



MISSISSIPPI STATE
UNIVERSITYTM

Faculty and Staff Guide
to
Research Administration

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662/325-7404 or preferably, by e-mail at mmcgee@spa.msstate.edu*

PREFACE

This guide replaces and supersedes any previous “Faculty and Staff Guide to Sponsored Programs.” In addition to significant changes in the University's administrative structure to answer the expanding scope of programs at Mississippi State University, there have been changes in program-related administrative procedures used to manage externally sponsored projects. The Offices of Regulatory Compliance (<http://www.orc.msstate.edu>) and Technology Commercialization (<http://www.otc.msstate.edu>) are separate offices reporting to the Vice President for Research and Economic Development. Please consult these web sites for information on these offices.

This guide provides information about the services offered through the Office of Sponsored Programs Administration and its personnel and their duties. It also serves as an administrative guide to the complexities of generating a successful proposal and managing an effective research program.

This guide was prepared by the dedicated staff of the Office of Sponsored Programs Administration. The Office of Research & Economic Development is the University's administrative office for the coordination of basic and applied research in the Research Division while the Office of Agriculture, Forestry and Veterinary Medicine coordinates research and sponsored scholarly activity through its cognitive Vice President. The Office of Sponsored Programs Administration provides timely and personal assistance for faculty, staff and administrators through several avenues. It serves as a center for the identification and distribution of information concerning research and other scholarly programs, external funding sources, grant support, and related matters. Operating Policy 70.01; “The policy of Mississippi State University is that all proposals and awards for project funding from external sponsors shall be processed through the Sponsored Programs Administration unit of the Office of Research. This includes proposals and awards for research, service, and instructional activities. Proposals and awards from the Division of Agriculture, Forestry, and Veterinary Medicine (DAFVM) are the responsibility of the Vice President for DAFVM and shall follow procedures given below for the DAFVM. All other university units shall follow procedures given below for the Division of Research.” It also serves as an administrative liaison to external sponsors.

The Office of Sponsored Programs Administration is responsible for the administration of sponsored program proposals, contractual negotiations of fiscal and administrative matters, non-fiscal post-award matters, as well as related areas of responsibility. The Office of Research is the responsible organization for all sponsored program matters.

Our mission is centered on a philosophy that our client's needs require a dedication to the pursuit of extraordinary administrative competence, exuberance and ambition. The Office of Sponsored Programs Administration will make every effort to team with the Principal Investigator, department and college to protect the interests of all parties involved in externally sponsored endeavors and regulated research areas. As an operational arm of the leadership of Mississippi State University, Sponsored Program's staff is committed to protecting academic freedom, institutional resources and fostering a team approach to the administrative management of sponsored programs, and the protection of researchers, the institution and the community in which we operate.

The Sponsored Programs Administration website is a comprehensive resource of information. You should familiarize yourself and visit the site frequently:

www.spa.msstate.edu

INTRODUCTION

External support for projects by sponsoring agencies - federal, state, foundation, or other - is, almost without exception, made to the institution, not the researcher.

The process of obtaining external funding for support of University programmatic efforts is basically a legal agreement between the sponsoring agency and the University. While the principal investigator develops and expresses the concept and details of the proposed project in a proposal, it is the University that submits this proposal to the sponsor, and the University that commits to the successful completion of the project. This is because only rarely do sponsoring agencies make awards directly to individuals and the infrastructure and support necessary to complete the project are the responsibility of the institution.

The authority of commitment of University facilities and support, and employee time, is a function of the Board of Trustees for Institutions of Higher Learning. The Board has delegated this authority to the Presidents of the institutions, and at Mississippi State University; the President has delegated the authority, and responsibility, to the Vice President for Research & Economic Development and the Vice President for Agriculture, Forestry and Veterinary Medicine.

The Office of Sponsored Programs Administration, while reporting to the Office of Research & Economic Development, provides service to the entire faculty, staff and professionals involved in sponsored project activities regardless of their divisional affiliations.

AN OVERVIEW OF SPONSORED PROGRAMS ADMINISTRATION

Definition of Sponsored Programs

For the purposes of this Guide, "sponsored programs" and "sponsored projects" are synonymous.

DEFINITION: A sponsored program is any project supported by external funds received by the University as a result of some communication such as a letter, application, or other written proposal approved and submitted by an authorized University official. The Office of Sponsored Programs is responsible for coordinating such activity. A sponsored program normally will have one or more of the following additional characteristics required or specified by the funding source:

- published application guidelines or procedures
- restrictions on the use of funds
- specified staff performances and/or project outcomes (objectives or products)
- limitations on the use of project data, inventions, and other products
- programmatic, technical and/or financial reports

Excluded from this Definition of Sponsored Programs are:

- all direct payments to individuals such as faculty fellowships
- gifts and bequests to the University
- student financial aid
- general solicitations that result in funds collected by the University's Development Foundation

Faculty and Administrative Responsibilities

Each proposal requesting external funding becomes a legal document binding the University to fulfill the conditions specified in the proposal. Thus, it is the author's responsibility to ensure that the proposal, in addition to the programmatic aspects of the project, complies with the University's policies, missions, and obligations.

When a proposal is submitted, it is submitted by the University, not an individual. When an award is received, it is received by the University.

The pre-award responsibilities of each person or office preparing and submitting a proposal requesting external funding are defined below.

These responsibilities will be discussed in greater detail in subsequent sections of this Guide.

Project Director/ Principal Investigator Definition: May be any person who is personally and professionally qualified to conduct the project determined by the submitting college, center, school or unit, and for whom the submitting component will assume full responsibility consistent with other obligations it assumes when transmitting the proposal. This person must be an employee or maintain a privileged status (e.g. emeritus appointment) with Mississippi State University during the project period.

Pre-Award Responsibilities

Person/Office	Responsibility
Project Director/ Principal Investigator	

- Identifies funding opportunities compliant with his/her goals and objectives and the goals and objectives of the department, college, school or unit.
- Writes proposals including narratives, budgets and all required forms.
- Develops project plans consistent with the mission of the submitting department, college, center, school or unit.
- Assumes responsibility for (post- and pre-award):
 - implementing and managing the project consistent with University and sponsoring organization's policies;
 - proper technical, programmatic and fiscal management and maintenance of related records;
 - quality overall project performance;
 - preparation of all technical or programmatic reports;
 - reporting all inventions that may result;
 - comprehensive compliance with the terms and conditions of the resulting sponsored agreement;
 - fiscal prudence and compliance with cognizant regulation.
- Transmits the proposal, with a completed and signed Internal Approval Sheet (IAS) to the Department Head for consideration.
- Initiates appropriate regulatory compliance requirements (e.g. IACUC, IRB, Biosafety approvals etc.).
- Interacts as early as possible in proposal and budget development with their Sponsored Programs Administrator.

Department Head

- Assists in identifying funding opportunities for the Department.
- Reviews proposals for consistency with department and college, school, center or unit missions, availability and commitment of support resources, including time, space and finances.
- Assures that all faculty and department obligations will be met.
- Indicates concurrence with the proposal by signing the IAS (including any cost-sharing agreements noted on the IAS or in the proposal itself).
- Forwards the proposal package to the appropriate College(s), School(s), Center(s) or Unit Dean(s) or Director(s).

