any sponsor, it is always submitted by OGDA through the GSU research portal to the central Office of Sponsored Proposals and Awards (OSPA) and not by the author of the proposal. When an award is received, the University, on behalf of the Principal Investigator/Project Director receives it. Thus, the author of a proposal must seek, secure, and substantiate the College's/University’s commitment to issues of compliance, support, and concurrence with fiscal and programmatic statements. To do so, the author must ensure that the proposal conforms to all applicable regulations, policies and procedures; must inform relevant administrators of potential commitments of time and resources and obtain their electronic consent to these commitments. It is the responsibility of the OGDA to review the accuracy and completeness of the College’s support of the proposed project and the College's suitability as a recipient of the targeted award.

Mission: The Office of Grants Development and Administration at Perimeter College encourages faculty and staff efforts in the acquisition of external funding by providing timely information, technical expertise, assistance in proposal development and submission, and by providing assistance to faculty in the administration of their projects in a service-oriented and user-friendly environment. Our office embraces creative and innovative ideas that can make an impact on teaching and learning at Perimeter College.
Guiding Principles:

- Provide the Perimeter College community with leadership in sponsored program development, administration, and compliance.
- Offer services that are responsive to the scholarly needs of the Perimeter College community.
- Provide differential assistance to the Perimeter College community based upon college priorities and individual experiences with sponsored programs.
- Facilitate the pursuit of external funding related to student success, research, creative activity, instruction, and community service.

Services

- Assist faculty and staff with identification of potential sponsors; offer technical proposal development assistance and review proposals for compliance with all applicable agency, GSU, USG, State and Federal regulations.
- Provide faculty and staff with timely information on funding opportunities.
- Provide faculty and staff with proposal-writing support, process and submit proposals in an accurate and timely manner.
- Identify and interpret sponsors’ guidelines.
- Maintain an archive of proposals and awards submitted by Perimeter College.
- Assist faculty and staff with the submission of proposals and revisions through the GSU Research Portal.
- Develop and update OGDA policies and procedures.
- Obtain required approvals for all research and sponsored programs to be submitted.
- Facilitate no-cost extensions for sponsored programs when applicable and justified.
- Review and monitor submission of technical programmatic reports to sponsoring agencies.
- Assist faculty and staff with budget revisions when needed.
- Provide guidance and direction to the administration to address the strategic priorities of the college.
- Coordinate with Perimeter College administration and OSPA on the financial administration of external funding received by the College.
- Provide reports on proposals and awards.
- Analyze funding trends as they relate to research and program strengths of Perimeter College.
II. Key Terms

Abstract: A 200-500 word summary, typically written last, demonstrating to the funding agency that this is a program worth funding. State the problem to be solved, note objectives to be achieved, and activities to be conducted.

Award: An award is financial assistance provided to the institution (recipient) that provides support or stimulation to accomplish a public purpose related to the mission of the institution.

Budget: The budget is a reasonable estimate of costs related to the proposed project. The budget estimates should be sufficient to perform the project while staying within the scope of the agency’s awards.

Budget Narrative/Justification: A budget justification is a narrative of the breakdown of the costs for each item in the budget so that the reviewer understands that all of the project costs are reasonable, allocable to the project, allowable based on the policies and procedures of GSU, USG and the agency and consistently treated. A budget justification explains in narrative form how the overall cost for each category listed in the budget was calculated.

CITI Training: All faculty, staff, undergraduates, graduate students and post-docs involved in empirical research and sponsored programs (grants) at Georgia State University are required to undertake Conflicts of Interests and Responsible Conduct in Research (RCR) education and training through the Collaborative Institutional Training Initiative (CITI). In addition, individuals involved in human subjects’ research are required to complete the additional human subject modules in their content area.

Conflict of Interest: A divergence between an individual's private interests and his or her professional obligations to the college such that an independent observer might reasonably question whether the individual's professional actions or decisions are determined by considerations of personal gain, financial or otherwise. An actual conflict of interest depends on the situation and the potential for the appearance of impropriety, and not necessarily on the character or actions of the individual.

Conflict of Interest Committee (COI Committee): The university committee constituted for the purpose of determining what conditions or restrictions, if any, should be imposed by the university to manage actual or potential conflicts of interest arising from disclosed Significant Financial Interests as defined herein. The COI Committee is designed to ensure the integrity of the research performed by employees that operate within the institution. Committee members are appointed by the Office of Research Integrity.

Contract: A contract is "an exchange of promises that gives rise to legally enforceable rights and duties." A contract is a form of a sponsored program. Contracts are agreements signed by
each party which stipulate that the sponsor will provide funding to a recipient in support of a
specific set of activities in return for which the recipient will furnish a particular product,
service(s), analysis, report(s) or other materials. Contract negotiation is more likely than grant
negotiation to involve discussion of proposed provisions restricting the publication or other use
of data, or clauses affecting potential patent rights and licensing agreements; contracts also
generally require frequent, detailed reporting. In a contract arrangement, the sponsor is
actively involved in overseeing the progress and direction of the project. A number of federal
agencies use contracts to fund research, development, training, and public service programs.
Most state awards are made in the form of contracts.

There are many different types of contracts. In sponsored projects, however, contracts are
usually of two types, either fixed-price or cost-reimbursement. Under a fixed-price contract,
the parties agree in advance on the price to be paid for a particular product or service. Once the
agreement has been executed, the recipient is obligated to perform the work set forth in the
contract and to deliver any and all products or "deliverables" specified in the contract. This
requirement must be fulfilled, regardless of the cost to the recipient. If the cost of performing
the contract is less than the amount set forth in the contract, the recipient (College) may retain
the excess funds. Under a cost-reimbursement contract, the sponsoring agency and the
recipient agree on the work to be performed and on an estimate of the total cost for
performing the work. The sponsoring agency is obliged to reimburse the recipient for actual
costs (up to the contract total) incurred in the performance of the work specified in the
contract.

**Cooperative Agreement:** Cooperative Agreements involve the active participation and
collaboration of the sponsor in all aspects of the project. A cooperative agreement is a form of
a sponsored program. In these types of agreements, the sponsor participates (to some extent)
in all decisions about what work is to be done, when it is to be done and who is to do it. Thus,
the sponsor becomes a true and genuine partner in the project. Because the degree of sponsor
involvement and the segregation of responsibility require specification, the cooperative
agreement usually involves more detail than a grant, though perhaps less than a contract.

**Cost Sharing:** Cost Sharing is a contractual obligation committing the institution to share in the
costs of a sponsored project. The proper documentation of cost sharing has been a major
target of audits making it the second leading area of cost disallowances.

**Disclosure of Significant Financial Interests (SFI): Financial Conflict of Interest Disclosure**
(FCOID) Form: The Policy on Financial Disclosures in Sponsored Research promotes objectivity
in University research by establishing processes that provide a reasonable expectation that the
design, conduct, and reporting of sponsored research are free from bias resulting from financial
conflicts of interest of the University employee involved in the research. The Disclosure of
**Significant Financial Interest form** must be completed by every person working on a sponsored
project (faculty, staff, and students).

**Facilities and Administrative Costs (F&A):** Expenses incurred by GSU in support of sponsored
awards and contracts that are not directly accountable to a cost object (such as a particular
project, facility, function or product). F&A costs include expenses attributed to facilities and administration (e.g., building use and improvement, operations and maintenance, equipment use, library use, general administration, etc.). All budgets for sponsored programs must include F&A costs in accordance with GSU’s federally negotiated rates. F&A costs are calculated based on the Modified Total Direct Costs which excludes buildings, individual items of equipment in excess of $5000, alterations and renovations, participant support costs, and that portion of each sub-award in excess of $25,000. Any reductions or waivers of indirect costs must be approved by the Vice-President of Research and Economic Development at GSU.

**Federal Flow-through:** Federal Flow-Through is a term used to describe the origin of the funding source when funds are received as a sub-award from a non-Federal entity who had originally received the funds directly from a Federal source.

**Fringe Benefits:** Fringe benefits are the costs associated with providing employees with FICA (social security); FICA Med (Medicare); Health and Life Insurance and Retirement. Annually, the Office of Sponsored Proposals and Awards provides established rates to utilize in planning sponsored program budgets.

**Funding Identification Request (FIR) Form:** The Funding Identification Request (FIR) form is the standardized internal PC form utilized to request assistance from the Office of Grants Development and Administration in identifying funding for a project idea originating from a faculty/staff member or a department.

