

General guidance on Sponsored Research Administration Compliance at The City University of New York (CUNY)

CUNY is comprised of 11 senior colleges, seven community colleges, The Macaulay Honors College and five graduate and professional schools, located throughout the city's five boroughs. CUNY regards scholarly activity, service and research as part of the normal activity and responsibility of the faculty. To that end, the primary responsibility for sponsored research and programs belongs to each College or School and their requisite department. A Principal Investigator (PI) or Project Director (PD) (See Page 2) who applies for sponsored research or program support has the overall award management of the sponsored program. Each College or School has a Grants Office (GO) (See Page 3) responsible for Sponsored Programs Administration and accessible to them to assist the PI or PD with any sponsored research or program administrative requirements. The Grants Office reports to the President, Provost or their designee of their College or School.

In addition to the GO, administration and oversight of sponsored research and sponsored programs is also provided centrally by CUNY under the auspices of The CUNY Office of Research (See Page 4), and the Research Foundation of The City University of New York (The Research Foundation) (See Page 5). [The University's Office of the General Counsel and Senior Vice Chancellor for Legal Affairs \(OGC\)](#) performs the review, drafting and negotiation of unfunded contracts and other agreements and provides legal advice to the University's central administration and its constituent colleges. [The Technology Commercialization Office](#) facilitates transfer of CUNY innovations to industry by nurturing collaboration between academia and industry, by championing sponsored research at various facilities within the University, by licensing of CUNY intellectual property to sponsors and other industry partners, and by supporting formation of new start-up companies.

Each of the stakeholders identified above plays a role in Sponsored Research and Programs Administration and Compliance. As a condition of accepting sponsor funds, the University must comply with a variety of award terms and conditions and, in the case of Federal funding, regulations that govern all awards. Compliance begins with the presentation of a proposal and continues for as long as the University is willing to accept funding from external sources.

The following guidance provides the PI or PD with an overview of several compliance areas inherent to the management of grants and contracts and especially to Federal regulations and compliance:

- **Pre-award management and oversight** (See Page 6)
- **Post-award management and oversight** (See Page 30)
- **Regulatory compliance:** including protection of [human subjects](#) and [animal subjects](#), [conflict of interest](#), [export control](#), and [research integrity](#).

Principal Investigator (PI) or Project Director (PD)

The PI has the primary responsibility for ensuring the success of the research as well as the overall award management of the sponsored program. As such, the PI must comply with the financial and administrative policies and regulations associated with the award. Responsibilities may include:

- Requesting required approvals in order to submit an application as well as ensuring all other forms and certifications are completed in a timely manner;
- Preparing the proposal and submission;
- Developing a budget, and if it includes PI and/or Personnel Effort, ensuring that the current institutional base salary is used, and that the effort is a reasonable estimate of effort to be expended in relation to the aim of the project as well as other College or School obligations;
- Participating in Award negotiations and alerting the Grants Office to the negotiations with the Sponsor in order to seek their involvement and assistance in revising the proposal budget. The PI must also ensure that the budgeted funds adequately cover the scope of the project;
- Having thorough knowledge of and abiding by the terms and conditions of the award;
- Having oversight of professional and technical decisions of the research project;
- Having oversight of professional and technical decisions as to personnel and the selection of particular items of equipment, supplies and other items to be purchased;
- Ensuring project's expenses are as budgeted, complying with sponsor requirements regarding reduction in effort and change in status, and seeking prior approval for any re-budgeting of committed effort. The PI is also responsible for ensuring that the selection of personnel and purchase of equipment and supplies is in accordance with the award budget.
- Monitoring of sub-recipients and contractors, if any;
- Ensuring financial and program records retained are accurate and auditable;
- Ensuring cost share records retained are accurate and auditable;
- Submission of sponsor or University reports and certifications on time and according to the University or sponsor's requirements; and
- Completion of the formal closeout of the project.

The Grants Office

The Grants Office or its equivalent, at each college or school is the office of record for all grants and contracts submissions. The Grants Office reports to the President, Provost or their designee and implements the research and sponsored programs policies of the University and the College or School. They also provide sponsored program administration services to the faculty of their college or school. The general functions of the Grants Office include:

- Assisting the PI with the administration of research and sponsored programs from inception through closeout;
- Reviewing proposals submitted to assure compliance with University policy. The Grants also reviews budgets to verify that all appropriate charges are included in the cost calculations.
- In cooperation with The Research Foundation, assisting the PI with the negotiation and acceptance of grant awards;
- In cooperation with the University and The Research Foundation, assisting the PI with the negotiation and execution of contracts and cooperative agreements;
- In cooperation with the University, assuring compliance with sponsor's policies, e.g., fiscal, property, intellectual property, human and animal subjects;
- In cooperation with the University, assuring compliance with the policies and procedures of the Research Foundation;
- In cooperation with the University and The Research Foundation, maintaining official records concerning sponsored projects including official grant and contract files;
- Assisting faculty and department/school staff in the preparation of proposals and other administrative aspects of sponsored projects as needed; and
- Training of faculty and administrative staff in the policies, procedures and practices of the University, College or School and sponsors.

See – [Grants Offices](#)

The CUNY Office of Research

The CUNY Office of Research promotes and supports the research, scholarly, and creative pursuits of the CUNY community, provides assurance to funding agencies and to the public that research at the University is conducted in accordance with the highest ethical standards and in compliance with applicable regulations, laws and University policies, and enhances technology commercialization, entrepreneurship, and economic development activities. The general functions of The CUNY Office of Research specifically relating to research and sponsored program administration include:

- Ensuring University compliance with federal, state and local regulations and ethical standards with regard to all aspects pertaining to the responsible conduct of research and the administration of sponsored programs;
- In cooperation with The Research Foundation, assuring compliance with sponsor's policies, e.g., intellectual property, human and animal subjects, and fiscal management;
- In cooperation with The Research Foundation, formulating grant and contract administration policy and procedures;
- Training of University faculty and staff concerning compliance with federal, state and local regulations and ethical standards with regard to all aspects pertaining to the responsible conduct of research;
- In cooperation with the Grants Offices and The Research Foundation, conducting training concerning compliance with federal, state and local regulations in the administration of research and sponsored programs.
- In cooperation with the President, Provost or their designee, identifying specific internal controls that must be in place at each campus and developing assessment tools; and
- Conducting periodic assessments of internal controls in place at Colleges or Schools.

