Sponsored Projects Handbook

Find a Funding opportunity

Prepare your proposal

Close out award

Manage project

Receive Award

The Office of Sponsored Projects

Seattle University
Updated: October 2019
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This handbook is designed for all faculty and staff applying for and/or managing an externally funded award. While not exhaustive, this handbook describes best practices for submitting a proposal, managing a sponsored project, related policies, and points of contact to assist you along the lifecycle of your award.

For information about sponsored projects and complete policy documents, please visit the Office of Sponsored Projects website.

All cited policies and forms, notated in bold italics, throughout this handbook can be found on the Policies and Compliance webpage of the OSP website.
2 THE OFFICE OF SPONSORED PROJECTS

The Office of Sponsored Projects (OSP) assists faculty and staff in the pursuit and management of external funding. This handbook will guide you through the lifecycle of sponsored projects beginning with prospecting for funding opportunities and ending with award closeout.

The OSP is responsible for ensuring compliance with federal regulations and laws, sponsor-specific guidelines, project-specific requirements and the policies and procedures of Seattle University. We collaborate with on-campus partners such as the Office of Corporate and Foundation Relations (CFR) and the Grant Accountant in the Controller’s Office to provide the resources needed to apply for and manage a sponsored project.

### Proposal Services

- **1:1 meetings to discuss funding strategy**
- **Prospecting for funding opportunities**
- **Guidance on sponsor requirements and polices**
- **Develop proposal checklist and timeline**
- **Assist in proposal budget development**
- **Facilitate institutional reviews and approval**

### Post-Award Services

- Negotiation and acceptance of new awards
- Host new award kick-off meeting and grant management training
- Facilitate change requests & communicate with sponsor
- Provide compliance guidance
- Review sponsor-required reports prior to submission
- Close-out award

### Institutional Role

- Maintain up-to-date policies and procedures; mitigate institutional risk
- Identify, convene and support collaborative, interdisciplinary project teams
- Provide support and trainings to faculty, grant management staff, and budget managers
- Communicate and celebrate sponsored project achievements
- Host networking, informational, and celebratory events regarding sponsored projects

#### 2.1 OSP CONTACTS

Jenna Isakson | Director | isaksonj@seattleu.edu | 206-296-6161

Sarah Bricknell | Sponsored Research Officer | bricknellsar@seattleu.edu | 206-398-4407

Kara Luckey | Sponsored Research Officer | kluckey@seattleu.edu | 206-398-4408

Gabrielle Mitrak | Senior Administrative Assistant | mitrakg@seattleu.edu | 206-296-2597
2.1.1 Sponsored Projects Financial Contact in Controller’s Office

Jennifer Riester | Grant Accountant | riesterj@seattleu.edu | 206-220-8233

2.2 LEARNING OPPORTUNITIES

- **Post Award Meeting**
  When a new award is received, an Sponsored Research Officer (SRO) will meet with the Principal Investigator/Program Director (PI/PD), budget manager, Grant Accountant, and any other applicable award staff to review the award’s terms and conditions, reporting requirements, budget, and institutional grant processes.

- **Peer Learning Group**
  Each quarter, the OSP hosts discussion session for sponsored project administrative staff and Budget Managers to network for resource sharing, an opportunity to provide feedback to OSP, and a chance to learn from peers through real-life case studies on a variety of topics.

- **Quarterly Grant-seeking workshops**
  The OSP hosts a quarterly workshop for faculty and grant-seeking staff to hone their skills in finding and applying to funding opportunities.

- **Individual or Departmental Trainings**
  The OSP is available to create customized trainings for your team, department, or college/division. Please contact the OSP Director to develop and schedule a customized training.

2.3 COMMON TERMINOLOGY AND DEFINITIONS

- **OSP** – Office of Sponsored Projects
- **RFP** – Request for Proposal or funder solicitation
- **PTF** – Proposal Transmittal Form
- **FCOI** – Financial Conflict of Interest
- **PI/PD** – Principal Investigator/Project Director
- **SRO** – Sponsored Research Officer
- **AOR** – Authorized Organizational Representative (Provost)
- **CFR** – Office of Corporate and Foundation Relations
- **Cost share/match** – university committed financial resources
3 Roles and Responsibilities at the Proposal Stage

Applying for a sponsored project proposal is a collaboration between the Office of Sponsored Projects, the PI/PD(s), the PI’s department/college(s), and the Office of the Provost.

