

## Montana State University – Office of Sponsored Programs

# Principal Investigator Guide

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### 100.00 Introduction

This Guide is designed to assist new and established investigators in conducting research at Montana State University (hereto referred to as MSU or University) by providing helpful resources, and in complying with research-related regulations. This Guide will provide a quick reference to answer general questions about research and to alert researchers to resources available to help them meet their research responsibilities. This Guide also provides an introduction to important research topics and includes links to relevant policies for easy access to current information. This Guide can also be found online at the Office of Sponsored Program website's [home page](#). [The Uniform Guidance, Subpart A](#) contains a list of helpful acronyms and definitions that complement this Guide.

### 110.0 Purpose

- To provide guidance to investigators about how to develop and administer sponsored research projects;
- To inform investigators, particularly Principal Investigators (PI's) and research staff of their roles and responsibilities in research administration and compliance;
- To collect and organize information about sponsored research projects administration in

one document; Generally, the Guide does not constitute MSU policy; either it summarizes existing policy and provides links to policies, or provides guidance and instruction on various topics relevant to MSU research.

## **120.00      Contents**

This Guide addresses standards for conduct of research at the University; sponsored project administration from proposal development through post-award administration; financial and other compliance responsibilities; intellectual property administration and technology transfer; and other research related policies, issues, and resources.

## **200.00      Standards for Conduct of Research**

MSU encourages research and scholarly activities and considers them as crucial to the education of students, the advancement of knowledge, and the intellectual growth of the faculty. MSU expects that research and scholarly activities will be conducted with the highest ethical and professional standards as described in the [Faculty Handbook](#).

## **210.0      Openness in Research**

MSU adheres to the principle of openness in research because of its mission of education, research, and public service. As such, MSU will generally not enter into a contract nor accept a grant to carry out research if the grant or contract restrains the freedom of the University to disclose:

- The existence of the contract or grant;
- The general nature of the inquiry to be conducted;
- The identity of the sponsor, or;
- The research results;

Generally, PI's must be free to publish the results of their research without prior approval of a sponsor or third party. Sponsors may be permitted a short period to review publications prior to submission in order to identify and request the removal of sponsor confidential information, or to identify and take appropriate steps to protect intellectual property.

Should a sponsored program agreement not conform to this policy, it will only be accepted if the principal investigator or center obtains an exception in accordance with the MSU Restricted Research Policy.

## **220.00      Research Misconduct**

All MSU researchers are expected to conduct scholarly research and publish the results with the highest standards of ethical conduct, truth, and accuracy. The University has established policies and procedures consistent with Federal regulations for responding to allegations of research misconduct. The policy establishes a method for reporting and investigating such allegations. Any suspected research misconduct should be reported to the dean of the relevant college. [The Faculty Handbook, Section 430](#), details the University policies on research misconduct.

### **230.00 Outside Interests and Employment**

MSU encourages sponsored research, consulting, and other activities that disseminate knowledge to the larger public. However, in participating in such activities, faculty and staff must be mindful of the potential for real and apparent conflicts between outside activities and their University responsibilities. They must also follow Montana law, [Board of Regents policies](#), and the [MSU Conflict of Interest](#) policy concerning conflicts of commitment and interest. Specifically, faculty and staff must disclose any significant financial interest which may affect their research as explained in more detail in [The Faculty Handbook, Section 440](#).

### **240.00 Nepotism**

MSU policy prohibits employees from participating in employment decisions concerning relatives. “Nepotism” is defined by state statute as “the bestowal of political patronage by reason of relationship rather than merit” ([Office of Legal Counsel, Nepotism](#)). The [MSU Personnel Manual, Section 430](#) provides further clarification of nepotism and how to avoid it during the hiring process. These policies emphasize that MSU employees may not employ or contract with relatives in sponsored research unless explicitly approved in accordance with the procedures contained in the Nepotism policy. MSU’s policy conforms to Federal regulations related to governing conflicts of interests. The prohibition applies to all types of employee appointments including hourly, temporary, and student employees, as well as to the selection of contracts and vendors.

### **250.00 Sexual Harassment**

MSU is committed to maintaining an environment free of sexual harassment not to exclude the research environment. For more information about the sexual harassment policy and training, contact the [Office of Institutional Equity](#) and/or consult the [Code of Conduct, Policies, Regulations and Reports, “Discrimination and Sexual Misconduct Policy and Procedures.”](#) PIs are required to complete training on this policy and may access on-demand training at <https://www.montana.edu/equity/training.html>.

Title IX Coordinator, Office of Institutional Equity  
Montana State University  
303 Montana Hall  
P.O. Box 172430  
Bozeman, MT 59717-2430

**Tel:** (406) 994-3947  
**Email:** [oe@montana.edu](mailto:oe@montana.edu)  
**Web:** [www.montana.edu/equity](http://www.montana.edu/equity)

### **260.00 Non-Discrimination**

MSU is an equal opportunity employer and does not discriminate on the basis of race, color, national origin (ancestry), sex, sexual preference/orientation, gender identity, gender expression, marital or parental status, age, creed, religion or political beliefs, mental or physical disability, genetic information, or status as a veteran (“protected classes”). [Discrimination, Harassment, and Retaliation Policy](#) provides further clarification on MSU’s commitment to creating learning and working environments free from discrimination and harassment. PIs shall conduct

research projects and operations in a way that does not discriminate against these protected classes and maintain documentation to support these efforts.

## **270.00 Data Retention and Storage**

MSU requires that all documentation related to Federal and state sponsored projects, including primary research data and all supporting documents, be available to Federal and state auditors for the period specified by Federal and state regulation – in most cases, a period of three years from the filing of the final financial report. MSU expects faculty members to retain all research data, in their laboratories or other appropriate research locations, and to provide access to the data when requested to do so by authorized institutional officials. Requests from sponsors for access to research data, as well as subpoenas for research data, should be forwarded to the Office of Sponsored Programs (OSP) or to the Office of Legal Counsel for review before

response is made. Further information on data security can be found through the Information Technology Center, [Enterprise Data Stewardship Policy](#).

### **300.00 Overview of Sponsored Programs Administration**

The Office of Sponsored Programs (OSP) manages all functions related to sponsored programs at Montana State University, defined as any activity, research or otherwise, that is funded by an external source such as Federal, state, or private organization. All requests for externally funded projects require the review and approval of OSP. Once a project is approved, the University and the Principal Investigator (PI) have a shared responsibility to the funding agency or sponsor to ensure that a project is performed as proposed, that funding is used in accordance with the specified terms and conditions, and that all required reports are provided according to the schedule established by the funder.

### **310.0 The Office of Sponsored Programs (OSP)**

The Office of Sponsored Programs is located on the third floor of Montana Hall and assumes responsibility for the following functions:

- Review and authorization of proposals for submission;
- Negotiation of award terms and conditions;
- Acceptance of awards on behalf of the University;
- Drafting and issuance of subcontracts and sub-awards;
- Coordination with the Principal Investigators and departments to assure compliance with all applicable sponsor regulations and University policies and procedures;
- Notifying the University community of funding opportunities as well updates to application guidelines;
- Informing the University community of sponsor regulations and policies;
- Supporting the efforts of the Principal Investigators and administrators in managing funds awarded as grants and contracts as detailed below in Section 600.00, 700.00, and 800.00;

The Office of Sponsored Programs and the Technology Transfer Office (TTO) are a part of the Office of Research and Economic Development.

### **320.00 The Principal Investigator (PI)**

A “Principal Investigator” or PI, is defined as anyone who is responsible for the design, conduct, or reporting of research. The PI assumes the primary responsibility for the conduct of any sponsored project. To ensure that the research is conducted by those who have the requisite skills and training, only employees authorized in the [Principal Investigator Policy](#) may serve as PI’s (or Co-PI’s) on grants and contracts managed by the MSU Office of Sponsored Programs. Generally, the policy provides that only tenured, tenure-track, or research faculty and research scientists may serve as PI’s, but some exceptions to this general rule exist, and should be reviewed if any other persons are being considered for designation as PI. Requests for deviations from the policy shall be handled on a case-by-case basis.

### **330.0 Overview of Principal Investigator Responsibilities**

Sponsored programs administration is a joint effort between the PI and the University. The PI is accountable for the proper fiscal management and for the scientific and intellectual direction of the project. The University is legally and financially responsible and accountable to the sponsor for the performance of the activity funded and the proper use of funds, but without the full cooperation and oversight of the PI, MSU would be unable to fulfill its stewardship role. The PI is responsible to the University and to the sponsor for the following:

- Enrollment in OSP-sponsored PI training before taking on PI responsibilities (the training is also encouraged for all other investigators and research personnel);
- Assurance that the scope of work for which the award was made is completed;
- Adherence to MSU policies and procedures;
- Expenditure of funds in accordance with the awarded budget and sponsor terms and conditions;

While the PI may delegate some responsibility for day-to-day management of finances or other tasks to departmental business staff, the PI remains accountable for compliance with University policy and sponsor requirements. A more detailed description of the PI's responsibilities can be found below in Section 840.00 and Appendix C.

### **400.00 Proposal Development**

OSP staff are available to assist PI's with the development of their proposals. Two levels of service exist for PI's to choose from, (1) design and development or (2) package preparation and review. Other pre-award services include referral to relevant, research-related services providers on campus and assistance locating funding. OSP also maintains electronic databases, reference guides, reports, directories guidelines, forms and templates, and notices from Federal, state, and private agencies which can be consulted. OSP also maintains an active list of limited submission opportunities and can guide PI's in the application process. PI's may consult with OSP to decipher information about a sponsor including the program deadline, application and review process, allowable costs, past and present funding priorities.

### **410.00 Protection of Confidential or Sensitive Information**

When preparing proposals, PI's should be aware that Federally funded proposals must be made available as stipulated by governmental regulations for audit and review. Therefore, PI's should be cautious about including sensitive information such as personal, scientific, or proprietary information that the PI may not want publicly distributed. If the Federal agency receives a request for access to the proposal under the "Freedom of Information Act" (FOIA), the agency will notify the PI to review the application for any information that may be withheld under applicable law. Notices of FOIA requests for information contained in MSU proposals should be reviewed with the [Office of Legal Counsel](#) before responding.

#### 420.00 Identifying Funding Sources

MSU holds a license for [SPIN \(InfoEd International\)](#), a comprehensive database of over 40,000 funding opportunities from Federal, state, and private entities. Students, staff, and faculty are permitted to use this system that is limited to MSU campuses. Faculty may define and execute custom searches based on keywords or enlist for a service that will send funding alerts directly to the email address provided. To save and share searches, PI's and their affiliates must sign up for a profile in SPIN by creating a new account. OSP can assist PI's with establishing an account as well as help with troubleshooting and use of the system. Faculty may also schedule an in-person appointment to learn about SPIN as well as review potential funding opportunities that align with their research agenda.