Dean or Director -- College, School, Center or Unit

- Reviews proposal for consistence with college, school, center or unit missions, availability and commitment of college, school, center or unit support services including, time, space allocation, and financial support.
- Assures that all department and college, school, center or unit obligations, as delineated in the proposal, will be met.
- Indicates concurrence with the proposal by signing the IAS (including any cost-sharing agreements noted on the IAS or in the proposal itself).
- Forwards the proposal package to the Office of Sponsored Programs, 133 Etheredge Hall.

Vice President for Research & Economic Development or Vice President for Agriculture, Forestry and Veterinary Medicine

- Reviews special institutional commitments such as waivers of Facilities and Administrative Costs.

- The legal authorization for commitments of the University to engage in contractual agreements on sponsored programs is the Board of Trustees for Institutions of Higher Learning (IHL). The IHL has delegated this authority to the several university presidents. At MSU, the President has delegated this authority, and responsibility, to the Vice President for Research and the Vice President for Agriculture, Forestry, and Veterinary Medicine. Thus the cognizant Vice President assumes the responsibility of making legal commitment with the funding agency on behalf of the University. Through establishment of the Office of Sponsored Programs, the aforementioned Vice Presidents have authorized the Director of Sponsored Programs to act on their behalf concerning sponsored projects provided that abnormal circumstances or substantial division commitment be coordinated with the appropriate divisional leadership.
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Office of Sponsored Programs

- Reviews the proposal for consistency with University mission and policies;
 - Reviews the budget for compliance with University policies, Cost Accounting Standards and sponsor guidelines;
 - Prepares the required “Representations and Certifications”
 - Verifies that all required reviews have been conducted on proposals that involve research using animals, human subjects, radioisotopes, biohazards, creation of hazardous waste, conflict of interest, and debarment;
 - Verifies that all appropriate arrangements have been made and documented for projects involving extra space allocation, renovation, new courses, campus housing, etc.
 - Reviews RFP terms and conditions and if appropriate or necessary prepare an exceptions letter to submit with the proposal
 - Assigns a proposal log number;
 - Has the required number of copies reproduced;
 - Prepares a transmittal letter to the sponsoring agency;
 - Forward the proposal, transmittal letter, etc. to the sponsor;
 - Distributes a copy of the proposal, transmittal letter, etc. to PIs immediate cognizant administrative unit (e.g. department head, center director or director of research);
 - Maintains records of proposal activities for periodic reporting to the President, Board, etc.
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HIGHLIGHTED SERVICES OFFERED TO THE PROJECT INVESTIGATOR BY THE OFFICE OF SPONSORED PROGRAMS ADMINISTRATION

Each administrator is assigned specific departments or centers. Researchers should consult the SPA web page (www.spa.msstate.edu) to determine the administrator assigned to their department or center. Check out “Staff” on the SPA homepage.

Sponsored Proposal/Agreement Review

Proposal Review

The Office of Sponsored Programs Administration is designated as the official unit on campus responsible for reviewing and analyzing proposals prior to approval. This service is provided to assure compliance with various sponsor, university or other regulations or guidelines pertaining to the submission of a request for funding.

When a faculty or staff member prepares a proposal they do so as an employee of Mississippi State University. Once the proposal is complete, it is submitted to the Office of Sponsored Programs Administration who will submit the proposal on behalf of the institution. This practice is followed because it is the institution that commits to the completion of work; designates space, human and fiscal resources to the project; and assumes responsibility for the adequate completion of the proposed project.

The Internal Approval Sheet discussed in this handbook provides the Office of Sponsored Programs Administration with the necessary departmental, collegiate and/or center level approvals. Such approvals are an integral part of the review process. In addition to their own evaluations of compliance with various proposal regulations, the department head, dean/director and/or center director evaluates the programmatic aspects of the proposal for scientific merit; departmental, collegiate or center missions, goals and objectives; and general feasibility.

Once the proposal reaches the Office of Sponsored Programs Administration a careful evaluation of the proposal mechanics is conducted. This evaluation includes assurance that proposal regulations are followed, appropriate supervision has reviewed the proposal from a technical perspective, all commitments are acknowledged, and the collective proposal effort is a favorable representation of Mississippi State University.

Part of the proposal preparation process includes the development of a proposal cost estimate (the budget). The Office of Sponsored Programs Administration staff will assist you in your development of a proposal budget. Ultimately, the proposal cost estimate must be reviewed by the Office of Sponsored Programs Administration several days prior to the date the proposal must be shipped. This assures compliance with various regulations: institutional (e.g. official policies and procedures, Cost Accounting Standards Board Disclosures Statement, etc); external (e.g. Office of Management and Budget A-21, A-110, etc); and sponsor-imposed (e.g. Request for Proposal or Solicitation Notification).

Award Review and Negotiation

The Office of Sponsored Programs Administration is designated as the official office responsible for coordinating and conducting sponsored agreement negotiations. This entails a teaming relationship with the following individuals/offices: the proposals author (the Principal Investigator or PI); appropriate PI supervisor (e.g. department head, dean or director, etc); the Controller’s Office; the University Counsel; the appropriate Sponsored Programs Administrator and the designated negotiator from the sponsor.

Sponsored Agreements must be fully read and evaluated prior to acceptance. Such an effort obviously takes time. During the evaluation, a Sponsored Programs Administrator will prepare a memorandum of exceptions to share with a designated negotiator from the sponsor. Although the Office of Sponsored Programs Administration is dedicated to a highly efficient operation, often time delays are created by external factors.

Once fully negotiated and an award has been accepted, sponsored agreements are “awarded” by the Office of Sponsored Programs Administration. The award package consists of an Award Information form (generated internally), the final sponsored agreement, an Internal Approval Sheet (submitted with the proposal), the original proposal and any revisions submitted subsequent to the original submission, and a final budget. The award package is routed to Sponsored Programs Accounting for the establishment of either a new fund (3XXXXX) or maintenance of an existing fund number. Once a fund number is established, Sponsored Programs Accounting will e-mail the fund number to appropriate personnel indicating that costs may be incurred and charged.

Staff from the office of Sponsored Programs will also facilitate any future communication with the sponsor outside of normal fiscal (invoicing, financial reporting) or programmatic communications. Such administrative communications include re-budgeting requests, scope of work changes, etc. Generally, such requests should be drafted by the Principal Investigator and routed through the Office of Sponsored Programs for review and signature if appropriate.

PROJECT PLANNING, PROPOSALS, AWARD, AND PROJECT MANAGEMENT

This section of the Handbook is devoted to a brief review of the elements of successful proposal writing, how to calculate a budget, and the procedures involved in the submission of a proposal.

1. THE ELEMENTS OF PROJECT PLANNING

1.1 Identification of Potential Funding Sources

Project directors are urged to contact their Dean or designated person, Research Center Director or for technical guidance and assistance in proposal development. When a funding source is located that seems appropriate for the contemplated project, the project director is urged to contact a key person at the sponsor to discuss the proposed project. While the responsibility of such contact rests with the project director, Office of Sponsored Programs Administration personnel are available to assist, in concert with the cognizant Dean or Director’s office, in identifying the appropriate person and determining the most appropriate means of contact. Personal contact between a project director and a program liaison person, by telephone, letter, e-mail, or in person is viewed as highly beneficial. However, prior to making such contact, you are encouraged to contact your Associate Dean or Director of Research to determine if there is a broader initiative currently underway between your department, college or center and the intended sponsor. Ultimately, information on the sponsor’s funding priorities and specific focus of funding are crucial in planning a proposal and in increasing its probability of success.