**Grant:** A grant is "an award of financial assistance to an eligible recipient in support of a proposed program." A grant is a form of a sponsored program. The term "grant" is used to describe awards of extramural support for projects submitted by faculty or staff. Grants for student financial aid are managed by the Office of Financial Aid and are not included in this definition. Generally, the grant mechanism is used when the sponsor is not seeking immediate benefit for itself but is simply providing support for work initiated by the Principal Investigator/Project Director (PI/PD). Grant recipient's make no guarantees other than work will be done as described in the proposal and that good program management practices will be followed. If an agency wishes to award grants for research, training, or public service in a particular area, it will announce the availability of funds and invite interested parties to submit proposals. The grantor offers a grant award via a Notice of Grant Award or a letter indicating the amount to be awarded as well as the conditions that must be met. The requirements associated with a grant award vary widely from sponsor to sponsor. Generally, grant awards are made for a particular period of time, with definite start and end dates; grant awards usually include restrictions on the use of funds and on the reallocation of funds from one budget category to another. Most sponsors require periodic progress reports and annual technical and financial reports, as well as final technical and financial reports at the end of a project. The sponsor expects to receive reports, but not to supervise the program.

**Human Subjects:** Human subjects are defined by the Code of Federal Regulations (CFR) as "a living individual about whom an investigator obtains (1) data through intervention or
interaction with the individual or (2) identifiable private information. The regulations extend to
the use of human organs, tissue, and body fluids from individually identifiable human subjects
as well as to graphic, written, or recorded information derived from individually identifiable
human subjects.

**Incidental Work:** Work in excess of the normal contractual duties included in an individual’s
institutional base salary.

**Institutional Animal Care and Use Committee:** The Institutional Animal Care & Use Committee
(IACUC) is a standing committee at Georgia State University that is charged with overseeing the
safety, respect, and dignity of animal subjects involved in scientific research in compliance with
applicable federal regulations and guidelines. In addition, the impact to human health must be
considered when interacting with animals. For additional information, please see GSU’s IACUC
policies.

**Institutional Base Salary:** The salary compensation paid for a full-time employee’s contractual
appointment, whether that individual’s time is spent on teaching, research, administration,
and/or service. Base salary excludes any income that an individual is permitted to earn outside
of his/her duties for extra compensation, summer salary, expense reimbursements and/or
incentive pay. Base salary may not be increased as a result of replacing organizational salary
funds with sponsored project funds.

**Institutional Responsibilities:** An individual's professional responsibilities on behalf of the
college which may include activities such as research, research consultation, teaching, clinical or
other professional practices, institutional committee memberships, and service on panels such
as an Institutional Review Board.

**Intellectual Property:** The Board of Regents of the University System of Georgia (USG) defines
intellectual property as “patentable materials, copyrighted materials, trademarks, software and
trade secrets, whether or not formal protection is sought.”

**Internal Review Board:** All research that involves the use of humans (e.g., survey, experimental,
evaluation, biomedical research) must be approved by an Institutional Review Board (IRB)
charged with the responsibility of maintaining institutional compliance with the U.S. Office for
Protection from Research Risks (OPRR) regulations regarding the use of human subjects in
research.

**Letter of Support/Commitment:** A letter of support/commitment is a written letter on
organizational letterhead that provides support/commitment to the specific line of scholarly
work/activity detailed in a sponsored program. Internal letters of support/commitment are
required to be obtained when a sponsored program commits institutional resources to a
project. External letters of support/commitment are often required to be submitted as an
attachment to a proposal or kept on file in the Office of Grants Development and
Administration at Perimeter College.
Memorandum of Understanding/Agreement: A memorandum of understanding/agreement (MOU or MOA) is a formal agreement between two or more parties. Companies and organizations can use MOU/As to establish official partnerships. MOU/As are not legally binding but they carry a degree of seriousness and mutual respect, stronger than a gentlemen’s agreement. Often, MOU/As are the first steps towards a legal contract. In US law, a memorandum of understanding is synonymous with a letter of intent (LOI), which is a non-binding written agreement that implies a binding contract is to follow.

Notice of Award Acceptance (NOAA): Once an award has been accepted, its budget verified, and all compliance areas approved, a Notice of Award Acceptance is distributed to the PI/PD and department administrator(s). A NOAA is also generated and distributed for post-award actions that affect budgets and periods of performance. The NOAA provides a summary of the award terms and conditions that require active monitoring and provides a record of actions taken on an award by GSU.

Notice of Intent (NOI) Form: The Notice of Intent is a standardized internal PC form utilized to obtain initial supervisor approval to submit for external funding and to establish the proposal development timeline.

Office of Management and Budget (OMB) 2 CFR, Part 200: The OMB 2 CFR, Part 200 is an administrative policy document issued by OMB to Federal agencies as instructions or information regarding a variety of topics including grant administration. OMB has worked cooperatively with the grantor agencies and the grantee community to develop government-wide policy to assure that grants are managed properly and that federal dollars are spent in accordance with applicable laws and regulations.

PIVOT: PIVOT is a comprehensive database of both public and private funding opportunities worth an estimated $33 billion. The database not only contains funding opportunities but also provides over 3 million scholar profiles that can be searched for potential collaborative research projects. Once you have established a log-in and created or updated your user profile, you can search the funding opportunities instantly and can save your searches and request weekly notifications of funding matching your research interests.

Project Director/Principal Investigator: The Project Director/Principal Investigator (PD/PI) is the individual(s) with the appropriate level of authority and responsibility to direct the project or program supported by the grant. The PD/PI is responsible and accountable to Perimeter College, or, as appropriate, to a collaborating organization, for the proper conduct of the project or program including the submission of all required reports. The PD/PI serves a critical role in the success of all sponsored programs by providing administrative oversight, budget management and accurate reporting to the sponsoring agency.

Proposal: In simplest terms, a proposal is a request for funding of a particular sponsored project. In general, it consists of several parts: a technical or narrative section, a budget, and
various assurances and forms. Appendices and attachments may or may not be required. A good technical proposal is a concise and coherent explanation of a project plan that has specific and reasonable goals. It should clearly state both the goals of the project and the methods to be used in reaching those goals. Finally, it should comply with sponsor limitations on length and should include only those supporting materials that are relevant. The budget is the Principal Investigator’s/Project Director’s (PI/PD) best estimate of the funds needed to carry out the project. It should be as detailed as is reasonably possible; the PI should be able to justify each budget item in writing.

When a sponsor has its own application form or instructions for submission, it is important that the PI use these forms and format, and follows the guidelines. PI’s should remember that the lead-time for review of proposals is six to nine months.

A proposal can describe a new, renewal, supplemental, or continuing project for which funds are sought from a potential sponsor in the form of a grant, contract, cooperative agreement or other instrument. Proposals may be in response to a solicitation from a sponsor or may be unsolicited. Following is a definition of types of proposals:

- **New Proposal**: A new proposal is one which is submitted for funding of a project that has not previously been funded. In almost every instance, new proposals are subject to competitive review. Proposals will be evaluated and ranked according to criteria established by the funding agency.

- **Continuation Proposal**: Most agencies award grants for a specified project period (usually one, three, or five years). Regardless of project length, the grantor generally makes funds available for only one year at a time. In order to obtain funds for additional periods of time within the grant period, a "continuation application" must be submitted. Continuation applications usually are not subject to competitive review.

- **Renewal Proposal**: In a "renewal proposal" the PI requests support beyond the initially approved project period. The type of sponsored program award--grant, contract, or cooperative agreement--is an indication of general program requirements regarding the sponsor’s role in the program, the Principal Investigator's responsibilities, the nature of expected outcomes, the payment method and schedule, and the use of program results or data. The particular program requirements for each sponsored program are specified in the award document.

- **Supplemental Proposal**: A supplemental proposal can be one of three things; it can add to an existing proposal to compensate for a deficiency, give further information or change the direction of a proposal, and it can be a special subject added to enhance an existing proposal. With supplemental proposals, PI/PD's usually ask for additional funding or an extension on existing funding. Supplemental proposals are subject to competitive review.

**Recipient**: A recipient is an organization receiving financial assistance directly from an awarding agency to carry out a project or program.

**Research**: Research is defined in the Code of Federal Regulations (CFR) as "a systematic investigation designed to develop and contribute to generalize knowledge." The term encompasses basic and applied research (e.g., a published article, book or book chapter) and
product development (e.g., a diagnostic test or drug). The term includes but is not limited to any activity for which research funding is available from diverse funding agencies through a grant or cooperative agreement and authorized under statutory authority, such as a research grant, career development award, center grant, individual fellowship award, infrastructure award, institutional training grant, program project or research resources award.

**Research Portal:** The research portal at GSU is the primary electronic system utilized to route proposal submissions and changes for approval.