3.1 Role of OSP
- Communicate required tasks/documents and deadlines with PI/PD
- Assist in proposal budget development
- Provide institutional documentation when required
- Review proposal for completeness and compliance
- Obtain institutional signatures (CFR, Controller, Provost)
- Facilitate submission of external funding applications
- Facilitate compliance with sponsor and university guidelines/policies
- Facilitate stewardship and administration of funds received

3.2 Role of Principal Investigator/Project Director
- Identify compatible funding opportunity
- Notify OSP of intent to submit a proposal using the online Notification of Intent to Apply form
- Develop the scope of work/project narrative
- Develop project budget (your SRO will assist)
- Communicate project with Chair and Dean/Director
- Compile complete proposal per sponsor Guidelines
- Complete the Proposal Transmittal Form and obtain division signatures
- Complete Financial Conflict of Interest form on an annual basis and return to OSP
- Meet college/division and OSP deadlines

3.3 Role of the Department/College
- Approve academic year course releases
- Verify salary for budget
- Ensure summer commitments (including teaching, service, etc.) do not exceed university allowability
- Approve of cost share and provide source of cost share funds
- Sign the proposal transmittal form prior to OSP deadline

4 Find Funding

The Lemieux Library and McGoldrick Learning Commons hosts a funding guide for finding available opportunities. This guide provides resources for members of the Seattle University
community seeking funding (including grants, fellowships, scholarships, and other awards) to support their research, education, creative endeavors, and other academic-related projects.

http://libguides.seattlem.edu/funding

4.1 OSP Consultations
OSP staff are here to support you in this process in a number of ways, including to: Discuss approaches to framing your project’s aims and activities in order to meet sponsor objectives; Develop the project’s budget; Provide feedback on narrative components (time permitting); and Ensure compliance with sponsor requirements and guidelines. Please contact osp@seattlem.edu to request a consultation with a Sponsored Research Officer.

4.2 The Office of Corporate & Foundation Relations
The Office of Corporate and Foundation Relations (CFR) provides assistance and guidance in identifying and developing relationships with private foundations and grantors. If you have a particular project in mind and are not sure where to start, contact CFR to discuss your interests. CFR is familiar with foundations’ funding interests and can assist in finding a match.

Director: Laura Vasilopoulos | vasilopl@seattlem.edu | 206-296-6118

4.3 Internal Opportunities
Additionally, SU offers internal funding opportunities such as:

- Office of the Provost via OSP - Summer Faculty Fellowships
- Center for Jesuit Education - Endowed Mission Fund
- Office of Global Engagement - Global Grants Program
- Institute for Catholic Thought and Culture – Faculty Research Fellowship

Please visit each office’s website for the most up-to-date information about fellowships and funding.

5 Notification of Intent to Apply
All letters of intent, pre-proposals, subaward commitments and full proposals to external sponsors are required to be submitted through the Office of Sponsored Projects. As soon as you have identified a funding opportunity you would like to apply for, notify OSP using the online Notification of Intent to Apply form. This will generate an email sent to OSP and a Sponsored Research Officer (SRO) will be assigned to your proposal.

The sooner you can notify OSP, the better!

Within 1-2 business days, after reviewing the request for proposal (RFP)/solicitation, your assigned SRO will follow up with you regarding the proposal requirements and internal
deadlines. For larger proposals and as time permits, the SRO will schedule a meeting with you to discuss your project and budgetary needs and to review SU and sponsor requirements.

6 BUDGET DEVELOPMENT

In developing a budget, please use the OSP-provided spreadsheet and budget justification template, unless otherwise specified by the funder. The most recent versions can be found on the OSP website or by contacting OSP.

The proposal budget plays an important role in your proposal package as it tells how you plan to accomplish the work described in your narrative. The budget must be feasible for the scope of work (not too high nor too low). The budget developed at this stage will carry on through the life of the project so it is imperative that all costs be evaluated beforehand. If the proposal solicitation advertises a maximum amount that can be proposed, then your scope of work must be reasonable within that amount.

Some initial questions to ask yourself and your project team include:

- What will it take to accomplish your scope of work?
- Who will be involved?
- What supplies/materials/equipment will you need?
- How and where will the project be completed?

6.1.1 Allowability, Allocability, Reasonableness

All components of a sponsored project budget must be allowable, allocable, and reasonable as defined in the OMB Uniform Guidance (2 CFR 200.403-405).