1.2 Types of Funding Support

The great majority of externally funded projects at Mississippi State University are carried out under one of three types of funding agreements. The first type, commonly called a "contract" is in actuality a procurement, a contractual agreement between the University and a sponsor. Under this agreement, the University agrees to perform specified services (research, instruction, or service), following sponsor-specified protocols, methodologies, etc., carried out on a schedule negotiated with the sponsor. Generally, contract-related expenditures by the University project director in a budget category (salaries, travel, etc.) have been predetermined by budget negotiation before the contract was awarded. Deviation from these categories may have to be submitted to the sponsor’s fiscal officer by the University’s Office of Sponsored Programs Administration and approved by the fiscal officer. Typically, procurement results in the acquisition of a product or service for the direct benefit of the sponsor.

The second type of funding support is "assistance," which is exactly that - assistance given to carry out a project in which the University project director and a sponsor have a common interest. These are usually called "grants" and may require the university to share in the cost of the project (or cost-sharing) [See Section 3.16, Cost Sharing.] Projects receiving

assistance, or grant support, are often categorized as follows: basic research; the development of methodologies that can be replicated elsewhere; the furthering of the arts and humanities; and the enhancement of the welfare of the public.

The third type of funding support is through cooperative agreements (or subcontracts); wherein a portion of the technical or programmatic part of the project is performed by Mississippi State University under a subcontract from the institution that has been granted the project.

1.3 Preliminary Proposals

Some sponsors assist the researcher in that they welcome preliminary proposals and/or letters of inquiry. This may be stated in the program announcement, or communicated by the sponsor's liaison person. The project director may forward such preliminary correspondence to potential sponsors, provided that the University is not committed in any way, as by a level of cost-sharing, the use of special facilities or equipment, or a budget estimate. The project director must supply copies of this correspondence to the department head, associate dean for research, the dean, and the Office of Sponsored Programs. Any correspondence quoting a budget estimate or a commitment of University personnel, equipment, facilities or other resources must be processed through the normal internal approval system with a completed Internal Approval Sheet (IAS) (**For the most current version of the IAS, see "Forms" on the SPA Website**)

1.4 The Internal Approval Sheet

The Internal Approval Sheet (IAS) is the key document in the processing of proposals, of awards, and in the generation of reports dealing with institutional proposal activities. It also is a record of agreements concerning release time, cost sharing, space utilization, etc. It is imperative that the project director fill out the IAS completely and accurately.

In addition to the proposal, the project director must be sure to attach a copy of the project announcement to the proposal package. Failure to do so may jeopardize the timely transmission of the proposal to the sponsor since this information is critical to Sponsored Program's processing of proposals.

There has been occasional confusion on the part of project directors regarding how to complete the Internal Approval Sheet. Below is a guide to assist in the complete and accurate preparation of the IAS form. If this does not answer specific questions please contact the Office of Sponsored Programs.

1.4.1 Instructions for the Internal Approval Sheet (IAS)

The PI is responsible for completing the IAS and for obtaining the signatures of the Department Head and the College, School or Center official. The form must be typed and is available in electronic format from the Sponsored Programs' Web Page at the following URL, www.spa.msstate.edu, and located under "Forms".

Page (1 of 2) Internal Approval Sheet

- a) Existing Fund Number if applicable – Enter the fund number of the existing project if the proposal is intended as a continuation, supplement or incremental funding. Also, for agriculture projects, use this block for the CRIS number. ORG and Program numbers are not necessary in this block.
- b) Originating College/Unit name/ORG Number – Enter the name of the college or unit and the corresponding ORG number if known.
- c) SPA Proposal # – SPA will complete this section
- d) Total Number of Copies – Enter the total number of copies to be submitted
- e) Receipt Date – If the copies are to be received by a specific date, then enter the receipt date
- f) Postmark Date – If the copies are to be post marked by a specific date, then enter the post mark date
- g) Address – Enter either a FedEx acceptable address for receipt deadline proposals or a post office acceptable address for postmark proposals.
- h) Phone – Enter the phone number of the sponsor (required for FedEx deliveries) if available.

- i) Fax – Enter the fax number of the sponsor if available
- j) Principal Investigator Name – Enter the name of the first Principal Investigator
- k) Employee ID Number – Enter the ID of the corresponding PI or Co-PI
- l) E-mail address and Phone # – Enter the e-mail address and campus phone extension of the corresponding PI or Co-PI
- m) Telephone number
- n) ORG Code/Dept Name – Enter the ORG number or department name of the corresponding PI.
- o) Repeat j-m for Co-PIs
- p) Project Title – Enter the project title
- q) Sponsor Name – Enter the name of the sponsor to whom the proposal will be submitted.
- r) Prime Sponsor Name – Enter the name of the prime sponsor from whom the sponsor will receive funding (flow-through proposals) if applicable.
- s) Code/SPA Use Only – Leave blank
- t) Research, Public Service, etc. – Mark the appropriate boxes in this section
- u) Initial Period (usually the first year) Proposed Start Date – Self explanatory
- v) Initial Period Proposed End Date – Self explanatory
- w) Total Period (usually the whole project) Proposed Start Date – Self explanatory
- x) Total Period Proposed End Date – Self explanatory
- y) Human Subjects, Animal use, etc. questions – Answer each and every question either yes or no. Refer to appropriate policies if necessary. Do not enter anything in the Protocol Number/Approval Date or the Regulatory Compliance Office Initial blocks.
- z) Signature Blocks – Sign and date and obtain signatures through the Dean/Director's office then forward to Sponsored Programs Administration for further processing after completing page 2 of 2

Page (2 of 2), Internal Approval Sheet

- a) REQUESTED FUNDS – Complete as shown. Only include funds you expect to be reimbursed by the sponsor. Total Direct Costs are all costs except indirect or F&A costs. F&A costs are all indirect costs associated with the project.
- b) Facilities and Administrative Rate Used in REQUEST – What rate and base was used (i.e. 43% rate, MTDC base for on campus research)
- c) DETAILED COSTS SHARE/MATCH
 - 1) Department Cash – Enter any departmental commitments such as personnel time, equipment purchases, contractual, commodities, etc.
 - 2) Office of Research (OR) Cash – Enter any OR cash commitments (not F&A waivers). You will need specific justification and evidence of commitment either as an attachment or in the space provided for explanations.
 - 3) DAFVM Cash – Enter any DAFVM cash commitments (not F&A waivers). You will need specific justification and evidence of commitment either as an attachment or in the space provided for explanations.
 - 4) Other (non-MSU) Cash – Enter external commitments. Again, you will need to explain the source and evidence the commitment in some way.
 - 5) In Kind (e.g. volunteer time) – Enter the total in-kind contributions here
 - 6) F&A on Cost Share – Enter any F&A calculated on direct-cost cost-share items. Do not include F&A waived from the request.
 - 7) Waived F&A – If the sponsor's guidelines do not specifically state that F&A is not allowed then you need a waiver from the Vice President for Research & Economic Development.
 - 8) Waived F&A – DAFVM - If the sponsor's guidelines do not specifically state that F&A is not allowed then you need a waiver from the Vice President of Division Ag, Forestry, and Vet Medicine.
 - 9) F&A Not Allowed by Sponsor – F&A that the sponsor will not allow to be charged by the University.
 - 10) Explanation of reduced F&A costs – Space provided for explanation of why you are not requesting the fully F&A recovery allowed.
 - 11) Cost Sharing Explanation/Commitments – Space provided for explanation of cost sharing and any commitments thereto.