**RFP/RFA:** These acronyms stand for Request for Proposals and Request for Applications, the announcement mechanisms the Federal government and many other sponsors use to let the community know that they are seeking proposals relating to a specific topic or broad program. RFPs and RFAs are the guides or roadmaps faculty members need to prepare proposals. RFPs are usually associated with requests for grant proposals and RFAs are usually associated with contract proposals.

**Routing Form:** The Routing Form is the standardized electronic GSU form available in the research portal, utilized to obtain internal institutional approval for all sponsored programs prior to submission to the funding agency.

**Senior Accountant:** The Senior Accountant for Perimeter College assists PIs with the financial aspects of grant projects including the monthly expenditure reviews. The Accountant monitors and approves all grant expenditures and reimbursements and assists in resolving discrepancies in accounting and budget records. The Accountant also assists in processing of all personnel actions related to grant projects. Lastly, the Accountant assists PIs with purchasing and making grant related travel arrangements.

**Significant Financial Interests:** Significant financial interest means a financial interest consisting of one or more of the following interests of the Investigator and those of the Investigator’s immediate family that reasonably appears to be related to the Investigator’s University responsibilities:

- With regard to any publicly traded entity, any remuneration received from such entity in the twelve (12) months preceding the disclosure and the value of any equity interest in such entity as of the date of disclosure that, when aggregated, exceeds $5,000;
- With regard to any non-publicly traded entity:
  - any remuneration received from such entity in the twelve (12) months preceding the disclosure that, when aggregated, exceeds $5,000, or
  - any equity interest regardless of value;
  - intellectual property rights (e.g., patents, copyrights), where income related to such rights and interests has been received;
  - reimbursed or sponsored travel, excluding travel that is reimbursed or sponsored by a federal, state, or local government agency, an institution of higher education, an
academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

Significant financial interest does not include the following types of financial interests: (1) salary, royalties, or other remuneration paid by the University to the Investigator if the Investigator is currently employed or otherwise appointed by the University, including intellectual property rights assigned to the Georgia State University Research Foundation and agreements to share in royalties related to such rights; (2) income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; (3) income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, or an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education; or (4) income from service on advisory committees or review panels for a federal, state, or local government agency, or an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

Equity interest means any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value. Financial interest means anything of monetary value, whether or not the value is readily ascertainable. Immediate family means an Investigator’s spouse and dependents. Remuneration means any payment for services including, but not limited to, salary, consulting fees, honoraria, and paid authorship. University responsibilities means an Investigator’s professional responsibilities on behalf of the University including, but not limited to, activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels.

Solicitation: A solicitation is an invitation from a funder to submit applications on a specified topic with specified purposes. The formal application and instructions for a solicitation are often referred to as one of the following: Request for Proposal (RFP); Request for Applications (RFA); Solicitation for Grant Applications (SGA); Request for Quotes (RFQ); Invitation to Bid (ITB); or Invitation to Negotiate (ITN).

Sponsored Programs: Generally, sponsored programs refer to scholarly, professional, and creative activities that GSU employees conduct with support from external funding instruments such as grants, contracts, cooperative agreements, or other types of financial arrangements. Sponsored programs may support instruction, research and/or public service activities. The Georgia State University Research Foundation (GSURF) serves as the recipient of most sponsored program funding. While faculty and staff may be the authors of proposals requesting funding, GSURF is the official recipient and steward of the external funding and support and accepts responsibility for oversight, compliance management and appropriate conduct of activities on behalf of the principal investigator/project director. Sponsored programs do not include voluntary donations or gifts to the college, funds received directly by a faculty or staff member including honoraria, testing and service agreements processed through...
re-charge centers having an established fee for service, or financial aid provided to students. All initiatives that contain one or more of the below conditions are considered to be a sponsored program:

- An investigator-initiated proposal for research, training or public service activities to an outside entity.
- A formal proposal exists requiring the endorsement of a GSU-authorized official.
- Progress, technical, final reports, and/or other exchanges are required. The proposed activity binds GSU to a specific delivery of work including service to a sponsor.
- The activity has a specified performance period or completion date.
- The agreement for the activity contains compliance terms and conditions.
- The agreement for the activity contains provisions for confidentiality.
- The testing/evaluating of proprietary products is involved.
- Initial pricing, expenditures, financial reporting, and/or performance may be subject to internal and external audit.
- Billing, separate accounting procedures, and/or report of expenditures are required.
- Reimbursement/payment is contingent on completion of specified exchanges.
- Unexpended funds must be returned to the sponsor at the end of the activity.
- Cost sharing/cash matching is involved in the performance of the activity.
- The activity includes budgeted indirect costs.
- The activity involves disposition of property, whether tangible or intangible, that may result from the activity (e.g., equipment, inventions, copyrights, or rights in data).

Sub-award: A sub-award is an award of financial assistance made under an award by a recipient to an eligible sub-recipient or by a sub-recipient to a lower tier sub-recipient.

Time and Effort: Faculty, staff, and students who receive compensation from sponsored projects (grants) that include personnel and fringe monies are required to track and document their effort. The sponsored project PI, who should have first-hand knowledge of the work conducted by the employee, must certify that the efforts described in the GSU Time and Effort reporting system are accurate each semester (Summer, Fall and Spring).

III. The External Funding Process and Procedures at Perimeter College

Only full-time faculty, staff members, or employees designated by the vice provost/dean, associate dean, chair or assistant chair may serve as Principal Investigators (PI) or Project Directors (PD) on a grant or other sponsored program. All individuals wishing to serve as PI/PD on a grant proposal must abide by all OSPA policies and procedures including the approval of all grant submissions through the GSU research portal. Each supervisor/signatory should consider the following when evaluating whether an individual may serve as a PI:

a. Individual’s employment status as a full-time employee;
b. Individual’s requisite training, skill, commitment, and expertise;
c. The individual’s ability to comply with the terms and conditions of the sponsored agreement, including reporting requirements; and
d. Perimeter College’s ability to comply with the terms and agreements of the proposed project, including cost sharing and reporting requirements, should the individual leave the employ of GSU or otherwise be unable to complete the proposed project.

All GSU faculty, staff, and undergraduate students involved in externally funded research and scholarly activities are required to complete the CITI training modules prior to the opening of any externally funded account. There are three required training modules offered through the University of Miami’s Collaborative Institutional Training Initiative (CITI) that must be completed. These modules are:
1. Responsible Conduct of Research
2. Human Subjects Research and
3. Conflict of Interests

Please visit the CITI training website at: https://www.citiprogram.org and create an account by clicking on the register tab. Search for GSU and continue to step 2 where you will complete your identifying information. Once you have registered, you will receive your login information. Login and add the courses. Under the Human Subjects Research question, select “Social and Behavioral Research Investigators”. Under Responsible Conduct of Research, select the appropriate track. Make sure you answer “yes” to the question, “Would you like to take the Conflict of Interest course?” so that this course is available for you to complete.

The process of acquiring and managing external funds can be grouped into two main parts: Pre-Award and Post-Award.
A. The Pre-Award Process. The Pre-Award process consists of four primary phases.

**PHASE ONE: IDENTIFY**

The first phase of the Pre-Award process is to identify the project idea and identify a funding source.

1. **Identify Need, Idea and Scope of Budget.** An idea for a project usually originates from an identified “need.” To be successful in garnering external funding support, it is very important that the project is strongly justified with data or evidence that supports the “need” for the project. With a “need” identified, it is important to sketch out the project’s idea including the activities/components and forecast the budgetary needs.
2. Search for Funding Source(s). Once the need, idea and scope of the budget have been identified, there are several approaches to identifying funding.

**Self Search.** There are three main approaches to self-identifying funding for the project:

*Pivot:* Pivot is a database containing funding opportunities. It is searchable by keyword/topic, or by sponsor. It also contains profiles which are searchable. This option is great for locating potential collaborators and obtaining funding recommendations based on profile contents. The database also provides newsfeeds announcing new funding opportunities in the humanities & social sciences, and health & sciences. The newsfeeds can be set up as Live Bookmarks or within Outlook and Google. [http://pivot.cos.com/](http://pivot.cos.com/)

*Agency Website Self-Search:* Individuals may also access agency websites to conduct self-searching. The advantage of visiting the agency websites is that they often provide additional information about the opportunities, and, in some cases, they provide sample project abstracts and proposals that can assist the person developing a proposal.

*Networking:* Many times, faculty/staff can learn about funding opportunities at conferences or workshops in your discipline or by networking with colleagues at other institutions. Sometimes networking can lead to collaborative proposals or sub-awards.

*OGDA Funding Search:* OGDA staff can assist in helping to identify potential sponsors for a wide variety of project ideas. Faculty and staff are always welcome to contact or visit OGDA to discuss particular areas of interest as well as to acquaint the staff with current activities and interests prior to initiating a funding search.