#### 430.00 Research Funding Opportunities

Faculty are automatically registered for the weekly MSU Research Funding Opportunities email upon hire. Staff and students must contact OSP to be registered. This email lists funding opportunities that are relevant to faculty agendas with instructions on how to apply. Limited submission opportunities as well as internal announcements are also listed. The opportunities listed are linked to a system that publishes the opportunities on the Office of Research and Economic Development, [Research Funding Opportunities webpage](#).

#### 440.00 Grants.gov

[Grants.gov](#) is a government-sponsored clearinghouse that provides access to information on over 1,000 grant programs and vets grant applications for Federal agencies. Grants.gov functions as a funding opportunity database, grant submission and reporting interface, as well as a repository of Federal information related to grants. Grants.gov has replaced most if not all paper application submissions with an electronic submission process. Most agencies require submission through Grants.gov unless they have their own submission interface. **MSU is already registered as an institution through Grants.gov and no additional registration is necessary.** If the agency requires submission through Grants.gov, contact your OSP research administrator at least two weeks before the due date and they will submit your grant application on your behalf. PI's may not submit direct to Grants.gov as signature of an Authorized Organizational Representative (OAR) is required.

#### 450.00 Limited Submission Opportunities

Sponsors may limit the number of proposals that MSU may submit to a particular program. Institutional procedures have been developed for selecting proposals in these circumstances. For many but not all opportunities, OSP will distribute an announcement soliciting internal letters of intent (LOI's) as well as post current limited submission opportunities to the [Funding Opportunities webpage](#). Limited Submission Opportunities are also available on the [OSP Limited Submission Page](#). Faculty are advised to stay apprised of current limited submission opportunities by visiting these pages regularly. In the event an opportunity is not advertised, faculty must consult the limited submission policy. For all limited submission opportunities, an internal selection process is used to review the proposals in order to select those that most closely match the sponsor's and MSU's funding priorities, and are most viable for funding. MSU has established a [Limited Submission Policy](#) that must be adhered to for acceptance of a proposal.

## **460.00 Limited Submission Policy**

By definition, limited submissions are funding opportunities that limit the number of applications that may be submitted per institution. The increase in limited submission opportunities and their changing requirements mean that some must be dealt with on a case by case basis. In order to prevent any potential disqualification of submissions by Montana State University, the following policies and procedures have been established. These policies and procedures apply to all grants and contracts including awards made directly to faculty members.

### **Identifying a Limited Submission Opportunity**

In the request for proposals document, organizations will specify whether the opportunity is a limited submission. The funding agency will typically indicate the number of proposals allowed per institution and the process by which they must be submitted. The Office of Sponsored Programs has developed an internal process that aids the institution in processing limited submission applications. These policies and procedures must be followed carefully and are detailed below.

### **Limited Submission Application Process**

#### ***Summary of Proposed Project / White Papers***

Principal investigators interested in a limited submission opportunity must submit a white paper, no more than two pages long along with a CV (also two-page maximum) via the ePCF system by the internal submission deadline established by OSP. OSP will post many select program opportunities on the OSP website under “Research Funding Opportunities” with internal deadlines as well as those established by the sponsors. Principal investigators who discover a limited submission opportunity not posted on the OSP website, must notify OSP immediately to ensure consideration of his/her project.

#### ***Selection of Projects***

If fewer than the allowed number of whitepapers are received, the routine process for submission will be followed, which consists of allowing the PI to proceed with an application. The PI will be notified by ePCF of their permission to proceed. If more than the allowed summaries are received, the MSU Research Council or ad hoc subcommittee when necessary (due to subject expertise and reviewer availability) will select the project(s) to be put forth on behalf of the university. Evaluation criteria will include, but not be limited to quality of the proposal, key deliverables, what makes the project competitive, and eligibility of the investigator. Other key considerations include probability of successful funding and support of the mission of the University. The committee is not obligated to disclose other committee members or provide detailed feedback in order to protect the identity of the committee members and other applicants. The Vice President for Research (VPR) or his/her designee is the decision-making authority for limited submissions.

#### ***Resubmission of Limited Submission Whitepapers***

If a proposal is submitted for a limited submission opportunity and is not funded, that proposal will have no preference over other projects in any subsequent limited submission opportunities.



In order to be considered for any subsequent limited submission opportunities, such proposals must be resubmitted and will be evaluated against competing projects.

#### **470.00 Proposal Preparation Overview**

The format or presentation of a particular proposal will depend on the requirements of the sponsor as they typically develop policies and procedures for the submission of proposals and may require the use of specific application forms or electronic submission interfaces. Other sponsors may have less stringent format requirements. PI's should obtain the most recent version of the sponsor's application guidelines and follow the required proposal format. Should PI's request assistance in preparing the application, guidelines and/or program URL's should be sent to OSP well in advance of the due date. The Proposal Timeline and Responsibility Chart, Appendix C, provides a detailed timeline by which particular proposal tasks need to be completed to ensure sufficient time for internal review and processing.

#### **480.00 Electronic Proposal Clearance Form (ePCF)**

OSP has developed the Electronic Proposal Clearance Form (ePCF) which must be used when submitting proposals to OSP for review and approval. The form summarizes key administrative and fiscal information about the proposal that is needed by the MSU reviewer in order to grant approval to proceed. The PI must review and approve the ePCF and the form is then routed via email to those responsible for certifying the proposal as sound and in compliance with MSU and agency guidelines. This may include the PI's department head, dean, departmental accountants or other administrative contacts, the Human Subjects/Institutional Review Board Chair, and the Vice President for Research. The proposal will not be authorized or transmitted to the sponsor until the completed ePCF and accompanying documents, such as Grants.gov packages have been received by OSP. The [link and instructions for the ePCF](#) are available on the main OSP website page.

**PI's are cautioned that the ePCF and all attachments must be submitted to OSP for review no later than 72 hours (3 business days) prior to the submission deadline.** In order to ensure that proposals are submitted in a timely, complete and accurate manner, all proposals and required documents will be submitted to the sponsor/agency no later than 72 hours (3 business days) prior to the posted deadline. OSP personnel will typically have the ability to recall submitted materials should you decide that changes need to be made after the initial submission, however it is the PI's responsibility to plan ahead and determine the appropriate amount of time required in order to adhere to this policy. It is recommended that you submit your proposal materials to the OSP with sufficient lead time to allow for processing and review your proposal.

Proposals received less than 72 hours prior to the submission due date will be submitted only if the Assistant Vice President for Research (or designee) determines that there is adequate time for a complete review of the proposal materials. In certain instances, a proposal may be submitted to the sponsor but later withdrawn or declined if issues arise due to the lack of time to properly review proposal materials. It is the responsibility of the PI to ensure that the proposal is submitted to OSP at least 72 hours prior to the deadline. Please see the "Proposal Timeline and

Responsibility Chart,” Appendix C to review OSP’s standard approved proposal submission timeline as well as this section for instructions on the ePCF.

#### 490.0      **Standard Elements of a Proposal**

In general, a proposal requires the following elements:

- **Title Page** includes the applicant name (Montana State University), title and duration of the project, amount requested, name and address of the PI and institutional contact (in most cases, the OSP Research Administrator);
- **Abstract or Proposal Summary** describes the objectives, methodology, and significance of the proposed project. The abstract should be intelligible to someone who is not an expert in the field and should be able to represent the project as an independent document;
- **Introduction** frames the problem and concisely states the importance of the research being proposed;
- **Project Narrative** includes the specific aims of the research, background and significance, preliminary studies and research design and methods;
- **Bibliography** consists of a full list of citations for sources referred to in the proposal documents in the style convention preferred by the funder;
- **Curriculum Vitae (CV) or Biographical Sketch** should be submitted for all key personnel, indicating educational and professional background, professional activities, honors and awards, and publications;
- **Budget and Budget Justification** reflecting a reasonable estimate of the expenses necessary to conduct the project. For more information about budget development, see section 600.00;
- **Current and Pending Support** outlines active awards and pending proposals for all key personnel. This includes all financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of a PI’s research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards. Training awards, prizes, or gifts typically do not need to be listed;
- **Facilities and Resources** describing spatial, human, or other resources that will be available to support the project. Examples include laboratory and office space, computing capabilities, animal facilities, library resources, or administrative personnel and departmental or institutional programs and services;
- **Equipment** describes regular and specialized research equipment such as vehicles, high-cost (above \$5,000) scientific equipment and facilities, and like items that support the functions of the project;

#### 500.0      **Pre-and Post-Award Services**

Two levels of service exist for PI’s to choose from, (1) design and development or (2) package preparation and review. [Pre-Award or Proposal Services staff](#) are available to assist with design and development of proposals, facilitation of research teams and research mentorship and training, and review and preparation for submission. Faculty can expect to engage with Proposal

Services staff and their affiliates in the [MSU Research Network](#) to select one or multiple services depending on their particular needs. Available services offered include:

- Finding funding for research;
- Networking and connecting to mentors and assembling a proposal team;
- Planning the proposal submission;
- Document development and completion;
- Proposal submission assistance (includes review, edit, and packaging);

Research Administrators or Post-Award may (if time allows) assist with grant package preparation and review before submission, as well as consultation on budgetary concerns.

#### **600.00 Cost Accounting Principles of Sponsored Project Support**

The majority of externally sponsored funding at MSU is provided by the U.S. Federal government. Cost accounting principles for higher education grantees are established by the Federal Office of Management and Budget (OMB) and MSU is expected to adhere to these principles. Budget support is available through OSP's Research Administrators.

#### **610.0 OMB Circulars (for awards made prior to December 26, 2014)**

**For awards made prior to December 26, 2014, the OMB circulars that are most relevant are as follows:**

**OMB Circular A-21:** Cost principles for Educational Institutions. This circular established principles for determining the direct and indirect costs applicable to grants, contracts, and other agreements with educational institutions.

**OMB Circular A-110:** Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations. This circular sets forth the administrative requirements that educational institutions must adhere to. Generally, individual Federal agencies implement OMB Circular A-110 as individual agency regulations.

**OMB Circular A-133:** Audits of Institutions of Higher Education and Other Non-Profit Institutions. This circular established audit requirements and defines Federal responsibilities for implementation and monitoring such requirements for institutions of higher education receiving Federal awards. In addition, the ethical standards expected of faculty participating in Federally sponsored programs are dictated by other Federal funding agency policies such as financial conflict of interest regulations and misconduct policies.