- 12) Special Requirements/Instructions – Space provided to communicate any special project requirements, handling instructions, etc.

The internal approval sheet must be fully completed prior to signing. The Principal Investigator's signature certifies that the proposal is complete and ready to submit for consideration. Further, the Principal Investigator is certifying that the content of the Internal Approval Sheet is correct and complete.

The Department head is certifying that the proposal is compliant with departmental mission, that the proposal is a sound representation of the abilities of the PI. Further, the Department Head certifies that the proposal is of sound scientific merit and will represent the Department and Mississippi State University as a meaningful proposal.

The Dean or Director is certifying that the proposal is congruent with collegiate or unit mission and complies with the mission and vision of the leadership of the institution. Further, the Dean or Director certifies that the proposal is of sound scientific merit and will represent the College or Unit and Mississippi State University as a meaningful proposal.

Regulatory Compliance

Regulatory compliance at Mississippi State University encompasses five (5) areas: projects involving human subjects, projects involving the use of animals, projects that may generate hazardous wastes, projects involving the use of radioactive materials, and projects involving potential biohazard risk. The Office for Regulatory Compliance (ORC) consists of trained professionals to assist you in meeting regulatory requirements. ORC and SPA will work with you closely to facilitate a smooth award process.

Relevant forms, policies, guidance and training opportunities are available online at <http://www.orc.msstate.edu>.

1.4.2.1 Research Involving Human Subjects

University policy and federal regulations require that all research involving human subjects be reviewed and approved by the University's Institutional Review Board for the Protection of Human Subjects in Research (IRB) prior to initiation of the project. This requirement applies to all human subject research, conducted by faculty, staff, and students, on- and off-campus, whatever the funding source for the project.

In this context, research is defined broadly as a formal investigation designed to develop or contribute to general knowledge; some “demonstration” and “service” projects may include research activities.

IRB approval is required before funding will be awarded. In some instances, a funding agency may require IRB approval at the time of proposal submission or at some time during the proposal review process. Additionally, some agencies require certification of Humans Subjects Research and IRB training at proposal submission. ORC and SPA can help you determine when IRB documentation is needed and when it must be submitted.

1.4.2.2 Animal Care and Use

To ensure that all animal use on campus is conducted in accordance with local, state, and federal laws and regulations concerning animal welfare, the Institutional Animal Care and Use Committee (IACUC) reviews protocols involving animal use. The IACUC is a standing committee reporting to the Vice President for Research. University project directors planning projects that utilize animals must submit their proposed protocol to the IACUC for its review and approval fairly early in the planning process to avoid potential delay.

IACUC approval is required before funding will be awarded. In some instances, a funding agency may require IACUC approval at the time of proposal submission or at some time during the proposal review process. ORC and SPA can help you determine when IACUC documentation is needed and when it must be submitted.

1.4.2.3 Hazardous Wastes

In many instances, University activities, both teaching and research, generate hazardous wastes. Hazardous wastes are defined as any material or substance that can threaten either health or the environment if improperly disposed of. The definition of what constitutes a hazardous waste, and requirements for the storage, handling, and disposal of these materials are strictly regulated by the Environmental Protection Agency.

The Hazardous Wastes Officer (HWO) trains University personnel in the proper procedures for management and disposal of hazardous wastes. The HWO is responsible for advising waste generators of which federal regulations are applicable to a specific problem. Further, the HWO is responsible for maintaining the necessary comprehensive documentation relating to waste disposal; no hazardous waste is to leave the campus without the HWO's knowledge and written approval.

Department and unit heads are responsible for the compliance of their organizations. This compliance includes them being aware of the nature of wastes generated by their operations - hazardous or nonhazardous.

University project directors seeking outside funding for projects that will result in the generation of hazardous wastes are reminded that they must show whether disposal costs of these wastes will be paid from departmental funds or from project funds.

Project personnel are reminded that certain activities that result in the generation of hazardous wastes require that a license or permit be obtained from EPA prior to beginning the activity. The initial step is for the project director to contact the Hazardous Waste Officer at 325-3294 to coordinate the planning process.

Annual training of all personnel who generate or manage hazardous waste is required by federal regulations.

1.4.2.4 Radiological Safety

Procedures and policies for the procurement, use, and disposal of all radioactive materials and sources of ionizing radiation on campus are the responsibility of the Radiological, Chemical and Lab Safety Committee. This Committee also is responsible for establishing safety measures to ensure the protection of all operating personnel, University employees, students, and the public. University personnel are responsible for carrying out safe procedures. The Radiological Safety Officer (RSO) oversees the practice of these procedures and policies.

The University operates under a special license issued by the Mississippi Department of Health, and is bound by that Department's "Regulations for Control of Radiation in Mississippi." This document reflects all applicable state and federal laws and regulations and is available from the Office for Regulatory Compliance.

For the purposes of these regulations, "radioactive materials" are defined as radioactive isotopes, sources emitting ionizing radiation, fissionable materials, fissionable products, irradiation services, and any and all materials or equipment that emit ionizing radiation or particles that are capable of causing ionization of chemical elements.

All University personnel who plan to use any of these materials, equipment, or services in the course of their projects should contact the RSO early in the planning stage of their proposed project. A copy of the application form, "Application for Permission to Obtain and Use Radioactive Isotopes" is available on the ORC webpage.

Specifics of the required procedures are given in the "Handbook of Responsibilities, Procedures, and Regulations Governing the Safe Use of Ionizing Radiation on the Campus of Mississippi State University" issued by the Radiological, Chemical and Lab Safety Committee. Copies are available from the Office for Regulatory Compliance by calling 325-3294.

1.4.2.5 Biohazards

The University Biosafety Committee (IBC) is designed to establish guidelines to ensure that all regulations promulgated by federal agencies are known by all University personnel who work with or come in contact with infectious agents of any kind. The IBC also oversees projects involving the use of recombinant DNA technology, and its membership meets the requirements specified by the National Institutes of Health (NIH) in section IV-B-2 of the “Guidelines for Research Involving Recombinant DNA Molecules (NIH Guidelines). All projects involving DNA technology are reviewed by this committee prior to acceptance of funding from a sponsor. NIH is the key agency in developing regulations that apply to these types of projects, and the guidelines that apply to this type of research are published in the Federal Register.

The policy and procedure statements on Biosafety and Compliance Regarding Crisis Planning for Biosafety are available on the Office for Regulatory Compliance home page. For guidance on Biosafety matters, contact the Biosafety Officer at 325-3294.

Intellectual Property

MSU’s policy with respect to protection, transfer, and commercialization of intellectual property (IP) is entitled “*Policy and Procedure Statement on Intellectual Property at Mississippi State University*”.