See – [The CUNY Office of Research](#)

Research Foundation of The City University of New York

The Research Foundation is a non-profit education corporation that assists the University in the identification of opportunities, procurement, use and disposition of funds from the federal, state, and municipal government and other sources to support all research and sponsored programs at the University. All grant applications name the Research Foundation and the College concerned as joint grantees. The responsibilities of the Research Foundation have been set forth in an agreement with the University which deals with various aspects of research, training and other projects throughout the colleges. In general, the RF provides administrative functions such as controlling and accounting for expenditures, preparing periodic fiscal reports for Principal Investigators and funding agencies, providing banking services and managing cash flow. All expenditures are monitored for availability of funds and for compliance with the Research Foundation policies and sponsor requirements. Auditable accounts are maintained and periodic expenditure reports and sponsor vouchers are prepared. The general functions of the Research Foundation include:

- Establishing policies, procedures and controls governing all expenditures;
- Assuring timely receipt of and proper fiscal stewardship for sponsor funds including the PSC-CUNY Faculty Research Program;
- In cooperation with the Colleges, negotiating University-wide F&A costs and employee benefit rates;
- In cooperation with the Colleges, ensuring compliance with federal requirements such as effort reporting, cost sharing and service centers;
- Assistance in Audit compliance and Resolution as well as Closeout Activity.

See – [Research Foundation of The City University of New York](#)

Pre-award Management and Oversight

Core Functions:

- ❖ Administrative review and endorsement of the Sponsored Research or Program proposals prior to submission;
- ❖ The submission of the Sponsored Research and Program proposal;
- ❖ Administrative review and Negotiation of Grants and Contracts at the time of an Award;
- ❖ Administrative review and interpretation of Award terms and conditions;
- ❖ Acceptance of the Award and Activation.

Core compliance topics:

- Administrative Review of Sponsored Research and Programs (See Page 8)
- Animal Care Review (See Page 9)
- Assurances, Representations and Certifications (See Page 10)
- Award Notice (See Page 11)
- Biohazards Review (See Page 12)
- Budget Development (See Page 13)
- Contracts (See Page 14)
- Cost Sharing and Cost Sharing Records (See Page 15)
- Export Controls (See Page 16)
- Facilities and Administrative Costs (See Page 17)
- Federal Funding Mechanisms (See Page 18)
- Federal Register (See Page 19)
- Financial Conflict of Interest Disclosure (See Page 20)
- Grants (See Page 21)
- Gift (See Page 21)
- Grants.gov (See Page 23-24)
- Human Subjects Review (See Page 25)
- Multiple Solicitations (See Page 26)
- Ownership of Intellectual Property (See Page 27)
- Pre-Award Costs (See Page 28)
- Sub-recipients and Consortium Agreements, Preparation (See Page 29)
- The Uniform Guidance (2 C.F.R. § 200) (See Page 30)

- **Administrative Review of Sponsored Research and Programs**

The federal government mandates that a central [Grants Offices](#) (GO) administer the initiation of sponsored activities. These administrative responsibilities require a professional staff with knowledge of the regulations of federal agencies and a means to maintain the records required by federal sponsors.

The GO at each College or School assists the PI with the application requirements and submissions. They assist with required formats, presentations, and budgets, provide the institutional approval and sign off for proposal submission. At the time of an award the GO office processes it together with the Research Foundation.

All proposal submissions must be submitted to the GO for review and signature or sign-off of the Authorized Organizational Representative (“AOR”) prior to submission to an external sponsor, even when institutional sign-off is not required by the sponsor. The AOR is designated by the Research Foundation.

Each college GO specifies an internal submission deadline, which may be prior to the agency or submission deadline for review and approval of the full proposal, internal forms and budget.

Each College and School has a required routing for review and approval for the submission of a sponsored proposal. The proposal along with the required approvals will ultimately be routed to the College or School GO for final review and, if required, electronic submission to the sponsor.

The review and approval for the submission of a sponsored project is necessary so as to assess:

1. Commitments of faculty and staff time and the effects on the teaching and other obligations;
2. Release Time arrangements;
3. Requirements for space and facilities;
4. Budget verification, including F&A costs, fringe rates, and cost sharing;
5. Identification of proposal requiring special review, such as use of human subjects, animals, biohazards, or intellectual property issues;
6. Disclosures of any potential financial conflicts of interest of the PI or any other person responsible for the design, conduct or reporting of the proposed project.
7. At the time of an award, faculty are responsible for advising and discussing the technical work aspect of the proposal. However, faculty are NOT authorized to negotiate the general terms and conditions of agreements. They should refer such negotiations to the Grants Office.

- **Animal Care Review**

Proposals involving the use of vertebrate animals must be reviewed by the Institutional Animal Care and Use Committee (IACUC) at each CUNY College. Committee approval is required before the fund account is established. Committee approval can be obtained “Just-in-time” for NIH grants before the award is made. Award spending for animal work may not begin until IACUC approval has been obtained. See: [Researcher Handbook](#)

- **Assurances, Representations and Certifications**

To obtain funding from the federal government or other sponsoring agencies, CUNY makes assurances to the sponsor that it is in compliance with a number of regulations. Each sponsor, or program, will have its own set of requirements. *These assurances, representations and certifications apply to the institution, not the principal investigator.*

The sponsor may require *some or all of* the following assurances, and may have additional agency-specific requirements:

- The University will comply with all regulations, policies, guidelines and requirements, as they relate to the application, acceptance and use of funds.
- The University has legal authority to submit applications and accept extramural funding for the University.
- Facilities are properly accredited and authorized.
- The University is not on the Federal Debarment and Suspension List.
- The University is an Equal Opportunity, Affirmative Action Employer.
- The University is in compliance with:
 - Federal Discrimination Regulations
 - Federal Lobbying Regulations
 - Federal Regulations Regarding Promoting Objectivity in Research
 - Federal Regulations Regarding Research Misconduct
 - Title VI of the Civil Rights Act
 - Title IX of the Education Amendments
 - Section 504 of the Rehabilitation Act
 - National Occupational Safety and Health Act
 - Drug-Free Workplace Act
 - Smoke-Free Workplace Act

- **Award Notice**

An Award Notice is the formal notification from the Sponsor that an award is offered in response to a submitted application.