Under the OMB Circular guidelines, costs may be charged if expenses meet the following criteria:

- **Reasonableness:** The nature of the expenditure and the amount must reflect an action that a prudent person would take under the circumstances;

- **Allocability:** The expenditure must provide a direct benefit to the project (i.e. the cost of a piece of equipment that is required to accomplish the work of two projects may be proportionately shared by those projects);
- **Consistency:** Costs incurred for the same purpose in like circumstances must be treated consistently as direct or indirect (F&A) costs across the institution;
- **Allowability:** Costs must conform to any limitations or exclusions as set forth in OMB Circular A-21 (Cost Principles for Educational Institutions). Examples of unallowable costs under Federal sponsorship include alcoholic beverages, entertainment costs, and memberships;

Costs that do not meet all of the above criteria may not be charged to Federal grants. Non-governmental sponsors may apply different cost principles. Investigators should read the sponsor instructions carefully and consult with OSP, in particular, their departmental Research Administrator for further clarification and/or assistance with developing a budget proposal.

#### **620.00 OMB Uniform Guidance (effective December 26, 2014)**

Effective December 26, 2014, a new set of Federal grant requirements became effective. Depending on the date of the award, the following [OMB Uniform Guidance](#) (“Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule”) may apply. PI’s are required to conform to circulars that are relevant to their awards. According to OMB, this guidance “will supersede requirements from OMB Circulars A-21, A-87, A-110, and A-122; Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up.” OMB also developed a [helpful crosswalk](#) from existing guidance to final guidance for PI’s and research staff to reference. The Uniform Guidance, [Composition of Costs](#) requires that PI’s consider the reasonableness, allocability, and allowability of costs when developing a budget proposal.

#### **700.00 Developing a Budget Proposal**

The proposal budget should delineate the entire cost of the project and accurately reflect costs that are necessary to complete the work. The budget should reflect the methodology/approach described in the proposal narrative. Reviewers should be able to determine if sufficient funds are being requested to successfully complete the project and that those requests are reasonable given the scope of work proposed. Accuracy and detail are essential in budgeting and PI’s should follow a sponsor’s guidelines and provide information in the format specified. The departmental accountant and the OSP Research Administrators are available to assist PI’s in developing budgets that are consistent with University and agency policies and guidelines. These staff members have access to current information related to University costs such as fringe benefit rates, travel allowances, tuition, and fees.

#### **710.00 Major Budget Categories**

Sponsored project costs fall into two broad categories; direct costs and facilities and administration costs (F&A’s). F&A costs are also sometimes called “indirect costs,” “IDC’s,”

or “overhead.” Updated language exists under [Uniform Guidance, Section 200.453](#), “Materials and Supplies Costs, Including Costs of Computing Devices,” which stipulates that (c) materials and supplies used for the performance of a Federal award may be charged as direct costs. In the specific case of computing devices, charging as direct costs is allowable for devices that are essential and allocable, but not solely dedicated to the performance of a Federal award and (d) where Federally-donated or furnished materials are used in performing the Federal award, such materials will be used without charge.

## 720.0 Salaries and Wages

- **Faculty:** Most if not all Federal agencies view research as an activity that is standard to an academic appointment at an Institution of Higher Education (IHE) and will compensate PI’s for their time and effort according to the time and effort allocated to the grant. No additional compensation may be paid from a sponsored project unless it is specifically identified as such in the budget proposal and specifically approved by the sponsor. For faculty salaries, current salary figures must be used. For multi-year proposals, an escalation factor of up to 7% per year. The National Science Foundation will pay only 2/9 of summer salary for tenure-track faculty.
- **Professional and Administrative Staff:** Use current salary figures unless the position is new or activity on the grant entails a major change in scope of duties, in which case, the PI will need to speak with [Human Resources](#), to establish an approximate grade and salary or visit the [Personnel Policy and Procedures Manual](#). For multi-year proposals, an escalation factor of up to 7% per year. Per Uniform Guidance, [Section 200.413](#), the salaries of administrative and clerical staff should normally be treated as indirect (F&A) costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:
  1. Administrative or clerical services are integral to a project or activity;
  2. Individuals involved can be specifically identified with the project or activity;
  3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency, and;
  4. The costs are not also recovered as indirect costs;
- **Graduate Research Assistants:** Contact the [Graduate School](#) to obtain current graduate stipend amounts. If paying graduate fees such as tuition and/or fees, they should be shown on a separate line item in the budget, often “other direct costs.” Facilities and administration costs (F&A’s) may not be charged on tuition and fees costs.

## 730.00 Fringe Benefits

There are different rates established for faculty, classified, full-time students and temporary staffing. These rates can be found in the [OSP Information Sheet](#) and by consulting directly with departmental accountants as they typically have specific rates for faculty that depend on a number of factors. Note that [Montana Law, Section 2-18-703 MCA](#) requires MSU to contribute a certain dollar amount towards the insurance group benefits costs for each MSU employee. That contribution is required regardless of whether the employee has elected insurance coverage by a state-sponsored group benefit plan. Thus, the fringe benefits charged to the research

sponsor must include the statutory insurance benefits contribution amount for each employee proposed to be paid under the grant.

#### **740.00      Equipment**

Per [Uniform Guidance, Section 200.33](#), “equipment” means tangible property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. See also [Section 200.12, Capital Assets](#), [Section 200.20, Computing Devices](#), [Section 200.48, General Purpose Equipment](#), [Section 200.58, Information Technology Systems](#), [Section 200.89, Special Purpose Equipment](#), and [Section 200.94, Supplies](#). Facilities and administration costs (F&A’s) may not be charged on equipment costs.

#### **750.00      Travel**

Per [Uniform Guidance, Section 200.474](#), travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-Federal entity. Such costs may be charged on an actual cost basis or on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed in like circumstances in the non-Federal entity’s non-Federally funded activities and in accordance with non-Federal entity’s written travel reimbursement policies. Allowable costs include meals, lodging, airfare, and ground transportation which must be in accordance with State of Montana travel rates. Current per diem and mileage rates are available from [MSU University Business Services](#). Some sponsors require a separate category for domestic and foreign travel. Proposers must provide sufficient detail in the budget narrative or equivalent to support the costs. Insufficient, inaccurate, or inconsistent detail for travel costs could result in delays during submission through OSP or at the sponsoring agency.

#### **760.0      Materials and Supplies**

All consumable materials including the purchase cost of animals as well as small items of equipment that do not meet the threshold for “capital equipment” are listed under this category. Each item or group of items should be listed categorically and justified by using catalog prices or reasonable estimates plus taxes and shipping costs. All materials and supplies must be purchased in accordance with [MSU Procurement Policy and Procedures](#). [Uniform Guidance, Section 200.453](#) stipulates that:

- a) Costs incurred for materials, supplies, and fabricated parts necessary to carry out a Federal award are allowable;
- b) Purchased materials and supplies must be charged at their actual prices, net of applicable credits. Withdrawals from general stores or stockrooms must be charged at their actual net cost under any recognized method of pricing inventory



withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs;

- c) Materials and supplies used for the performance of a Federal award may be charged as direct costs. In the specific case of computing devices, charging as direct costs is allowable for devices that are essential and allocable, but not solely dedicated to the performance of a Federal award, and;
- d) Where Federally-donated or furnished materials are used in performing the Federal award, such materials will be used without charge;

## **770.00 Publications**

[Uniform Guidance, Section 200.461](#) stipulates that publication costs for electronic and print media, including distribution, promotion, and general handling are allowable. Proposers are to include a best estimate of the costs of any publications.

## **780.0 Services Provided by Non-MSU Entities:**

- **Subaward/subcontract:** A subaward/subcontract issued to an agency, University, or independent contractor performs a portion of the prime contract/award scope of work and receives a portion of the prime budget, passed through from MSU. All of the terms and conditions in the prime grant or contract, applicable to the type of subrecipient involved, are included in the subcontract/subaward agreement. Each proposed subcontractor/subaward PI should prepare and submit a detailed budget and scope of work to be performed to their OSP office or equivalent and once it is approved, it should be provided to MSU's OSP office for review and approval. Each subaward budget will be listed separately on the subaward line item. In most circumstances, Federal sponsors allow MSU to apply its negotiated F&A rate on the first \$25,000 of the subcontract budget and the total cost shall be listed as a direct cost to the prime. For further guidance on Subcontracts/Subawards, consult [OSP's Subaward page](#).
- **Contracted Services:** [Uniform Guidance, Section 200.459](#) stipulates that the costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill, and who are not officers or employees of the non-Federal entity, are allowable subject to some limitations. This category consists of services rendered by others excluding rentals, repairs, and maintenance. This category includes consultant and professional services, honorariums/speaker fees, and general off-campus services provided by others. On-campus services (e.g. animal care, technical services, plant growth, etc.) should also be included in this budget category. Most Federal agencies limit the minimum and maximum daily compensation rates paid to off-campus consultants which can be found by accessing the agency-specific grants administration guide. MSU Legal Counsel's signature is required on all contract service agreements for \$25,000 or above. OSP provides additional guidance on subcontracts, vendors, and consultants on the [Subaward Page](#).
- **Communications:** This includes long-distance, cell phone, postage, courier service (FedEx, etc.) advertising, and other costs of communicating. Cell phone use must conform to MSU's

[Policy on Mobile Communication Devices](#). Typically, cell phone use is treated as an F&A cost and not as a direct cost to the project. Cell phone costs are allowable on non-Federal awards when permitted by the sponsor. Cell phone costs may be charged to Federal awards in exceptional circumstances which must be fully justified in the budget narrative.

- **Maintenance and Repair:** [Per Uniform Guidance, Section 200.452](#), costs for utilities, insurance, security, necessary maintenance, janitorial services, repair, or upkeep of buildings and equipment (including Federal property unless otherwise provided for) are allowable. Costs for improvements which add to the value of buildings and equipment must be treated as capital expenditures. Please consult with [MSU Facilities Services](#) before scheduling any of these services.
- **Participant Support Costs:** This category includes the costs of travel, meals, and lodging for non-MSU project participants (i.e. conference participants, participants in a clinical trial or study, etc.). [Uniform Guidance, Section 200.456](#) deems that participant support costs are allowable with prior approval of the Federal awarding agency. Facilities and administration costs (F&A's) may not be charged on participant support costs.
- **Rental Costs of Real Property and Equipment:** Per [Uniform Guidance, Section 200.465](#), rental costs are allowable to the extent that the rates are reasonable in light of such factors as: rental costs of comparable property, if any; market conditions in the area; alternatives available; and the type, life expectancy, condition, and value of the property leased. Please note that rental or lease payments on facilities/space are not subject to facilities and administration costs (F&A's) but rental costs for equipment are subject to F&A's.