- **Allowability** - Is the charge allowable? Consider:
  - Specifications of the program solicitation and funder’s financial policies
  - If federally funded, must adhere to CFR 200 federal cost principles
  - All awards must adhere to Seattle University policies
    - Is it included as an indirect or direct cost? (it cannot be both and must be treated consistently)

- **Allocability** - Is the item/cost allocable to this particular project only?
  - It should solely advance the work in this proposal
  - If it benefits two or more projects, it should be reasonable and proportionately paid for and documented.

- **Reasonable** - Would it withstand external review by a prudent individual?
  - A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.
It reflects market prices for comparable goods or services in the geographic area.

Please review the Unallowable Cost Categories Policy for specific items not allowed on grants.

6.1.2 Primary Budget Components

- **Personnel** – SU faculty and staff salary
- **Fringe** – if SU faculty or staff are paid from the award, the budget will always need to include fringe benefits at the current rate
- **Student Wages** – in accordance with Student Financial Service’s current student wage rates
- **Goods/Services** – supplies and materials, vendor services
- **Travel** – typically field research trips, visits with collaborators, or professional meeting to disseminate your project findings
- **Equipment** – specifically allocated for this project
- **Consulting** – external professional services that cannot be accomplished by SU personnel
- **Subcontracts/subawards** – when collaborations with other institutions/agencies are included
- **Participant support** – expenses specifically for trainees/program attendees if hosting a conference or workshop (if allowable)
- **Facilities & Administration (or Indirects)** – the unallocable costs of the institution to do business and accommodate the project (always included on federal awards at the negotiated rate; always sought on private awards at the sponsor’s allowable rate or SU’s default 15%)

6.1.3 Basics of the Primary Budget Components

**Personnel**
All salary on a sponsored project must adhere to the Grant Compensation Policy
Faculty salary: (rates vary by college/school)
- Academic year = salary subvention (1 course release = 14.29%); requires chair and dean approval
- Summer = effort in months; max amount is 2.7 months for all summer commitments
  - Each summer month cannot exceed 1/9 of institutional base salary (IBS) – combining teaching, service & research
Staff/Administrative salary:
- Only when allowable by funder & justified
- Always salary subvention; percentage of overall effort/salary (i.e. 20% of 1 FTE)

**Fringe benefits** must always be included on the budget when SU faculty or staff are receiving salary (the one exception is Jesuit salaries are exempt).
- The current rate is 28.4% of salaries and wages.

**Student Compensation**
Per Student Financial Services policy, all students are paid an hourly wage
• Stipends are only allowable when sponsor designates that funding for training (such as an NSF REU)
• Must adhere to SFS guidelines and current pay rates.
• Graduate Assistantships are only available to qualifying positions for students in the following graduate programs – See SFS guidelines for current eligible programs

**Travel**
Travel may be appropriate for field work, collaborative/professional meetings, or annual agency meetings.
• SU travel rates apply
• Airfare – economy class
  • Note that federally funded travel must be on a US flag carrier airline
• No alcohol on grants!

**Equipment**
Grant-funded equipment must be specifically allocable to the proposed project. A reasonable cost estimate may be included in the proposal; if available, include a vendor-provided quote.

• SU Procurement policies apply (if awarded)
• Federal definition of equipment: $5,000 or greater or 1 year life or longer

**Participant Support**
The cost of attendee(s) support for duration of the conference, workshop, or program. It may include: Travel Costs: Meals & Lodging; Tuition/Registration/Conference Fees; Attendee Stipend; or Workshop materials. The Program Announcement (PA) will clearly define what participant support is and what is allowed. Participant support is excluded from Facilities and Administrative (F&A) costs.

**Subrecipient vs. Contractor**
Please use the subrecipient vs. contractor checklist to determine if the third party involved in your project is a Subrecipient or Contractor as defined by federal guidelines (CFR 200.23).
• Characteristics of a
  • Subrecipient:
    ▪ Performance is measured in relation to whether objectives of project were met
    ▪ Has responsibility for programmatic decision-making
  • Contractor:
    ▪ Provides the goods or services within normal business operations
    ▪ Provides similar goods or services to many different purchasers
    ▪ Normally operates in a competitive environment
    ▪ Provides goods or services that are ancillary to the sponsored program
Independent Contractor/Consultants
When specific needs of the project’s scope cannot be addressed by the personnel within Seattle University, it may be appropriate to hire a consultant.

