HOWARD UNIVERSITY

OFFICE OF SPONSORED PROGRAMS
PRINCIPAL INVESTIGATORS PROCEDURES HANDBOOK

2010

What is a Sponsored Program?

A sponsored program is any activity supported by external funds awarded to the University as a result of some formal communication such as a contract, a letter, an application, or a written proposal signed by an authorized University official. Such communication must be reviewed and processed by the Office of Sponsored Programs (OSP). Typically, a sponsored program also has one or more of the following attributes:

- Award is contingent upon the University accepting specific staff performance and/or achieving specific performance targets.
- A line item budget with restrictions on the use of funds by function or activity, and/or restrictions on the transfer of funds among budget categories.
- Requirement for programmatic or technical report.
- Requirement for fiscal report and/or external audit.
- Provision for the disposition of intangible property such as patents, copyrights, inventions, and licenses, which may result from the activity.

Howard University requires that any application for a sponsored project initiated by a faculty or employee of the University must be submitted by the institution. This makes the institutional review, approval and authorization of all proposals critically important

What Office is Responsible for Coordinating this Activity?

The Office of Sponsored Programs (OSP) is the administrative unit charged with the responsibility of coordinating these functions. OSP has the primary administrative responsibility to provide needed services and support in the University's efforts to obtain external funding. Each institution participating in sponsored programs needs such an office to assist the faculty in finding funding sources, developing grant capabilities in preparing sponsored proposals, and adhering to the institutional and funding sources' rules and regulations and maintaining compliance with set policies and procedures.

Organizationally, OSP is located within the Office of the Senior Vice President for Research and Compliance. It is headed by the Assistant Vice President for Sponsored Programs and Research, who reports directly to the Senior Vice President for Research and Compliance.

OSP serves as the central coordinating unit for the University's externally sponsored research activities and projects. The OSP is responsible for coordinating all research and research-related activities at the University. It assumes the initiatives as well as assists faculty in the identification of potential funding sources, development of research proposals, and interaction with program officers at sponsoring agencies. The Office of Sponsored Programs processes, monitors, and facilitates the evaluation of all sponsored research projects to ensure that all grants and contracts are consistent with institutional goals, policies and procedures.

OSP Responsibilities

- Maintaining up-to-date funding information and related materials from a variety of funding agencies, including public, private and corporate sponsors.
- Disseminating pertinent sponsor information to faculty sources.
- Providing assistance to faculty and staff in clarifying and interpreting agency guidelines, requirements, regulations, as well as University policies and procedures.
- Assisting Principal Investigators in proposal preparation with editing and evaluation of proposals to ensure responsiveness to sponsor requirements, and correctness of style and content.
- Processing proposals for internal reviews and approval.
- Undertaking post-submission inquiries and tracking.
- Coordinating compliance with federal and state government regulations and University policies.
- Maintaining official University Sponsored Programs award files.
- Preparing administrative reports of University Sponsored Programs activities.
- Undertaking post-award monitoring for adherence to sponsor terms and conditions of award, including fiscal and technical accountability requirements.
- Coordinating development of memoranda of understanding (MOUs) with potential sponsors.
- Works with the Principal Investigator to obtain proper authorization for rebudgeting or transfer of funds across budget line items
- Evaluating client-initiated subcontracts to ensure that University interests are protected.
- Developing and monitoring University-initiated contracts, subcontracts and sub-agreements.
- Serving as official University point-of-contact between the sponsor and the institution.
- Reviewing, implementing, and monitoring the University's research administration policies and procedures, as well as contributing to the formulation of new policies as necessary.
- Protecting and managing innovations created at the university by utilizing patents, trademarks, and copyright procedures as needed.
- Facilitating the transfer of university technology useful in the promotion of economic development and new found relationships with industry.
- Ensuring that invention disclosures are reported to their respective agency and remaining in compliance with government legislation, i.e. Bayh-Dole Act

How Does it Work?

As illustrated in Figure 1, winning an award for a sponsored project is a multi-step process. This handbook is intended not only to facilitate this process, but also to serve as a guide to both new and experienced investigators in developing applications for extramural funding, and in meeting the responsibilities expected from Principal Investigators or Project Directors when funded. It is an evolving document, which will be modified as University policies and sponsors' guidelines change.

In order for this process to work, the faculty or Principal Investigators/Program Directors (PIs/PDs) must assume certain responsibilities as listed in Figure 2.

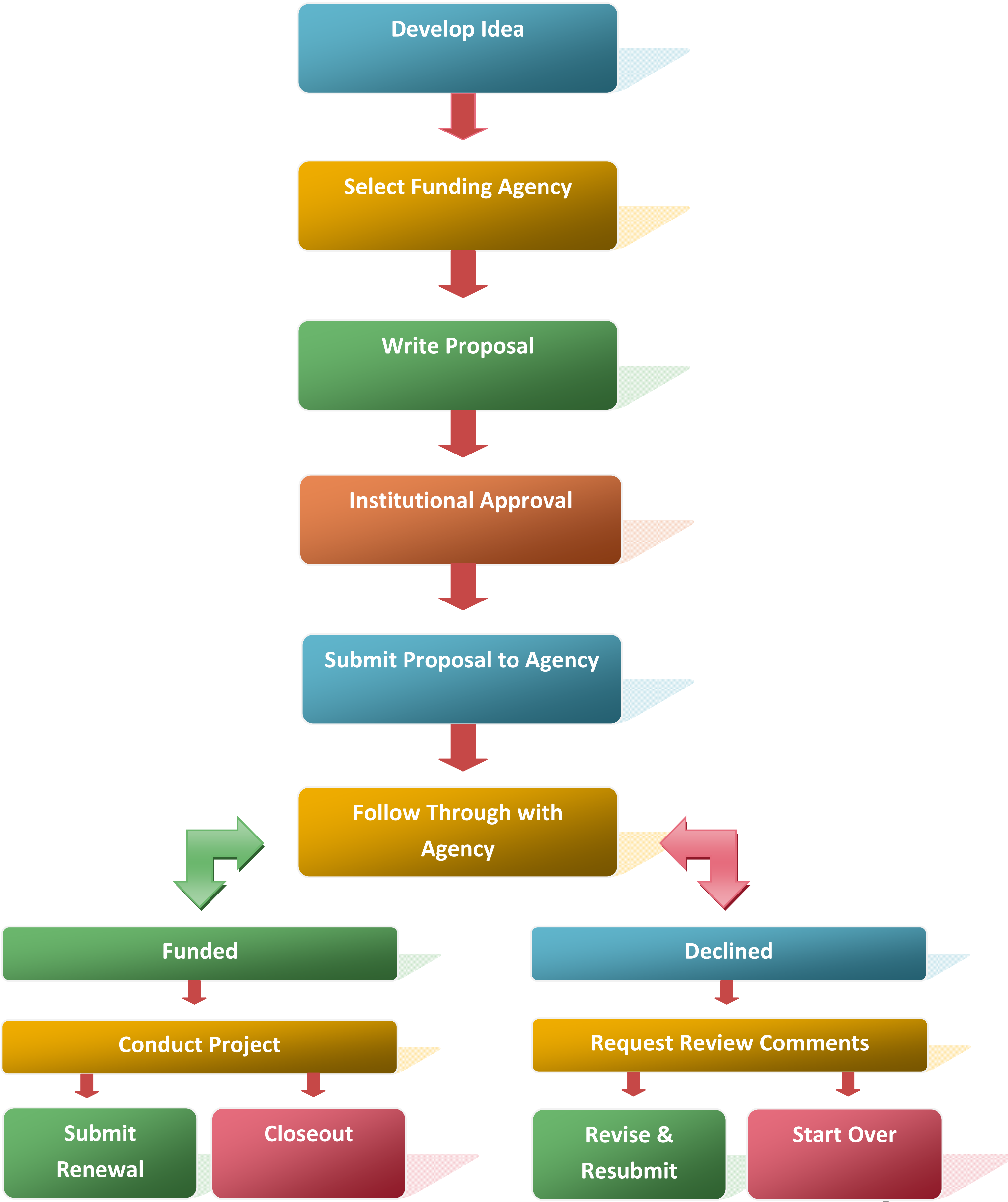
Federal and other sponsoring agencies may use any of the following legally binding instruments to provide extramural funding for sponsored research and projects: grant, cooperative agreement or contract. In each instance the agency decides on the appropriate award instrument. The distinctions among these instruments are explained in OMB Circular A-110: Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Nonprofit Organizations.

Grant - A grant is used when the principal purpose of the transaction is to accomplish a public purpose of support or stimulation authorized by Federal Statute. Substantial involvement between the sponsor and the recipient is not expected when carrying out the activity. The exact course of the work and its outcome cannot be defined precisely.

Cooperative Agreement - A cooperative agreement is used when the principal purpose of the transaction is to accomplish a public purpose of support or stimulation authorized by Federal Statute, and substantial involvement between the sponsor and recipient is anticipated during the performance of the work. The nature of the involvement can be defined and specified in advance.

Contract - A contract is used when the primary purpose of the transaction is acquisition of property or services for the direct benefit or use of the Federal Government involvement.

figure1


Develop Idea
Select Funding Agency
Write Proposal
Institutional Approval
Submit Proposal to Agency
Follow Through with Agency
Funded
Declined
Conduct Project
Request Review Comments
Submit Renewal
Closeout
Revise & Resubmit
Start Over

PI 's Role and Responsibilities – Figure 2	
PI is responsible	**for the direction of the project and/or the education and training of students.**
PI is knowledgeable	**about the regulatory requirements of the sponsor and the policies and procedures of the University.**
PI conducts	**the work supported by the grant or contract in a timely and professional manner.**
PI ensures	**that all costs are allowable and allocable in accordance with OMB Circular A21 – Cost Principles for Educational Institutions**
PI ensures	**that all cost sharing and/or matching fund commitments set forth in the award are met and documented. Cost share must be mandatory.**
PI ensures	**that any subcontractors comply with the terms and conditions of each subcontract/sub-agreement and with the reporting requirements passed down to them.**
PI ensures	**that all closeout requirements are met including final technical report, reports on invention, property, and financial status report (FSR). The Grants and Contracts Accounting department is responsible for the preparation and submission of the FSR.**

PI keeps and maintains	**securely on campus all research or programmatic records conducted or produced in the course of the grant or contract (including all programmatic/technical reports) for the period required by the audit retention clause of the award.**

Pre-Award Issues-Finding Funding

The list of possible resources available to assist prospective investigators in identifying potential sponsors is a long one. It encompasses electronic resources, periodicals, brochures, newsletters, and basic references.