Most notices of award address these points:

- Period of Performance
Under the Uniform Guidance §200.77 Period of performance means the time during which the non-Federal entity may incur new obligations to carry out the work authorized under the Federal award. The Federal awarding agency or pass-through entity must include start and end dates of the period of performance in the Federal award
- Name of the Principal Investigator
- Dollars Committed and/or Obligated
- Future Year Commitments
- Cost Sharing
- Accounting and Reporting Obligations
- Deliverables
- Payment to The Research Foundation on behalf of the College
- Special Terms and Conditions

- **Biosafety Review**

Proposals for activities involving the use of recombinant or synthetic nucleic acid molecules, use of infectious agents, other hazardous agents, select agents and toxins, transgenic animals or dual use research require additional oversight by an Institutional Biosafety Committee and/or Environmental Health and Safety (EHS) Officer. See: [Researcher Handbook](#)

- **Budget Development**

In developing a budget for a sponsored project, the Principal Investigator (PI) must ensure that the project budgets are accurately reflected in the budget periods and project period, as well as accurately defined in the narrative of the budget justification. [Grants Offices](#) (GO) works with the PIs to develop budgets.

The budget plan is the financial expression of the project or program as approved during the award process

A detailed budget should be prepared for every application as it serves as a guideline for spending the project's funds and outlines the proposed project in fiscal terms. At the time of negotiating and accepting the award, the detailed budget is used to assist in determining whether the award amount is sufficient to accomplish specific aims in the proposal, or whether a modification of the proposal and revised budget is required. In addition to a budget, a budget justification is frequently requested by the sponsor at the time of grant submission. The budget justification is a narrative that describes how the PI plans to expend the grant funds. The budget justification uses the same categories as in the budget but with extra detail to enable the sponsor to determine how the budget amounts were derived. Some sponsors, such as NSF and NIH, have precise requirements for the budget justification. For example, the NIH may use a modular budget format and an applicant will request funds in lump sums of \$25,000 intervals. In this case, the budget justification includes the name, role, and number of person months for every person on the project.

- **Contract**

Usually a contract must be signed by both the Sponsor and the University before it becomes binding and requires defined deliverables on a specified schedule.

There are two types of contracts:

- **Fixed-Price:** Contracts are made at a set amount, regardless of the actual costs for completing a set scope of work. The University is paid this set amount.

And

- **Cost Reimbursement:** This type of contract specifically defines the maximum level of support a sponsor will provide. If actual project costs are less, the University will only be reimbursed its actual costs. If research costs exceed the proposed estimate, the University must report only on the amount incurred, not exceeding the maximum level of support completed. The University however, may still be obligated to complete the proposed work.

[FedBizOpps](#) is the single government-wide point-of-entry for federal government procurement opportunities worth more than \$25,000.

- See - Federal Funding Mechanisms (See Page 17)

• Cost Sharing and required Cost Sharing Records

Cost Sharing is the financial support contributed by universities to sponsored projects. Compliance with federal cost accounting standards requires that Cost Shared expenses be treated in a consistent and uniform manner in proposal preparation, award negotiation and the accounting of these expenses in the financial reports to sponsors.

Any Cost Sharing included in the award budget is a condition of the award **and is subject to audit.**

Under the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, [Sections 2 CFR 215.23\(a\)\(5\)](#), [200.29](#), & [200.306](#) state that Cost Sharing is not expected, nor can it be used in the review process, unless a Cost Sharing requirement is allowed under the awarding agency's regulations and specified in a notice of funding opportunity.

There are two types of Cost Sharing which require both tracking and reporting:

- **Mandatory Cost Sharing:** Project costs that are not paid by the sponsor and are required as a condition of the award.
- **Voluntary Committed Cost Sharing:** Costs specifically pledged on a voluntary basis and specifically included in the award budget.

CUNY discourages Cost Sharing unless such a commitment is required by the sponsor. When there is documented evidence that a Voluntary Cost Sharing commitment is necessary to ensure the competitiveness of the CUNY proposal, approval must be obtained by the Vice Chancellor for Research at the time of the application/proposal.

See – [VC Memorandum on Voluntary Committed Cost Sharing](#)

See – [Research Foundation Cost Sharing Policy](#)

Note:

Cost Sharing may not be explicitly stated in an Award Notice¹, but it is always recognized in the award document by virtue of language that states the award is based on the application/proposal submitted.

¹ Cost sharing offered to a sponsor in the proposal documents, must be specified and quantified, becomes a binding commitment upon the execution of the award document.

- **Export Control**

U.S. export controls exist to protect the national security and foreign policy interests. Export controls govern the shipment, transmission, or transfer of regulated items, information and software to foreign countries, persons or entities. Each CUNY College has an appointed export control administrator who works in collaboration with the research compliance staff within the Office of the Vice Chancellor for Research, to ensure compliance with export control regulations. See: [Researcher Handbook](#)

- **Facilities and Administrative Rates**

Principal Investigators are responsible for including Facilities and Administrative (F&A or indirect costs) in proposals for sponsored projects funded by external entities.

Each CUNY College has a federally negotiated F&A rate which has been negotiated by the Research Foundation with the Department of Health and Human Services (DHHS) on the School's behalf. The Principal Investigator must use the federally approved rates for all sponsored projects and may not offer or promise a reduced rate to a sponsor in advance of receipt of an approved waiver.

[Under the Uniform Guidance Subpart E-200.414](#) - Cost Principles-Indirect ("F&A") Costs:

1. The Agency must accept the negotiated rate of the institution; and
2. A 10% de minimis indirect cost rate will be used by institutions that do not have a negotiated rate.

See – [Research Foundation F&A Rates](#)

See - [Research Foundation F&A Cost Analysis](#)

• Federal Funding Mechanisms

The Federal Government provides funding for research and development (R&D) primarily by two mechanisms:

1. Grants or Cooperative Agreements²
2. Contracts (See Page 13)

Both types are considered to be legal contracts between the sponsor and the University, as they both involve a formal and legally binding agreement. Unlike a Grant or Cooperative agreement, the Federal Government uses contracts as a *procurement mechanism*.

Difference between Grants and Contracts	
Contracts	Grants
<ul style="list-style-type: none">• Used as a <i>procurement</i> funding mechanism (i.e. buyer/seller) for the direct benefit or use of the U.S. Government• Relatively inflexible as to scope of work, budget and changes• Failure to perform can result in potential legal action or financial consequences• May be unilaterally awarded at proposal stage without ability to negotiate terms and conditions• Governed by terms and conditions, including clauses from the Federal Acquisition Regulation (FAR)	<ul style="list-style-type: none">• Flexible funding mechanism to <i>support public</i> purpose (i.e. assistance mechanism)• Some flexibility to change Scope of Work, Budget, etc.• More freedom to adapt project• Usually only annual report• Federal grants are governed by the administrative terms and conditions found in the grants administration manuals or handbooks of the sponsoring agency, e.g. the NSF Grant Policy Manual or the NIH Grants Policy Statement. These types of documents set forth the sponsor's general terms and conditions of award and are derived from OMB Uniform Guidance.