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**PHASE TWO: STRATEGIZE**

Once the project and funding opportunity have been identified, Phase Two of the pre-award process is to Strategize.

**Strategy Meeting with OGDA:** The purpose of the Strategy Meeting is to review the key requirements of the Request For Proposals (RFP) in order to assist the Principal Investigator (PI) in developing the strongest proposal possible. OGDA staff assists faculty and staff in examining the project ideas to determine if they are feasible and fundable and determining the course of action in regards to the pursuit of the opportunity. If, after reviewing the RFP, the PI is still interested in pursuing the opportunity, the pre-award staff assists the PI in completing the Notice of Intent (NOI) Form. In addition, the Pre-Award staff reviews the Significant Financial Interest Disclosure policy and procedures in order to assure that any disclosures are made prior to the proposal submission.

**Complete Notice of Intent Form:** The Notice of Intent (NOI) form is a standardized internal Perimeter College form utilized to obtain initial supervisor approval to develop a proposal for
external funding. The NOI Form requires the PI to also provide a brief abstract of the proposal. The last section of the NOI Form contains a timeline. Together, the PI and OGDA complete the timeline section, working backwards from the proposal deadline and allowing a minimum of 10 business days for final approval prior to the grantor deadline. After the PI’s supervisor approves and returns the completed and signed NOI form, the pre-award process moves into Phase Three: Develop.

**PHASE THREE: DEVELOP**

The Develop Phase is the most difficult and labor intensive part of the pre-award process. During this phase, the OGDA staff provides the PI with critical guidance. It is important that the PI understands that any feedback is intended to be constructive criticism and helpful in the design of a competitive application. All GSU, USG and granting agency policies and procedures must be adhered to in the proposal.

**Template Documents:** After identifying a potential sponsor and receiving the completed NOI form, OGDA staff reviews RFP guidelines one more time and develops an electronic grant template for each document required by the RFP. The templates are then provided to the PI for completion.

**Draft Proposal:** Developing the strongest proposal often takes considerable time. Starting the process early enables the PI to develop multiple proposal drafts and obtain feedback from several different readers. It is important to have a variety of people review the draft proposal to receive the best feedback possible. It is also important to seek out assistance from a variety of people as the proposal is developed. Do not hesitate to seek out specialized assistance from other relevant units at the university such as information technology, institutional effectiveness and/or facilities. In developing the proposal draft, be sure to use template headings and subheadings appropriately and link them to the sections identified in the application instructions. This will assist the reviewer in finding the information that they are seeking and potentially

**Typical Template Elements:**
- Abstract/Summary
- Table of Contents
- Project Narrative
- Budget
- Budget Narrative
- Additional Attachments

**Typical components of a proposal narrative:**
- **Introduction** – Frames the importance of the project for funding in a larger context and establishes your suitability for performing the project. The introduction should capture the reviewer’s interest and identify target areas of need to be addressed.
- **Needs Statement** – Describes a critical condition or social need and tells the funding agency specifically the problem that is being addressed and why the agency should be interested in sponsoring the work.
- **Goals** – A broad statement of the overall proposal purpose.
- **Objectives** – Describes what specifically will be accomplished. Objectives must be measurable with expected outcomes.
- **Methods/Activities** – Outlines activities to be used to reach stated objectives, allowing the funding agency to visualize the implementation of the project. Provides the steps you will take to achieve the expected outcomes. Note: for scientific proposals, this should always be stated in the format of a hypothesis and testing.
- **Evaluation** – Explains measures of the success of the project and how they will be evaluated to determine the final level of success of the project.
- **Dissemination** – Describes how research findings might be shared with others.
create the conditions for a more positive review. The data referenced in the draft proposal should be current and cited wherever applicable. Failure to do so can cause the reviewer to question the integrity and ability of the PI. Reviewers spend the majority of their time evaluating the written text, so it is important that all text is well written. Well written text is free from spelling and typographical errors. It flows easily and is a pleasure to read.

Secure Letters of Collaboration: PI’s are required to obtain letters of collaboration for any internal or external commitments to the project before the proposal can be approved for submission. Letters of collaboration should be on letterhead, signed by the individual who has the authority to commit the resources and provide the details of the resources to be committed to the project. The PI should obtain the letters of collaboration early in the proposal development process to assure that the project activities will be able to be conducted. Below are some examples of resources that would require internal letters of commitment:

- Space to conduct project activities
- Assistance and support of technology and/or equipment
- Cost-sharing
- Time and effort of personnel from various units at the university
- Any items/activities in the proposal that commit college funds or resources
- Resource commitments from external organizations

Review and Critique: The first draft is reviewed and critiqued by OGDA. It is very important to obtain candid feedback on the first proposal draft. PI’s should be aware that all comments and suggestions are meant to strengthen the proposal into a competitive, easy-to-read document. OGDA will correct any typographical errors and offer comments and suggestions regarding areas of the proposal that need strengthened, clarified or revised. If time permits, it is helpful to receive multiple rounds of feedback from OGDA and other peers. Each round of editing strengthens the proposal and makes the proposal easier to read for the reviewers. Typically, OGDA schedules at least one in-person meeting to review the critique of the proposal and schedules a second, separate meeting, to review and make adjustments to the budget and budget justification.

Revise Proposal Documents: The PI is responsible for making revisions to the proposal drafts in accordance with the feedback received from OGDA and other peers. OGDA recognizes that the PI may not always agree with the comments and suggestions made in the review and critique and may choose to forego addressing those suggestions. In instances where the comments address activities and/or expenses that would violate university, USG and/or agency policies and procedures, the PI will be required to make corrections. Failure to make these corrections will cause the proposal to not be submitted.

Final Documents Provided to OGDA: Electronic copies of all final proposal documents including letters of collaboration must be received by OGDA on or before the deadline set in the original Notice of Intent (normally ten days prior to the deadline) in order to obtain the required internal approvals prior to submission. Failure to meet this deadline can jeopardize the ability
of OGDA to submit the proposal to OSPA through the research portal in time to make the sponsors deadline.

**A Note About Human Subjects Research:** If a PI plans on conducting a project that involves Human Subjects Research, the PI will need to follow the policies and procedures outlined by GSU’s Office of Research Integrity and will require all associated personnel to complete CITI Training and submit the study to GSU’s Internal Review Board for approval. OGDA encourages all PIs to complete CITI training prior to submission and start the IRB process prior to the anticipated start date of the project.

**PHASE FOUR: SUBMISSION**

Once final documents have been provided to OGDA, the Pre-Award process moves into the final phase of Submission which includes several steps.

**Completion of the Disclosure of Significant Financial Interests (SFI) Form:** At this stage, the PI and any CO-PIs are required to complete the Significant Disclosure of Financial Interests form located at this link: [https://sfi-gfa.rhcloud.com/login/gsu](https://sfi-gfa.rhcloud.com/login/gsu). Although all employees are required to complete an annual disclosure, a new disclosure must be completed each time a sponsored proposal is submitted. In completing the disclosure, each individual must check “proposal submission” under the Sponsored Project Disclosure heading and complete the required information. GSU will not allow proposal submission to the sponsoring agency until all SFI Disclosure has been completed.

**Completion of Agency Submission Procedures.** OGDA reduces administrative burdens on PIs by completing all procedures required by the sponsoring agency. This includes preparing all electronic or paper application documents and uploading all required documents to the applicable electronic submission or mailing paper documents depending on the agencies submission procedures.

**Upload Documents to the Research Portal.** OGDA assists the PI by uploading all documents to the research portal so that the proposal can be approved internally prior to OSPA’s five day deadline. Once completed, the research portal will electronically route the proposal documents and obtain the required internal approvals. This typically includes the PI, the PI’s chair/supervisor, the Chief Administrative Officer (CAO) for Perimeter College and the Vice Provost/Dean.

**Obtain Internal Approvals.** Once the PI (and Co-PIs) electronically approve(s) the proposal submission through the research portal, an email is sent to the PI/CO-PI’s chair/supervisor for review and approval. The chair/supervisor is responsible for reviewing the contents of the proposal to assure that the project activities are reasonable and achievable and that the resources needed to accomplish the project are adequate and available in the instance of any
cost-sharing or course releases. If approved, the PI’s chair/supervisor electronically signs the form in the portal. After the PI’s chair/supervisor has electronically approved the proposal, an email is sent to the CAO followed by the Vice Provost/Dean of Perimeter College for approval.

**Proposal Review by OSPA.** Once the CAO and Vice Provost/Dean have approved the proposal submission, the proposal is forwarded to OSPA for review and approval.

**Remedy Errors.** If any errors are discovered, OSPA will require those errors to be rectified before the proposal can be submitted. OGDA assists the PI in making any required adjustments or corrections required by OSPA.