Some Federal Funding Sources:
National Science Foundation (NSF)
Department of Health and Human Services (DHHS), National Institutes of Health (NIH), (ACF, HRSA, SAMHSA, CDC)
National Endowment for the Humanities (NEH)
National Aeronautics and Space Administration (NASA)
National Oceanic and Atmospheric Administration (NOAA)
National institute of Standards and Technology (NIST)
Department of Education
Department of Defense
Department of Homeland Security

Other Funding Sources:
Grants.gov
Illinois Research Information Service (IRIS)
Grants.net
Federal Register
Fedbizopps.gov
Grant maker Websites (http://fdncenter.org/funders/)

Other private and community foundations in the U. S.
Robert Wood Johnson Foundation Ford Foundation William K. Kellogg Foundation Carnegie Corporation American Cancer Society Alfred P. Sloan Foundation Howard Hughes Medical Institute Commonwealth Fund Andrew Mellon Foundation Juvenile Diabetes Foundation International

The Office of Sponsored Program will assist faculty by providing information about available resources that may be used to identify both externally and internally-sponsored funding opportunities. These *resources include, but are not limited to, publications, websites, on-line search engines, and other communications or announcements.*

Pre-Award Issues-Proposal Development and Submission

Following identification of a funding source or potential sponsor, the next important task is to prepare a strong proposal for submission to the agency. The proposal is the primary vehicle by which the prospective project director communicates an idea and plan to a sponsor. It informs why, how, when and by whom the activities being proposed will be done. In accordance with Proposal Development and Submission Policy 600-003., all proposals for external funding are submitted to the Office of Sponsored Programs Research Administration (OSP/RA) prior to agency submission. Submission of proposals through a single office enables Howard University (through OSP/RA) to review proposals for consistency with university policies and compliance with external regulations. Formats vary but a typical proposal would include the following parts outlined below

Proposal Development

The individual leading the proposal submission and the conduct of a subsequent award is the Principal Investigator/Project Director (PI/PD). Normally, the PI/PD is a Howard University faculty member. Eligibility will be determined on a case-by-case basis and will be based primarily on consistency with the university mission, sponsor requirements, and the ability of Howard University to support the initiative (e.g., meet administrative requirements such as financial reports and invoices, dedicate space, etc.).

The PI is responsible for completing and submitting the following documents and performing the following actions during the development of a proposal:

- *Application to Seek Off-campus Funds*
- *Budget*
- *Budget justification*
- *Statement of Work*
- *All completed information required by sponsor*
- *Conflict of Interest form for all key personnel (if required by sponsor)*
- *Obtaining Dean and Department Chair Approval for Cost Sharing (at their discretion for approval*
- *Obtaining Provost approval for additional space (if necessary)*
- *Notifying institutional committee if applicable and obtaining approval (if necessary CB Powell Building Suite 137, 806-4759)*
    - *Human subjects (http://ovprc.howard.edu/offices/orc/index.html)*

- *Animal subjects (http://ovprc.howard.edu/offices/orc/index.html)*
- *BioSafety (http://ovprc.howard.edu/offices/orc/index.html*
- *Radiation Safety (http://ovprc.howard.edu/offices/orc/index.html*
- *For Each Subcontractor, Subcontractor Budget, Budget Justification and Institutional Approvals*
- *Copy of Institutional Base Salary Letters for All Key Personnel*
- *Facilities and Administrative Cost Waiver/Reduction Form (if necessary)*
  - *http://ovprc.howard.edu/resources/index.html*

See Appendices for copies of forms. Additional requirements may need to be completed when developing particular proposals.

Cover Page

Typically, sponsoring agencies provide their official cover sheets. When none is provided, OSP provides a cover page that includes the following:

- Proposal/Project Title
- Name and address of the sponsor;
- Name and address of Howard University;
- OSP Proposal Number
- Name and Title of the Principal Investigator;
- Total amount requested;
- Proposed duration of research

The Technical Proposal

Abstract/Executive Summary

The abstract provides a brief summary of the project, and in most cases, within a space limitation specified by the sponsor. It is important to use words economically and efficiently in writing the abstract. The abstract should be clear, and should accurately reflect and parallel the content of the proposal without exceeding the sponsor's page limit. It should include the problem to be addressed, the objectives to be achieved, the approach to be used and the total cost of the project. Although it appears first in the proposal, the abstract should be written last with the thought that it may be the only part of the proposal that is read by some agency reviewers. It should be clear, succinct and effective in generating interest for the project.

Introduction/Background

The introduction/background section of the proposal allows the investigator to briefly sketch the background for the proposal; demonstrate knowledge of the field by critically evaluating existing knowledge; specifically identify gaps the project is expected to fill; and persuasively and concisely state the importance of the project. It is useful in this section to relate the aims of the project to the broad long-term goal.

Goals & Objectives

In the goals and objectives section, the Principal Investigator states the broad long-term goal and the expected outcome(s) of the proposal. This should be followed with a listing of specific objectives which should be clear, brief, realistic, and where possible, measurable.

Methodology

The section that discusses the methodology should relate the specific approach to specific objectives and explain why the ones proposed are best suited to achieve the project objectives. In some proposals, this section may include the projected sequence or timetable for the project.

Key Personnel
The key personnel section details who will do what is being proposed. This section should include a brief description of the qualifications, relevant experiences and specific roles of all the key personnel, listing the Principal Investigator first. Personnel critical to the successful completion of the project should be included even if no salary is requested. In the appropriate section, relevant publications of key personnel must be listed.

Evaluation
The evaluation section should relate the assessment to the stated objectives; describe evaluation method and data to be used; give time frame and describe resources and personnel that will be involved; and discuss the intended use of the evaluation results.

Budget or Cost Proposal

The Budget, also called a cost proposal (generally for contracts) by some sponsors, is a comprehensive planning document that integrates all of the details for attaining the objectives of the proposal. The budgetary process should take into account preparation for the long-range goals, as well as the short-term objectives. For your convenience, a budget template is provided at the OVPRC website at **http://ovprc.howard.edu/resources/index.htmlb** .

Practically all proposals are funded on the basis of a line-by-line budget, which typically includes both direct cost and facilities and administrative cost (indirect cost). The project budget is the instrument through which the cost of the project's activities plans, priorities, and organization are expressed. The funding agency grants a certain amount of money to the project on the basis of the line-by-line budget estimate that is submitted as part of the proposal. Most government granting agencies expect that the project director will adhere to the budget, and may require prior approval before certain changes are made. A number of foundations also require prior approval for budget modifications subsequent to an award. Typically, such approvals must be requested and approved in writing.

Direct costs are defined as those costs of the project that will be paid directly to personnel or vendors and are clearly allocated to a project. These costs are typically itemized in the project budget. Direct costs include, but are not limited to, the following:

- *Personnel (faculty, staff, postdoctoral fellows, graduate students, undergraduate students, etc.)*
- *Fringe benefits*
- *Consultants*
- *Stipends and Tuition*

- *Travel*
- *Equipment*
- *Materials and supplies*
- *Animal costs*
- *Subcontracts (and associated sub recipient F&A costs)*
- *Patient care costs*

Facilities and Administrative (F&A) Costs are defined in Section E (1) of the ***Circular*** as costs "incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity."

F&A costs are commonly referred to as "indirect costs" or "overhead".

Examples of F&A costs include:

- *Salaries, wages, and fringe benefits for clerical and administrative staff*
- *Office supplies (basic supplies)*
- *Subscriptions*
- *Library books*
- *Periodicals*
- *Memberships*
- *Office and general equipments (e.g., desks, chairs, computers)*
- *Photocopying*
- *Postage*
- *Repair and maintenance (e.g., equipment, remodeling)*
- *Telephone and internet (e.g., monthly bills, installation, maintenance)*
- *Utilities*
- *Proposal development costs*

See the Exceptions – Charging F&A-type Costs as Direct Costs section of ***Direct and Indirect Cost Charging Policy 600-015*** for special circumstances where it is appropriate to charge costs listed above directly to a sponsored project.

Budget Development

Direct Cost Budget Elements included in the budget should be provisions for the following cost categories:

Personnel

- Salaries & wages to cover personnel needs. Salaries requested must be consistent with the regular practices of the University. These costs are usually calculated as a percentage of effort based on Institutional Base Salary (IBS)

- Fringe Benefits (employee benefits such as social security, worker's compensation, retirement, unemployment, health insurance, etc.) should be factored into this object using the appropriate rates. Please see the OVPRC website at http://ovprc.howard.edu/resources/links.html or the current fringe benefit rates.

Consultant Services should be justified and may be paid only to experts outside the University who provide a unique contribution to the project. Daily compensation rate, number of days of expected service and per diem allowances should be included in the travel, consultant or "other" category of the budget. The University's Controller's office has daily compensation limits for consultants. Any deviations must require prior approval. Please see the Office of the Controller's website for rates.