² Cooperative Agreements are used when federal sponsors want to retain more active involvement in the conduct of the project. This active oversight may be evidenced by a high level of agency program officials advising on the direction of the project, more frequent reporting, or anticipated deliverables.

- **Federal Register**

Published by the [Office of the Federal Register](#), National Archives and Records Administration (NARA), the Federal Register is the official daily publication for rules, proposed rules, and notices of Federal agencies and organizations, as well as executive orders and other presidential documents.

- **Financial Conflict of Interest Disclosure**

Financial disclosure forms must be submitted with all sponsored research proposals. [See CUNY Conflict of Interest Policy](#)

A federal sponsor may inquire at any time before, during, or after an award into any Investigator disclosure of financial interests and the University's review and response to such disclosure, regardless of whether the disclosure resulted in the determination of a financial conflict of interest or not.

- Grant

A grant is a project/program that is funded by a sponsor and is also called a sponsored project or program. The proposal can include the statement of work, hypothesis, and/or defined set of deliverables. *Sponsors often do not require the University to countersign grants because the Terms and Conditions are agreed upon by submitting an authorized signed proposal.* The Sponsors require programmatic, technical, or detailed financial reports. A sponsored project/program entails:

1. specific commitments regarding the commitment of effort and other deliverables, and/or milestones;
 2. a budget to cover the cost of the project including direct costs associated with the project and indirect costs that are incurred at the institution in order to accommodate the project;
 3. a defined period of performance as a term and condition of the award;
 4. a competitive application or bid process.
- See - Federal Funding Mechanisms (See Page 17)

- Gift

A Gift is defined as the voluntary contribution of external support by a donor to the College or School, without any requirement for receipt of any economic or other tangible benefit in return beyond what any general member of the public would receive. The contributor of a gift is referred to as the “donor” and the donor’s intent must be philanthropic or charitable. The primary beneficiary of a gift is the general public and not the donor.

Gifts typically carry no reciprocal obligations between donor and recipient, and are often unrelated to the business interests or mission of the donor. A gift generally has no time limit for its use and expenditure. A gift may be directed by a donor to support the work of a specific department or faculty member, but in these cases, the department or faculty member typically would have broad discretion as to the design and implementation of, and specific expenditures to support, specific academic activities for which funds received would be used. Although it is not unusual for a donor to expect a report on the general uses of funds donated (for example, a list of activities or projects that have been supported by a gift) or even a report on line-item expenses, a donor may not recoup gift funds. If a gift made for a restricted purpose has not, however, been spent according to the donor’s restrictions, a donor may have grounds to rescind and recoup the gifted funds.

Gift solicitation and acceptance should be coordinated with the appropriate development officer in each College or School. In situations in which the determination of gift vs. sponsored program award is not obvious, consult the [Grants Offices](#) (GO).

- **Grants.gov**

[Grants.gov](https://www.grants.gov) is the most comprehensive source for information on federal funding opportunities and offers a variety of subscription services. This web portal posts federal discretionary grants for the federal grant-making agencies.

Congress makes decisions about federal research and development funding through the authorization and appropriations process primarily from the perspective of the individual Agencies and Programs within the Executive Departments or Independent Agencies:

➤ **Executive Departments**

- [Department of Agriculture \(USDA\)](#)
- [Department of Commerce \(DOC\)](#)
 - [National Institute of Standards and Technology](#)
 - [Environmental Protection Agency](#)
- [Department of Defense \(DOD\)](#)
 - [Army Research Office](#)
 - [Advanced Research Projects Agency \(DARPA\)](#)
 - [Office of Naval Research](#)
 - [Office of Energy Research](#)
- [Department of Education \(ED\)](#)
 - [Dept. of Ed. Grant and Contract Info \(including EDGAR\)](#)
- [Department of Energy \(DOE\)](#)
- [Department of Health and Human Services \(HHS\)](#)
 - [National Institutes of Health](#)
 - [The following NIH Parent Announcements are available \(sorted by Activity Code\):](#) [Research (R) | Research Training (T) | Career Development (K) | Fellowships (F) | Admin Supplements | Post-award Administrative Action]
 - [NIH Grants](#)
 - [NIH Directory Service](#)
 - [NIH Grants Policy Statement](#)
 - [NIH ERA Commons](#)
 - [NIH Reporter](#)
- [Department of Homeland Security \(DHS\)](#)
- [Department of Housing and Urban Development \(HUD\)](#)
- [Department of Justice \(DOJ\)](#)
- [Department of Labor \(DOL\)](#)
- [Department of State \(DOS\)](#)
- [Department of the Interior \(DOI\)](#)
- [Department of the Treasury](#)

- [Department of Transportation \(DOT\)](#)
- [Department of Veterans Affairs \(VA\)](#)

➤ **Independent agencies**

- [National Aeronautics and Space Administration \(NASA\)](#)
 - [Office of Space Sciences](#)
 - [NSPIRES: National Aeronautics and Space Administration](#)
- [National Endowment for the Arts](#)
- [National Endowment for the Humanities](#)
- [National Science Foundation \(NSF\)](#)
 - [NSF Fastlane](#)
 - [NSF Directory and Staff](#)
- [Nuclear Regulatory Commission \(NRC\)](#)
- [United States Agency for International Development](#)
- [Small Business Administration](#)
 - [SBIR and STTR](#)

The 26 federal grant-making Agencies are listed in [The Catalog of Federal Domestic Assistance](#) ("CFDA") along with their 2292 Programs.

- **Human Research Protection Program (HRPP)**

At CUNY, all research involving human subjects (funded or not funded) must be reviewed by the University's HRPP and/or Institutional Review Board (IRB). Human subject research may not be initiated prior to receipt of a HRPP exemption or IRB approval. See - [CUNY Human Research Protection program \(HRPP\)](#)

- **Multiple Solicitations (concurrent)**

Multiple (concurrent) solicitations, that is, the submission of the same proposal to two or more sponsors, may be made provided this fact is clearly disclosed in the text of the proposal.