## **800.00 Facilities and Administration Costs (F&A's)**

Facilities and Administration Costs (also called "F&A's," "indirect costs," "IDC's," or "overhead") are those costs that are incurred for common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. They include categories such as library operations, utility costs, depreciation of buildings and equipment, operations and maintenance costs, grant and contract administration and accounting, and general administrative expenses for central offices such as the President, Provost, Vice Presidents, Human Resources, Purchasing, or similar campus office. See Appendix A, Institutional Use of F&A Funds for information on how these costs are distributed to the College and Department levels.

## **810.00 Facilities and Administration Rates**

MSU's F&A cost rate is negotiated periodically with the U.S. Department of Health and Human Services. Current rates are found in the [OSP Information Sheet](#). The full F&A cost rate will be applied to all proposals unless the funding agency prohibits F&A costs or otherwise establishes an alternate method for assigning these costs. The PI may not negotiate a reduction in the rate unless approved in advance by the VP for Research or his or her designee. Proposals submitted to state agencies must follow the [Board of Regents Policy 404](#).



## **820.00 Cost Sharing**

Cost sharing or “matching” means the portion of project costs not paid by Federal funds. Per [Uniform Guidance, Section 200.306](#), voluntary committed cost sharing is not expected under Federal research proposals and cannot be used as a factor during the merit review of applications or proposals. There are instances when cost sharing or matching is required and MSU policy allows proposals to include cost sharing only when required by the sponsor as part of the eligibility criteria. Cost sharing under Federal awards are subject to certain Federal regulations which stipulate that cost sharing must come from non-Federal sources. Proposals that list cost sharing must explain how the cost sharing commitments will be met in accordance with MSU’s Cost Sharing Policy, contained in Appendix B.

## **830.00 Modified Total Direct Costs (MTDC)**

As defined in [Uniform Guidance, Section 200.68](#), “Modified Total Direct Costs” means all direct salaries, wages, applicable fringe benefits, materials and supplies, services, travel, and up to \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs. The definition of MTDC has been modified slightly in recent documents to clearly state that the MTDC exclusion is applicable only to the first \$25,000 of a subaward, and consequently, is not applicable to subcontractors/vendor agreements.

## **900.00 Proposal Review, Processing, and Approval**

All MSU proposals submitted to external funding agencies must be transmitted by OSP. Regardless of sponsor requirements, proposals must be reviewed and have University approval per Section 470.00. OSP has developed the Electronic Proposal Clearance Form (ePCF) which must be used when submitting proposals to OSP for review and approval. The form summarizes key administrative and fiscal information about the proposal that is needed by the MSU reviewer in order to grant approval to proceed. The PI must review and approve the ePCF and the form is then routed via email to those responsible for certifying the proposal as sound and in compliance with MSU and agency guidelines. This may include the PI’s department head, dean, departmental accountants or other administrative contacts, the Human Subjects/Institutional Review Board Chair, and the Vice President for Research. The proposal will not be authorized or transmitted to the sponsor until the completed ePCF and accompanying documents, such as Grants.gov packages have been received by OSP. The [link and instructions for the ePCF](#) are available on the main OSP website page.

## **910.00 Electronic Proposal Clearance Form (ePCF) and Approvals**

**PI’s are cautioned that the ePCF and all attachments must be submitted to OSP for review no later than 72 hours prior to the submission deadline.** In order to ensure that

proposals are submitted in a timely, complete and accurate manner, all proposals and required documents will be submitted to the sponsor/agency no later than 72 hours (3 business days) prior to the posted deadline. OSP personnel will typically have the ability to recall submitted materials should you decide that changes need to be made after the initial submission, however it is the PI's responsibility to plan ahead and determine the appropriate amount of time required in order to adhere to this policy. It is recommended that you submit your proposal materials to the OSP with sufficient lead time to allow for processing and review your proposal.

Proposals received less than 72 hours prior to the submission due date will be submitted only if the Assistant Vice President for Research (or designee) determines that there is adequate time for a complete review of the proposal materials. In certain instances, a proposal may be submitted to the sponsor but later withdrawn or declined if issues arise due to the lack of time to properly review proposal materials. It is the responsibility of the PI to ensure that the proposal is submitted to OSP at least 72 hours prior to the deadline. Please see the "Proposal Timeline and Responsibility Chart," Appendix C to review OSP's standard approved proposal submission timeline.

#### **920.00 Materials Required for Review (ePCF)**

An end-stage draft of the abstract or proposal summary, budget and budget justification, and any other requested documents must be attached to the ePCF for the review and approval process. Limited submission opportunities list any required documents for the internal review and approval process and must also be attached.

#### **930.00 Required Review and Signatures**

Proposals may not be submitted to external sponsors without prior approval of the University. The signature, electronic or written, of the institutional authorized official (in most cases the Assistant Vice President for Research) is required. In many cases, this authorization certifies compliance with Federal regulations and pre-acceptance of terms and conditions of the award. OSP will not sign a proposal until the review process that occurs via ePCF is complete. This process can take up to a week and PI's are encouraged to submit proposals well in advance of sponsor deadlines to allow for review and internal processing. It is recommended that proposals are submitted one to two weeks before the deadline, and under no circumstances may they be submitted less than 48 hours before the submission deadline.

#### **940.0 Proposal Review and Approval Responsibilities**

The Proposal Timeline and Responsibility Chart, Appendix C, provides a detailed timeline by which particular proposal tasks need to be completed to ensure sufficient time for internal review and processing.

**PI Proposal Review and Approval Responsibilities** consist of the following:

- Read RFA carefully and discuss project with research team;

- Contact program officer to determine if project is a fit (provide summary and CV beforehand);
- Notify (choose applicable) Departmental Accountant, Pre-Award/Proposal Services, and Research Administrator of impending submission;
- Provide link of RFA to the above personnel with list of personnel on the project and their role;
- Contact any needed personnel such as consultants, subcontractors, evaluators, etc. to collect required documents;
- Draft project narrative and provide to team and personnel assisting with submissions;
- Access any document templates provided by Pre-Award/Proposal Services or the Research Administrator and begin adding content;
- Send any prepared documents to Pre-Award/Proposal Services for review, edit, and upload to online submission systems. If it is within the 72-hour period, all documents must be submitted to the Research Administrator for review and upload via the ePCF;
- Review and make any final edits to documents prepared by Pre-Award/Proposal services if within the appropriate timeframe;
- Provide final package for review and submission to the Research Administrator via ePCF via “Transfer Agency Files” at least 72 hours before the deadline;
- The final responsibility rests upon the PI to ensure scientific/technical accuracy of the contents of the proposal and compliance with all University and sponsor requirements;

**Departmental Business Manager/Accountant Review and Approval Responsibilities** consist of the following:

- Ensure appropriateness of the project proposed by the PI given the resources of the department and its objectives;
- Provide PI with any needed information for budgetary documents such as current rates for salary, fringe benefits, etc.;
- In coordination with Pre-Award/Proposal Services, assist PI with any forms such as Federal SF-424 documents, cover sheets, etc.);

**Department Head and Dean Review and Approval Responsibilities** consist of the following:

- Ensure appropriateness of the project proposed by the PI given the resources of the department and its objectives;
- Ensure commitment to the PI by allowing sufficient time and effort to conduct the project;
- Ensure sufficient space and resources for the proposed work;
- Meet cost sharing commitments in accordance with the Cost Sharing Policy, contained in Appendix B.
- The Department Head and Dean’s approval of the ePCF certifies review and approval of the proposal;

**OSP Pre-Award/Proposal Services Review and Approval Responsibilities** consist of the following (if Pre-Award/Proposal Services are requested and there is sufficient time):

- Establish secure working folders and share with the team, staff and research alike;
- Provide PI with a checklist of required documents, the current guides and documents required for sub-awardees/collaborators;
- Provide PI with current templates and examples (if available) and download current forms;
- Advise PI to seek review from a senior colleague or expert for technical content;
- Suggest additional staff needed for project and provide contact info (evaluators, experts, etc.);
- Review budget against project to check for fit and appearance;
- Review, edit, and make suggestions to all prepared documents and save under a new file name;
- In consultation with Departmental Accountants (if needed), fill out any forms such as any forms such as Federal SF-424 documents, cover sheets, etc.);
- Collect any institutional documents and/or signatures needed and ensure all subaward forms have been received, reviewed, and uploaded to package;
- Work with PI to ensure Post Award/Research Administrators have all documents required for submission at least 72 hours before the agency deadline;

**OSP Post-Award Review and Approval** consist of the following:

- Review proposals for compliance with University and sponsor requirements;
- Assist PI's with development and review of budgetary documents;
- Notify PI's and/or departments of potential problems with the funding source such as unusual reporting requirements or problematic intellectual property policies;
- Ensure that documentation provided related to any required assurances such as human subjects, vertebrate animals, lobbying, or other requirement is accurate and complete;
- Work with PI to obtain approval on modifications to indirect costs (F&A's) or any restrictions on publications;
- Verify cost sharing commitments and/or matching funds;
- Review ePCF for appropriate signatures as well as PI compliance with the stipulations of the RFA;

## **950.00 Proposal Submission**

Most sponsors require electronic submission of proposals through established submission portals such as Grants.gov, NSF Fastlane, or NIH ASSIST. In some cases, proposals are submitted in hard copy format via US Mail or FedEx. In both cases, PI's are to ensure that the proposal is reviewed and approved via ePCF before submission. Grants.gov has replaced most if not all paper application submissions with an electronic submission process. Most agencies require submission through Grants.gov unless they have their own submission interface. **MSU is already registered as an institution through Grants.gov and no additional registration is necessary.** If the agency requires submission through Grants.gov, contact your OSP Research Administrator.

at least two weeks before the due date and they will submit your grant application on your behalf. PI's may not submit direct to Grants.gov as signature of an Authorized Organizational Representative (OAR) is required. PI's may work with Pre-Award/Proposal Services to have their proposals sent via US Mail or FedEx.

#### **960.00 Pre-Award Audits and “Just-in-Time” Requests**

Sponsors may require additional supporting documentation prior to review or award of a proposal. PI's should maintain a file for all supporting materials used in the development of a project budget that may include copies of price quotes or documentation for equipment, travel costs, animal costs, or other costs. Preserving these documents and maintaining their accessibility may prevent delays in processing and reductions in funding in some cases. Sponsors may wish to support a project but at a reduced level of funding. If requested, a revised budget should be submitted to OSP for review before submitting to the sponsor. Reductions in proposed budgets should be evaluated to determine whether there is a significant change in the PI's level of effort or scope of work. OSP is responsible for negotiations of any changes to the proposal at this stage and when notified of such negotiations, the PI must refer the sponsor to OSP, specifically, to the Research Administrator.