Stipends and Tuition are provided for support of graduate or undergraduate research assistants to help carry out the proposed research. Tuition remission is not taxable. Stipends are taxable and should be filed as a source of income for the tax year in which the funds were received

Travel includes in-state and out-of-state trips for fieldwork, attendance at conferences and seminars needed by the investigator to enhance his/her ability to perform the work of the proposal, or to present the results of the project. Itemize travel expenses of project personnel by purpose (e.g., staff to training, field interviews, advisory group meeting, etc.). Show the basis of computation (e.g., six people to 3-day training at $X airfare, $X lodging, $X subsistence). In training projects, travel and meals for trainees should be listed separately. Show the number of trainees and unit costs involved. Identify the location of travel, if known Domestic travel includes travel in the United States, its possessions, and travel to Puerto Rico and Canada. All other travel is considered foreign travel. Government sponsors generally require persons traveling under a grant or contract to travel by U.S. flagged carriers, if available.

Equipment includes allowable items such as scientific equipment and apparatus unavailable to the Principal Investigator for the purpose of conducting the work required on the project. In accordance with the University policy, generally, equipment refers to an item of property that has the acquisition cost of $3,000 or more and an expected service life of more than one year. A brief description and justification to show the purpose, function and cost of the equipment is necessary.

Materials and Supplies include items such as printing instructional materials, office supplies and audiovisual and computer supplies. List items by type (e.g., postage, training materials, copying paper, and other expendable items such as books, hand held tape recorders) and show the basis for computation. Generally, supplies include any materials that are expendable or consumed during the course of the project. The budget should indicate in general terms the type of expendable materials and supplies that are required to meet the goals of the project.

Animal costs include the species, the total number of care days, the cost per day, and the total cost.

Subawards or Subcontracts are an award to a subrecipient when the prime award is assistance (grant or cooperative agreement). A subcontract is an award to a subrecipient when the prime award is procurement (contract). A subaward or subcontract constitutes an agreement between the University and another party to transfer a portion of the University's obligations under an award to that party. Principal Investigators must make clear provisions in the budget to pay for such sub-agreements if they are included in the proposal. Each sub-agreement should be identified separately, and followed with a brief explanation of the services that the sub-awardee or subcontractor will provide, and the appropriateness and reasonableness of the cost. Sub-agreements, sub-awards, and subcontracts are not executed until the award or contract is received by the University. **PI's should contact OSP for assistance in developing appropriate subcontract agreements following their award.**

Patient Care costs are associated with either in- or out-patient care which is directly related to the project are allowable under some circumstances.

F&A Costs *are expressed as a percentage of total direct costs, but which exclude: permanent equipment over $3,000; the portion of subaward costs over $25,000; tuition and stipend for trainees on training programs; and rental of off-campus facilities. The Campus calculates its F&A cost rates and negotiates these with the U.S. Health and Human Services Audit Agency acting on behalf of all federal agencies. There are off-campus and an on-campus F&A cost rates determined by the project's location. Projects where at least 51% of the work is performed off-campus may be apportioned at the applicable off-campus rates.*

Cost Sharing or matching may be required in some cases by Federal sponsor. This requires that the Campus make a contribution towards the total costs of a project. The amount of such contribution required may vary from less than 5% to greater than 50% of the total project cost. The Campus' share of such costs may come from several sources:

- *other support for the same project, i.e. from non-Federal sources if the project is to be Federally-funded;*
- *a portion of the faculty member's project time for which no support funds are being requested;*
- a portion of the Facilities and Administrative (F&A) costs may have to be contributed (special Campus approval is required);
- *donated computer time, with the written consent of the computer center involved; and/or*
- *contributed resources from the Department or College.*

Cost-sharing should be included only where absolutely required by the sponsor. It is never to be assumed to be a voluntary or gratuitous gesture. Cost-sharing imposes a substantial burden on the Principal Investigator to provide supporting documentation to the Office of Contract and Grant Accounting. For further guidance on cost sharing, consult the University's Cost Sharing Policy 600-012.

ANTICIPATE!

Budget adjustments for salary increases in all budgets that are longer than one year or that spans University fiscal years must be included

Sample Budget Calculation

Personnel		
Salaries & Wages		
Principal Investigator (10%@$100,000/annum)	$10,000	
Co-Investigator (10%@$100,000/annum)	$10,000	
Research Associate (50%@32,000/annum)	$16,000	
Research Assistant (50%@24,000/annum)	$12,000	
Technician (10%@$20,000/annum)	$ 2,000	
		$50,000
Fringe Benefits		
Principal Investigator ($10,000 X 27,1%)	$2,710	
Co-Investigator ($10,000 X 27,1%)	$2,710	
Research Associate ($16,000 X 27,1%)	$4,336	
Research Assistant (($12,000 X 27,1%)	$3,252	
Technician ($2,000 X 27,1%)	$ 542	
		$13,550
Total Personnel		$63,550
Consultants		
Consultant A (5 x $100)	$500	
Consultant B (2 x $150)	$300	
Total Consultants		$ 800
Travel		
PI Travel		$ 1,200
Materials and supplies		$1,450
Equipment		$ 5,000
Subcontractors		
Subcontractor A	$10,000	
Subcontractor B	$13,000	
Total Subcontractors		$23,000
Total Direct Costs		$95,000
F&A Costs		
F&A Rate (48%) X * Modified Total Direct Costs		$45,600

*Modified total direct cost = total direct cost – [student stipends + tuition + capital expenditures (building, individual items of equipment, alterations and renovations+ amount in excess of $25,000 of each subcontract for each subcontractor)]

Total Proposed Budget (Direct Costs + F&A Costs) $140,600

Budget Justification

The purpose of the Budget Narrative is to present clear justification for all expenses outlined in the Budget. Narratives should address each of the major cost categories (personnel, fringe benefits, travel, equipment, supplies, and consultants). The Justification should provide brief descriptions of the duties of all positions, justify all equipment purchases, and explain how subcontracts will help achieve goals and objectives of the project.

Sample Budget Justification

Salaries and Wages- Senior Personnel
The Principal Investigator, Dr. xxxx, will devote XXX summer and XXX academic months per year toward the project. He will be responsible for overall project management and xxxxxxxxxxxxxxxxxxxxxxxxxx..

Salaries and Wages- Other Personnel

Funding for one full time graduate student is requested. He or she will work 1300 hours per year, per established University policy. The student will work on tasks assigned by the PI related to the area of X as described in the project narrative.

Funding for xxx undergraduate student(s) during the summer and academic year is requested. The undergraduates will work on specific tasks related to the proposed research under the supervision of the PI and/or graduate student.

Fringe Benefits
Fringe Benefits are calculated as direct costs in accordance with the University's Indirect Cost Rate Agreement with the Department of Health and Human Services.

Travel
Domestic Travel - A total of $3,000/year is requested for the PI and/or students to attend two-three annual technical conferences related to the proposed research. It is estimated that one

trip per person will cost $1,000 and includes costs for airfare, hotel/meals, registration, and incidentals for an average three day trip. (Note some agencies require more specific detail).

Foreign Travel -A total of $2,500/year is requested for the PI to attend one international technical conference related to the research topic. Costs include domestic and international airfare, ground transportation, hotel/meals for a five day conference, and other conference incidentals. (note some agencies require more specific detail).

Participant Support Costs
This category is used for workshop, training, and seminar cost categories if your proposal includes such a component.

Materials and Supplies: A total of $xxx per year is requested for research materials, supplies and consumables needed to carry out the proposed research. Such supplies might include items like xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx.

Consultant Services: A total of $xxxxxxx per year is requested for consultant services of xxxxxxxxxxxxx from xxxxxxxxxxxxxxxx. These costs include a daily consultant rate of $xxxxxxxxx for xxxx days for the purpose of xxxxxxxxxxxxxxxx.

Subcontracts: A total of $xxxxxxxxx per year is requested for a subcontract to xxxxxxxxxxxxxxxxx. (note a formal detailed budget is required for any subcontractor)

Equipment
A total of $xxxx is requested to purchase the following items of equipment. This equipment is needed for the specific purpose(s) of xxxxxxxxxxxxxxxxx.

Facilities and Administrative (F&A) Costs
F&A Costs are calculated in accordance with Howard University's Facilities and Administrative Costs Rate Agreement with the Department of Health and Human Services. Currently, HU is using a rate of 48% of modified total direct costs (MTDC), per DHHS Agreement dated XXX.

Pre-Award Issues-Proposal Processing

A formal proposal to conduct a research, training, or service project with support from an external agency represents an offer by the University. It is necessary, therefore, that any such proposal have the endorsement of those responsible for carrying out the project, as well as those authorized to commit the University and the Campus to a legal offer. For proposals, the authority to officially commit the campus has been delegated to OSP/RA. A review and routing procedure has been established in order to ensure that each proposal or application for sponsored programs has been reviewed and endorsed by the various responsible persons and that compliance exists between sponsor, and University. All proposals for external support of training, research, or service projects must be submitted to OSP/RA. The process is summarized in the flow chart diagram in Figure 1.

INTERNAL ROUTING AND REVIEW

The people or offices involved in the internal review and processing are as follows:

- ***Principal Investigator** is responsible for the budget, technical content, quality, and preparation of the proposal in accordance with sponsor guidelines. Please see the Proposal Development and Submission Policy 600-00 for required deadlines and documentation. The PI is also responsible for working with the Research Compliance Office to review matters involving human subjects, DNA research, hazardous substances, and the experimental use of animals.*

- ***Department Chair** is responsible for certifying to the academic soundness of the project, the compatibility of the project with the Principal Investigator's other commitments, the availability of space and facilities, any cost-sharing commitments, while assuring that the project is in keeping with department and University objectives, and concurring that the proposal should be submitted to the agency named.*

- ***Dean of the College** is responsible for determining the appropriateness of the project within College and University programs, and that resources will be available.*

- **OSP/RA** is responsible for ensuring compliance with applicable laws and regulations and with University administrative rules. Concurrently, problems of cost sharing, acceptance of contractual terms, and budget matters will be resolved.