However, some agencies may NOT accept proposals submitted to other potential sponsors. A reference to the individual sponsor's policy concerning multiple solicitation should be found in their sponsor application guidelines. If not, the PI should inquire directly with the sponsor's program officer and seek guidance from their Grants office.

For Example:

NSF

1. ***Submission for Review by Multiple Programs within NSF.*** The same work/application cannot be funded twice. The submission of duplicate or substantially similar applications concurrently for review by more than one program without prior approval may result in the return or the redundant applications.
2. ***Submission of Same Application to Multiple Agencies.*** With the exception of the Biological Directorate Policy, concurrent submission of an application to other organizations for simultaneous consideration will not prejudice its review.

NIH Center for Scientific Review

Examples of Situations Where Concurrent Applications are Not Allowable

1. Alternating (next round) submissions of two applications with highly overlapping aims, when the summary statement of the first application has not been released at the time the second application is submitted.
2. Concurrent submissions of an application to both an RFA and a Program Announcement (PA/PAR/PAS)
3. Concurrent submission of two applications with different activity codes (e.g., R21 and R01) where the aims of one application are the same or significantly overlap with those in the other application.

- **Ownership of Intellectual Property**

At CUNY, Intellectual Property (IP) means all forms of intellectual property, including but not limited to, Inventions, Copyrightable Works, Trade Secrets and Know-How, and Tangible Research Property, but excluding Trademarks. Ownership of IP developed at CUNY or by CUNY researchers is determined in accordance with CUNY IP Policy.

See - [CUNY Intellectual Property Policy](#)

- **Pre-Award Costs**

Pre-award costs are defined in the [Uniform Guidance § 200.458](#) as those costs incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency.

Contact your Research Foundation Project Administrator to determine whether Pre-award costs are allowable.

- **Sub-recipients and Consortium Agreements (Preparation)**

When an investigator from another organization forms a collaboration with an investigator at CUNY as part of a sponsored research proposal the collaborating institution will become a sub-recipient of any sub-award applied for and awarded. Subaward proposal elements are expected to conform to the sponsor requirements for the Prime proposal.

The Guidelines for issuing a sub-award on a sponsored project are issued by The Research Foundation.

See – [Research Foundation Subcontracts](#)

- [The Uniform Guidance \(2 C.F.R. § 200\)](#) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

[The Office of Management and Budget](#) (OMB) issues OMB Circulars which are the management and budget instructions or information issued to Federal Agencies. [The Uniform Guidance](#) (Part 200-Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Awards) is a new set of regulations which consolidates several OMB Circulars, including A21, A110, and A133. These regulations have an impact on the pre and post award oversight and management of grants and contracts.

See – [Research Foundation OMB Uniform Guidance](#)

Post-award Management and Oversight

Core Functions:

- ❖ Controlling and accounting for expenditures;
- ❖ Accounts receivable management, collections and cash management;
- ❖ Financial Reporting and invoicing;
- ❖ Sub-awards and sub-recipient monitoring;
- ❖ Cost Compliance;
- ❖ Effort Reporting and certification;
- ❖ Re-budgeting, Modifications, No-Cost Extensions; PI Transfer;
- ❖ Independent Audits and financial reviews;
- ❖ Internal Audit and Internal controls;
- ❖ Award Closeouts.

Core compliance topics:

- Allowable Costs (See Page 32)
- Allocable Costs (See Page 33)
- Audit (See Page 34)
- Consistency Rules (See Page 35)
- Consultant Services (See Page 36)
- Copyrighted materials (See Page 37)
- Cost Accounting Standards (See Page 38)
- Cost Transfers (See Page 39)
- Effort Reporting (See Page 40)
- Equipment (See Page 41)
- Expanded Authorities or Waiver of Authorities (See Page 42)
- Internal Controls (See Page 44)
- Key Personnel (See Page 44)
- Openness in Research (See Page 45)
- Participant Support Costs (See Page 46)
- Prior Approval Requirements (See Page 47-48)
- Program Income (See Page 49)
- Project Extensions and No Cost Extensions (See Page 50)
- Publications (See Page 51)

- Reasonable costs (See Page 52)
- Re-budgeting (See Page 53)
- Record Retention (See Page 54)
- Reports (See Page 55)
- Salary Caps (See Page 56)
- Significant Project Changes (See Page 57)
- Subrecipients Monitoring (See Page 58)
- Termination of a Federal Grant (See Page 59)
- Travel (See Page 60)

- **Allowable Costs**

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- (a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- (b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- (c) Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of CUNY.
- (d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- (e) Be determined in accordance with generally accepted accounting principles.
- (f) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
- (g) Be adequately documented.

- **Allocable Costs**

- (a) A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received. This standard is met if the cost:
 - (1) Is incurred specifically for the Federal award;
 - (2) Benefits both the Federal award and other work of the non-Federal entity and can be distributed in proportions that may be approximated using reasonable methods; and
 - (3) Is necessary to the overall operation of the non-Federal entity and is assignable in part to the Federal award in accordance with the principles in this subpart.
- (b) All activities which benefit from CUNY's indirect (F&A) cost, including unallowable activities and donated services by CUNY or third parties, will receive an appropriate allocation of indirect costs.
- (c) Any cost allocable to a particular Federal award under the principles provided for in this part may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards, or for other reasons. However, this prohibition would not preclude CUNY from shifting costs that are allowable under two or more Federal awards in accordance with existing Federal statutes, regulations, or the terms and conditions of the Federal awards.
- (d) Direct cost allocation principles. If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then, notwithstanding paragraph (c) of this section, the costs may be allocated or transferred to benefitted projects on any reasonable documented basis. Where the purchase of equipment or other capital asset is specifically authorized under a Federal award, the costs are assignable to the Federal award regardless of the use that may be made of the equipment or other capital asset involved when no longer needed for the purpose for which it was originally required.
- (e) If the contract is subject to CAS, costs must be allocated to the contract pursuant to the Cost Accounting Standards (See Page 39). To the extent that CAS is applicable, the allocation of costs in accordance with CAS takes precedence over the allocation provisions in this part.

- **Audit**

Sponsored agreements funded with public money (federal, state, and local government awards; subcontracts under government prime grants and contracts) are subject to review of all project activity (program and financial) by auditors. Sponsors mandate that the terms and conditions of the awards as well as all pertinent regulations governing sponsored projects are complied with before, during and at the termination of the award. The sponsors also require that CUNY has processes and policies in place to deter any fraud, waste and abuse.