#### **970.00 Sponsor Site Visits**

For large proposals, sponsors may wish to visit the University to meet with those who will be responsible for the conduct and administration of the proposed project. The visits vary from brief meetings to discuss the specifics of the science, to multi-day reviews by a team of outside experts who will evaluate all aspects of the proposed work and the University environment available to support it. OSP must be notified of any proposed site visit as these events usually involve coordinating with multiple offices on campus such as the President's Office, Vice President for Research, and/or the Provost's Office. OSP can assist in coordinating these visits and will be available to meet with members of the site visit team. In order to save on travel budgets, some sponsors hold site visits wherein the PI and other key personnel are invited to meet agency representatives at the sponsor's headquarters. These visits also need to be coordinated through OSP or the Office of Research and Economic Development.

#### **1000.0 Award Acceptance**

Broadly defined, an award is financial support for a specific research project, training or educational program, equipment purchase, or other activity. Federal agencies and many private research sponsors categorize awards into the four basic types described below. The categories determine how the funds are allocated and controlled and each type of award carries with it a set of regulations and responsibilities to which PI's must adhere.

- **Grants** are transfers of funds to support scientific projects in which the sponsor has an interest but does not play an active role. The grant is given without expectation of delivery of a specific product or service other than periodic reports and/or a final written report. Grants are written documents with general terms and conditions that usually stipulate a project

period and minimal reporting requirements. Grants typically fund basic research, fellowships, and training.

- **Contracts** are entered into to provide support for a specific, often narrowly focused, set of tasks for the direct benefit of the sponsor. Contracts are legal documents by which a non-Federal entity purchases property or services needed to carry out a project or program under a Federal or private award. Contracts vary from subcontracts or sub grants, also known as “subawards.”
- **Subawards/subcontracts/subgrants** are grants and awards provided by the prime recipient to a subrecipient to carry out part of a Federal award. Subawards are typically subject to the terms and conditions of the prime award. MSU maintains policies on subawards that must be adhered to. For further guidance on Subcontracts/Subawards, consult OSP’s [Subaward](#) page.
- **Cooperative Agreements** are legal instruments of financial assistance between a Federal awarding agency and a recipient wherein there is substantial involvement between the two parties in carrying out the funded project.
- **Testing Agreements** are for the purpose of third-party requests to use MSU laboratories, equipment, and expertise to perform fee-based testing using protocols specified by the third party, and performed primarily for their benefit. Testing agreements are not considered sponsored research and MSU has adopted a policy for when these agreements are appropriate as well as developed forms to be submitted. Contact the [Technology Transfer Office \(TTO\)](#) for information related to testing agreements.

#### **1010.00      Receipt of Award**

The Vice President for Research or his/her designee has authority to accept an award on behalf of MSU. MSU requires that all sponsored awards be processed, and all award documentation be sent to OSP to be reviewed and accepted on behalf of the University. Any documents sent directly to the PI must be sent immediately to OSP upon receipt.

#### **1020.00      Negotiation and Acceptance of Awards**

OSP reviews all terms and conditions of an award and assures Legal Counsel and Technology Transfer before acceptance to ensure that the sponsor’s requirements are compatible with law and MSU’s policies and procedures. A sponsored award binds both the sponsor and MSU to certain commitments, it is important that the terms are clearly understood and that all concerns are resolved before the award is accepted. OSP assumes primary responsibility and takes the lead in negotiating terms between MSU and the sponsor. PI’s are not expected or encouraged to negotiate with external sponsors, although they may be asked to participate in discussions with the agency concerning programmatic issues. If a PI is contacted directly by a sponsor regarding the terms of an award under discussion, the sponsor should be referred to OSP.

#### **1030.00      Signature Authority**

Many sponsors require the signature of an authorized institutional official to formally accept the terms and conditions of the award. OSP is responsible for obtaining the appropriate institutional signature. Investigators are cautioned against signing any University agreements or material

transfers. These agreements bind the University to certain obligations and, as such, can only be signed by those who have delegated authority signature. Please visit the [Delegation of Authority Policy](#) for information.

#### **1040.00 Account Set-up**

Once an award has been accepted, an index/fund number is established by OSP to allow expenditures to be incurred. This signifies that the fund is active under the management of OSP and is subject to restricted use as determined by the award terms and MSU policies and procedures. Once notified of the index/fund number, PI's may charge allowable project expenses against the account within the start and end date, and purposes justified in the proposal budget.

#### **1050.0 Pre-Award/Late Award Account Set-up**

Under certain conditions, a PI may request an account prior to the actual receipt of the award. Most Federal grants permit the incurrence of pre-award costs and MSU permits expenditures which conform to MSU's [Cost Transfer Policy](#) as well as [Uniform Guidance, Section 200.458](#) which details the conditions upon which pre-award expenditures may be allowed. MSU's OPAS Committee is authorized to award these expenditures and upon verification of the expected award and award start date, a request for pre-award spending may be submitted to OSP via the OPAS forms. However, if it is determined that funding is not ultimately available, the PI and Department shall assume responsibility for all expenses posted to the grant.

#### **1100.00 Post-Award Administration**

The process of managing sponsored research funds is a shared responsibility among the funder, the PI, the Office of University Business Services, the PI's departmental accountant/business manager, and Office of Sponsored Programs with each entity responsible for areas under their purview. Federal grants are to be managed in accordance with [Uniform Guidance, Subpart D, Post-Federal Award Requirements](#) that stipulate that the Federal awarding agency must manage and administer the Federal award in a manner so as to ensure that Federal funding is expended as associated programs are implemented in full accordance with U.S. statutory and public policy requirements, including, but not limited to the following: protecting public welfare, the environment, and prohibiting discrimination. The Federal agency communicates to MSU all relevant public policy requirements, including those in general appropriations provisions. MSU is responsible for complying with all requirements of the Federal award, and Post Award Administration works closely with the PI to ensure these requirements are satisfactorily met.

#### **1110.00 Responsibilities in Post-Award Administration**

The PI assumes primary responsibility for accomplishing the technical goals of the project and for complying with the financial and administrative policies and regulations associated with the award. Although PI's may have administrative staff or graduate students to assist them with the management of project funds, the ultimate responsibility for the management of the sponsored research project activities and responsible expenditure of funds ultimately rests with the PI.

**Office of Sponsored Programs Post-Award Responsibilities** consist of the following;

- Primarily, establish and maintain effective internal control over the Federal award that provides reasonable assurance that the award is managed in compliance with Federal statutes, regulations, and the terms and conditions of the award;
- Establish the fund/index in the University financial system;
- Advise PI's regarding Federal and sponsor guidelines and regulations;
- Facilitate good project management practices by disseminating information and providing training to PI's on a range of topics related to sponsored activities;
- Serve as the primary liaison between the PI and the sponsor in all areas requiring sponsor approval, including changes to scope, budget, key personnel, and project end dates;
- Maintain project files and records of the proposal and grants information system;

**Additional administrative support to departments** consist of the following:

- Management of receivables, billings, and collections: OSP manages the collection of grant funds and maintains account records for each sponsor. OSP draws funds under Federal letters of credit as costs are incurred, issues billings to sponsors and conducts follow-up on payments;
- Project financial reporting: Preparation and submittal of financial reporting to sponsors will be conducted by OSP as well as generation of monthly Inception to Date Report (ITD) for each project for PI review;
- Administer effort reporting in order to provide documentation for employee salary charges to Federal grants;
- Monitor and respond to, in conjunction with the department, incidents of overspending;
- Coordinate government, private sponsor, and public accounting firm audits;
- Develop and negotiate Federal facilities and administrative agreements;
- Monitor government property accounting inventory maintained by Property Management;

**PI Post-Award Responsibilities** consist of the following:

- Execute the project as outlined in the funded proposal and the terms and conditions of the award using sound management techniques;
- Authorize only those expenditures that are reasonable and necessary to accomplish the project goals and are consistent with the sponsor's terms and conditions;
- Spend no more than the authorized amount for the project period(s);
- Carry out the financial plan as described in funded proposal;
- Notify OSP of any proposed changes in scope of work, changes in personnel including the PI or other key persons, the budget, or period of performance;
- Follow all applicable University policies and procedures such as travel, purchasing, employment, contracted services, and compensation for personnel;



- Assure that cost-sharing or matching commitments are fulfilled and reported to OSP in a timely manner;
- Assure that Time and Effort Reports for the funded project are reported by the department in a state of accuracy, completeness, and timeliness;
- Oversee the care and maintenance of property procured with project funds in accordance with sponsor guidelines;
- Report any intellectual property development that results from the project to the Technology Transfer Office (TTO) in accordance with [Board of Regents Policies on Intellectual Property](#) and [MSU Patents and Copyrights Policies and Procedures](#);
- Prepare and submit periodic and final project progress reports in accordance with the terms of the award;
- Review project expenditures (including the monthly Project Financial Reports provided by OSP) to confirm that they are correct and appropriate;
- Comply with all sponsor and MSU rules, regulations, and terms and conditions of the award;

**Departmental Accountant/Business Managers Post-Award Responsibilities** consist of the following:

- Assist in administration of the award at the departmental level;
- Act as liaison between the PI and OSP;
- Have or acquire knowledge of MSU policies and procedures related to grant management, as well as the terms and conditions that apply to individual awards;
- Maintain budgetary control through departmental accounting systems, assuring that expenditures are in compliance with the approved budget;
- Provide assistance to the PI in reviewing expenditures to assure appropriateness and correctness;
- Monitor grant expenditures to assure that overspending does not occur;

#### **1120.00      Paying Bills and Charging Expenses to Accounts**

PI's or other authorized project personnel initiate expense charges to a sponsored project. Expenditures must be consistent with grant requirements and purchasing procedures. The [Business Procedures Manual](#) and the [Procurement Policy and Procedures](#) provide guidance on purchasing requirements and submitting bills for payments.

#### **1130.00      Paying Salaries from Project Funds**

To pay salaries from a project fund, the department (initiated by the PI) must complete and forward a Personnel Transaction Form (PTF) to Human Resources, Personnel and Payroll Services. Additional requirements apply and are detailed in the [Employment and Compensation of Personnel Paid from a Grant or a Contract](#) policy.

#### **1140.00 Internal Institutional Charges**

Certain internal University services (computer services, library loans, telephone charges, etc.) may be electronically billed to a departmental account and charged to a sponsored research account if the OSP fund/index number is provided to the internal departments. The charges must be reviewed by the PI for accuracy.