If you have questions concerning IP protection or licensing, please call the Director, Office of Technology Commercialization (OTC), at 325-3521 or check the OTC home page for forms and additional information: www.otc.msstate.edu

1.5.1 Inventions

Disclosure. Project directors are reminded that disclosure is required for all inventions developed under (a) grants and contracts between external sponsors and MSU; or (b) developed as a university assigned effort. To facilitate the disclosure process, a standardized “*Invention Disclosure Form*” is available for download from the OTC home page or via a link on the Sponsored Programs home page and included for your convenience, at A-9 in Appendix I.

Ownership. The grant or contract sponsor (1) may specify that the materials be placed in the public domain, (2) may claim reproduction, license-free use, or other rights, or (3) may assign all rights to MSU. For University assigned efforts, MSU shall own the invention.

Patents. Provisional patent applications for certain MSU owned inventions may be filed based on licensing potential and other factors as appropriate. Utility patent applications are generally not filed unless there is a sponsor willing to fund the patent costs. OTC coordinates the patent prosecution with outside counsel.

1.5.2 Scholarly or Creative Works and Copyrightable Materials

Individual Efforts. Scholarly or creative works include traditional academic publications, such as professional papers published in scholarly journals, or newly created texts or books that often result from usual activities of faculty and nominal use of University resources. Because there is no specific assignment for faculty to develop such scholarly or creative works, although they may be incorporated into the regular recognition and rewards processes of MSU because they are used throughout the academic community as a measure of the quantity and quality of the research and teaching effort, these works are not considered work for hire but professional activities wherein the copyright is vested with the creator who is entitled to royalties or other income derived from such works.

Decisions relative to registering these works with the Copyright Office are left to the individual creator. However, the individual is urged to copyright such materials in his/her name. For assistance in obtaining and completing the proper form, the proper marking of the work, and related matters, contact OTC.

University Supported Efforts. Copyrightable materials created with Substantial Use of university resources or for research and educational use in the laboratories and classrooms of MSU are considered to be work for hire, and so copyright of these materials is vested with MSU. As copyright owner, the University shall make decisions relating to registration of such sponsored works. The copyright application is filed by OTC.

Sponsored Supported Efforts. For copyrightable materials developed under grants and contracts between external sponsors and MSU, the sponsor (1) may specify that the materials be placed in the public domain, (2) may claim reproduction, license-free use, or other rights, or (3) may assign all rights to MSU.

Copyright Registration. Note, it is not necessary to register a copyright in order to protect the material – copyright protection is created automatically and without formality as soon as the work is created. However, registration must be filed before a copyright owner can file an infringement lawsuit. Note, certain federal agencies such as DOE, require written permission prior to registration.

For University personnel, the most commonly used copyright registration form is Form TX which is used for registration of non-dramatic literary works and computer programs. “Non-dramatic literary works” include fiction, non-fiction, poetry, textbooks, reference works, directories, catalogs, advertising copy, and compilations of information. See A-8 in Appendix 1 for an example of Form TX. The current fee for copyright registration is \$45.

There are other forms used for registration of musical works, dramatic works, pantomimes and choreographic works, pictorial, graphic, and sculptural works, motion picture and other audiovisual works, and sound recordings, serials, journals, newspapers, etc. Please refer to the Copyright Office of the Library of Congress <http://www.loc.gov/copyright/> for a complete description of these forms and to obtain downloadable versions.

1.5.3 Software

Disclosure. To protect MSU's copyright, all software with commercial potential should be disclosed to OTC prior to publication or distribution to third parties by any means. To facilitate the disclosure process, the OTC uses a standardized “*Software Disclosure Form*” which is available for download from the OTC home page or via a link on the Sponsored Programs home page and included for your convenience, at A-9 in Appendix I.

Ownership. MSU owns the copyright to all software created:

- Under grants or contracts with federal agencies and most other sponsors; or
- As a result of an assigned University effort or commission; or
- With Substantial Use of university resources; or
- For research and educational use in the laboratories and classrooms of MSU.

In these situations, the creation of the software is considered to be "work for hire" and the copyright registration with the Library of Congress will list MSU as the author. The copyright application is filed by OTC.

Copyright Registration. Regarding copyright registration of a computer program, a computer program is defined as "a set of statements or instructions to be used directly or indirectly in a computer in order to bring about a certain result" Copyright protection extends only to the literary or textual expression contained in the computer program. Copyright protection is not available for ideas, program logic, algorithms, systems, methods, concepts, or layouts. Registration consists of submitting a completed Form TX, a \$45.00 non-refundable filing fee, and one copy of the identifying material which consists of identifying portions of the program, (first 25 and last 25 pages), reproduced in a form visually perceptible without the aid of a machine or device, either on paper or microform, together with the page or equivalent unit containing the copyright notice.

1.5.4 Other Intellectual Property

Please see the intellectual property policy, www.otc.msstate.edu, for detailed information on trademarks, trade secrets, patentable plants, mask works, and novel plant varieties.

1.5.5 Distribution of Licensing Income

Income derived from the commercialization of any MSU-owned Intellectual Property shall be distributed as follows: First, all income will be used to reimburse out-of-pocket expenses incurred by MSU during the commercialization process such as (a) protecting (e.g. patent prosecution and/or copyright registration, patent/copyright maintenance); (b) defending; (c) marketing; (d) licensing; (e) enhancing the marketability or any other aspect of the IP; (f) dealing with MSU Research and Technology Corporation equity interest associated with the IP; and (g) Advance Royalty Payments.

After all expenses have been reimbursed, all subsequent income shall be distributed as shown below. Please refer to the IP policy for an explanation of the footnotes.

Royalty Payments ¹	First \$5,000	\$5,000 - \$100,000	Above \$100,000
Inventor(s)/Creator(s) ^{2,5,6}	100%	50%	40%
Inventor's(s)/Creator's(s) College, Department, Center, or Unit ^{3,8}	0%	25%	30%
Development Fund ⁴	0%	10%	15%
MSU Office of Intellectual Property and Technology Licensing or Research and Technology Corporation ⁷	0%	15%	15%

2. THE PROPOSAL DOCUMENT - NARRATIVE OR TECHNICAL PART

This section deals with three aspects of writing the narrative portion of a proposal - suggestions on style, recommendations on format, and a detailed breakdown of the various elements of a proposal. Before starting to write the document, the writer should have the proposed project thoroughly planned.

The proposal content should be responsive to the sponsor's interest, insofar as this can be done without sacrificing the logic of the proposal. For example, if the sponsor has defined several priority areas, make sure that you communicate clearly how your proposal fits into one or more of these areas.

The narrative portion of the proposal should present the objectives and scientific, engineering, or educational merit of the proposed project, the suitability of the methods to be employed, the qualifications of the project personnel and the grantee institution, and the effect of the project on the infrastructure of the science, engineering, or education in these areas and the amount of funding required.

The statement in NSF's publication "Grant Proposal Guide" summarizes the general requirements of the narrative proposal and can be applied to any sponsor:

The Project Description should provide a clear statement of the work to be undertaken and must include: objectives for the period of the proposed work and expected significance; relation to longer-term goals of the PI's project; and relation to the present state of knowledge in the field, to work in progress by the PI under other support and to work in progress elsewhere.