Maintaining compliance with the rules and regulations applicable to the federal research funding received by the University is of great importance to CUNY.

Types of audits include:

- **Operational/Process Audit**
This type of audit evaluates the College or School's processes, procedures, and associated internal control activities to determine how they impact the attainment of the University's organizational goals and objectives.
- **Financial Audit**
This type of audit involves reviewing The Research Foundation's records and reports in order to determine if financial transactions are properly recorded in its financial accounting and reporting system.
- **Compliance Audit**
This type of audit involves verification of whether a College or School is in compliance with established guidelines (policies, procedures, laws, regulations). These would include adherence to the University's internal policies and procedures as well as external requirements from federal/state agencies.
- **Investigative Audit**
This type of audit is usually requested by University management, external parties, or as a result of an anonymous report from [The Research Foundation's Whistleblower Hotline](#) or [CUNY's Research Compliance Office](#).
- **Follow-up Audits**
This type of audit is to determine that previous audit recommendations have been implemented. These audits may be scheduled between 90 and 180 days after issuance of the final report depending on the significance of the findings.

See – [Research Foundation Audit](#)

- **Consistency Rules**

Consistent treatment of costs is a basic cost accounting principle to assure that the same types of costs are not charged to sponsored agreements both as direct costs and as indirect costs. This concept is reinforced and emphasized in the Cost Accounting Standards Board's Cost Accounting Standard 502, with which, educational institutions are required to comply.

Consistency means that costs incurred for the same purpose, in like circumstances, must be treated uniformly either as direct costs or indirect.

Consistent treatment of costs must be applied across the entire institution and be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-federal entity.

Applicable Uniform Guidance [Section §200.412](#)

- **Consultant Services**

A consultant (considered an independent contractor) may provide advisory services related to a sponsored project. The consultant:

- is not responsible for the overall outcome of the sponsored project.
- is not responsible for conducting the sponsored project.
- is not responsible for reporting technical progress to the prime.
- is not responsible for defining the sponsored project's scope of work; the University defines the scope and the consultant determines how to accomplish the work.
- is responsible for providing its own work area, tools, materials, and supplies to accomplish its work.

See – [Research Foundation Independent Contractor Policy](#)

- **Copyrighted materials**

Copyright is a form of protection provided by the laws of the United States (title 17, U. S. Code) to the authors of “original works of authorship.”

See – [CUNY Right Materials](#)

- **Cost Accounting Standards**

The Cost Accounting Standards Board (CASB) set forth broad Cost Accounting Standards for Education Institutions. The federal CAS regulations are established in [48 CFR Part 9905](#) and the [Uniform Guidance 2 CFR 200](#).

Cost Accounting Standard 9905.501 requires consistency in estimating, accumulating and reporting costs.

Cost Accounting Standard 9905.502 requires consistency in allocating costs incurred for the same purpose.

Cost Accounting Standard 9905.505 requires proper treatment of unallowable costs.

Cost Accounting Standard 9905.506 requires consistency in the accounting periods used for cost accounting.

Adherence to this cost accounting procedures has significant implications for the preparation and approval of budget material for inclusion in proposals to federal sponsors. Recipients of federally funded awards are obligated to ensure that costs are allocated in accordance with federal statute.

See – [Research Foundation F&A Cost Analysis](#)

- **Cost Transfers**

A cost transfer is an after-the-fact reallocation of costs, either salary or non-salary costs, to a sponsored project. Cost transfers are not the same as Re-budgeting (See Page 53). Re-budgeting is a reallocation of budget funds but does not involve a transfer of expenditures.

See – [Research Foundation Cost Transfers](#)

- **Effort Reporting**

Effort is defined as the amount of time spent on a particular activity. It includes the time spent working on a sponsored project in which salary is charged or contributed (cost shared – see [Cost Sharing Policy](#)).

CUNY faculty effort is expressed as a percentage of the total amount of time spent on work-related activities (instruction, research, etc.) for which the University compensates an individual.

Effort reporting is certification to the granting agencies that the effort charged or cost shared to each award has actually been completed during the performance period of the project.

See – [Research Foundation Effort Reporting Guidance](#) and [What is effort reporting and why is it so important that it be accurate?](#)

- **Equipment**

Equipment is defined as a non-expendable capital item of movable or personal property with the following characteristics:

- Costs \$5,000 or more per unit (for the Computer Hardware the threshold is \$1,000)
- Has a useful life expectancy of two years or more
- Is complete in itself and will retain its identity as a separate item
- Will not be expended or consumed in research

See – [Research Foundation Equipment](#)

- **Expanded Authorities or Waiver of Authorities**

“Expanded authorities” or “Waiver of Authorities” refers to a limited number of actions that normally require prior approval by the awarding agency but for which the agency has waived its authority and given this authority to the grantee.

As expanded authorities or waiver of authorities is a Federal Agency specific term it does not apply to all Grants and never applies to contracts.

Certain changes, however, always require prior approval of the awarding agency. These changes impact the project scope or objective and are evidenced by:

- Change of Principal Investigator (PI) or other key personnel;
- Absence of the PI for more than three months, or a 25 percent reduction in effort spent on the project by the PI or other key personnel;
- Transfer of the performance of substantial programmatic work to a third party
- Significant re-budgeting, whether or not the particular expenditures require prior approval;
- Need for additional funds;
- Other changes specifically cited in the award or in agency-specific guidelines.

Contact your Research Foundation Post Award contact to determine whether the award falls under Expanded Authorities.

If prior approval is required then written approval must be obtained from the Sponsoring official. It may also be helpful or even a required preliminary step, to obtain official approval for certain actions. Written approval may be made by e-mail or document. Approval cannot be obtained over the telephone or during an in-person conversation.

- **Key Personnel**

Senior/Key Personnel also referred to as the Program Director or PD/PI are individuals who contribute to the scientific development or execution of a project in a substantive, measurable way. Key Personnel must devote measurable Effort to the project. "Zero percent" Effort or "as needed" are not acceptable levels of involvement for those designated as Senior/Key Personnel.

The prior approval requirement for changes in status of personnel applies to senior/key personnel.

Individuals that do not have a specified measurable Effort but are nevertheless contributing to the scientific development or execution of the project should be listed as Other Significant Contributors. These individuals are listed at "Effort of Zero Months or % Effort" and on an "as needed" basis. Individuals with measurable Effort may not be listed as Other Significant Contributors.