#### **1150.00 Travel Charges**

Travel reimbursement requests must be made to OSP no later than 10 days after the trip has been completed. PI's and their project personnel must also submit a Travel Authorization request if traveling out of state. Reimbursable travel expenses include only those incurred while traveling on official business. Please consult the [Business Procedures Manual, Section 500.00 Travel](#), before travel arrangements are made.

#### **1160.00 Cost Transfers**

Generally, transfers of costs from one sponsored research account to another are not permitted except to correct errors, and even then, cost transfers are generally allowed within 90 days of charging the cost to a fund in Banner. Consult the [Cost Transfer Policy for OSP Funds](#) for more information.

#### **1170.00 Time and Effort Reporting**

Effort reporting is required by Federal regulations, OMB Circulars (for awards made prior to December 26, 2014) and [Uniform Guidance, Section 200.430](#). Effort reporting is a method of documenting the time devoted to an externally sponsored grant or contract and is expressed as a percentage of professional activity devoted to a particular fund.

All individuals who devote effort to grants or contracts, whether they receive pay or not, are subject to effort reporting. Federal regulations require MSU to have a system in place for certifying the allocation of salaries and wages associated with sponsored agreements. MSU employs after-the-fact certification to confirm that the activity of an employee supports the compensation charged to Federal awards. All employees who perform work on the project must submit a monthly time and effort report to the [OSP Time and Effort System](#). Each person must provide a reasonable estimate of the time actually spent working on the project. PI's are responsible for reviewing all time and effort reports to ensure accurate accounting of their own effort and that of their staff. PI's are also responsible for complying with sponsor requirements for notifications regarding changes in personnel and effort and must ensure that commitments of effort to the project are met according to the timeline and guidelines of the sponsor. OSP provides training to PI's and their research staff on MSU's process for effort reporting. When assessing percentage of activity expended on a sponsored project, "total effort" is defined as actual effort devoted to all the activities for which MSU compensates an employee for their appointment. For faculty, total effort includes instructional activities, administrative activities, public services, and clinical and research activities. The Federal government guidelines acknowledge that in an academic setting, teaching, research, services, and administration are

often inextricably intermingled. A precise assessment of factors that contribute to costs is not always feasible, nor is it expected. Reliance is placed on estimates, however, the percentage of compensation charged to a Federal award during a reporting period can never exceed the percentage of total effort associated with the award.

#### **1180.00 Organizational Prior Approval System (OPAS)**

In an effort to streamline post-award administration of changes from the approved application or budget, many Federal agencies have delegated authority to institutions to approve certain post-award changes. In exercising this authority, OPAS grantees must assure proper stewardship over these funds and that all costs charged to the awards are allowable, allocable, and reasonable. OSP has OPAS request [forms](#) available for your use.

#### **1190.00 Budget Revision and Reallocation of Funds**

PI's should begin by contacting OSP to determine whether or not budget revisions or reallocation of funds is authorized under the award and/or whether these actions require OPAS approval. Some sponsors do not allow revisions or allocations while some impose limits for changes (for example, some sponsors require prior approval for charges of more than 10%). The PI should assess the impacts of revision or reallocation to determine if there will be sufficient funds to complete the project activities or whether F&A fees will shift. If required by MSU or the sponsor, the OPAS form should be submitted as soon as the need for a change in the budget is recognized.

#### **1200.00 Grant Closeout**

From the Federal perspective, as detailed in [Uniform Guidance, Section 200.16](#), and [Section 200.343](#) "closeout" means the process by which the Federal awarding agency or pass-through entity determines that all applicable administrative actions and all required work of the Federal award have been completed and the grant may be closed. All reporting related to performance, finances, and other reporting must be submitted no later than 90 days after the end date of the award. New awards may be denied or delayed if existing awards are not properly closed. OSP is responsible for closing grants, awards, and contracts and will do so when the conditions described above are met.

#### **1210.00 Final Reports and Deliverables**

The PI shall work with OSP to ensure that the award is closed in accordance with [Uniform Guidance, Sections 200.16](#) and [Section 200.343](#). This includes completion of project deliverables and submission of any final reporting. It is the PI's responsibility to ensure that the final report and the project deliverables are submitted to the sponsor.

#### **1220.00 Program Income**

If permitted by the sponsor, program income may help to defray program costs. [Uniform Guidance, Section 200.307](#) details requirements related to the generation of program income, property, deductions, additions, cost sharing, and income after the period of performance. Some

types of income include fees for services, receipts from the sale, use, or rental of equipment purchased with program funds, and royalties from patents and copyrights. Program income incurred after the period of performance may be subject to Federal requirements regarding appropriate use of these funds. The PI will be required to report any and all program income to Office of Sponsored Programs so that requirements may be met.

#### **1230.00 Excess and Unexpended Funds**

Except for fixed price contracts, the total expenditures in the index/fund must match total income in the index/fund. Any excess funds must be returned to the sponsor and any account deficiencies will not be paid by sponsors; however, fixed-price contracts may be an exception.

#### **1240.00 Retention of Records**

Most sponsors require awardee agreement to retain financial and research-related records for periods up to ten years. [Uniform Guidance, Section 200.333](#), details additional requirements for retention of records. OSP shall retain any and all fiscal records for future auditing purposes.

#### **1250.00 One-Year, No-Cost Extension**

Sponsors may allow for a “no-cost extension” or period in which deliverables may be completed without incurring additional costs. The OPAS Committee is responsible for granting one-year, no-cost extensions and PI’s must submit forms or an email explaining why an extension is necessary. Requests should be sent to the OSP Research Administrator overseeing the grant at least 30 days prior to the end date of the existing contract period.

#### **1260.00 Transferring to Another Institution**

If the PI plans to transfer to another institution and wishes to move the grant or contract(s) to the new institution, approval will be required by the institution and other officials, as well as the sponsor. The PI should begin the discussion of a transfer with the respective department head and then with OSP so that they may determine what will be required from the institution and sponsor. The PI should plan to submit a final report before the transfer is complete that details the work to be completed and amount remaining to expend. If it is decided that the grant will remain at MSU, a new PI must be identified and the sponsor must approve of this selection. This is typically accomplished by submitting a letter requesting the change with the CV of the new PI attached. An approval signature by the approved institutional official may be required in both cases.

#### **1270.00 Transferring Equipment and/or Property to Another Institution**

Major equipment and property purchased with sponsored funds typically vests with the university, however, there are exceptions so the source of funding for the original equipment/property will need to be identified. The PI shall prepare a list of equipment and the source of funds, to present to the department head and if necessary, the MSU OPAS Committee. Once a determination of ownership is made for each piece of equipment, then consideration of the disposition can be considered. If the equipment vests with MSU, it must be managed in accordance with the [Uniform Guidance, Section 200.313](#). If the equipment was purchased with

Federal funds and the government has elected to retain federal title, it must be managed in accordance with [Uniform Guidance, Section 200.312](#).

Any release of equipment will be at the discretion of the department head and/or the MSU OPAS Committee. A copy of the approved request will need to be provided to the Research Administrator in OSP and MSU Property Management so that accurate inventory records can be maintained and to remove MSU property control tags.

#### **1280.00 Facilities and Administration (F&A) Fund Balances**

After the PI terminates from their position at the University, any unexpended F&A funds will revert to the Office of Research and Economic Development. If there are ongoing obligations, it will be the responsibility of the department to request retention of these funds by supplying an outline of how funds will satisfy these obligations. All decisions related to remaining F&A funds will be made by the Vice President for Research or his/her designee.

#### **1300.00 Research Regulatory Compliance**

MSU is responsible for managing and administering awards, both Federal and non-Federal, in a manner so as to ensure that funding is expended and associated programs are implemented in full accordance with U.S. statutory and public policy requirements, including but not limited to: those protecting public welfare, the environment, and prohibiting discrimination. MSU has established a number of programs to ensure compliance with policies and procedures such as the Office of Sponsored Programs (OSP), Office of Research Compliance (ORC), Institutional Review Board (IRB), Technology Transfer Office (TTO), Institutional Animal Care and Use Committee (IACUC), Radiation Safety Committee (RSC), Office of Legal Counsel, and MSU Biosafety Committee. This section expands upon the requirements for research projects that entail the use of human and animal subjects, impacts to the environment, and/or potentially involve conflicts of interest. The OSP Electronic Proposal Clearance Form (ePCF) requires the disclosure of any proposed use of human or animal subjects, conflicts of interest, technology transfer, biosafety hazards, or potential impacts to the environment.

#### **1310.00 Office of Research Compliance (ORC) Oversight**

The [Office of Research Compliance](#) oversees University programs designed to ensure compliance with Federal, state, and local regulations for research, creates and supports an environment that furthers the ethical and responsible conduct of research, including the [Conflict of Interest Management Program](#) and the Research Integrity Verification Program. The Office of Research Compliance is the primary office that oversees research activity that may require regulatory compliance. ORC is also directly responsible for managing [Export Control](#), or transfers of controlled information, including technical data, to persons and entities outside the United States, as well as shipment of physical items or goods, technical or scientific information related to export controlled items, or travel to sanctioned or embargoed countries.

#### **1320.00 Export Controls and Regulatory Framework**

Export laws and regulations promulgated by the U.S. Department of Commerce, the U.S. Department of State, and the U.S. Treasury Department are the basis for restricting use of and access to controlled information, goods, and technology for reasons of national security or

protection of trade. In general, the export control regulations cover four main types of University activities:

- Transfers of controlled information, including technical data, to persons and entities outside the United States;
- Shipment of controlled physical items, such as scientific equipment, that require export licenses from the United States to a foreign country;
- Verbal, written, electronic, or visual disclosures, regardless of where the disclosure takes place, of controlled scientific and technical information related to export controlled items to a foreign national (everyone other than a U.S. citizen, a permanent resident alien, and certain ‘protected individuals’ [refugees and those with asylum], including any company not incorporated in the United States). Such a transfer is termed a “deemed export” and is regulated because the transfer is “deemed” to be to the country where the person is a resident or citizen;
- Travel to certain sanctioned or embargoed countries for purposes of teaching or performing research;

Most exports do not require government licenses. However, licenses are required for exports that the U.S. government considers “license controlled” under:

- [The Department of Commerce’s Export Administration \(EAR\)](#). The EAR is concerned with dual-use items, such as computers or pathogens, which are designed for commercial use but have the potential for military application;
- [The Department of State’s International Traffic in Arms Regulations \(ITAR\)](#). ITAR covers defense-related items and services;
- [The Treasury Department’s Office of Foreign Assets Control \(OFAC\)](#). OFAC administers and enforces economic and trade sanctions that have been imposed against specific countries based on foreign policy, national security, or international agreements.