The Project Description should outline the general plan of work, including the broad design of activities to be undertaken, and, where appropriate, provide a clear description of experimental methods and procedures and plans for preservation, documentation, and sharing of data, samples, physical collections, curriculum materials and other related research and education products. It must describe as an integral part of the narrative, the broader impacts resulting from the proposed activities, addressing one or more of the following as appropriate for the project: how the project will integrate research and education by advancing discovery and understanding while at the same time promoting teaching, training, and learning; ways in which the proposed activity will broaden the participation of underrepresented groups (e.g., gender, ethnicity, disability, geographic, etc.); how the project will enhance the infrastructure for research and/or education, such as facilities, instrumentation, networks, and partnerships; how the results of the project will be disseminated broadly to enhance scientific and technological understanding; and potential benefits of the proposed activity to society at large.

A more detailed discussion of how the proposal writer can apply the elements of this statement to a specific proposal are given in Section 2.3, following.

2.1 Suggestions on Style

The proposal document is a very significant factor in the decision by a funding agency to approve or disapprove a project. While it must be well written - i.e., be clear, concise, readable, and be free of jargon - the content, logic, and arrangement of the document are highly important. It is crucial that the proposal demonstrates:

- * that the idea for the project is important and addresses a significant need,
- * that the project director has done a thorough job of choosing the best approach to solving the particular problem and of planning its implementation,
- * that the applicant - both project director and institution - has the capabilities of carrying out the proposed project successfully.

In addition to content per se, success hinges on the proposal's organization, readability, effectiveness in clearly communicating the proposed plan to the sponsor and reviewers, and effectiveness in clearly communicating how the proposed project meets the sponsor's needs or programs.

The following "DO's" and "DON'T's" are modified from an unknown source and are not the original product of the author of this handbook.

DO read all forms and instructions provided by the sponsor and follow them carefully. Have someone not involved in writing the proposal check to see that the informational requirements have been met.

DO adapt the language of the proposal to the audience at the sponsor. Highly technical words or phrases should always be explained unless they are commonly used and easily understood. Do the sponsor and reviewers the courtesy of enabling them to understand what you wrote without additional study.

DO write with clarity and conciseness. Proposals are rarely judged on their length. Reviewers irritated by unnecessary prose are likely to judge the proposal negatively.

DO have your proposal read for clarity, grammar, and style before final typing.

DON'T bury the important parts of the proposal plan behind too many introductory phrases. Reviewers should be able to discern the important elements easily, without having to dig for them.

DON'T be afraid to use underlining, capitalization, headline titles, etc., as needed to make the proposal more readable.

DON'T clutter the body of the proposal with a lot of drawings, charts, tables, etc. unless required by the application instructions. Too many of these will interrupt the smooth flow, reducing readability. Usually this type of information should be attached as appendices.

2.2 Proposal Format

All sponsors have some special requirements regarding proposal format, number of copies required, submission deadlines, etc. Certain sponsors, NIH for example, have highly specific requirements and supply printed forms to be used for title, budget, summary, and text pages of proposals submitted to them. More and more sponsors are mandating electronic submissions (ex. NSF Fastlane and DOE IIPS and Grants.Gov). Many sponsors have established a strict limit on the pages permitted in the narrative portion, and have limited vitae to one page each. You are urged to read carefully the technical proposal requirements of the sponsor before writing begins.

2.2.1 Dimensions and Quality

All materials should be typed or printed on 8½ x 11" paper suitable for quality reproduction. Unless specifically required, binding your proposal is not recommended. Many sponsors are so specific as to advise when stapling is allowable and if so precisely where to staple a proposal. It is imperative that the project director highlights such requirements and abides by them.

2.2.2 Illustrations and Tables

All illustrations and tables should be referenced in the text and placed as close as possible to their respective references without adversely affecting the readability or flow of the narrative. An exception to this is when the sponsor has established a strict limitation of the number of pages permitted. Under such circumstances, it usually is possible to place a series of illustrations and/or tables as an appendix.

2.2.3 Page Numbering

If the proposal instructions include specifics on page numbering, follow those instructions. If not, use the following. All pages are to be numbered. On the cover, however, which is counted as page "**1**", the number is not displayed. Continue using lower case Roman numerals through the CONTENTS page (usually "iii", the first number displayed). The text begins with the INTRODUCTION, page 1, and continues to the appendices, with Arabic page numbers. Appendices are identified either by capital Roman numbers (Appendix I, II, etc.) or capital letters (Appendix A, B, etc.) Pages within an appendix are numbered with Arabic numerals, as A-1, A-2, etc, or IV-1, IV-2, etc.

Pages should be numbered at the bottom-center unless otherwise specified in the proposal instructions.

2.2.4 Page Format

An inch margin should be used on all sides of the text unless specified differently by the sponsor's guidelines. All sections are to be typed using space and one-half or double-spaced, unless otherwise specified. If the sponsor does not specify spacing but does place a strict limit on the number of pages allowed, use single spacing with double between paragraphs if such condensation is necessary to fit the text within page limitations. Sponsor guidelines to the contrary notwithstanding page numbers should be centered at least 3/4 inch from the bottom of the page.

Direct quotes, especially those running more than 3 typewritten lines, typically are indented 10 spaces and should be typed single-space, block style.

2.3 An Outline of Proposal Content

The NSF summary of the general requirements of the narrative proposal, quoted in the introduction to this section, can be rephrased into more general terminology that is broadly applicable to almost every field of endeavor.

First, define the problem. Give some quantification to support the prevalence or seriousness of this problem.

Second, state the solution, and explain briefly how and why it is the solution. Both here and in the definition of the problem, show that you are familiar with the literature - that you are conversant with recent advances in the field, and insofar as possible, with the progress of current research. However, these sections are not an extensive and comprehensive review of the literature.

Third, what solution do you propose, and briefly, why? What personnel are you going to use, for how long, doing what? Define a timetable of events.

Fourth, what attributes does Mississippi State University have that makes it the place to conduct this project? Experienced personnel, equipment, other resources?

Fifth, how are you going to measure whether you are attaining your goal? The evaluation component can consist of internal evaluation, calling in external consultants, having the sponsoring activity conduct the evaluation, or a combination of these.

Finally, how are you going to disseminate your findings so that they can be evaluated, adapted, and utilized by others facing the same problem - through reports, journal articles, or other means?

Definition of how much the project will cost (the budget) is treated in Section 3.

A comprehensive listing of these items is included in **Narrative or Research Plan**, following.

Specific items to be included in the narrative portion of the proposal are (these are suggestions for your consideration only when the sponsor does not have specific guidelines to the contrary):

Cover Sheet - A Proposal Cover Sheet should be used unless the sponsor specifies a different format. If the starting date is unspecified, select that date most appropriate for the probable sponsor review cycle and that fits the MSU calendar. In other words, if a project involves 9-month faculty personnel, scheduling its start in the middle of a semester can cause problems. Show the duration for which funds are requested. In the "Amount Requested" block, show only those funds requested from the sponsor.

Contents Page - a separate page listing the major parts of the proposal with page numbers.