- If allowed in the program announcement, the consultant and the consultant’s budget will need to be explained in the budget justification.
  - Why this particular consultant?
- Typically budgeted by an hourly rate or standard rate for their services
- Upon award and before working with the consultant, contact OSP to set-up a consultant agreement.
- At proposal stage, SU needs the consultant’s:
  - CV
  - Scope of Work
  - Detailed budget
  - Letter of commitment

Subawards
Subawards are the contracts issued to your collaborators or Co-PIs at another institution. SU would be the “prime” institution facilitating the proposal submission and award negotiation, while your collaborator is the “subaward.” The subaward budget will then be incorporated into the prime budget as one line item total. However, some agencies require itemization of a subaward budget; reference the RFP for guidance.

- At proposal stage, SU needs the Subrecipient’s:
  - Commitment Form (contact OSP for this form)
  - Scope of Work (SOW)
  - Budget & budget justification (approved by their institution)
  - Letter of Commitment (signed by their AOR)

Cost Share (or Match) Requirement
Cost share, also called a match, are Seattle University funds committed to the project. All cost share included on a proposal must be provided and approved by the PI/PD’s department/college. Begin this discussion early in your proposal process to ensure this is possible!

- Cost share is can be considered either voluntary or mandatory but in either case, when it is included on a proposal it becomes committed cost share.
  - Voluntary cost share is when a PI/PD chooses to include cash or in-kind university resources on a proposal, when it is not required by the sponsor.
  - Mandatory cost share is when the sponsor requires the institution to commit monetary resources to assist in funding the proposed project.
  - Committed cost share is any university funds, either voluntary or mandatory, budgeted in the proposal. Once proposed to the sponsor, SU is held accountable for spending those funds in accordance with the proposal and must be treated consistently to the sponsored project funds.

- Cash vs. In-kind
  - Cash = supplies/equipment purchased for project, wages for project; funds spent during the project period only
In-kind = % effort of faculty/staff, unrecovered indirects, existing facilities or equipment (as allowed by the sponsor)

- For full guidance, please review the Costshare and Matching Policy

Indirect Costs
Indirect costs, also called Facilities & Administration (F&A), indirects, IDC, or overhead costs, are real costs to the university inherent in doing business. These include, but are not limited to, general office supplies, general copying, administrative services (payroll, Student Financial Services, OSP, the Grant Accountant, etc.), the buildings, office furniture, technology, and utilities.

Review the full Policy on Fringe Benefit and IDC charged to Sponsored Projects on our Policy & Compliance page.

Federal indirect rates:
On campus rate: 42% of Modified Total Direct Costs (MTDC)
- MTDC includes salaries and wages, fringe benefits, materials and supplies, services, travel, and up to the first $25,000 of each subaward
- 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.

Off campus rate: 17% of MTDC
- This rate is only used if 50% or more of the research takes place OFF campus (field research, another lab, etc.) and must be approved by the Controller.

Private sponsor indirect rate:
It is our standard to charge 15% of total direct costs; unless otherwise specified by the sponsor. Please contact the Director of OSP to discuss indirect rate negotiations.

7 Proposal Submission Process

OSP must receive the complete proposal package at least five (5) business days prior to the sponsor’s deadline. Your department or college may have additional deadlines ahead of OSP’s. Please be sure to contact your chair and dean/director as early as possible in your proposal development process to ensure you can meet their internal deadlines for reviewing and signing off on the PTF.

After the PTF has been signed by all PI/PDs, chairs, and dean/director(s), it is the PI/PD or their designee’s responsibility to submit the PTF and complete proposal package (see section 7.4) to OSP.

7.1 OSP Review
OSP requires five (5) business days prior to the sponsor’s deadline to conduct the following reviews and obtain the required institutional signatures before proposal submission:
OSP is responsible for ensuring compliance with the funder, government and the university requirements to maintain ethical research practices and to reduce institutional risk. OSP will carefully review the PTF and proposal for compliance areas requiring follow up such as human subjects research (referral to IRB), biosafety, and export controls.

OSP will also provide an administrative review to ensure the proposal meets the sponsor’s guidelines and requirements for content and formatting. This review is performed to ensure that your proposal meets the highest standards possible before submission.