Fortunately for universities, these regulations exclude publicly available, fundamental research results from the regulatory requirements for approvals or licenses. Both the EAR and ITAR define fundamental research in a similar manner; it is “basic and applied research in science and engineering where the resulting information is ordinarily published and shared broadly within the scientific community, as distinguished from research the results of which are restricted for proprietary reasons or specific U.S. Government access and dissemination controls.” Tangible items, however, do not fall under the fundamental research exemption. In cases where an MSU research is fabricating an item for shipment outside the U.S., then that item must be checked against the EAR, ITAR, and OFAC lists referenced above to see whether a license is required. The Office of Research Compliance works closely with MSU’s [Office of Legal Counsel](#) on matters related to export control, and PI’s are advised to contact either the Legal Counsel or ORC for guidance before any research activities are initiated.



### **1330.00 Managing Conflicts of Interest**

The University encourages its faculty to participate in sponsored research, to consult with government and industry and to engage in other activities that further the mission of the University. At the same time, the University is committed to ensuring that these activities are conducted in an atmosphere free from biases and interests that could compromise the free and open pursuit and dissemination of knowledge. The University follows all pertinent guidelines and policies in regard to conflicts of interest as outlined in the [MSU Legal Policy on Conflicts of Interest](#), [Board of Regents Policy on Conflicts of Interest](#), [42 CFR Part 50 Subpart F: Promoting Objectivity in Research](#), [45 CFR Part 94: Responsible Prospective Contractors and Financial COI](#), as well as any related Federal conflict of interest policies. PI's are expected to disclose any actual or potential conflicts of interest including but not limited to those related to significant financial interest, or interests in equity, salary or other compensation, consulting fees, and/or intellectual property rights. The Office of Research Compliance in conjunction with the Office of Legal Counsel can provide guidance to PI's as well as disclosure forms and training to ensure PI's avoid conflicts of interest.

### **1340.00 Human Subjects in Research and the Institutional Review Board (IRB)**

The [Institutional Review Board](#) (IRB) oversees the protection of the rights, welfare, and well-being of human subjects who participate in research at Montana State University. The IRB follows the ethical standards described in the Belmont Report as well as all applicable Federal, state, and local regulations. The IRB is responsible for reviewing and approving all research involving human subjects (including student research projects). All research involving human subjects must be registered with the IRB regardless of funding source or location. The IRB can provide more detailed information as to what constitutes research involving human subjects; what types of research are exempt, how to apply for IRB approval, and other information concerning regulation of human subject research at MSU. Approvals must be granted before research begins or data and results generated must not be used in publications and other forms of dissemination.

### **1350.00 Animal Subjects in Research and the Institutional Animal Care and Use Committee (IACUC)**

[The Institutional Animal Care and Use Committee](#) (IACUC) ensures the health, well-being, and humane use of animals in research, following the regulations and guidance of the U.S. Department of Agriculture and the Department of Health and Human Services. MSU's IACUC is responsible for reviewing all protocols involving live vertebrate animals for research, training, and testing, and ensures compliance with all applicable laws, policies, and Federal regulations. The IACUC ensures that all animals are treated humanely and that research is performed to the highest standards. The IACUC is also responsible for inspection of animal facilities (including satellite facilities) and laboratories, and oversight of training and educational programs.

### **1360.00 Biological Safety in Research and the Institutional Biosafety Committee (IBC)**

[The Institutional Biosafety Committee \(IBC\)](#) at MSU ensures a safe environment for individuals working with biohazardous materials and ensures the protection of the community and environment by preventing exposure to biohazardous materials. The Biosafety Program provides technical advice to PI's on lab containment, security, and safety procedures. PI's should consult the Committee before beginning their research with any questions related to approval requirements, processes, or policies. The Biosafety program also works with PI's on safely managing select agents, which are materials that have the potential for use in bioterrorism or warfare. For a current list of select agents, visit the Federal "[Select Agents and Toxins List](#)." Any materials classified as select agents or toxins must be declared to the Committee and the PI should expect to undergo an application process as well as training and to satisfy any pertinent Federal requirements.

### **1370.00 Radiation Safety in Research and the Radiation Safety Committee (RSC)**

The Radiation Safety Officer (RSO) and [Radiation Safety Committee \(RSC\)](#) is responsible for ensuring that individuals working with radioactive materials or radiation producing equipment are monitored for and protected from physical exposures to radiation. There are enforceable limits established by Federal law to occupational radiation exposures. The Nuclear Regulatory Commission is the rule-making body that promulgates and enforces the radiation protection regulations in the United States. MSU currently has a "Broadscope Type A" license which allows for a variety of radioactive material research to be conducted. MSU is under the Nuclear Regulatory Committee's jurisdiction and, as such, is required to maintain compliance with Title 10, Code of Federal Regulations, Part 20 (10 CFR 20) governing radioactive material. PI's who plan to conduct research must contact the RSC to submit a protocol which will be reviewed for approval. Once approved, PI's must maintain lab safety oversight including correcting problems and discrepancies. Training for radiation safety is available through RSC and may be required depending on the terms and conditions of the sponsor.

### **1400.00 Intellectual Property, Research, and the Technology Transfer Office (TTO)**

The MSU [Technology Transfer Office \(TTO\)](#) works with PI's to commercialize the inventions of MSU faculty, spur entrepreneurship based on MSU technology and provide a gateway for industry looking to utilize MSU resources. The TTO works to develop associations with private industry and to facilitate private sponsors of research at MSU. Faculty members or other employees participating in research or other activities are required by Board of Regents and a number of other pertinent MSU policies, to disclose to the Technology Transfer Office and/or Office of Research Compliance any patentable discoveries or copyrightable works for hire developed as an employee of Montana State University. This disclosure allows both offices to assist in protection of the works and commercialization. The [Board of Regents Policies on Employee Equity Interest and/or Business Participation](#) require Board of Regents approvals for the following interests and activities:

1. Employee inventor or creator ownership, or award of an equity interest or similar participation in the ownership, of a business entity;



2. Employee inventor or creator participation as a director, officer, or as a member of the board of directors or other governing board of a business entity; or
3. Employment of the employee inventor or creator by the business entity.

The Technology Transfer Office also works with PI's to assess and pursue patents, copyrights and trademarks, identify potential licenses for intellectual property, and review Material Transfer Agreements (MTA's).

#### **1410.00 Patents, Copyright, and Trademark**

TTO will meet with PI's to discuss the applicability of their research to industry and identify possible inventions. As a result of faculty meetings or in response to unsolicited disclosures, the TTO reviews [Intellectual Property Disclosure Forms \(IPDF's\)](#) submitted by inventors. TTO Staff then determines the possibility of securing IP protection based on such factors as novelty, uniqueness, and usefulness, and will pursue patent or other legal protection in accordance with the [Board of Regents, Inventions and Patents Policy](#) and the [MSU Patent Policy](#). Protections are also in place for [Student Patent Rights and Copyrights](#). In accordance with [Montana Board of Regents Policy on Copyrights](#), TTO will assess whether it is appropriate to protect creative works through copyright and names or logos through trademark. Works subject to copyright include but are not limited to computer programs, visual aids, manuals, and public relations material. [Uniform Guidance, Section 200.448](#), details allowable and unallowable costs on Federal awards related to securing patents and copyrights.

#### **1420.00 Licensing**

Intellectual property accepted by the TTO will be assigned by the inventor/creator to MSU. The TTO, with assistance from the inventor/creator and potentially Office of Research Compliance, will identify potential licensees for intellectual property developed at the University. This includes patented ideas, copyrighted works, and trade secrets. TTO is responsible for negotiating licensing agreements with potential licensees and is the office that is authorized to enter into agreements related to the use of intellectual property owned by the University. License revenue for technologies developed at MSU are equally divided between inventors and MSU.

#### **1430.00 Material Transfer Agreements (MTA's)**

The TTO is the office designated by Montana State University to review all academic and commercial MTA's for incoming material. "Material" or "materials" are defined as those materials that the provider is supplying that include portions, purebred progeny, and unmodified derivatives of the original material. Consistent with [MSU's Policy on Material Transfer Agreements \(MTA's\)](#), the TTO is authorized to sign MTA's on behalf of MSU if they are acceptable under MSU's policies and consistent with MSU's academic mission. Faculty will need to complete the "[Materials Transfer Agreement](#)" form that has been adopted for use by MSU in all transfers of research materials.

#### **1440.00      Industry Use of University Resources**

If a business requests access to or use of University research facilities such as research equipment, research animals, diagnostic and chemical analysis laboratories, the Plant Growth Center, or similar resource or facility, TTO will determine whether such use is appropriate and authorized under University policy and will enter into appropriate use agreement with the company or individual. The “[Research Facilities/Equipment Use Agreement](#)” form will need to be completed and approved before access to facilities or equipment is permitted.

## **APPENDIX A – INSTITUTIONAL USE OF F&A FUNDS (also known as “RED Allocation Plan to Colleges”)**

### **Principles Applicable to Plan:**

- Funds will be allocated to the Deans of each college in order to reimburse costs of research and scholarship and promote further research development across the University;
- Fund amounts will reflect research productivity of each college, align growth in research efforts and provide a framework to support specific college research needs;
- The intent of this plan is to reduce ad hoc funding arrangements;
- Funds allocated to the deans must be used to reimburse costs of research or to expand research productivity (examples include research equipment, lab renovations, service contracts and other research-related items);
- Funding for faculty startup costs or retentions, required match for grants and institutional support will continue to be negotiated with the Deans, Provost and VPRED;

### **Procedures for Each Fiscal Year:**

- Eligible fund/indexes will be identified and assigned an F&A distribution code to direct up to 25% of funds to each college F&A fund/index;
- Distributions will occur automatically as expenditures from OSP managed funds occur;
- OSP managed funds that are already receiving direct RED support (including match) will be ineligible for this plan unless specific exceptions are negotiated;
- This plan will be reviewed on an annual basis with the deans.

## APPENDIX B – MSU COST SHARING POLICY

“Cost sharing” or “matching” means the portion of project costs not paid by Federal awards (unless otherwise authorized by Federal statute). Effective October 1, 1999, MSU’s Cost Sharing Policy for Federally funded projects will consist of the following: cost sharing will only be added to proposals if it is required by the sponsor as stipulated in the Request for Proposals (RFP) as one of the eligibility criteria to apply for the award. The policy change has been reviewed and approved by the PEC and Faculty Council. Cost sharing can be difficult to generalize and if a PI suspects that cost sharing may be involved in a proposal, they should notify the OSP Research Administrator as well as disclose this requirement in the OSP Electronic Clearance Form (ePCF). Any and all written sponsor cost sharing requirements should be attached to the OSP Electronic Clearance Form (ePCF). A [Cost Share FAQ](#) exists on the OSP Website.