Abstract - a simple, concise statement of about 200 words (see sponsor guidelines) that outlines the objectives of the research, the methodology to be used, the type of results sought, and a mention of the application of these results. In some cases, a proposal may be partially evaluated on the basis of the abstract.

Narrative or Research Plan - some sponsors stipulate a maximum length for this section; others recommend a maximum length. Bottom line is write clearly, concisely and efficiently. Communicate effectively and always obtain a nonaffiliated and trusted peer's opinion of your proposal prior to submitting.

Introduction - this should contain a statement of the overall objective of the proposed project. This may include a review of the most significant previous literature (literature review), the relationship of this project with the present state of knowledge in the field, the project director's long-term goals, with related on-going work by the project director and others in the field, and with previous work by the project directors.

Specific Aims - list the specific objectives to be accomplished during the entire period of sponsor support.

Methodology - give details of the project plan, including the rationale for the chosen approach. Describe experiments, methods and techniques, any specialized equipment, the type of data you expect to obtain, and the methods to be used in analyzing these data.

Significance - what is the significance of the anticipated results of the project?

Evaluation Component - how do you plan to evaluate the efficiency and/or effectiveness of your project plan, both on going and post-project. (This is the equivalent for the social sciences and education of good laboratory practices, quality control, and replication measures in the physical and biological sciences.)

Personnel - list the key professional personnel, starting with the Principal Investigator. After each person's name, show the individual's professional title, role in the project, a brief description of the individual's qualifications, and the percent of time the person will devote to the project. A complete curriculum vita, including list of publications, should be included as an appendix. For individuals with a lengthy list of publications, list only those titles applicable to this proposal, and add the statement "Also (blank#) other publications in refereed journals." Graduate students and other personnel need not be listed by name if not available.

Facilities Available to the Project - describe briefly any pertinent items of equipment, technical support facilities that will be used in support of the project, information on available space, and similar information. Any lengthy listing or description of such material should be included as an appendix, cited in the text.

Project Period - state how long a period of time will be required to complete the project, and include a schedule of major activities or milestones.

Current or Pending Support - give a summary of all current support the PI is receiving, and, when appropriate, the support being received by other key personnel expected to participate in the project. This summary should include the title and dates of current sponsored agreements, the source of funds, and annual budget amounts. The percentage of time that each of the project personnel is committed should be given. A statement should list other proposals (including this one) that currently are being considered by, or will be submitted to, other sponsors.

Representations and Certifications

Some sponsors require certain certifications (for example: Lobbying and Drug-Free Workplace) and representations (for example, Cost Accounting Standards (CAS) and Federal Acquisition Regulations (FAR)). The project director is responsible for alerting the Office of Sponsored Programs of the need to complete and include representations and certifications. Office of Sponsored Programs personnel will handle the completion of these documents.

Export Control Regulations

Export Control Regulations have severe consequences, fines up to \$1 million per accuracy and the PI can go to jail for violations. Refer to the Export Control Website and Management Plan, <http://www.spa.msstate.edu/quicklinks/export.php>, for a better understanding of what is involved and who is involved.

3. BUDGET PLANNING AND COMPUTATION

Primary responsibility for budget planning and development rests with the Principal Investigator(s) (PI) or Project Director(s) in consultation with the Department Head or Research Director. Staff members of SPA will advise the PI in general matters in the preparation of the budget, and will review and approve the budget prior to submission of a proposal. Early involvement of SPA in the proposal process can eliminate many potential problems.

When preparing a budget, be realistic. Include sufficient funding to carry out the project, but do not artificially inflate items. Underestimating project costs strongly suggests to reviewers that the proposal author does not fully comprehend the proposed work. Also, when a researcher is awarded a project where the budget is not sufficient to cover necessary project costs, some organization must come up with the funding - department, college, etc.

3.1 Cost Proposal Review

A. Initiating Review by Sponsored Programs

To obtain Sponsored Programs review/approval you may FAX a copy of the budget along with your detail sheets to Sponsored Programs Administration at **(662) 325-3803** or e-mail your SPA administrator. You may also contact your Sponsored Programs Administrator to schedule an appointment at (662) 325-7404 or via e-mail.

B. Deadlines

Please see that a Sponsored Programs Administrator reviews your budget/proposal 3 days before the proposal must be sent. This will assure adequate time to make any corrections before the proposal is submitted.

3.2 Salaries and Wages

A. Faculty and Staff (including Research Assistants and Post Doctoral Candidates)

Use current salary figures with an appropriate inflation factor as of July 1 of each year thereafter. If an MSU faculty member will only be consulting on a project, it will still be calculated as a percentage of the appointment. No extra compensation may be paid from a sponsored project unless it is specifically identified as such and requested from the agency in the proposal and approved.

B. Wages/Temporary Employees

Use hourly wage rates as appropriate for the type of work performed within the guidelines issued by Human Resource Services. You may or may not choose to use 4% - 7% per year inflation factor, but we strongly suggest it.

3.3 Fringe Benefits (Refer to www.spa.msstate.edu)

- A. Staff, Faculty, and Research Associates,
- B. Graduate Research Assistants,
- C. Student Workers

3.4 Equipment

Only items costing \$1000 (with some exceptions, see Receiving & Property Control website at www.property.msstate.edu) or more each should be listed here, cost estimates should include sales tax and shipping; identify each piece of equipment with a corresponding cost.

3.5 Travel

- A. Check with the approved MSU Travel Agency.
- B. Per diem rates MSU Subsistence Per Diem Rates, mileage rates are listed in the MSU Policies and Procedures Manual
- C. If travel is to a foreign destination, contact the MSU Travel Office for procedures.
- D. Inflation suggested at 4 - 7% per year but not mandatory.
- E. Designate two subcategories, one for MSU employee travel and another for Consultant, Participant or Honorarium Travel.
- F. Always provide justification of travel expenses. Sponsors often ask for detail when they perform proposal cost analysis. Keep in mind that a lump sum figure with no destinations and/or detail may hold up the award process.

3.6 Materials and Supplies (MSU categorizes as commodities)

- A. Principal Investigator's best estimate or catalog price, plus tax and shipping costs for each item.
- B. Inflation suggested at 4 - 7% per year but not mandatory.
- C. Individual components to be used for equipment fabrication should be identified as such.

3.7 Publications (MSU categorizes as contractual)

- A. Principal Investigator's best estimate of page charges, etc.
- B. Contact MSU Printing Services for quotes / rates
- C. Inflation suggested at 4 - 7% per year but not mandatory.

3.8 Consultant Services (MSU categorizes as contractual)

- A. Most federal agencies limit the maximum daily compensation rate to GS-18 level.
- B. Inflation suggested at 4% per year but not mandatory.

3.9 Computer Services (MSU categorizes as contractual)

- A. Contact Information Systems and User Support for rates on special services or access.

- B. Inflation suggested at 4% per year but not mandatory.

3.10 Subcontracts (MSU categorizes as contractual)

- A. Have each subcontractor prepare and submit a detailed budget. They will want to obtain their standard institutional/agency approvals first.
- B. Each subcontract should be listed separately. Math on budgets submitted by subcontractors should be checked.
- C. If the subcontractor is requesting facilities and administrative costs, include it as a direct cost to MSU.
- D. Submit a copy of the subcontractor's most current negotiated facilities and administrative cost Agreement for audit purposes.
- E. Inflation rates used by subcontractors should be in accordance with subcontractor's normal practices.
- F. MSU facilities and administrative cost on subcontractor costs is calculated using the appropriate rate for the first \$25,000 of subcontractor total costs only. If there are multiple subcontracts, facilities and administrative cost is collected on each of the subcontracts.