For all proposals, letters of intent, pre-proposals, and subaward commitments, OSP will facilitate the Provost’s review and signature as the award will ultimately be an agreement between the institution and the sponsor.

### 7.2 Submission
Most proposals will be submitted by the assigned SRO within OSP.

#### 7.2.1 Federal Submissions
Most federal awarding agencies require proposal submissions to be made through their online portal. By signing off on the PTF, SU’s AOR, has granted permission for the SROs to submit the proposal to the federal government on their behalf. The SROs have authorization within the federal sponsor’s portal (such as grants.gov or Fastlane) to submit the proposal on behalf of the Provost.

If your proposal is to a federal sponsor, you must share access to the proposal with your SRO. Sharing a proposal enables a thorough review and submission. Your proposal cannot be submitted without this access.

#### 7.2.2 Private Submissions
Due to CFR’s close partnership and stewarding of relationships with corporations and foundations, a designee in CFR will often facilitate the submission of a private proposal. Occasionally, a PI may be directly submit the proposal to the private sponsor. The person responsible for submitting a private proposal will be determined on a case-by-case basis during the proposal development process.

Regardless of who submits a private proposal, it cannot be submitted until the SRO has received the Provost’s signature on the PTF.

### 8 Post-Award Management
The following sections provide guidance on the management of a sponsored project once it has been awarded.

The Principal Investigator or Project Director (PI/PD) is ultimately responsible for oversight of all “post-award” activities. Post award activities include carrying out the project as
proposed, the spending and tracking of funds in accordance with SU’s policies and sponsor requirements, and meeting all reporting requirements. The PI will work closely with their Budget Manager, OSP and Controllers Office staff.

Should you have any questions regarding your award, please contact the Office of Sponsored Projects for a consultation.

8.1 TERMS & CONDITIONS OF AWARD

Once an award is received, the PI and project staff need to carefully review the complete award agreement or contract, including award attachments and adhere to all terms and conditions. OSP will assist in communicating with SU legal and the sponsor should any provisions need negotiation. The PI/PD is responsible for carrying out the project in compliance with all sponsor terms and conditions, federal, state and local laws, and Seattle University policy.

8.2 SIGNATURE AUTHORITY

All sponsored project agreements and contracts must be reviewed by OSP and signed by SU’s authorized organizational representative (AOR) per the Document Review Process Policy. At SU, the AOR is the Provost, or their delegate. No agreement, amendment, subcontract, consulting contract, report, or any other document requiring institutional authorization under a sponsored project is considered executed unless the AOR has reviewed and signed. OSP will facilitate the AOR approval process for all sponsored project-related agreements.

8.3 PERSONNEL

Sponsored projects may employ SU faculty, staff, students, temporary employees, consultants/independent contractors, or grad students. Personnel appointments will be listed in the proposal budget and approved by the sponsor at the time of the award. Should circumstances in personnel change, please work with your SRO to request a prior approval from the sponsor.

To apply SU personnel payroll to a sponsored project, please refer to the Grant Compensation Policy to ensure the appointment complies with SU policy.

8.4 EFFORT REPORTING

Under federal regulation and University policy, Principal Investigators and all project personnel receiving compensation from a federal award are required to certify effort on
each federally-funded project. OSP will distribute effort reports on a bi-annual (fall and spring) basis to each project personnel.

### 8.5 Independent Contractor Agreements

If the appointment of an independent contractor or consultant is necessary within your sponsored project, please provide your SRO with the scope of work, duration of their commitment, and budget to issue an agreement. The agreement must be executed prior to the contractor beginning work.

### 8.6 Subawards

When a subaward is included in a proposal and approved by the sponsor, the Office of Sponsored Projects will issue the subaward with the subrecipient institution. The OSP and Grant Accountant will conduct a risk assessment and set-up a subrecipient monitoring plan, per the *Subrecipient Monitoring Guidelines*, for each subaward based on the information provided in the Sub Commitment Form.

The PI/PD is responsible for reviewing and approving subawardee invoices to ensure that the assigned deliverables were satisfactorily met before the invoices are submitted through ProcureSU.

### 8.7 Prior Approvals

Seattle University’s policy is that all costs proposed or incurred on a sponsored project complies with the approved scope of work and budget, general sponsor terms and conditions and University policies and procedures. The Principal Investigator of a sponsored project is required to report major deviations as outlined below from budget and program plans using the *Institutional Prior Approval Form* (IPAF). Changes requiring approval may include changes in scope of work, budget revisions, changes to personnel, or to request a no-cost extension regardless of funder.