**Proposal Submission.** Once OSPA is satisfied with the proposal, they will notify the PI and OGDA that the proposal is ready to submit. OSPA submits all Federal submissions but on occasion provides OGDA the authority to submit non-Federal applications. Many agencies require proposals to be submitted electronically and most recommend that applicants submit before the day of the deadline to avoid technical glitches. In addition, there can sometimes be additional information required when submitting electronically that is needed from the PI. As a result, OGDA recommends that all proposals be approved and ready for submission a minimum of 24 hours prior to the deadline and that the PI be accessible during the time of submission. Once the proposal is submitted, OGDA/OSPA forwards all notifications and final documents to the PI for their records. Paper submissions must be submitted a minimum 48 hours prior to the deadline to assure that the application package will arrive to the agency prior to the deadline. After the proposal is submitted, OGDA examines potential pre-implementation activities that must occur should the agency award the project. Examples of such activities include, but are not limited to, the submission for IRB approval if the project involves human subjects’ research, the hiring of project personnel which may need to be advertised in advance of the award start date, and the purchasing process on a large piece of equipment that needs to be bid on.

**B. Key Roles and Responsibilities in the Pre-Award Process**

<table>
<thead>
<tr>
<th>Principal Investigator/Project Director (PI/PD) (including Co-PIs) Responsibilities</th>
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<tbody>
<tr>
<td><strong>PRE-AWARD</strong></td>
</tr>
<tr>
<td><strong>1. Identify</strong></td>
</tr>
<tr>
<td>• Identifies the need for the project, activities/components of the project and forecasts budgetary needs</td>
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<tr>
<td>• Utilizes PIVOT, agency websites and networking to identify funding sources</td>
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<tr>
<td>• Informs direct supervisor of intent to develop the project</td>
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<tr>
<td><strong>2. Strategize</strong></td>
</tr>
<tr>
<td>• Attends Strategy Meeting</td>
</tr>
<tr>
<td>• Reviews complete application instructions (RFP) from sponsoring agency</td>
</tr>
<tr>
<td>• Works with OGDA to review RFP and complete Notice of Intent (NOI) form</td>
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<tr>
<td>• Obtains supervisor approval on the NOI form and returns to OGDA</td>
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<tr>
<td><strong>3. Develop</strong></td>
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<tr>
<td>• Utilizes proposal template documents to develop a proposal draft</td>
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<tr>
<td>• Completes draft proposal documents</td>
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</tbody>
</table>
- Secures letters of collaboration to substantiate internal and external commitments
- Revises proposal documents based on feedback received from OGDA and other reviewers
- Provides OGDA with final proposal documents 10 days prior to proposal deadline

4. Submission

- Discloses Significant Financial Interests through SFI Electronic Form
- Reviews and approve final application (proposal documents) via the research portal
- Makes corrections to errors found in the review and approval process
- Remains accessible to OGDA staff on proposal submission day
- Forwards any confirmations and communications from sponsoring agency related to proposal submission

## PI/PD Supervisor Responsibilities

### PRE-AWARD

**1. Identify**

- Verbally approves or disapproves the PI/PD to move forward with the project idea

**2. Strategize**

- Reviews Notice of Intent (NOI) form and signs if approved

**3. Develop**

- Assists in identification and inclusion of institutional resources and signs internal letter of commitment when needed

**4. Submission**

- Reviews and approves final proposal documents through research portal
- Emails OGDA and PI/PD with explanation for any unapproved proposals

## Grants Development and Administration Responsibilities

### PRE-AWARD

**1. Identify**

- Assists the PI/PD on initial project idea, need and scope of budget needs
- Assists PI/PD with funding searches
- Consults with GSU Foundation regarding possible funding sources when applicable
- Notifies PI/PD once funding is identified

**2. Strategize**

- Reviews complete application instructions (RFP) from sponsoring agency
- Plans and leads Strategy Meeting
- Assists with the completion of the NOI form and project development timeline
- Reviews and integrates any former feedback from prior submissions

**3. Develop**

- Develops and provides proposal document templates for each document required by the funding agency to the PI/PD
- Assists with identifying partnerships required by the funding agency
- Assists with the identification of internal data needs and submits formal data request to Institutional Research
- Advocates internally for project resources
- Assists with the development of letters of collaboration
- Coordinates all proposal and budget development meetings
- Consults with PC Human Resources regarding the inclusion of any grant-funded positions
- Reviews proposal draft documents and provides feedback to PI/PD
- Enrolls PI/PDs in any applicable electronic submission systems
- Reviews and edits final proposal and budget documents to prepare for submittal
- Notifies PC Financial Officer if proposal includes cost-share or personnel positions
- Assembles final proposal documents in research portal for approval process

### 4. Submission

- Completes research portal routing information; uploads all final documents in the research portal and/or agency systems for electronic submissions; prepares hard-copy submissions when required
- Oversees approval process
- Notifies all associated personnel of confirmation of successful application submission and provides all notifications and final documents to the PI for their records.
- Reviews submitted proposals to identify pre-implementation activities that need to occur in advance of the project start date
- Notifies PI/PD and PI/PD Supervisor of identified pre-implementation activities that need to occur in advance of the project start date
- Requests Advance Account from OSPA when needed for pre-implementation activities
C. The Post-Award Process.
The Post-Award process for external funding at PC contains four primary phases and begins when GSU receives notification of an award.

Notification
- Award Notification Received
- Notification Review
- Senior Leadership Notified

Set-Up
- Award Information Submitted to OSPA
- OSPA Establishes Sponsored Program Account
- Post-Award Training
- PI Obtains Budget Authority

Implementation
- Project Activities Initiated
- Programmatic and Financial Monitoring
- Programmatic Reports Reviewed by OGDA
- Programmatic Reports Submitted to Agency
- Monthly Reconciliation of Expenditures
- Invoicing and Drawdowns
- Expenditures and Activities Conclude

Close-Out
- Notify PC Human Resources
- Equipment Disposal and Intellectual Property
- Submit Final Report to OGDA
- Submit Final Report to Agency
- Submit Final Invoice and Financial Report to Agency
- Record Retention

PHASE ONE: NOTIFICATION

Award Notification Received. The Post-Award process begins when GSU receives notification that an award has been made to the institution.

Notification Review. If the award notification is received by a unit or individual outside of OSPA, the award notification must be immediately forwarded to OGDA for entry in the Research Portal. PIs and PI Supervisors are not authorized to sign award documents on behalf of GSU. The notification provides GSU with the necessary documentation to begin the process.
of setting up the award account. The Award Notice includes all terms and conditions of the grant and sets the parameters for conducting the project. OSPA will review the award notice to ensure that it complies with the original proposal. If the award notice states that funding will be at a lower level than requested in the original application then OSPA will have OGDA meet with the PI to determine the necessary budget revisions and conduct the required award negotiation. The revised budget, along with appropriate documents accepting the grant, will be transmitted to the sponsoring agency under the direction of OSPA.

PI and Senior Leadership Notified. The terms and conditions of awards often place limits on making announcements regarding external funding. As such, the Director of OGDA reviews the award terms and conditions and notifies the PI and senior leadership of the award and any required processes to be followed regarding announcements, both internally and externally.

PI and Project Personnel Complete Required Training Modules in CITI. All faculty, staff, undergraduates, graduate students and post-docs involved in empirical research and sponsored programs (grants) at Georgia State University are required to undertake Conflicts of Interests and Responsible Conduct in Research (RCR) education and training through the Collaborative Institutional Training Initiative (CITI) prior to an award being activated. In addition, individuals involved in human subjects’ research are required to complete additional human subject modules in their content area.

PI Submits IRB Materials (when project involves Human Subjects Research).

PHASE TWO: SET-UP

Once the award notification has been approved for processing by OSPA, the second phase of the process is the award set-up.

OGDA Submits Award and Budget Information to OSPA. Upon receipt of the award notification, OSPA will request any information regarding the award and a revised budget.

OSPA Establishes Sponsored Programs Account(s). Once OSPA receives the award notification in the Research Portal, a sponsored programs account is established and a Notice of Award Action (NOAA) is uploaded in the portal. If the project includes cost-sharing, a cost-share account at PC is also established by the PC Budget Office. Once OSPA has created the NOAA, OGDA will schedule a post-award training for the PI/PD and his/her immediate supervisor.