- Coordinate the internal review process;
- Ensure compliance with sponsor guidelines and policies;
- Ascertain compliance with institutional policies and mission objectives;
- Verify proper authorization of institutional commitments regarding matching, cost-
    - sharing or in-kind contribution;
- Ensure approval by appropriate institutional review board(s) when necessary. Ensure
    - compliance Assure that University is appropriately reimbursed for services;
- Verify budget totals.
- with university's fiscal policies;
- Ensure correctness of direct cost, salaries and fringe benefits computations;
- Verify cost sharing and in-kind contributions;

OSP/RA REVIEW

Each proposal must be accompanied by a routing form, Application to Seek Off Campus Funds.. The Application to Seek Off Campus Funds Form must have appropriate endorsement signatures before submission of the proposal to OSP/RA. THIS INCLUDES PROPOSALS SUBMITTED ELECTRONICALLY. Proposals proceed from the Principal Investigator to the Department Chair, then to the Dean of the College, and then to OSP/RA. If a paper proposal is submitted.

In regard to submitting the proposal to the agency, a distinction exists between those proposals submitted in paper ("hard copy") format and those submitted electronically.

***Paper**: When all approvals are in hand, OSP/RA will sign the proposal on behalf of the University and prepare and attach a cover page to each proposal. Approved proposals are sent by the Principal Investigator to the sponsoring agency.*

Electronic*: Agencies that offer or mandate electronic proposal submission may use Grants.gov, or their own individual systems. Therefore, specifics of submission protocols will vary somewhat. The Principal Investigator electronically submits the proposal to OSP/RA along with a hard paper copy of the proposal. Upon review and approval, an OSP/RA Research Administrator then electronically submits the proposal to the agency. The Principal Investigator will then receive electronic confirmation of submission. The Application to Seek Off Campus Funds and all other required internal documents must be completed BEFORE OSP/RA will consider electronic submission to the agency.*

More information about Grants.gov and about particular agencies and their electronic submission systems can be found on the OVPRC website at http://ovprc.howard.edu/index.html

Principle Investigators should bear in mind that their sponsoring agency may have a specific deadline date and that the proposal must be submitted to OSP/RA well ahead of that date. It is requested that the hard copy of any proposal is submitted to OSP/RA at least five (5) days prior to the sponsoring agency's deadline so OSP/RA may complete the internal review cycle. If a proposal is to be submitted electronically, in addition to the hard copy routed to OSP/RA, the electronic copy should also be submitted to OSP/RA at least five (5) days prior to the sponsoring agency's deadline.

Historically, the ease of submitting electronic proposals is directly related to the amount of time prior to the deadline date that OSP/RA has to submit the proposal, as system failures due to overload may result on the actual deadline date.

****Note - Even if the proposal is to be submitted electronically, internal processing and administrative approval(s) must be completed before submission.**

Signature Authority on Proposals Generally, the Manager of the Office of Sponsored Programs is the authorized signee on proposals. The Manager of the Office of Sponsored Programs signs grants and cooperative agreements, whereas the Senior Vice President for Research and Compliance signs contracts. However, some funding agencies may require that the chief executive officer endorse the proposal. In such cases it may be necessary to obtain the signature of the President.

Proposal Transmittal Where Principal Investigators are uncertain about whom the authorizing signatory should be, the signature space on the proposal cover sheet should be left blank, and an OSP/RA staff will fill in the appropriate official.

Upon completion of internal review and approval, OSP/RA will advise the Principal Investigator that the proposal is ready for transmittal to the funding agency.

OSP/RA transmits proposals either electronically. The PI transmits proposals by U.S. Postal Service (First Class Mail), United Postal Service, Airborne Express, or Federal Express; depending on the requirements of the sponsor. Specialized services such as courier service and hand-delivery are also the responsibility of the Principal Investigator.

Proposal Revisions - *Sometimes*, negotiations with the sponsor may dictate that either the cost proposal or the technical proposal or both be revised before an award is made. In such instances, the revisions must go through the same internal processing procedures for review and approval as the initial proposal.

Declined Proposals - *If* a proposal is declined by the sponsor, OSP/RA should be informed **IMMEDIATELY** so that records may be updated.

Withdrawal of a Proposal - If a proposal is to be withdrawn for any reason, OSP/RA should be contacted prior to submission of the withdrawal request to the agency. Generally, the withdrawal request should be generated and transmitted by OSP/RA.

Assurances and Certifications

The Manager of the Office of Sponsored Programs is the official authorized to sign supporting assurances and certifications required by sponsoring agencies. However, certifications regarding fiscal matters are signed by the Finance/Fiscal Officer.

The OSP/RA staff will provide Principal Investigators whatever assistance is necessary to complete all required assurances and certifications for proposals.

Human Subjects in Research *Howard University adheres to the policy for the protection of human research subjects in accordance with the United States Department of Health and Human Services regulations, 45 CFR 46. All research projects involving human subjects that are conducted under the auspices of the University, regardless of the funding source, must be reviewed and approved by the Institutional Review Board (IRB). The Office of Research Compliance (ORC) is the administrative unit responsible for coordinating the functions of the IRB.*

Proposals involving human subjects should be submitted to Office of Research Compliance for assignment to the IRB, including the proposed research protocols and informed consent forms. Following IRB review, the Principal Investigator will be advised of the outcome in writing, whether approval, disapproval, or suggestions for modifying the proposed protocol. Under no circumstances will a research project involving human subjects be allowed to proceed without prior IRB review and approval

Use of Vertebrate Animals in Research Federal regulations require that the University assure the humane care and use of animals as research subjects in accordance with the Animal Welfare Act (P.L. 99-158). The Public Health Service (PHS) Policy further requires that institutions must have on file in the Office for Protection from Research Risks (OPRR) of the National Institutes of Health (NIH) an approved Animal Welfare Assurance document before they can receive PHS research funds.

The university has established the Institutional Animal Care and Use Committee (IACUC), which have the responsibility for monitoring and approving all research protocols conducted under the auspices of the Institution that involve vertebrate animals. The Office of Research Compliance (ORC) is the administrative unit responsible for coordinating the functions of the IACUC.

PI's whose research may require the use of vertebrate animals should submit their proposals including the protocols to the ORC for IACUC to review the proposal protocols.

Radiation Safety - PI's whose research involve ionizing radiation should submit their proposals *the Radiation Safety Committee (RSC)*

Hazardous Materials and Biosafety PI's whose research involve biohazardous agents and recombinant DNA (rDNA) molecules should submit their proposals to the **Institutional Biosafety Committee (IBC)** for research involving biohazardous agents and recombinant DNA (rDNA) molecules and/or may be required to work with the University's Department of

Environmental Health and Safety Office. The role of the Department of Environmental Health and Safety (EHS) is to advise and consult in matters relating to the health and safety of faculty, staff, students, and visitors, and in matters related to regulatory compliance programs for campus administrative and academic activities. EHS functions in direct support of the teaching, research, and public service mission of Howard University. All researchers contemplating the use of hazardous materials should first contact the University's Office of Research Compliance at (202) 806-4759.

Post-Award Issues-Award Acceptance and Set-Up

The award is made to the University, not an individual. Notification of a sponsored program award to the University may be simply an award letter, a purchase order, a detailed contract, or an agreement spelling out the terms and conditions of the award.

Generally, the notification of award goes to the Office of Sponsored Programs. OSP will notify the PI of the award, review the award terms and conditions, review the Proposal file for completeness and for consistency with the award, begin the initial award set-up process in PeopleSoft, and then send a copy of the award along with an Award Transmittal Notice to Grants and Contracts Accounting (GCA).

GCA is responsible for completing the award set-up, activating the award in PeopleSoft and then notifying the Principal Investigator and OSP of the PeopleSoft Project Identification Number and of award set-up completion. In addition, GCA is responsible for conducting the PI award Kick-off meeting for review of terms and conditions and responsibilities.

If award notices (or letters of decline) are sent directly from the funding agency to the Principal Investigator or other University officials, original copies should be forwarded to OSP/RA.

Awards for proposals that did not undergo the normal internal processing, review, and approval through OSP/RA may be refused by the University. In all cases, the University is not obligated to accept an award

Personnel Hiring - Although all personnel hiring at the University is processed by the University's Office of Human Capital Management (HCM), all requisitions must be submitted via PeopleSoft by the PI/Department and approved by GCA and the Office of Financial Analysis and Budget (OFAB) before submission to the HCM for processing. Principal Investigators should contact the HCM office to get answers to questions on university hiring policies and procedures as well as required forms as soon as possible following the notification of award. One should initiate the processing of requisitions well before the proposed starting date for new personnel. A Principal Investigator shall not engage new personnel to work on a project before the appointment has been completed by HCM becomes effective. Payment for such services rendered prior to the effective date of the approved may be disallowed and may become the personal liability of a Principal Investigator or designee who ignores this provision.