- OSP will review the IPAF request in accordance with your Sponsored Project Agreement and the sponsor’s general guidelines to determine if sponsor approval is required.
- OSP will contact the sponsor for approval if required.
- If the approval is approved internally and/or by the sponsor, the assigned SRO will update the budget input form to reflect the changes within the university accounting system.

### 8.8 Reporting Requirements & Procedure
The PI is responsible for submitting accurate and timely reports to the sponsor. OSP offers notification and review support while the Grant Accountant will provide the financial report.

**Programmatic Reporting.** The PI is responsible for completing any reports required by the sponsor. After the post-award meeting, OSP will send report reminders to your Outlook calendar. These notifications will remind you of upcoming reports 6 weeks before the sponsor due date. If you need additional time to plan for the report, please plan accordingly. OSP requests to receive a copy of the report for filing.

**Financial Reporting.** All official financial records must be reviewed and approved by the Grant Accountant in the Controller’s office and OSP prior to submission. Although you may be internally tracking the budget, the financial reports submitted need to be the university’s official records which can only be provided by the Controller’s Office.

If the report requires an institutional signature, OSP will facilitate this through the Provost’s Office. Please review our *Technical and Financial Reporting Policy* for more information.

### 8.9 ScholarWorks

Sponsored Project details, including but not limited to, sponsor information, terms, grant dollars awarded and project abstracts will be uploaded to the Seattle University ScholarWorks Digital Repository. This information is online and available to the Seattle University community as well as the general public.

The OSP encourages all faculty to create their own profile within ScholarWorks to store and share their scholarly work.

### 8.10 Grant Close-out

The grant close-out process is initiated when the funding agency determines that all required work associated with the award is completed. If an awardee does not seek/receive supplemental funding or a no-cost extension by the completion date, the grant will be closed-out.

At the grant’s end date, the SRO will initiate the close-out process by sending the closeout checklist to the PI and Budget Manager. Closing the grant includes:

1. Ensuring all personnel appointments are removed
2. Purchases have cleared the budget
3. Cost share requirements are met
4. Unallowable costs are removed
5. Subcontract invoices are received
6. Effort reports (if required) are certified
7. All sponsor funding is received
8. All reports have been submitted
This process should take place within 90 days of the grant’s end date.

9 BUDGET MANAGEMENT

The PI/PD is ultimately responsible for their sponsored project budget, including cost share, if applicable. Depending upon your division, you may have the assistance of a budget manager to assist with tracking and reconciling your budget.

At the end of each month’s close (as notified by the Controller’s Office), the PI/PD or Budget Manager must reconcile their report in InformSU with their financial records and resolve any discrepancies.

9.1 ACTIVITY STRINGS AND PROJECT CODES

When a new sponsored project award is received, the assigned SRO will request a new activity string and project code from the Grant Accountant. The activity string is the unique accounting code assigned to your project to correctly charge the award and deposit award income. The project code is assigned for the use of the Projects Accounting reporting tool discussed later in this section. These codes need to be included on all financial transactions related to this project.

9.2 COST SHARE

Cost sharing is any project cost that is not reimbursed by the sponsor to support the scope of work defined by the sponsored award. Cost sharing, also known as “matching funds,” is funded by Seattle University or a third-party, which is generally a non-federal resource.

Cost-share requirements are determined in the proposal stage and the source of funding must be named on the Proposal Transmittal Form (PTF) by the proposer’s department or college/division with approval from their chair and dean/director, and will be verified by the controller’s office prior to submission.

If included in a proposal and subsequent award, cost-share will be held to the same standards as the sponsor funded award in regards to personnel, purchasing, prior approvals, tracking, reporting, and spending down.

9.3 PURCHASING

The PI, with oversight by the Budget Manager, is responsible for spending the funds as proposed by the sponsor in adherence to the sponsor and university policies. All purchases within ProcureSU are reviewed for allowability, allocability and reasonableness by the Grant
Accountant prior to approval. Please document the purpose of each purchase within the comments section of ProcureSU.