If an award is made, Other Support information would be required of all individuals designated as Key Personnel and any changes in funding and overlap for Key Personnel must be tracked and reported. This is not the case for Other Significant Contributors as considerations of overlap do not apply to these individuals.

- **Internal Controls**

The Uniform Guidance states in [§200.61 Internal Controls](#) are a process implemented by a non-Federal entity, such as CUNY, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of *operations*;
- Reliability of *reporting* for internal and external use; and
- *Compliance* with applicable laws and regulations.

In accordance with §200.303, a non-Federal entities such as CUNY must maintain effective internal control over the federal award that provides reasonable assurance that the entity is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the award.

Applicable Uniform Guidance section: [200.61](#) & [200.303](#)

See – [Research Foundation Internal Control](#)

- **Openness in Research**

Refers to the principle of freedom of access by all interested persons to the underlying data, to the processes, and to the final results of research.

See – [CUNY Openness in Research](#)

- **Participant Support Costs**

Under the federal Uniform Guidance, participant support costs include stipends and subsistence allowances, travel allowances and registration fees paid to, or on behalf of participants or trainees (but not employees), in connection with conferences or training projects. Participant support costs that can be directly attributed to an individual participant.

Costs for project organizers (such as a PI or Co PI), speakers, and program facilitators or coordinators, even where these individuals actually participate as a program participant, are not considered participant support costs.

Participant support costs are exempt from Facilities and Administrative (F&A or indirect costs).

See – [Research Foundation Participant Support Costs](#)

• Prior Approval Requirements

Prior approval is the written permission by an Authorized Organizational Representative (AOR) at The Research Foundation in advance of an administrative action that would result in a change in budget and/or program plans on a sponsored award.

Prior Approval Requirements are found in the [OMB Uniform Guidance section 200.308](#)

For most Federal awards, prior written agency approval is required for the following changes:

- Change in the objectives or scope of the project (even if there is no associated budget revision);
- Change in the key person(s) specified in the notice of award;
- Need to charge salaries of administrative and clerical staff as direct costs (unless included in the approved proposal);
- Disengagement from the project for more than three months by the approved project director or Principal Investigator (PI);
- Reduction in Effort devoted to the project by the PI or key person(s) specified in the award notice by 25% or more;
- Transfer of Participant Support/trainee costs to another budget category;
- Addition of a foreign component;
- Transfer of a significant part of the programmatic effort to a third party via a subcontract not included in the approved proposal.
- Need to issue a fixed price subaward;
- Change in the approved cost sharing;
- Change in the approved use of animals or human subjects;
- Change of grantee institution;
- Need for pre-award spending more than 90 days prior to the award start date
- No-cost extensions to the period of performance beyond the first no-cost extension of up to 12 months.

- Carry-forward of funds of the current year budget (including prior year carry-forward funds) into the next budget period within a project period, unless an award has carry-forward authority.

Non-Federal sponsors may have similar, additional, or less restrictive requirements for prior approval.

See – Expanded Authorities or Waiver of Authorities (See Page 42).

• Program Income

Program Income is income earned by a grant recipient from activities which are supported by the direct costs of an award. It includes, but is not limited to:

- Fees earned for services performed under the grant, such as those resulting from laboratory drug testing.
- Rental or usage fees, such as those earned from fees charged for the use of computer equipment purchased with grant funds.
- Third-party patient reimbursement for hospital or other medical services, such as insurance payments for patients where reimbursement occurs because of the grant supported activity.
- Funds generated by the sale of commodities, such as tissue cultures, cell lines, or research animals.
- Fees received to attend conference or workshop funded by a sponsored project.

This income must be appropriately documented and the resulting revenue and expenses properly recorded and accounted for. This income must be administered through a program income account established by the Research Foundation.

Program Income is the property of the sponsor and is to be accounted for in accordance with the Terms and Conditions of the Award.

- **Project Extensions and No Cost Extensions**

A No-Cost Extension (NCE) is an extension of the period of performance beyond the expiration end date of the award. Project extensions permit a principal investigator to complete a project. As the phrase “no cost” suggests, there is no additional funding provided by the Sponsor.

A no-cost extension may be requested by a Principal Investigator when all three of the following conditions are met:

- The end of the project period is approaching, AND
- There is a programmatic need to continue the research, AND
- There are sufficient funds remaining to cover the extended effort.

Some federal sponsors have delegated the responsibility for approving no-cost extensions for grants to the institution under Expanded Authorities.

Note:

Funds remaining in the account is not a justifiable reason for requesting an extension. Extensions may be requested only for programmatic reasons (such as the work took longer than expected). However, it is appropriate to state that sufficient funds remain in the account to support the project for the additional period of time.

If you require a NCE, you will need a detailed justification for what unexpected event(s) delayed the progress of the project, how the unexpected events were remedied, what progress will occur during the no cost extension period to successfully complete the Statement of Work, and how the no cost extension request will benefit the project’s results.

See – Expanded Authorities or Waiver of Authorities (See Page 42).

- **Publications**

The freedom to publish and disseminate the results of its research is integral to all university work. Consequently, the university will undertake research or studies only if the scientific results can be published or otherwise promptly disseminated.

See – [CUNY Openness in Research](#)

- **Reasonable costs**

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. In determining reasonableness of a given cost, consideration must be given to:

- Whether the cost is necessary for the performance of the activity; and
- Whether incurrence of the cost is consistent with established policies and practices.

- **Re-budgeting**

The budget for a sponsored project is the financial expression of the project or program as approved during the award process. During the conduct of the project, the Principal Investigator may decide that budget changes are needed in order to meet the requirements of the project. Many sponsors allow some flexibility in how project funds are expended and permit budget changes needed to meet project requirements. Principal investigators must request prior approval from the sponsor for budget changes when necessary.

See – Budget Development (See Page 12)

See – Expanded Authorities or Waiver of Authorities (See Page 42)

See – Prior Approval Requirements (See Page 47)

Please note that when budget revisions are made in direct cost categories, there could also be an impact on the Facilities and Administrative (F&A or indirect costs) to be charged to the project.

- **Record Retention**

Records retention is the term applied to the maintenance of important records that document decisions, policies, financial activities and internal controls.

See – [CUNY Grants Record Retention](#)

See – [Research Foundation Record Retention Policy](#)

See – [CUNY Record Retention Schedule](#)

- **Reports**

Financial Reports

The Research Foundation prepares and submits interim and final financial reports. It is important to note that the principal investigator is ultimately responsible for management of the fund and, as such, must ensure that all expenses charged are accurate and allowable under the Terms of the Award.