Activity	*Description*	*Contacts for Assistance*	*Responsible Party*	*Timeframe*
Create Position Description	*Ensure that Position Descriptions are current. Obtain hard certified copy for your files. Have electronic copy available to be uploaded into your Position Requests. HCM Compensation will assist with creation of Position Descriptions.*	*John Peeples Director HCM Compensation & Performance Management (202) 806-1280*	*Hiring Manager*	***Before creation of a Position Request in PeopleSoft.***
During Hiring Freeze adhere to Vacancy Review Guidelines	*Complete Request for Exception to the Hiring Freeze form, submit to the appropriate Cabinet Officer.*	*Vacancy Review Guideline http://www.hr.howard.edu/*	*Hiring Manager*	***Before creation of a Position Request in PeopleSoft.***
During Hiring Freeze adhere to Vacancy Review Guidelines	*Cabinet Officer reviews request form. If the position is approved, the Cabinet Officer forwards the form to the Vacancy Review Board.*	*Vacancy Review Board e-mail estroud.vacancyreview@howard.edu.*	*Cabinet Officer*	***Before creation of a Position Request in PeopleSoft.***
Approve Position	*Vacancy Review Board reviews the Position Request form. If the position is approved at this level, the Hiring Manager is notified and may create the Position Request in PeopleSoft.*		*Vacancy Review Board*	***Before creation of a Position Request in PeopleSoft.***
Create Position Request In PeopleSoft	*Create Position Request in PeopleSoft Manager Self Service to create a new position, or to fill/reallocate an open position. When Position Requests have been fully approved through HCM and the Budget Office, the Hiring Manager receives a "loaded" Position Number that must be used in the Job Opening.*	*Contact your Recruiter with questions. Employment Recruiter Assignment listing can be located at: http://www.hr.howard.edu/Employment/default.htm*	*Hiring Manager*	***Before creation of a Job Opening.***
Create Job Opening	*Create Job Opening in PeopleSoft Recruit and Reappoint to communicate with HCM Employment re:*	*Contact your Recruiter with questions. Employment Recruiter Assignment listing can be located at:*	*Hiring Manager*	***Before Job Posting or Reappointment.***

	requesting a job posting or requesting a reappointment.	*http://www.hr.howard.edu/Employment/default.htm*		
Usage of Employment Agencies	*The Vice President HCM must be notified in writing of all searches being conducted by search firms or employment agencies at the time of contact.* *Once a selection has been made, the hiring department must follow all applicable University hiring procedures in coordination with the Department of Employment. Staff salary offers must be confirmed by the Office of Compensation and Performance Management.*	*Elizabeth Stroud* *Vice President* *HCM* *(202) 806-1299* *John Peeples* *Director* *HCM Compensation & Performance Management* *(202) 806-1280*	*Hiring Manager*	***Before Job Posting.***
Create Job Posting	All Job Opening requests will go directly from the Requester to the Recruiter who will then either post or not post depending on University position posting policy. Exception requests to the posting requirement must be communicated in writing to the Vice President HCM by a Sr. Administrator. Requests can be for a single opening, a category of positions, or other needs as appropriate.	*Contact your Recruiter with questions. Employment Recruiter Assignment listing can be located at:* *http://www.hr.howard.edu/Employment/default.htm*	*Hiring Manager, HCM Employment*	***Three day minimum if Job Posting is required.***
Apply for Position	*All applications for employment consideration must be processed on line using PeopleSoft. An exception to posting does not negate the need for the selected applicant to submit their application on line.* *In lieu of completing the on line application in full, applicants can submit a resume on line and complete the first page of the HU application on line so that the University has the required information.* *Persons selected for a faculty position or a position recruited by an executive search firm must place an application on line to complete the appointment process.*	*Contact Department of Employment with questions.* *(202) 806-7714*	*Applicants*	***Varies.***
Conduct Applicant Screening	*Hiring Manager accesses all applications on line in PeopleSoft and interviews applicants.*		*Hiring Manager*	***Varies.***
Conduct Reference Check – External Candidate	*Hiring Manager conducts reference checks, and provides Recruiter with copies of the outcome.*	*Contact your Recruiter with questions. Employment Recruiter Assignment listing can be located at:* *http://www.hr.howard.edu/Employment/default.htm*	*Hiring Manager*	***Varies.***
Conduct Reference Check	*HCM Employment will provide a copy of the last annual evaluation to the Hiring Manager upon*	*Contact your Recruiter with questions. Employment Recruiter Assignment listing can be located at:*	*HCM Employment*	***2 to 3 business days***

– Internal Candidate	*request.* *With the knowledge of the employee, Hiring Managers can consult with the current employee's supervisor prior to making a tentative offer.*	*http://www.hr.howard.edu/Employment/default.htm*		
Select Applicant	*Hiring Manager notifies the Employment Office of selected applicant via email.*	*Contact your Recruiter with questions. Employment Recruiter Assignment listing can be located at: http://www.hr.howard.edu/Employment/default.htm*	*Hiring Manager*	***1 day***
Conduct Background Investigation	*The Employment Office will confirm that the selected applicant meets the minimum qualifications in the position description before completing the background investigation.*	*Contact your Recruiter with questions. Employment Recruiter Assignment listing can be located at: http://www.hr.howard.edu/Employment/default.htm*	*HCM Employment*	***3 to 5 business days***
Make Job Offer	*Upon selection of a suitable incumbent by the department, the Recruiter will create the Job Offer within PeopleSoft, which requires departmental approval. Offer Letter will be extended upon completion of on line approvals.*	*Contact your Recruiter with questions. Employment Recruiter Assignment listing can be located at: http://www.hr.howard.edu/Employment/default.htm*	*HCM Employment, Hiring Manager*	***Allow two weeks before New Hire Reporting Date.***
Notify Department – Internal Candidate	*When an internal candidate becomes a finalist, HCM Employment will contact the individual's current supervisor upon acceptance of an offer of employment in another part of the University. Minimum notice is two weeks for individuals paid bi-weekly. Exceptions to this policy are rare, but may be made by agreement of the current and new departments if such action meets the best interests of the University.*	*Contact your Recruiter with questions. Employment Recruiter Assignment listing can be located at: http://www.hr.howard.edu/Employment/default.htm*	*HCM Employment*	***1 day***
Complete Employment Eligibility Forms	*Hiring Managers and Recruiter should direct New Hire to employment eligibility forms on the HCM website, and instruct New Hires to bring these forms to New Hire Orientation. Recruiters will collect forms prior to orientation whenever possible.*	*Employment Eligibility Forms http://www.hr.howard.edu/Employment/default.htm*	*New Hire*	***Prior to New Hire Reporting Date.***
Schedule New Hire Reporting Date	***New Hires are scheduled to report to the University at the beginning of a pay period. This is for their benefit in terms of a formal orientation. Exceptions can be accommodated at the request of the Hiring Manager.***		***New Hire***	***Beginning of a Pay Period.***

Effort Certification

OMB Circular A-21 requires that effort verification be completed for all "professorial and professional" staff. At Howard University, professorial staff includes all faculty members and professional staff includes all salaried staff and hourly employees involved in research activities.

In accordance with the Effort Reporting Policy 600-017, grant salaried personnel must certify effort following each period on the Howard University academic calendar (fall academic semester, spring academic semester and summer session) and salaried staff certify effort reports every 6 months for the periods 1/1 – 6/30 and 7/1 – 12/31. OMB Circular A-21 states "[w]here the institution uses time cards or other forms of after the fact payroll documents as original documentation for payroll and payroll charges, such documents shall qualify as records for this purpose." Thus, hourly employees complete bi-weekly time cards to certify their effort. ***Please see Effort Reporting Policy 600-017.***

Purchasing

All requisitions for purchasing equipment and materials for sponsored projects should be submitted by the PI/Department via PeopleSoft for approval. The University's Materials Management Department (MMD) processes all requisitions for goods and external services. Principal Investigators should contact MMD for the required procedures and forms.

All equipment purchased with extramural funds must be properly tagged and inventoried by the MMD. Principal Investigators should contact MMD for the appropriate procedures **Since title to all equipment purchased under a sponsored project is usually vested in the University, under Federal Regulations, the Principal Investigator cannot dispose of, or transfer equipment <u>without proper approval</u>**

Subrecipients (Subcontractors and Consultants>$5000) - *All requisitions for subrecipients must be submitted by the Principal.*

The PI generates Purchasing Requisition in PeopleSoft for each Sub-Recipient according to amounts approved in the prime grant award.

The Requisition should be entered as a Limit Sum Requisition.

NOTE: If this is a first-year subcontract and the contract amount exceeds $25,000, funding will be allocated to both the C553 and C556 accounts.

- *The first $25,000 will be allocated to C553 and entered as one item line in a requisition.*
    - *The account code, 5530, should be used for the first $25,000.*
- *Anything over $25,000 (the remainder of the contract amount) should be allocated to C556, as a second item line in the same requisition.*
    - *The account code, 5535, should be used for the remainder.*

NOTE: For consulting agreements, funds will be allocated to the C520 account and 5263 is the appropriate account code.

The PI submits the following to OSP:

- *Purchase Order Number*
- *Sub-agreement Information Form(s)*
- *Scope of Work*
- *Compensation Rate/Detailed Budget*
- *Budget Justification*

The Office of Sponsored Programs/Research Administration (OSP/RA) is responsible for establishing all Grant Subcontracts and Consulting Agreements (in excess of $5,000).

OSP submits the draft agreement to the University's Office of General Counsel (OGC) for review and approval > upon approval, OSP obtains the signature from the Senior Vice President for Research and Compliance and forwards the partially executed agreement to the subrecipient. OSP facilitates the negotiation between the OGC and the Subrecipient,.

Travel - Travel that applies to all employees. PI's should contact the University Accounts Payable department regarding the University's Travel Card Program and required forms and documentation.

The following steps apply in the approval process:

- Complete a Travel Authorization form and Travel Card Request form. (This form may be obtained from the Dean's office of your respective School/College).
- Follow instructions on the form and obtain the required signatures (departmental head, supervisor, dean, or president as applicable).
- Submit form with the appropriate signatures to the **Accounts Payable Department**.

International Travel - Typically all sponsors require prior approval for travel overseas unless the sponsored project is to be conducted outside the continental United States, or the necessity for such travel was explained in the proposal. Government policies governing international travel require that U.S. flagged carriers must be used wherever possible..

Requisitioning Approval to Award Financial Aid

All funds and/or financial aid to be provided to students must be processed through the Office of Financial Assistance and Student Employment. The Financial Aid Requisition Form must be prepared by the requesting department and submitted to GCA in order to award funds and/or financial aid to students.