PI and Supervisor Attend Post-Award Training. After receiving the sponsored program budget identification numbers, OGDA and the Senior Accountant schedule and conduct a required post-award training session with the PI and the PI’s supervisor. It is mandatory that the PI’s supervisor be present at the training since the PI’s supervisor has the responsibility for the project in the event that the PI leaves the college or decides to remove themselves from the
project. The focus of the training is to interpret the terms and conditions of the funded award. The session will be conducted at a time mutually convenient for all parties involved. The extent of the agenda will depend on the type of award, and will provide the following information:

- Budget Information
- Cost Sharing or Matching, if applicable
- Time and Effort Reporting
- Grant Reporting (Programmatic/Financial)
- Applicable regulations/policies and procedures (Awarding agency/GSU)

(Please note that the implementation of sponsored programs may require that a portion of the work be conducted by a person or persons not affiliated with GSU. OSPA and OGDA will assist the PI in developing the sub-award agreement, and in securing the signature of GSU’s authorizing official. Sponsor regulations that apply to the prime award recipient also apply (“flow-through”) to subcontractors and must be referenced in the subcontracts.)

At the conclusion of the post-award training, attendees will sign a verification form certifying they have received and understand the information outlined in the session. The PI will then work with OGDA regarding any official announcement for both internal and external audiences.

**PI Obtains Budget Authority.** At the conclusion of the post-award training, the PI receives budgetary authority and responsibility for the sponsored programs account(s) and the PI supervisor is responsible for authorizing and approving all expenditures. The PI is responsible for managing the budget and expending it in accordance with all applicable regulations regarding expenses related to the project in the approved budget. The PI must be familiar with and comply with both the sponsor's guidelines as well as University, USG and State guidelines for fiscal management of sponsored programs.

Expended grant funds must always be allowable based on the following conditions:

- **Reasonable** — Costs must be reasonable, reflecting conscientious and prudent financial decision-making (the cost must be able to withstand public scrutiny).
- **Allocable** — Every incurred cost must have a direct benefit to the sponsored project being charged, not to the general needs of the department or College.
- **Consistent** — Costs must be consistently treated, consistent with the normal costs standards of the College and not exceeding normal limits of similar charges that are not grant-supported.
- **Conform to Limitations** — All items budgeted must conform to any limitations or exclusions set forth in the OMB 2 CFR, Part 200 principles or in the sponsored agreement as to types or amounts of cost items.

*A special note regarding cost-sharing.* The PI is responsible for managing all cost-sharing commitments specifically related to his/her sponsored project including documenting allowable cost-sharing and ensuring all cost-sharing obligations are fulfilled. Cost-sharing documentation includes, but is not limited to, the following: certification of PI/PD effort on a sponsored project—the effort report is the documentation for the cost sharing; departmental payment of expenses from a companion cost sharing (match)—grant account reports and expense
documents will constitute the documentation for the companion cost sharing account; payment of expenses from a department account—grant reports and expense documents will serve as documentation of payment; third-party provision of in-kind cost sharing to PC. The third party will provide a letter stating the value of the in-kind cost sharing based on applicable cost principles.

PHASE THREE: IMPLEMENTATION

The third phase in the Post-Award process is the implementation of the sponsored program.

Project Activities Initiated. Once the PI has budget authority, it is important that the PI begin project activities immediately in accordance with the activities written in the proposal while obeying all agency, State, Federal, GSU and USG policies and procedures. Failure to begin projects in a timely manner can sometimes jeopardize future funding from the agency or can lead to a reduction in the funds received during the award period. The PI is responsible for initiating the hiring process if applicable. The hiring of personnel to be associated with a sponsored program is guided by GSU and USG policies and procedures, as well as any sponsor regulations. The PI must inform OGDA of any staffing changes during the course of the project. The OMB 2 CFR, Part 200 requires that verification of time and effort for all personnel working on grants and sponsored programs. The time and effort reporting provides documentation for time donated to the activity by College personnel. Faculty/Staff with multiple assignments must account for all (100%) employment time. Time and effort reporting is due 30 days after the end of each semester for the duration of the grant.

Employees working on sponsored programs are subject to the same travel policies and procedures for GSU.

Programmatic and Financial Monitoring Occurs Continuously. OGDA and the Senior Accountant conduct ongoing programmatic and financial monitoring of all sponsored programs. The monitoring includes a monthly review of expenditures, periodic program visits and interim progress reports obtained through the Programmatic Review Questionnaire. PI supervisors and/or PC administrators are immediately notified of any concerns.

PI submits Required Programmatic Reports to OGDA for Review. The PI must forward all programmatic reports required by the sponsoring agency to OGDA for review prior to submission. In addition, the PI is responsible for submitting a Programmatic Review Questionnaire annually to OGDA for multi-year sponsored projects.

PI Submits Reports to Sponsoring Agency. Once OGDA has reviewed the programmatic report and provided the PI with feedback, the PI may submit the programmatic report. All reports that require the signature of the authorized official must be submitted to OSPA for submission to the designated agency. All PIs are required to submit any required programmatic reports in advance of the agency deadline.
Accounting and PI Reconcile Expenditures Monthly. Expenditures on grant and sponsored program accounts must be allowable, allocable, reasonable, and consistent while conforming to any limitations or exclusions set forth by the federal Office of Management and Budget (OMB), sponsoring agencies, University System of Georgia (USG), and the College. Each month, the Senior Accountant provides the PI with an expenditure report. The PI is responsible for reviewing the report and analyzing the sponsored program’s expenditures. If any expenses were incurred that were not related to the project, the PI should report any discrepancies immediately to the Senior Accountant who will then work with the PI to rectify the expenditures. The Senior Accountant should also be notified by the PI if expenses that were made for the project did not appear on the expenditure report. Please note the following:

1. Propriety of expenditures incurred under sponsored accounts is the primary responsibility of the individual(s) initiating the expense. The Principal Investigators/Project Directors (PI/PD) and his/her direct supervisor are responsible for ensuring that allowable expenditures and obligations incurred adhere to the fiscal terms and conditions of the award in accordance with GSU financial policies and procedures, OMB 2 CFR, Part 200 and any agency specific requirements.

2. During proposal development, the Office of Grants Development and Administration (OGDA) works with the PI/PD to develop a budget with expenditures that are allowable, allocable, reasonable, and consistent while conforming to any limitations or exclusions set forth by the federal Office of Management and Budget (OMB), sponsoring agencies, University System of Georgia (USG), and the university.

3. When the sponsored program is awarded, OGDA holds a post-award training meeting with the PI/PD, their direct supervisor, and any other essential personnel involved, to review the grant award, the approved budget as well as policies and procedures that govern expenditures.

4. Each term, OGDA sends an email reminder on the policies and procedures associated with cost expenditures.

5. Any expenditure or change in project scope made by a PI/PD that deviates from the approved award must be approved by the OGDA in advance.

6. If expenditure occurs outside of the budget breakdown sent from OSPA, OGDA will contact the Grants Budget Manager for resolution. If it is determined to be unallowable for the grant, the home department will be charged the expenditure.

7. PI/PD’s are required to review expenditures and identify any errors each month. OGDA will be an approver of all purchases in PantherMart as well as any travel authorizations.

8. If any costs are found to be in error, the project director is responsible for adhering to all GSU cost transfer policies. Please note that OSPA must approve any cost-transfer that exceeds 90-days.
9. Drawdowns and invoicing are only conducted by OSPA after the PI/PD has validated that all expenses are allowable and consistent with the award on the monthly expenditure report.

**Project Activities and Expenditures Conclude.** Sponsored programs normally conclude at the end of the award period. All expenditures must be incurred prior to the project’s end date. The PI is responsible for analyzing the final budget expenditures and notifying the Senior Accountant of any discrepancies. Any expenditure that occurs in the final 60 days of the project must be justified and needed to complete the project.

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**PHASE FOUR: CLOSEOUT**

The purpose of project close-out is to ensure all final documents as described in the terms and conditions of the award notice have been completed and submitted to the sponsoring agency at the expiration of the project period. The OMB 2 CFR, Part 200 outlines general close-out requirements. All final programmatic and financial reports must be submitted to the granting agency within 90 days after the end of the project unless otherwise stated. Timely submission of close-out documents is critical to alleviate the possibility of suspended or denied final payments from sponsoring agencies.

**PI Informs PC Human Resources Regarding Personnel Impacted by the Termination of the Award.** If any personnel are being supported through external funds, the PI must notify PC Human Resources at minimum, 120 days in advance of the project’s end date to assure that the proper steps are taken regarding sponsored program employees. All remaining funds are then de-obligated/returned to the funding agency.

**PI Follows Agency Guidelines Regarding Equipment Disposal and Intellectual Property Rights.** The PI must abide by the sponsor’s policies and procedures for the disposal of equipment and the ownership of intellectual property rights. In the absence of direction from the sponsor, USG and GSU policies and procedures provide guidance.