Types of Cost sharing or match include but are not limited to:

- **Unrecovered indirect costs (also known as “foregone” or “waived” IDC’s)** – The difference between MSU’s negotiated IDC rate and the rate allowed by the sponsoring agency. For example, the USDA IDC rate is capped at 30% of all project costs and MSU’s Federal research IDC rate is 44%, with the difference of 14% of unrecovered or foregone IDC’s (departments and PI’s do not have to track these);
- **Soft dollars** – Typically the salary/benefits of persons involved in the project, such as PI’s, Co-PI’s, Key Personnel, etc. For example, a lab technician may have 50% of their salary paid from a research project and 50% paid from state funds, but they provide 60% effort on the research project resulting in a 10% soft dollar cost share (tracked by the departmental Time and Effort reports);
- **In-Kind (also known as third party)** – Contributions of salary, travel, equipment, supplies and other budget areas that are from non-MSU sources (tracked with a completed and signed [In Kind form](#));

### Pertinent Federal Regulations

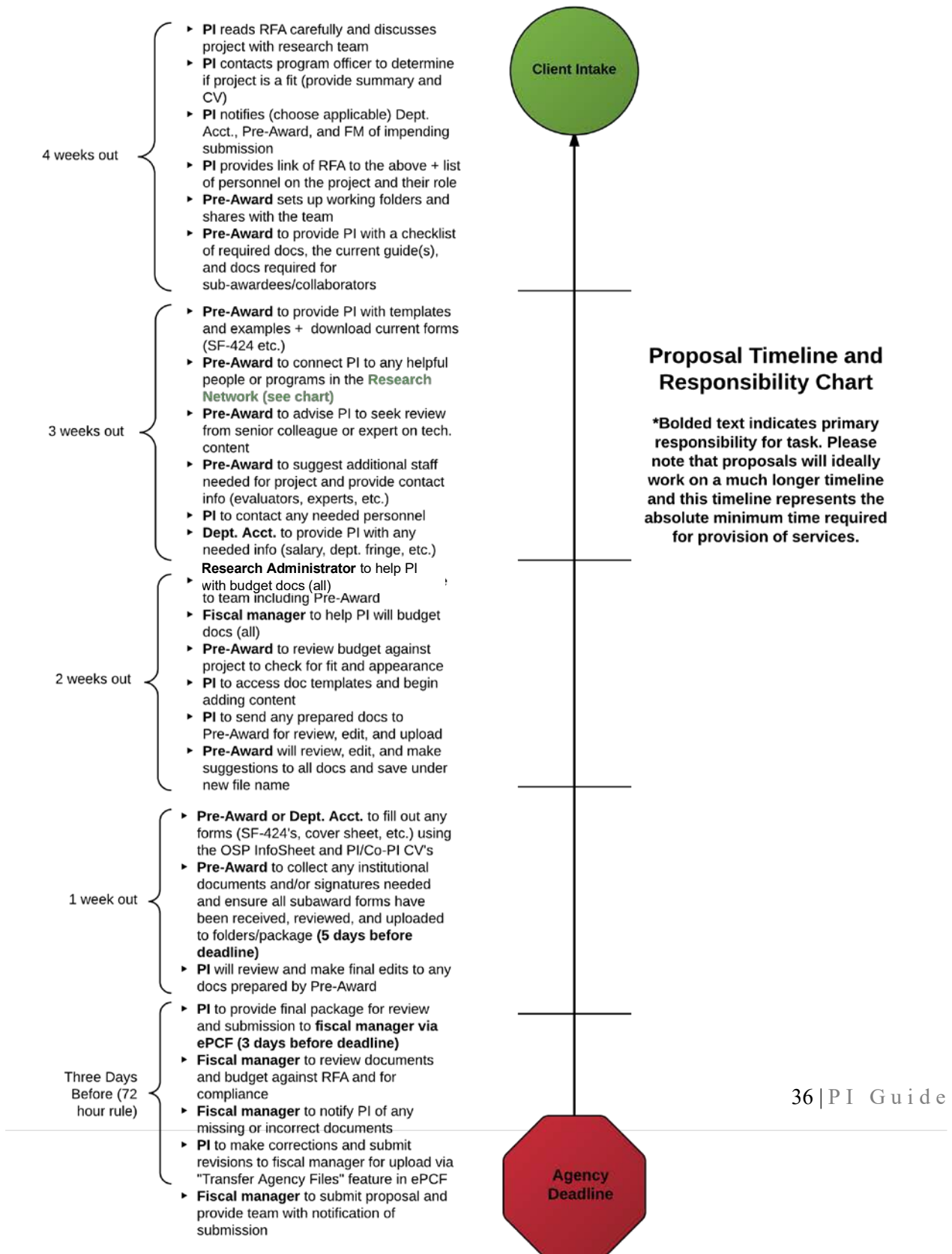
[Uniform Guidance, Section 200.29](#) and [Section 200.306](#) provide further detail on cost sharing on Federal awards. In summary, under Federal research proposals, voluntary cost sharing is not expected and cannot be used as a factor during the merit review of applications or proposals. For all Federal awards, any shared costs or matching funds and all contributions, including cash and third party in-kind contributions, must be accepted as part of the non-Federal entity’s cost sharing or matching when such contributions meet all of the following criteria:

- 1) Are verifiable from the non-Federal entity’s records;
- 2) Are not included as contributions for any other Federal award;
- 3) Are necessary and reasonable for accomplishment of project or program objectives;
- 4) Are allowable under Subpart E – Cost Principles of this part;
- 5) Are not paid by the Federal Government under another Federal award, except where the Federal statute authorizing a program specifically provides that Federal funds made

available for such program can be applied to matching or cost sharing requirements of other Federal programs;

- 6) Are provided for in the approved budget when required by the Federal awarding agency; and
- 7) Conform to other provisions of this part as applicable.

## APPENDIX C – PROPOSAL TIMELINE AND RESPONSIBILITY CHART



## **APPENDIX D – WHO CAN SERVE AS PI?**

### **ROLE OF PRINCIPAL INVESTIGATOR**

The PI assumes primary responsibility for satisfactory management of all externally funded research projects. Thus, the technical requirements of the project and the day-to-day administration, as well as financial management are the responsibility of the Principal Investigator, under the supervision of the department head, dean, and the Office of Sponsored Programs.

### **WHO MAY SERVE AS A PRINCIPAL INVESTIGATOR (PI)?**

In order to ensure that the project is conducted by those who have the requisite skills, training, and ability to uphold MSU's institutional commitments to funding agencies (subject to the Exceptions below), only employees with at least a 0.1 FTE appointment who hold the following positions may serve as PIs (or Co-PIs) on grants and contracts managed by the MSU Office of Sponsored Programs:

- Tenurable Professors (Full Professors, Associate Professors, or Assistant Professors)
- Research Professors, Associate Research Professors, or Assistant Research Professors
- Senior Research Scientists or Research Scientists
- Senior Research Engineers or Research Engineers
- Emeritus Faculty with a minimum .1 FTE

### **WHO MAY SERVE AS A CO-PRINCIPAL INVESTIGATOR (CO-PI)?**

Only individuals in the following categories may serve as Co-PIs on grants and contracts managed by the MSU Office of Sponsored Programs (Subject to the Exceptions below):

- Any individuals who are qualified to serve as a PI may also serve as a Co-PI.
- Post-doctoral scholars or post-doctoral research associates may serve as Co-PI, however for PI status, specific written approval must be granted by the department head and dean of the college where they are affiliated.
- Undergraduate students and graduate students: these may only serve as Co-PIs if the funding agency has specified that they may do so. In that case, specific written approval of the department head

Required written approvals must be completed approximately one month before the grant or contract submission deadline.

## EXCEPTIONS

Individuals other than those specifically stated above may serve as PI or Co-PI only if specific written approval is obtained by the sponsoring department head, dean, and the Associate Vice President for Research. Exceptions could apply to individuals such as Emeritus Faculty with no FTE, MSU employees who do not hold a faculty position, or Federal employees as outlined below. Such approval must be completed approximately one month before the grant or contract proposal submission deadline.

Federal employees holding faculty-affiliate positions may serve as PI's only with written approval from the Federal agency's authorized business official, and the relevant MSU department head and dean and the Associate Vice President for Research. If approval is obtained, a written agreement between the Federal agency and the University is required, which must define the relationship between and the management responsibilities of all parties. Federal employees may not be assigned signature authority on a sponsored project.



## **APPENDIX E – RESPONSIBLE CONDUCT OF RESEARCH (RCR) PLAN (also known as “Montana State University Plan to Comply with America COMPETES Act”)**

The 2007 America Competes Act directed NSF to require that all NSF-funded students and postdocs undergo training in the responsible conduct of research (RCR). Implementation of this requirement became effective January 4, 2010, when all institutions submitting proposals to the National Science Foundation (NSF) must certify that they have a training plan in place for undergraduate and graduate students and postdoctoral scholars who will be supported by NSF to conduct research and other scholarly activities. This certification must be in place at the time of proposal submission. Training plans do not always need to be submitted with the proposal, but are subject to review upon request. Institutions are responsible for verifying that undergraduates, graduate students, and postdoctoral scholars receive training. These guidelines as well as frequently asked questions are enumerated in detail in NSF’s, [“Responsible Conduct of Research \(RCR\)”](#) program page. This page also contains resources for PI’s who are interested in developing additional RCR materials for their personnel. A discussion of how PI’s provided RCR training to their students and postdocs will be required in the new “Public Outcomes Report” required by NSF, and will be submitted to Research.gov.

Montana State University will require Principal Investigators (PI’s) that receive NSF awards containing the RCR language to identify students and postdocs receiving payments under this award, to identify the appropriate amount of RCR training required for each student depending on their duties. It is suggested that at a minimum, each person involved in the project should take the [Collaborative Institutional Training Initiative \(CITI\)](#) that MSU provides through the Office of Research Compliance. The CITI program is modeled after the Belmont Report and introduces researchers to concepts related to research ethics. It is suggested that project personnel take this training shortly after receipt of award and prior to the end date of the award. Upon completion of the course, a confirmation is generated that must be retained by both the taker of the course and the PI. OSP receives confirmation of persons completing the CITI modules and those lists will be compared to a report of NSF funded personnel in order to identify personnel that may have overlooked this requirement.