PROCESSING OF PAYMENTS FOR GOODS AND SERVICES

The Office of the Comptroller, Accounts Payable Department is responsible for payments to vendors for goods and services, either when received or, when required by contract, in advance of receipt by the University. To initiate payment to a vendor for goods and services, the Accounts Payable department must have the following documents:

- *Approved Purchase Order, Completed or a Partial Receiving Report indicating the service or goods were satisfactory provided, an Invoice and the Vendor's W-9 (for new vendors).*

FACTORS AFFECTING ALLOWABILITY OF COST

The following criteria must be considered in determining the allowability of a cost:

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

- *Costs must be allocable to sponsored agreements under the principles and methods of Circular A-21. A cost is allocable to a particular sponsored project if the goods or services involved are chargeable or assignable to the project in accordance with the relative benefits received.*

- *CAS and the revised Circular A-21 emphasize the importance of consistent application of cost accounting principles. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs. Where the University treats a particular type of cost as a direct cost on sponsored agreements, all costs incurred for the same purpose in like circumstances must be treated as direct costs for all activities of the institution. Consistent treatment of costs is necessary to avoid inappropriate charges to the federal government or other sponsors when sponsored agreements are charged directly for specified costs, then charged again, through the University's indirect cost rate. PIs, department administrators and in some specific instances central administration officials, should review costs to ensure that they are allowable and allocable to a project. Size, nature and complexity of sponsored agreements, although not the final determining factor, are in the aggregate important considerations in determining unlike circumstances. Due to the unique requirements of each sponsored agreement, unlike circumstances are determined on a case by case basis (see section 3.2).*

DIRECT COSTS

OMB Circular A-21: Cost Principles for Educational Institutions states "Direct costs are those costs that can be identified specifically with a particular sponsored project, an instructional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs. Where an institution treats a particular type of cost as a direct cost of sponsored agreements, all costs incurred for the same purpose in like circumstances shall be treated as direct costs of all activities of the institution." (A-21, D.1.)

The above statement implicitly makes the point that charges to a sponsored project should support the project's purpose and activity and represent those costs necessary to meet the project's scientific and technical requirements. Such charges cannot be assigned arbitrarily or for the purpose of simplified budget management that is unrelated to the sponsored agreement's purpose.

Additional Criteria for Determining Direct Costs

1. *The cost must be included in the awarded budget, or the cost must be permitted within rebudgeting authority granted by the sponsor. When preparing applications for sponsored projects, the PI usually submits a detailed budget. This budget includes line items such as salaries and wages, benefits, travel, supplies and other direct costs. The award reflects approved budgeted items and becomes a part of the agreement between the university and the sponsor. Only those costs that are included in the budget or rebudgeted costs allowed by the sponsor should be charged. If the cost requires institutional and/or sponsor prior approval after the award is made, the approval must be secured before the cost is incurred.*

2. *The cost must not be restricted by the sponsor. Costs that are restricted or unallowable as indicated in the award notice or sponsor guidelines may not be charged to a sponsored project.*

DOCUMENTATION OF DIRECT COSTS

A. The cost must be identified with activity in the sponsored agreement to which the cost is charged. For example:

- *Long distance telephone and fax costs should be linked to the sponsored agreement by means of a manual log or analyzing the long distance phone bill and allocating costs.*
- *Purchases for a specific sponsored agreement must identify the grant's account number on the invoice, requisition, purchase order, or other payment document.*
- *Supplies drawn from a central storeroom or inventory may be charged directly to a sponsored agreement if their applicability to the sponsored agreement is recorded at the time of withdrawal. All such costs must be charged to sponsored agreements based on anticipated usage at the time of withdrawal.*

B. Documentation that links the cost incurred to the sponsored agreement activity should be done by someone who is in a position to know the sponsored agreement activity; e.g., the person who is making the long distance telephone call (as in example A.1 above) or the person designated by the principal investigator to purchase goods and services for that particular project.

C. Documentation must be maintained for a period of three years following the date the final expenditure report is submitted to the sponsor. If any litigation, claim or audit is started before the expiration of the three year period, the records must be retained until all issues are resolved and final action taken.

D. Only actual costs may be charged to the sponsored agreement. (See Section 5.0 for documentation guidelines for the distribution of direct costs across two or more projects.)

UNACCEPTABLE DIRECT COSTING PRACTICES

The following direct costing practices are unacceptable because they do not meet A-21's standard for a "high degree of accuracy" in the assignment of costs to sponsored agreements:

1. *Rotation of charges among sponsored agreements by month without establishing that the rotation schedule credibly reflects the relative benefit to each sponsored agreement;*
2. *Assigning charges to the sponsored agreement with the largest remaining balance;*
3. *Charging the budgeted amount rather than charging an amount based on actual usage;*
4. *Assigning charges to a sponsored agreement in advance of the time the cost is actually incurred;*
5. *Identifying a cost as something other than what it actually is, such as classifying an item of equipment as a supply;*
6. *Charging expenses exclusively to sponsored agreements when the expense has supported non-sponsored agreement activities;*
7. *Assigning charges that are part of normal administrative support (indirect costs) for sponsored agreements (e.g., accounting, payroll). Refer to 3.0 on Indirect Costs in these guidelines.*

CHANGES DURING THE AWARD PERIOD

Allowable changes during the award period are listed below. Grant/ contract recipients should be familiar with the terms of awards pertaining to specific mechanisms. These are found in the Request for Applications.

Changes to Approved Expenditures of Budget Categories

PI's may wish to expend funds differently from the approved budget. However, budget category increases or decreases require submission of a request form, an explanation of the need for budget changes, and signature approval from the sponsor prior to execution.

Requests for changes must be submitted to the Office of Sponsored Programs/Post Award Services Unit (OSP/PASU) for approval on the "Rebudgeting Request" form. This form requires justification of the requested change(s), including: (1) identification of the budget categories from which and to which funds would be transferred; (2) the reason for the change—how the change will facilitate achievement of the research objectives; and (3) an explanation of how the purpose for which the funds were originally approved will be met. Changes may not be implemented until written approval has been obtained from the sponsor. Changes made without prior approval are subject to disallowance**. Please see Budget Revisions Policy 600-020 and required form on website http://ovprc.howard.edu/resources/index.html .**

Changes that violate the basic conditions of the award are not permitted, e.g., reducing the PI time commitment to less than the minimum required for the award type. The total dollar amount of the award and the indirect costs rate approved in the original award must remain constant.

Changes in Investigator Availability

If for any reason work on a project cannot be continued either under the direction of the original PI or at the recipient institution, the PI or an official representative of the University must notify the sponsor promptly to discuss the available options. To obtain approval for changes, a letter from the respective Dean via OSP must be submitted to the sponsor.

If, after discussion, the sponsor does not accept the requested changes, all parties will be notified in writing and the project must be terminated. **Please see Prior Approval Policy 600-016 and required form on website http://ovprc.howard.edu/resources/index.html .**

Principal Investigator Changes

The program must be notified immediately if the status or percentage of effort of the PI changes for any reason.

Circumstances may occasionally arise which necessitate the selection of a new Principal Investigator or Co-PI for an active sponsored project. If the project can be continued at the University, the University may propose the appointment of a new PI. The new appointment can only be made with the concurrence of the departmental head, the dean of the school or college and ultimately, the sponsor. The request for a change should provide an explanation of why the change is necessary and also include the vita of the new Principal Investigator and/or Co-PI, and should be channeled through the Office of Sponsored Programs to the sponsor.

To effect a change, the respective Dean must provide the sponsor via OSP with a written explanation for the PI's resignation and a justification for the appointment of the nominee, including his/her biographical sketch and "Other Support" statement. The nominee may assume responsibility for the project only after the program has approved the replacement.

Change of Institution

Occasionally, a Principal Investigator may accept an appointment in another institution before the expiration of an award received while employed by the University. If the PI is moving to another institution eligible to receive awards, the award may be transferred to the new institution with approval of both the original and new institutions. Should the University elect not to retain the project, the departing Principal Investigator must send a request to transfer the unspent portion of the award to the new institution. Such a transfer must be approved by the department head, the dean of the school or college, and ultimately by the sponsoring agency. Approved transfers occur only after final accounting and certification by the responsible grant accountant that all incurred obligations have been settled, and a balance remains for transfer to the new institution.

At the request of the PI, ownership of materials and equipment purchased or created with grant/ contract funds for work on the project may transfer to the new institution upon approval by the program. .

First, the sponsor must receive a release statement from the original recipient institution which includes an estimate of the unexpended balance of the award. Then, the sponsor must receive a letter of intent to accept the award from the prospective recipient institution. In addition, the following pages must be submitted:

- *Cover Page with original signatures*
- *Budget Summary for remaining project period, using the estimated unexpended balance from the original institution (see below)*
- *Detailed Budgets for each remaining year with associated budget justifications*
- *Key Personnel (if changed)*
- *Biographical Sketches for Key Personnel (if changed)*
- *Other Support for Key Personnel (if changed)*
- *Facilities and Resources (if changed)*
- *Human and/or Animal Subject Assurances, where applicable, from a federally approved*

Please see Principal Investigator Transfer Policy 600-011 on website
http://ovprc.howard.edu/resources/index.html

Unexpended Funds

During all but the final budget year, unexpended funds may be transferred to a subsequent budget year through submission of a "Request to Carry Forward Unexpended Funds". During the final year, funds may be carried forward beyond the original contract termination date through submission of a "Request For No-Cost Time Extension". Carry forwards may require sponsor approval. Typically the award notice will dictate what approvals are required

Carry-Forward Request

If applicable the PI must obtain prior approval from the program to carry forward unexpended funds. Approval to carry forward funds is requested by submitting a "Request to Carry Forward Unexpended Funds" form no later than 60 days prior to the end of the project period, and must be accompanied by a current progress report and any updated assurances that are applicable. Funds must be carried forward into the same budget category from which they originated, unless a "Budget Modification Request" form is submitted and approved.

The program may disallow the use of unexpended funds not carried forward according to these procedures. The yearly budgets within the grant contract must be adhered to.

Please see Prior Approval Policy 600- 016 and Carry Over Request Form on website **http://ovprc.howard.edu/resources/index.html**

No-Cost Extension

In the event a PI is unable to complete the proposed work prior to the award termination date and determines that more time will be needed to complete work on a sponsored project beyond the expiration date of the award, a no-cost extension may be requested from the sponsor. The Principal Investigator should notify OSP in writing along with a "Request for No-Cost Time Extension" form about the need for a no-cost extension at least sixty (60) days prior to the expiration date of the award. OSP will work with the Principal Investigator to obtain the sponsor's approval.