**PI Forwards Final Report to OGDA for Review.** As with annual programmatic reports, all final programmatic reports must be forwarded to OGDA prior to submission to the funding agency. OGDA will notify the PI regarding any special submission procedures (submitted directly or via OSPA).

**Final Programmatic Report Submitted.** The PI is responsible for ensuring the submission of the final programmatic report. It is common for agencies to withhold final payments until after the report is received. Consequently, it is imperative that the report is submitted in a timely manner.
OSPA Submits Final Invoice and Financial Report. Once the PI has submitted the final report, then OSPA can submit the final invoice. After the final invoice has been paid and all budgetary discrepancies have been resolved, OSPA submits the final financial report. Typically the final financial report must be submitted within 90 days of the end date of the project.

Records Retained in Accordance with Agency Requirement. All programmatic and financial reports must be retained in accordance with the agency guidelines. OMB 2 CFR, Part 200 states that “Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as authorized by the Federal awarding agency.” The exceptions to this rule include:

- If any litigation, claim, or audit has started before the expiration of the 3-year period, the records need to be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.

- Records for real property and equipment acquired with Federal funds need to be retained for 3 years after final disposition.

- When records are transferred to or maintained by the Federal awarding agency, the 3-year retention requirement is not applicable.

- Different retention rules apply to the indirect cost proposal related records. (OMB 2 CFR, Part 200).

Because the period of a grant may range from 1 to 10 or more years, the 3-year rule needs to be considered together with the length of the grant. For example, the records of a grant starting in 2017 and ending in 2018 should be kept until 2021 or 2022 depending on the date of the final financial report submission.

D. Key Roles and Responsibilities in the Post-Award Process

<table>
<thead>
<tr>
<th>Principal Investigator/Project Director (PI/PD) Responsibilities</th>
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<tbody>
<tr>
<td><strong>POST-AWARD</strong></td>
</tr>
<tr>
<td><strong>1. Notification</strong></td>
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<tr>
<td>• Conducts pre-implementation activities identified by the Director of OGDA</td>
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<tr>
<td>• Forwards all award notices and/or communications to the Director of OGDA immediately upon receipt</td>
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<tr>
<td>• Works with Director of OGDA during award negotiations</td>
</tr>
<tr>
<td><strong>2. Set-Up</strong></td>
</tr>
<tr>
<td>• Attends required Post-Award Training session with supervisor prior to obtaining budget authority on all budgets related to the sponsored program</td>
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<tr>
<td>• Certifies receipt and understanding of the Post-Award Training Manual materials</td>
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<tr>
<td><strong>3. Implementation</strong></td>
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<tr>
<td>• Responsible for authorizing and approving all expenditures and adhering to all applicable sponsoring agency, institutional, state and federal rules and regulations</td>
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</tbody>
</table>
• Bears responsibility for the overall scientific and administrative conduct of the project, for meeting the terms and conditions of the award, and for representing the project to the sponsor. Abides by all IRB regulations as described by the Department of Health and Human Services when the project involves human subjects’ research. (add regulation reference)
• Accountable for managing the budget on his or her grant or contract
• The role of the PI/PD as primary Accountable Officer cannot be delegated
• Completes a Budget Manager Authorization form annually
• Works with Grants Post-award Administrator and PC Marketing and Communications to prepare any press releases or public announcements regarding the award
• Completes all required Human Resources documents when personnel are to be hired as part of the project and notifies OGDA of any staffing changes during the course of the project
• Implements project activities in accordance with the terms and conditions of the award and the approved proposal and budget
• Completes time and effort reporting on all sponsored program personnel
• Monitors encumbrances and expenditures for review and approval of monthly expenditure reports
• Initiates budget transfer requests as appropriate
• Initiates cost transfers to correct errors in a timely manner, within 45 days; manages the project to minimize the need for such transactions
• Ensures the completion, accuracy, and timeliness of programmatic (technical) reports to OGDA for review prior to submission to the sponsoring agency
• Ensures that OGDA receives a copy of the letter of transmittal of any reports or correspondence with the sponsoring agency
• Notifies OGDA of the need to initiate a no-cost extension in advance of financial report submission in accordance with University and sponsoring agency requirements
• Notifies and includes OGDA and supervisor regarding any sponsoring agency requests for site visits, audits, or other types of appraisals of the institution/sponsored program(s)
• Initiates requests for budget modifications per sponsor requirements and works with OGDA to review the award document to determine if prior approval by the sponsor is required

4. Close-Out
• Upon receipt of the 120-day close-out reminder, analyzes final budget expenditures and notifies the Senior Accountant of any discrepancies prior to the end of the project budget year or project closeout
• Upon receipt of the 60-day close-out documents, initiates required close-out responsibilities
• Completes all close-out intellectual property requirements including, but not limited to, final programmatic deliverables/reports, submission of invention disclosures and other reports as required
• Works with Grants Post-award Administrator and Senior Accountant to assure all costs are allocable, allowable and a final invoice/report can be issued according to the sponsoring agency fiscal close-out requirements
• Notifies Human Resources of sponsored program supported personnel, including names and termination dates, 120 days prior to project close-out
• Retains all programmatic and financial records in accordance with agency guidelines
# PI/PD Supervisor Responsibilities

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<td><strong>2. Set-Up</strong></td>
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<td>• Attends required Post-Award Training session with PI/PD</td>
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<tr>
<td><strong>3. Implementation</strong></td>
</tr>
<tr>
<td>• Supervises PI/PD in project activities</td>
</tr>
<tr>
<td>• Includes sponsored program activities in job performance evaluation of PI</td>
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<tr>
<td><strong>4. Close-Out</strong></td>
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<td>• Certifies receipt and understanding of the Post-Award Training Manual materials</td>
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# Grants Development and Administration Responsibilities

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<th>POST-AWARD</th>
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<tr>
<td><strong>1. Notification</strong></td>
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<tr>
<td>• Notifies PI/PD and other appropriate personnel regarding denied awards and requests agency feedback</td>
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<td>• Reviews terms and conditions of awards</td>
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<td>• Negotiates terms and conditions of awards</td>
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<tr>
<td>• Forwards final award notification and supporting documents to OSPA for review and authorizing signature</td>
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<td><strong>2. Set-up</strong></td>
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<tr>
<td>• Provides award notification with terms and conditions to the budget and/or accounting offices</td>
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<td>• Examines sponsoring agency approved proposal and budget and any applicable cost-share items and translates costs to USG chart of accounts</td>
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<td>• Creates and submits an approved budget and budget justification to OSPA</td>
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<td>• Provides Senior Accountant with any cost-share information needed to establish a cost-share account. Please note that the sponsored program budget will not be activated until the establishment of the cost-share account.</td>
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<td>• Provides Senior Accountant with NOAA, specific terms and conditions for the award and detailed budget</td>
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<td>• Creates Post-Award Training Manuals specific to the sponsoring agency and the terms and conditions of the award</td>
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<td>• Conducts Post-Award Training session with PI/PD, PI/PD Supervisor and other appropriate personnel</td>
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<td>• Obtains signatures from PI/PD, PI/PD Supervisor and other personnel attending training, certifying receipt and understanding of the Post-Award Training Manual materials</td>
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<td>• Coordinates any press releases or public announcements regarding the award with the PI/PD and PC Marketing and Communications</td>
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<td><strong>3. Implementation</strong></td>
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<tr>
<td>• Notifies appropriate personnel regarding the sponsored program award and specific terms and conditions</td>
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<td>• Reviews programmatic reports and correspondence between the PI and the funding agency prior to submission</td>
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<td>• Develops and communicates timely compliance reminders for PI/PD, PI/PD Supervisor and other appropriate personnel</td>
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<td>• Pre-reviews time and effort reporting from all sponsored program personnel</td>
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<td>• Assists PI/PDs in budget and cost transfers</td>
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<tr>
<td>• Conducts quarterly monitoring of all sponsored program budgets</td>
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<td>• Conducts programmatic reviews on sponsored programs</td>
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Reviews and approves PI/PD correspondences and reports with the sponsoring agency prior to submission
Contacts OSPA quarterly to ensure drawdowns and invoices are completed in a timely manner from the proper budgets

4. Close-Out

Forwards any final financial information to OSPA for review and authorizing signature
Distributes project close-out reminder to PI/PD and Senior Accountant at 120, 90, 60 and 30 days prior to project close-out
Assists PI/PD in procedural questions regarding non-financial reporting during close-out
Verifies and retains final financial close-out notice and documents from OSPA
Retains all programmatic and financial reports in accordance with agency guidelines

Senior Accountant Responsibilities

| POST-AWARD |
|---|---|
| 2. Set-Up | Creates sponsored program budget in PC accounting system in accordance with the Budget Request Form for new and multi-year grants
Forwards accounting string information to Grants Program Administrator
Reviews Administrative Data Forms and financial terms and conditions and creates sponsored program budget account
Participates in the Post-Award Training of PI/PDs |
| 3. Implementation | Maintains financial files for sponsored programs
Notifies PI/PD and Grants Program Administrator regarding budget errors
Processes budget and expense transfers
Consults with Grants Program Administrator regarding costs principles and applicable state, Federal and agency rules and regulations
Conducts monthly reconciliations of all sponsored program budgets
Sends monthly expenditure reports to PI/PDs for review and approval |
| 4. Close-Out | Assists PI in reviewing final expenditures on the sponsored project account
Completes required documentation to close-out any cost-share accounts |

IV. Budget and Budget Narrative Development Tips

Budget. The budget for the project must conform to the agency guidelines as well as USG/GSU policies and procedures. As the proposal is being developed, it is often helpful to sketch out the items that will need to be funded. All budgeted items must be allowable in accordance with the following factors from the OMB 2 CFR, Part 200.