- **Allowability** - the goods or services to be paid by sponsored project funds are allowed by the funder, are included in the budget, and adhere to SU procurement policies.
  - For federally funded awards or subawards, please review 2 CFR part 200, subpart E - Cost Principles (specifically part 200.403) or SU’s Policy for Unallowable Cost Categories

- **Allocability** - the goods or services to be paid for by the grant funds are pertinent to the activities conducted under this award (see 2 CFR 200.405)
  - It should solely advance the work in this proposal
  - If it benefits two or more projects, it should be reasonable and proportionately paid for and documented.

- **Reasonableness** - A cost is reasonable if, in its nature and amount, does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. (see 2 CFR 200.404)

As always, Seattle University policy must be adhered to for all purchases. If cost share is part of your award, expenses must be held to the same standards as expenses paid by the grant.

### 9.4 Procurement Thresholds
To ensure that the university continues to obtain goods and services at the best value, the following methods of competitive bidding are required for all new contracts or non-contracted purchases. If assistance is needed, it is recommended to engage the Procurement Department early in the bidding process.

<table>
<thead>
<tr>
<th>Dollar Amount</th>
<th>Bidding Requirements</th>
<th>Bidding Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>$0 - $3,000</td>
<td>Verbal Quote Required</td>
<td>If pricing is considered reasonable, there is no requirement to solicit a competitive quote/proposal.</td>
</tr>
<tr>
<td>$3,001 - $50,000</td>
<td>2 Written Quotes Required</td>
<td>Obtain a quote/proposal from at least 2 qualified sources for supplies or services. Include documentation from both sources with the requisition.</td>
</tr>
<tr>
<td>$50,001 - $150,000</td>
<td>3 Written Quotes Required</td>
<td>Obtain a quote/proposal from at least 3 qualified sources for supplies or services. Include documentation from both sources with the requisition.</td>
</tr>
<tr>
<td>Over $150,000</td>
<td>RFP/RFQ Competitive Proposals</td>
<td>The University will evaluate the proposals received and award the contract to the responsible firm whose proposal is most advantageous to the program, with service levels, price and other factors considered.</td>
</tr>
</tbody>
</table>

Note: Sponsored Project procurement thresholds are different from general SU procurement thresholds.

**Sole Source**

If only one source is qualified to provide the goods and services, it is an emergency purchase or required by a federal awarding agency, the purchase may be made without competition. The Sole Source Justification form must be completed.

9.5 Indirect Costs

Seattle University’s policy is to charge the federally negotiated indirect rate to all publicly-funded sponsored projects. Privately-funded grant indirect costs are charged at the accepted rate of the sponsor, as negotiated by the Director of the Office of Sponsored Projects at the time of the proposal submission.

9.6 Rate of Spending

The PI, with support from their Budget Manager, is responsible for spending their sponsored project funds and associated cost share (if applicable) in accordance with their project timeline. Good communication and timely review of financial information by both the PI and Budget Manager will help avoid late spending, address potential audit questions, and facilitate close-out of the award. All spending should conclude well ahead of the project's end date to ensure all purchases are used by the end of the project period.

See sections 4.8 Budget Tracking, 4.9 Budget Reconciliation, and 4.11 Financial Reporting Tools for best practices on how to be fiscally responsible and avoid spending spikes at the end of a project.

9.7 Budget Tracking

PIs should keep a record of all expenses made on their sponsored project on a spreadsheet and by maintain receipts. Each purchase should be monitored and reconciled with SU’s General Ledger on a monthly basis by the grant's Budget Manager (PI or otherwise). OSP can provide a budget tracking template for each new award.

When all expenses and encumbrances are recorded, it will reflect the most up-to-date record of your grant budget and is a useful tool to track the remaining balance of each cost category and the total award. This will help determine if a re-budget or no cost extension is necessary.

9.8 Budget Reconciliation

The purpose of reconciling your budget is to ensure your actual expenses match with the official institutional records. By tracking expenses regularly, you can identify mistaken charges, anticipate charges that are missing from the university’s official record, or capture charges missed from your records.
At the end of each month's financial close (approximately 2-3 weeks after the end of each month), the Controller's Office will send an email to all Budget Managers announcing the close of the month. At this time, the Budget Manager should reconcile their records with the controller's monthly financial report provided in InformSU.

After the end of each fiscal quarter, the Grant Accountant will send a summary report of your financials comparing actuals to date with total budget, rate of spending, and project timeline complete (% of total award period already complete).