The request must include:

- *the estimated funds remaining;*
- *an explanation for the need to extend the project;*
- *a current progress report ;*
- *any updated assurances that are applicable.*

The approved "Request for No-Cost Extension" serves also as the approval to carry forward funds into a new budget year. ***Please see Prior Approval Policy 600- 016 and required form on website*** ***http://ovprc.howard.edu/resources/index.html***

Post-Award Issues-Reporting

Periodic Reporting Requirements

Personnel Effort Certification-As a condition to receiving Federal funding, Howard University is required to maintain and certify the percentage of time (i.e., effort) that employees devote to Federally sponsored projects as outlined in the Principles for Determining Costs Applicable to Grants, Contracts, and Other Agreements with Educational Institutions *(OMB Circular A-21).*

Additionally, OMB Circular A-21 requires that this verification be completed for all "professorial and professional" staff. At Howard University, professorial staff includes all faculty members and professional staff includes all salaried staff and hourly employees involved in research activities.

To meet the requirements of OMB Circular A-21, faculty members certify effort reports following each period on the Howard University academic calendar (fall academic semester, spring academic semester and summer session) and salaried staff certify effort reports every 6 months for the periods 1/1 – 6/30 and 7/1 – 12/31. OMB Circular A-21 states "[w]here the institution uses time cards or other forms of after the fact payroll documents as original documentation for payroll and payroll charges, such documents shall qualify as records for this purpose." Thus, hourly employees complete bi-weekly time cards to certify their effort. ***Please see Effort Reporting Policy 600-017*** ***http://ovprc.howard.edu/resources/index.html***

Progress Reports

PI's must submit scientific progress reports in accordance with award terms and conditions. Reports should be channeled through the Office of Sponsored Programs and must be submitted to the sponsor by the specified deadlines. Annual reports should be transmitted to OSP with an Application to Seek Off Campus Funds. Monthly and Quarterly technical reports do not require an Application to Seek Off Campus Funds. Failure to submit the required information or to submit reports by the dates indicated may result in recall, reduction, delay, or discontinuation of funding.

Award continuations will not be authorized unless a complete progress report has been submitted.

The PI is responsible for completing and submitting the following documents and performing the following actions for Progress Reports for Award Continuations:

- *Application to Seek Off-Campus Funds*
- *Budget & Budget justification for upcoming Budget Period*
- *Scientific Progress Report*
- *All completed information required by sponsor*
- *Conflict of Interest form for all key personnel (if required by sponsor) in accordance with the Policy 600-002*
- *Obtaining Dean and Department Chair Approval for Cost Sharing (at their discretion for approval)*
- *Notifying institutional committee if applicable and obtaining approval (if necessary)*
    - *Human subjects (http://ovprc.howard.edu/offices/orc/index.html)*
    - *Animal subjects (http://ovprc.howard.edu/offices/orc/index.html)*
    - *BioSafety (CB Powell, Room 137, 806-4759)*
    - *Radiation Safety (CB Powell, Room 137, 806-4759)*
- *Copy of Institutional Base Salary Letters for All Key Personnel*
- *Facilities and Administrative Cost Waiver/Reduction Form (if necessary)*

http://ovprc.howard.edu/resources/forms_checklists.html

Grants and Contracts Accounting is responsible for submitting all financial reports/invoices to the sponsor

Post-Award Issues-Award Closeout

Award Closeout Requirements

Award closeout involves much more than simply the expiration of an award. For a sponsored project to be properly closed-out, the <u>Principal Investigator must ensure that the following requirements are met</u>:

- Proper closeout procedures have been followed for personnel hired during the award
- All personnel effort has been certified in accordance with the University's policy
- All technical reports required by the sponsor have been submitted in time
- OSP has received copies of all technical reports this includes Subcontractor Technical Reports
- Property/Equipment purchased with sponsor funds have been reported via OSP and any sponsor requirements for the transfer or disposal of property purchased through the award have been met
- Patents or copyrights have been reported via OSP and procedures have been followed, if applicable

The Principal Investigator is responsible for notifying the responsible GCA Accountant of any outstanding financial charges so that the sponsor can be properly billed before the final FRS report is submitted.

The Office of Sponsored Programs/Post Award Services Unit (OSP/PASU) is responsible for

- ❖ *Verifying that report has been submitted and, if possible, received by the appropriate point of contact (POC) at the funding agency*
- ❖ *Sending "Reminder Emails to PI's <u>90 days</u> prior to end of personnel appointment funding on sponsored projects.*
- ❖ Sending "Reminder Emails – Progress/Final Technical Report" to PI's for delinquent reports, with copy to Chair and Dean;
- ❖ Requesting that a copy of the report(s) be submitted to OSP, Chair and/or Dean;
- ❖ Submitting Equipment Reports to sponsor
- ❖ Submitting Patent Reports to sponsor

Grants and Contracts Accounting is responsible for submitting all Final financial reports/invoices to the sponsor.

Document Retention ***Recipient institutions are required to maintain accounts, records, and other evidence pertaining to costs incurred in accordance with the records retention policy and sponsor guidelines.*** *Please see Sponsored Programs Records Retention Policy 600-034.*

APPENDICES – FORMS

HOWARD UNIVERSITY
RESEARCH AT The Capstone
Integrity, Responsibility, Trust, Generosity, Creativity

OSP Use Only
OSP Proposal# ______________
Date Submitted to OSP ______________
Research Administrator ______________

Reset Form

Application to Seek Off Campus Funds

Please complete this form, including signatures by Principal Investigator/Project Director (PIs/PDs), Co-Investigator(s), Key Personnel, Department Chairperson(s)/Director(s), and Dean(s); send it and one (1) copy of the proposal to OSP.
Allow Five (5) working days prior to the deadline for processing within OSP.
OSP reserves the right to withdraw for consideration any proposal that was received less than five full business days prior to its submission due date and which was received by OSP without sponsor solicitation guidelines. Call 202-238-2580 for assistance.

☐Yes ☐No Stimulus Funding (ARRA) Opportunity
☐Yes ☐No Electronic submission (e.g. Grants.gov)

Contact to pick-up reviewed proposal
Name ______________ Phone ______________

1. Principal Investigator

Name ______________
School/ College ______________
Dept/Div/Center ______________ Building ______________
Email ______________ Phone ______________ Fax ______________

2a. Project Title ______________

____

b. Key Words ______________

3a. Current Budget Period
Start Date ______________ b. End Date ______________

b. Entire Project Period
Start Date ______________ b. End Date ______________

4. Proposal/Application Type
☐New ☐Renewal ☐Continuation ☐Supplement ☐Revision ☐Resubmission

Related FRS/PS Project Number ______________

5a. Activity Type
☐Grant ☐Subcontract ☐Clinical trial Agreement
☐Contract ☐Cooperative Agreement

b. Activity Purpose
☐Research ☐Services ☐Career Development
☐Fellowship ☐Training ☐Other ______________

6. Sponsor ______________
a. Contact Name and Address:
Name ______________
Phone ______________ Address ______________
Email ______________

b. Prime sponsor Flow-through funds? Yes ☐ No ☐
If Yes, Prime Sponsor ______________

c. Catalog of Federal Domestic Assistance Number (CFDA) ______________

7. Deadline Date for Proposal ______________
☐Announcement/Guidelines/RFP attached ☐Receipt/Delivered
☐Postmarked ☐No unique guidelines apply
☐URL for Announcement, etc ______________

OSP-RA ID. ____________________

Current HU F&A Rates:
RESEARCH 48% - On-Campus Activities 26% - Off-Campus Activities
Cognizant Agency - DHHS Agreement Date - 11/30/09

HOWARD UNIVERSITY — RESEARCH AT The Capstone

Integrity, Responsibility, Trust, Generosity, Creativity

Facilities and Administrative Cost Waiver/Reduction Request Form

(Special Note: It is the expressed preference of Howard University that faculty pursue funding opportunities that will result in FULL recovery of facility and administrative funds based on the federally-negotiated and approved rate of 48%).

I, ________________________________, Principal Investigator on the proposal/application

titled ____

to ________________________________ (Sponsor), wish to hereby request

a waiver ☐ OR reduction ☐ of the University's Facilities and Administrative (F&A) cost for the following reason(s):

A. Limit Imposed by Sponsoring Agency Policy
- Attach statement/excerpt of agency policy
- Rate: ____%

Modified Total Direct Cost Base		$ ________
Full Rate	____%	$ ________
Reduced Rate	____%	$ ________
Total Amount Waived:		$ ________

B. Other Reason:

Explain:

(May attach memorandum to this form)

Approval Signatures:

1. ______________________________ ____________________
Principal Investigator Date

2. ______________________________ ____________________
Department Chair Date

3. ______________________________ ____________________
Dean Date

4. OSP ☐ RECOMMENDED ☐ NOT RECOMMENDED

Explain if not recommended:

______________________________ ____________________

Dana C. Hector, CRA. Date
Executive Director, Office of Sponsored Programs

5. OVPRC ☐ APPROVED ☐ NOT APPROVED

______________________________ ____________________

Florence B. Bonner, Ph.D. Date
Senior Vice President for Research and Compliance

OSP-RA ID. ____________________

Current HU F&A Rates:
RESEARCH
48% - On-Campus Activities
26% - Off-Campus Activities
Cognizant Agency - DHHS
Agreement Date - 11/30/09

HOWARD UNIVERSITY — Research at The Capstone

Integrity, Responsibility, Trust, Generosity, Creativity

Facilities and Administrative Cost Waiver/Reduction Request Form

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Full Rate	____%	$ ________
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B. Other Reason:

Explain:

(May attach memorandum to this form)

Approval Signatures:

1. ______________________________ ____________________
Principal Investigator Date

2. ______________________________ ____________________
Department Chair Date

3. ______________________________ ____________________
Dean Date

4. OSP ☐ RECOMMENDED ☐ NOT RECOMMENDED

Explain if not recommended:

______________________________ ____________________
Dana C. Hector, CRA. Date
Executive Director, Office of Sponsored Programs

5. OVPRC ☐ APPROVED ☐ NOT APPROVED

______________________________ ____________________
Florence B. Bonner, Ph.D. Date
Senior Vice President for Research and Compliance

HOWARD UNIVERSITY

RESEARCH AT The Capstone

OFFICE OF SPONSORED PROGRAMS

REQUEST FOR ADVANCE ACCOUNT FORM

ALL REQUESTS FOR ADVANCE ACCOUNTS MUST INCLUDE A SPONSOR-GENERATED DOCUMENT INDICATING THAT THE ANTICIPATED AWARD (INCLUDING TOTAL AMOUNT) IS BEING PROCESSED (EXAMPLE: E-MAIL; LETTER; FUTURE-RECOMMENDED OR INCREMENTAL FUNDING NOTICE.)