A). Allocable. A cost is allocable to a particular cost objective (i.e., a specific function, project, sponsored agreement, department, or the like) if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received or other equitable relationship. A cost is allocable to a sponsored agreement if (1) it is incurred solely to advance the work under the sponsored agreement; (2) it benefits both the sponsored agreement and other work of the institution, in proportions that can be approximated through use of reasonable methods, or (3) it is necessary to the overall operation of the institution and, in light of the principles provided in OMB 2 CFR, Part 200, is deemed to be assignable in part to sponsored projects.
B). Reasonable. A cost may be considered reasonable if the nature of the goods or services acquired or applied, and the amount involved therefore, reflects 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: (a) 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; (b) 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; (c) whether or not the individuals concerned acted with due prudence in the circumstances, considering their responsibilities to the institution, its employees, its students, the Federal Government, and the public at large; and, (d) the extent to which the 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.

C). Consistently Treated. All costs that are budgeted are consistent with established institutional policies and practices applicable to the work of the institution generally, including sponsored agreements. The practices used in estimating costs in pricing a proposal are consistent with GSU’s cost accounting practices used in accumulating and reporting costs.

D). Conform to Limitations. All items budgeted must conform to any limitations or exclusions set forth in OMB 2 CFR, Part 200 or in the sponsored agreement as to types or amounts of cost items.

In addition, external funds are never allowed to supplant existing funds. Funds are only allowable if they are used to supplement existing efforts. In developing the budget, it is important to consult with OGDA regarding the budget items before investing too much time in the budget narrative. With that said, the most expensive items in any budget begins with personnel costs.

Personnel Costs. Budgeting for personnel on an externally funded project can quickly exhaust available funds. Consequently, funds for personnel must always be necessary and reasonable. There are several types of personnel costs that are typical and include:

1. Full-time positions-full-time positions that are 100% allocable to the project. The hiring of all full-time positions must abide by GSU and USG policies and procedures regardless of the funding source.
2. Part-time positions. Part-time positions include those that are 100% allocable to the project at 19 hours or less per week. The hiring of all part-time positions must abide by GSU and USG policies and procedures regardless of the funding source.
3. Course release or Salary Buy-out
4. Faculty summer salary-Faculty members on 9 month appointments are permitted per USG regulations to receive up to a certain percentage of their annual salary for work conducted in the summer. Summer salary includes pay for summer courses. Faculty cannot exceed 100% time and effort. If a full summer course load is 2 courses, then faculty members cannot work on an externally funded project and receive compensation above their 100% effort.
5. Extra Compensation-Extra compensation and replacement pay for faculty and staff is typically not allowable. Only in rare cases when the proper justification and documentation is provided in accordance with USG and State policies can it be allowable.

**Fringe Benefits.** Fringe benefits are the costs associated with providing employees with FICA (social security); FICA Med (Medicare); Health and Life Insurance and Retirement. Annually, OSPA establishes rates to utilize in planning sponsored program budgets. Please consult with OGDA to be sure that the proper rates are budgeted.

**Equipment.** Items that are considered equipment includes expenditures for a material item of a non-expendable nature, such as a movable unit of furniture or furnishings, an instrument or apparatus, a machine (including attachments), or an instructional skill training device. Equipment can include a set of small articles whose parts are replaceable or repairable, while the whole retains its identity and utility over a period of time that is characteristic of and definable for items of its class. Motorized vehicles not used on public roads; such as aircraft, boats, lawn mowers, farm tractors, road building equipment, etc. are also considered equipment. Items in this group, generally, should have a life expectancy of three years or more, cost $5,000 or more, and be controlled by a perpetual inventory record.

**Travel.** Travel costs included in a budget can include funds for the travel or personnel to conduct research, attend a conference, make presentations or conduct the activities of the service or training project. Budget funds must always adhere to the USG/GSU travel policies and procedures as well as any additional stipulations by the awarding agency.

**Participant Costs.** Participant costs include all direct payments to project participants. Payments include stipends for participants attending meetings, training or workshops, as well as travel expenses including per diem and scholarships. Indirect costs are not calculated on funds from this category.

**Other Direct Costs.** Other Direct Costs includes any budgeted items that do not fit any of the prior categories and are not participant support costs. Includes all types of consumable materials used in operation of the institution. Consultant services, subcontracts, rental fees for buses, vans to transport participants, publication costs, computer services and registration fees for conferences are included in this category. For consultants, each individual’s expertise, primary organizational affiliation, normal daily compensation rate, and number of days of expected service should be included. GSU employees cannot be paid as consultants nor can they receive stipends. A description of the consultant’s qualifications should be included if these individuals have not been identified. Subcontracts exist when significant parts of research or project activities are contracted or otherwise transferred to another organization. A clear description of the work to be performed, the basis for selection of the sub-awardee, and a separate budget for the sub-award should be included.

**Facilities and Administrative (F&A) Costs.** F&A costs (also known as indirect costs) are expenses incurred by GSU in support of sponsored awards and contracts for facilities and administration (e.g., building use and improvement, operations and maintenance, equipment use, library use, general administration, etc.). These are costs that funding agencies provide above and beyond the cost of funding a project and that are recognized as a necessary part of the budget. GSU will charge the
federally negotiated F&A cost rate on the Modified Total Direct Costs of an award. Any reductions or waivers of F&A costs must be approved by the Vice-President of Research and Economic Development

**Modified Total Direct Costs.** Modified Total Direct Costs include all budget items except capital expenditures (buildings, individual items of equipment in excess of $5000, alterations and renovations to facilities), a portion of each sub-award in excess of $25,000 and all participant support costs.

**Cost Sharing.** Cost-sharing or matching funds include project costs supported by the college (faculty salaries, fringe, travel, supplies, etc.) or other sponsored agreements and in-kind contributions donated by third parties (equipment, supplies, etc.). Normally, GSU requires sponsored project costs to be fully funded by external resources. The decision to authorize the use of internal resources to supplement funding of a sponsored project is based on the availability of funds and the importance of the project in furthering the mission of the College as determined by members of the college cabinet. If approved, cost-sharing may be allowed on a sponsored project only if the sponsor’s program announcement or solicitation requires cost sharing as a condition of funding and/or will be a proposal review criterion. All cost sharing must be confirmed in writing by individuals authorized to commit resources. At the proposal stage, cost-share being offered is documented and approved by the PI/PD, PI supervisor and/or Vice Provost as appropriate. Proposed third party cost-share is documented in a letter of commitment from the third party. Cost-sharing is allowable only if it is verifiable; not included as contributions for any other federally-assisted project; necessary and reasonable for proper and efficient accomplishment of the project; allowable under the cost principles of OMB 2 CFR, Part 200; not paid by the federal government under another award, except where authorized; provided for in the approved budget; and conforms to other applicable provisions of OMB 2 CFR, Part 200.

**Total Project Costs.** The total project cost is the sum of all direct costs and F&A costs.

**Budget Narrative.** The budget narrative (a.k.a. budget justification) supplements the information provided in the budget by justifying how the budget cost elements are calculated and are necessary in implementing the project and accomplishing the results. The budget narrative is a tool to help the reviewers fully understand the budgetary needs of the applicant and is an opportunity to provide descriptive information about the costs beyond the constraints of the budget. Together, the budget narrative and budget spreadsheets should provide a complete financial and qualitative description that supports the proposed project plan.
V. Links to Forms

Pre-Award Forms
Notice of Intent (NOI) Form
Financial Conflict of Interest Disclosure (FCOID) Form

Post-Award Forms
Post-Award Training Certification Form
Programmatic Review Questionnaire
Close-out Checklist
Close-out Questionnaire