Technical Reports

In addition to financial reports, most grants and contracts also require the submission of interim and final technical reports of the research accomplished during the period of performance. The specific requirements are either stated in the Award Notice, or, in the case of many grants, in a policy manual referenced in the Award. It is the Principal Investigator's responsibility to prepare and submit the technical reports to the sponsor.

Report of Inventions

Most sponsors require that discoveries and inventions be disclosed to the sponsor upon conception or reduction to practice. The Principal Investigator is responsible for adhering to a sponsor's invention reporting requirements, as well as, the University's policies regarding the disclosure of inventions

See – [CUNY Intellectual Property Policy](#)

See – [CUNY Technology Commercialization Office \(TCO\)](#)

A Final Invention Statement and Certification is usually executed and submitted following the expiration or termination of a grant or award. The Statement includes all inventions which were conceived or first actually reduced to practice during the course of the work under the grant or award, from the original effective date of support through the date of completion or termination.

Final Inventory of Equipment

All federal contracts and many grants require a final inventory of equipment purchased, fabricated or furnished by the sponsor during the period of the project. Non-federal sponsors may have other requirements.

- **Salary Caps**

A salary cap is defined as a maximum *amount* or *rate* of compensation for personal services that a sponsor will reimburse the University on a sponsored program. A Salary Cap is NOT a limitation on how much a Principal Investigator can be paid by the University. Calculations for salary do not include fringe benefits. They are calculated separately, based on the salary cap, and should be identified in the proposed budget as a separate line item. At CUNY, the amount of salary above the cap is designated as cost sharing.

See – [Research Foundation Effort Certification](#)

The Department of Health and Human Services (DHHS)

DHHS, which includes the NIH (National Institutes of Health), has a salary cap that limits the amount of funding the agency will provide for an individual's salary. The salary cap amount is reviewed annually and is indexed to a specified Executive Pay Level and changes periodically.

See - [NIH Salary Cap](#)

Department of Defense (DOD)

The DOD cap, "[Benchmark Compensation Amount](#)", is applicable to contracts only, is currently set at a total compensation rate of \$952,308 (all forms of remuneration for services, and related costs that would be considered fringe benefits) per federal fiscal year.

National Science Foundation (NSF)

There is no salary cap for proposals submitted to NSF. However, [NSF's Proposal and Award Policies and Procedures Guide](#) limits faculty to two months of their salary in any one year. This limit includes salary compensation received from all NSF-funded grants. Faculty paid from multiple NSF grants must not re-budget to pay themselves additional salary. The total amount of salary paid from all NSF grant sources must not exceed two months unless explicitly approved by NSF.

Other Sponsors

Other sponsors may also impose a salary cap so it is important to review the solicitation to determine if your sponsor has a salary cap.

- **Significant Project Changes**

In general, most sponsors must be informed of any changes that effect the scope of the project (even if there is no associated budget revision) of the research to be performed as described in the proposal and as accepted during the award negotiations at the time of an award.

Indications of significant project change include:

1. A significant change (decrease) in the percentage effort devoted by the key project personnel to the project is considered as affecting the scope of the research.
2. An absence/change of the Principal Investigator.
3. Change in the approved use of animals or human subjects, or a change in the objective or emphasis of the study.
4. Change of grantee institution.

See – Prior Approval Requirements (See Page 47)

- **Subrecipient Monitoring**

As a recipient of a federally sponsored award, the Principal Investigator (PI) and the Research Foundation (RF) on behalf of the Colleges of the The City University of New York must comply with the guidance outlined in OMB's Uniform Guidance. The PI is responsible for review and approval of all subrecipient invoices, reports and deliverables. In the event that the deliverables are not received in a timely manner, the PI should contact the sub-recipient, as this could indicate a potential problem that should be addressed quickly. In addition to the review of documents, the PI may initiate regularly scheduled conference calls with the subrecipient to monitor the progress of the subaward and may schedule a periodic or random visit. Any changes in the award affecting the sub-recipient that require monitoring or management must be promptly communicated to the College's Grants Office as well as the RF's Project Administrator and Compliance Manager.

See – [Research Foundation Subrecipient Monitoring Procedure](#)

See – [Research Foundation Subrecipient Commitment Form](#)

See – [Research Foundation Checklist to Determine Subrecipient or Contractor Classification](#)

- **Termination of a Federal Award**

Termination means the ending of a Federal award, in whole or in part at any time prior to the planned end of period of performance.

The Federal award may be terminated in whole or in part as follows:

- (1) For failure to comply with the terms and conditions of a Federal award;
- (2) For cause;
- (3) When agreed upon by Grantor and Grantee including the termination conditions, effective date and, in the case of partial termination, the portion to be terminated; or
- (4) By the Grantee. However, if it is determined that a partial termination will not accomplish the purposes for which the Federal award was made it may be terminated in its entirety.

Before the Termination of a grant or cooperative agreement, it may be put into suspension creating a temporary interruption of Federal funds to the award recipient under the grant or cooperative agreement being suspended. If in suspension for failure to comply or for cause, the suspension may be lifted by corrective action taken by the recipient, or may be the first step in making a decision to terminate the award.

- In the event that a project is terminated, the awarding agency will typically:
 - Notify the PI and/or The Research Foundation, in writing of its decision;
 - Specify the reason;
 - Afford the PI and sub-recipients a reasonable time to terminate project operations; and
 - Request the PI seek support from other sources.

An awarded project which is prematurely terminated will be subject to the same requirements regarding audit, recordkeeping, and submission of reports as an awarded project that runs for the duration of the project period.

See - [NIH](#)

See - [NSF](#)

- Travel

Travel is allowable as a direct cost when it takes place as part of a proposal and is subsequently awarded as travel in the budget line item. All awards are subject to specific agency restrictions, as well as [The Research Foundation's Travel Guidelines](#) and [Transportation for Project Related Travel](#).

Note that a sponsor's terms and conditions must be followed with regard to **foreign travel**. Many sponsors require prior approval for foreign travel, even when the foreign travel has been included in the initially approved budget. See [Fly America Act](#)

Sponsored project travel has a high audit profile and is routinely examined by internal, external and sponsor auditors. Therefore, each transaction must be adequately documented. Documentation must provide clarity so that anyone reviewing the transaction can verify that it is allowable, allocable and reasonable.

If travel costs are not allowable, allocable, reasonable, consistently treated and sufficiently documented, they cannot be charged to a sponsored research project.