REQUEST FOR:

1. ☐ PRE-AWARD COSTS (USUALLY 90-DAYS...PER SPONSOR POLICY)

   OR

2. ☐ ADVANCE FUNDS ON A CONTINUATION OR RENEWAL: PREVIOUS PEOPLESOFT PROJECT ID NO. ______________

3. PRINCIPAL INVESTIGATOR: ______________________________
4. SCHOOL/DEPARTMENT: ______________________________
5. AGENCY/SPONSOR: ______________________________
6. PROJECT TITLE:
7. EXPECTED AWARD DATE: ______________
8. PROJECTED AWARD AMOUNT (PER SPONSOR NOTICE): $ ______________
9. ADVANCE PERCENT (CHECK ONE): ☐ 10% ☐ OTHER ______ %

   *ADVANCE TOTAL : $ ______________

REASON FOR REQUEST:

***CONDITION STATEMENT:** If approved, this advance will be authorized on the condition that in the event Agency/Sponsor funds are not awarded, ALL expenditures will be the responsibility of the School, Department, AND Principal Investigator.*

IF THIS CONDITION STATEMENT IS ACCEPTABLE PLEASE INDICATE BY SIGNING BELOW:

PRINCIPAL INVESTIGATOR : ______________________________ DATE: __________

CHAIR/DIV. HEAD: ______________________________ DATE: __________

DEAN: ______________________________ DATE: __________

OSP DIRECTOR: ______________________________ DATE: __________

VPRC APPROVAL: ______________________________ DATE: __________

SVP/CFO APPROVAL: ______________________________ DATE: __________

***(NOTE: BUDGETS FOR THE ADVANCE TOTAL MUST INCLUDE ALL APPLICABLE FRINGE BENEFITS (CURRENT: SALARIES – 27.1% / WAGES – 8.2%) AND F&A COSTS (CURRENT: ON-CAMPUS - 48%/ OFF-CAMPUS - 26%)**

HOWARD UNIVERSITY

OFFICE OF SPONSORED PROGRAMS

REBUDGETTING REQUEST FORM

Principal Investigator: ____________________ Phone: __________
PI Email Address: ____________________ Phone: __________
Primary Sponsor: ____________________ Project ID: __________
Flow Thru Sponsor: ____________________
Fund: ○ Sponsor (21) ○ Cost Share (14)

EXPENSE		CURRENT BUDGET	DECREASE FUNDS	INCREASE FUNDS	REVISED BUDGET
C510 - FACULTY SALARY		$0.00	$0.00	$0.00	$0.00
C512 - POSTDOC / DOCT / GA SALARY		$0.00	$0.00	$0.00	$0.00
C513 - NON-FACULTY SALARY		$0.00	$0.00	$0.00	$0.00
C514 - WAGES		$0.00	$0.00	$0.00	$0.00
C515 - OVERTIME		$0.00	$0.00	$0.00	$0.00
C516 - STUDENT WAGES		$0.00	$0.00	$0.00	$0.00
C517 - FRINGE BENEFITS		$0.00	$0.00	$0.00	$0.00
C520 - SUPPLIES / EXPENSES		$0.00	$0.00	$0.00	$0.00
C525 - PROCUREMENT CARD		$0.00	$0.00	$0.00	$0.00
C545 - FOOD SERVICES		$0.00	$0.00	$0.00	$0.00
C549 - RESEARCH PUBLICATIONS		$0.00	$0.00	$0.00	$0.00
C550 - TRAVEL		$0.00	$0.00	$0.00	$0.00
C551 - PATIENT CARE		$0.00	$0.00	$0.00	$0.00
C552 - TRAINEE COSTS		$0.00	$0.00	$0.00	$0.00
C553 - SUBCONTRACTS < $25,000		$0.00	$0.00	$0.00	$0.00
C554 - FINANCIAL AID		$0.00	$0.00	$0.00	$0.00
C555 - INCIDENTAL COMPENSATION		$0.00	$0.00	$0.00	$0.00
C556 - SUBCONTRACTS => $25,000		$0.00	$0.00	$0.00	$0.00
C579 - UNALLOCATED FUNDS		$0.00	$0.00	$0.00	$0.00
C580 - AUXILLARY ENTERPRISE		$0.00	$0.00	$0.00	$0.00
C600 - EQUIPMENT/LIBRARY BOOKS		$0.00	$0.00	$0.00	$0.00
C650 - CAPITAL EXPENDITURE		$0.00	$0.00	$0.00	$0.00
TOTAL DIRECT COST		**$0.00**	**$0.00**	**$0.00**	**$0.00**
MTDC		$0.00	$0.00	$0.00	$0.00
C570 - F&A @	48%	$0.00	$0.00	$0.00	$0.00
TOTAL COST		**$0.00**	**$0.00**	**$0.00**	**$0.00**

Justification (Required)

PI Signature: ____________________ Date: __________

*Requests requiring sponsor approval must be acompanied with a letter to the sponsor and submitted through the OSP.

FOR OFFICE OF SPONSORED PROGRAMS USE ONLY

OSP-PASU Reviewed : __________ Sponsor approval: ☐ Check if approval is required
GCA/RFA Processed : __________ Sponsor's decision: ☐ Approved (See attached) ☐ Declined

HOWARD UNIVERSITY | RESEARCH AT The Capstone

Integrity, Responsibility, Trust, Generosity, Creativity

REQUEST FOR NO-COST TIME EXTENSION

Use this form to request the extension of a project beyond the normal closing date. This request must be received no later than 30 days prior to the end of the final year of the award. Submit this form with the Progress Report

PRINCIPAL INVESTIGATOR(S): ______________________________

PROJECT TITLE: ______________________________

____

SPONSOR: ____________________ ORIGINAL END DATE: ____________________

PEOPLESOFT PROJECT ID: ____________________ CONTRACT NUMBER: ____________________

EXTENSION REQUESTED: 6 months ☐ 12 months ☐

CATEGORY	CURRENT BUDGET	EST. EXPENDITURES	Estimated CARRY FORWARD
PERSONAL SERVICES	$ ______	$ ______	$ ______
FRINGE	$ ______	$ ______	$ ______
SUPPLIES	$ ______	$ ______	$ ______
TRAVEL	$ ______	$ ______	$ ______
EQUIPMENT	$ ______	$ ______	$ ______
CONSULTANTS	$ ______	$ ______	$ ______
OTHER	$ ______	$ ______	$ ______
SUBCONTRACTS	$ ______	$ ______	$ ______
F & A	$ ______	$ ______	$ ______
TOTAL COSTS	$ ______	$ ______	$ ______

Explain why all the funds were not expended during the final budget year. Explain the need to extend the project beyond the normal termination date. Use additional pages if necessary.

____

Signature of PI Named Above — Date

____

Signature of Office of Sponsored Programs/Post Award Services Unit — Name/Title — Date

____

Approval Signature of Office of Sponsored Programs Director — Date

Howard University Office of Sponsored Programs
2225 Georgia Ave NW
Howard Center 3rd Floor
(P) 202-238-2580
(F) 202-986-6937
ora@howard.edu

HOWARD UNIVERSITY
RESEARCH AT The Capstone
Integrity, Responsibility, Trust, Generosity, Creativity

REQUEST TO CARRY FORWARD UNEXPENDED FUNDS

Use this form is to request a carry-forward into the next budget and/or project year

PRINCIPAL INVESTIGATOR(S): ______________________________

PROJECT TITLE: ______________________________

____

SPONSOR: ____________________ ORIGINAL END DATE: ____________________

PEOPLESOFT PROJECT ID: ____________________ CONTRACT NUMBER: ____________________

EXTENSION REQUESTED: 6 months ☐ 12 months ☐

CATEGORY	CURRENT BUDGET	EST. EXPENDITURES	Estimated CARRY FORWARD
PERSONAL SERVICES	$ ______	$ ______	$ ______
FRINGE	$ ______	$ ______	$ ______
SUPPLIES	$ ______	$ ______	$ ______
TRAVEL	$ ______	$ ______	$ ______
EQUIPMENT	$ ______	$ ______	$ ______
CONSULTANTS	$ ______	$ ______	$ ______
OTHER	$ ______	$ ______	$ ______
SUBCONTRACTS	$ ______	$ ______	$ ______
F & A	$ ______	$ ______	$ ______
TOTAL COSTS	$ ______	$ ______	$ ______

Explain why all the funds were not expended during the final budget year. Why is it necessary for the achievement of the research aims that the unexpended balance be carried forward? Use additional pages if necessary.

____
Signature of PI Named Above *Date*

____
Signature of Office of Sponsored Programs/Post Award Services Unit *Name/Title* *Date*

____
Approval Signature of Office of Sponsored Programs Director *Date*

Howard University Office of Sponsored Programs
2225 Georgia Ave NW
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