This report must be reviewed and signed by the PI and Budget Manager, certifying that “the enclosed report has been reviewed. To the best of my knowledge, salary and wages charged to this project are appropriate in relation to work performed on this project. All other costs charged to this project are, to the best of my knowledge, allowable, allocable, and reasonable. Where required, the below noted corrections have been, or will be, submitted to the Grant Accountant,” and returned to the Grant Accountant by the deadline provided.

These reports serve as documented proof for auditors that the PI is regularly monitoring the grant’s financial activity and compliance.

9.9 **Cost Transfers**

If an error or unallowable cost has been discovered, the PI and Budget Manager must complete a standard *Journal Entry* form and an additional grant-specific *Cost Transfer Justification Form* to correct the error or remove the unallowable cost. Both forms are submitted to the Grant Accountant for review and processing.

Journal entries should only be used to correct errors and not as a mechanism to regularly shift expenses from a different account on to a sponsored project account. This is a highly discouraged situation as it can raise red flags during an audit.

9.10 **Financial Reporting Tools**

9.10.1 **InformSU**

InformSU is the home to institutional reports and data sources, including the official financial records of Seattle University. Sponsored Project PIs and administrative staff are granted access to their sponsored projects financial reports after the post-award meeting. You can access InformSU through the MySU website. Additionally, you can find training opportunities, videos, and resources through EngageSU, also accessed through the MySU website.

9.10.2 **Self-Serve Projects Accounting**
Projects Accounting is a tool specifically for sponsored projects. While the data reflects the same financial data available within the InformSU GL reports, projects accounting is displays your financial reports on your project’s unique timeline rather than on the university’s fiscal calendar.

Projects Accounting can be accessed at my.seattleu.edu

10 POLICY & COMPLIANCE

The OSP is responsible for maintaining compliance and reducing institutional risk in collaboration with other offices on campus. The following compliance areas require additional attention if applicable to your project.

10.1 COMPLIANCE ASPECTS

Responsible Conduct of Research
All personnel working on an NSF or NIH-funded award are required to complete responsible conduct of research training. The PI is responsible for ensuring all personnel have completed this training prior to beginning work on the project. All other researchers are highly encouraged to complete the training. SU subscribes to the CITI Program (http://www.citiprogram.org) to fulfill this requirement.

More information can be found here: https://www.seattleu.edu/sponsored-projects/policies/responsible-conduct-of-research-training/

Biosafety
Biological and biomedical research offers tremendous opportunities for improving our understanding of biological mechanisms and processes and for targeting new and more effective therapies for devastating conditions. At the same time, however, this research involving recombinant DNA, infectious agents, and other potentially hazardous biologics carries inherent safety risks. Working at an appropriate biosafety containment level and with the appropriate safety precautions is essential for mitigating those risks.

Contact: Sheila Lockwood, lockwoos@seattleu.edu, (206) 220-8273

Institutional Review Board
The Seattle University Institutional Review Board (IRB) supports research endeavors of SU affiliates while ensuring the highest ethical protections for human research participants. In addition to research protocol review, the IRB offers consultations (for students as well as seasoned researchers) to help with your project development and protocol submission at any stage. The IRB reviews and oversees research protocols that are conducted by current SU students, faculty, and staff. If you are a part-time SU employee during the academic year, consult with the Provost’s Office regarding eligibility for IRB review of your research protocol.

Contact: irb@seattleu.edu, (206) 296-2585
Export Controls
Please contact OSP if your project involves foreign travel, exporting data or materials outside of the US or to foreign nationals.

10.2 Sponsored Project Policies
The current Sponsored Project Policies can be found on the OSP website, including:

Closeout Policy
Cost Sharing & Matching Policy
Effort Certification Policy
Federal Rate Agreement
Policy on Fringe Benefit and IDC Charged to Sponsored Projects
Gift-Grant Checklist
Grant Compensation Policy
Intellectual Property (see section II.B. of the Faculty Handbook)
Invention Disclosure Form
Participant Support
Patent Policy
Procurement Policy
Procurement policy for grant-funded equipment and services
Program Income
Document Review Process Policy
Sponsor Funded Equipment Disposal Policy and Procedures Manual
Subrecipient or Contractor Checklist
Subrecipient Monitoring Guidelines
Technical & Financial Reporting Policy
Unallowable Cost Categories
Volunteer Research Agreement
Whistleblower Protections & EthicsPoint reporting resources

Please do not hesitate to contact osp@seattleu.edu should you have any questions or concerns throughout the sponsored project lifecycle.

We look forward to working with you!