3.11 Other Direct Costs

- A. Any MSU service center used should be shown here. Each center should be contacted by the Principal Investigator to get estimates for services requested (MSU categorizes as contractual).
- B. Telephone tolls, photocopy charges, equipment maintenance, conference registration fees, etc. also belong in this category and are subject to OMB A-21 acceptance. If telephone equipment/line rental is to be charged to the grant, it should be separately identified here as such and not included as tolls. Charges for equipment and line rental will need to be strongly justified in the budget justification (MSU categorizes as contractual).
- C. Inflation factor for all above items is at the Principal Investigator's discretion (suggest 4 - 7% per year).

3.12 Total Direct Cost

The total direct cost is simply the sum of all direct costs.

3.13 Modified Total Direct Cost

Modified total direct cost (MTDC) is defined as total direct costs less capital expenditures (alterations, improvements, renovations, equipment), tuition remission, patient care charges, and the portion of any individual subgrant or subcontract in excess of \$25,000, and stipends.

3.14 Facilities and Administrative Costs (aka Indirect Costs or Overhead)

- A. Normal facilities and administrative cost rates will generally be applied on all proposals unless the funding agency prohibits facilities and administrative costs or has its own rates. Obtain prior approval from SPA.
- B. Off-Campus Rate = 26.0% MTDC (investigator not using MSU owned facilities)
On-Campus Research Rate = 43.0% MTDC July 2005 – June 2009
Instruction Rate = 52.8% MTDC July 2005 - June 2009

On-Campus Services Rate = 27.5% MTDC July 2005 – June 2009

Use the above rates for proposals extending beyond June 2009 until a new rate is negotiated.

Sponsored agreements will not be subject to more than one facilities and administrative cost rate. If more than 50% of a project is performed off-campus, the off-campus rate will apply to the entire project.

C. Standard facilities and administrative costs are charged on all costs with the exception of:

- (1) Equipment items costing \$1,000 or more each.
- (2) Alteration and renovation costs.
- (3) Costs over \$25,000 of each subcontract. Facilities and administrative costs are charged on the first \$25,000 of each subcontract only.
- (4) Tuition.
- (5) Some agencies such as the NSF do not allow facilities and administrative costs charged to participant support costs for activities such as symposium, seminars or workshops. If in doubt, check with Sponsored Programs Administration.

3.15 Cost Sharing

First some definitions. Cost sharing is a phrase used to indicate that more than one sponsor will share in the costs associated with a project. The most common relationship is for an external sponsor to provide most of the funds and for the University to provide the remainder of the funds necessary to carry out a project successfully. Matching is a form of cost sharing that generally defines a specific ratio of sponsor and University dollars. This type of cost share is usually an eligibility requirement stated in the RFP (request for proposals) and is usually not always provided from institutional resources. Cost sharing and matching are nearly synonymous and are often used interchangeably.

The two primary types of cost sharing/matching are in-kind contributions; and, cash contributions. In-kind contributions are those wherein a value of the contribution can be readily determined, verified and justified but where no cash is actually transacted in securing the good or service comprising the contribution. Two examples of in-kind contributions are: (1) The donation of volunteer time valued at a rate that would be reasonable for the time devoted had the volunteer been compensated for the time. For example, if you solicit volunteers from the local high school to help run surveys on a research project without compensating the volunteers, it would be appropriate to value the volunteer's time at, say minimum wage for the number of hours volunteered; (2) The donation of non-institution space where such space would normally carry a fee for purposes other than supporting this particular project (i.e. some negotiation between the PI and the donator, or a benefit will accrue to the donator of the space other than the immediate monetary reimbursement for the use of the space.) This might be utilization of the local Bank Conference Center without having to pay the pre-defined and published rate. (3) Third party donations will be reported to the sponsor as cost share and documentation for this cost share will be required.

Cash contributions differ from in-kind contributions in that an actually cash transaction occurs and can be documented in the accounting system. This includes allocation of compensated faculty and staff time to projects. Although it is easy to mistake the allocation of compensated faculty/staff time as a donation or as an in-kind because the faculty or staff member would be compensated regardless of the advent of the sponsored project, the value is the result of a cash transaction and should be treated as a cash contribution. Another example of cash contribution is the purchasing of equipment by the institution.

Cost sharing included in a proposal or a proposal budget must be documented in the official accounting records upon acceptance and management of an award. At MSU cash contributions (including faculty time and the like as described above) will require the transfer of budget from an appropriate fund to cover the cash contribution amount. This transfer of budget must initiate from an E&G, Designated, or Gift fund belonging to the University or from a Restricted fund allowing such use. In-kind contributions must be documented with official correspondence from the organization providing the in-kind cost sharing to include the appropriate substantive documentation such as published rate schedules, time cards from volunteers, etc.

Upon commencing management of your sponsored project containing cost sharing, Sponsored Programs Accounting will send an email advising you the value of cash contributions to the restricted fund from which your sponsored project will be managed. Do not ignore this correspondence. Transfer the funds immediately upon receipt of this correspondence to avoid an under-recovery of sponsored funds as the project matures. Sponsored Programs Accounting will only invoice the sponsor for the proportionate share of expenditures. Hence, the restricted fund will run in a perpetual deficit until the value of the cash contributions is transferred from appropriate internal or authorized restricted funds. The management unit (i.e. department, center, and branch station) is responsible for cash deficits.

If Cost Sharing is in the proposal, an obligation will be set up at the time the award is set up. Every effort should be made to meet the obligation within the grant period. **Grants whose cost-sharing obligation has not been met may be subject to reduction by the agency.**

If Cost Sharing obligations are not required, they should not be listed on the budget page and should not have a dollar value assigned in the narrative. Lab space should not be shown as a MSU contribution. Be sure you are not over-committing a person's time beyond 100% effort -- if a person is being paid 100% on other projects and that situation will not be changing, do not commit him/her to this project unless it is clearly shown as extra compensation. As a general rule, cost share the minimum amount required.

Using federal dollars as matching or Cost Sharing toward another sponsored project is not allowed unless you have written authorization from both federal agencies.

Facilities and administrative costs "waived" on the grant portion can generally be claimed as Cost Sharing as well as facilities and administrative costs on the Cost Sharing portion.

3.16 Total (by Source)

In each column, the sum of all costs is shown by source (i.e., Sponsor or MSU)

4. PROPOSAL APPROVAL AND TRANSMISSION

All proposals seeking outside funding must receive full internal approval prior to being sent to the sponsor. The Internal Approval Sheet and the Proposal Cover Sheet are the key instruments in the internal review, approval, and transmittal process. These forms are available from the Office of Sponsored Programs Administration website, www.spa.msstate.edu.

4.1 The Proposal Package

A complete proposal package consists of the original copy of the proposal, the completed Proposal Cover Sheet (if required), and the completed Internal Approval Sheet (IAS). The proposal and Proposal Cover Sheet are sent to the sponsor, while the Office of Sponsored Programs retains the IAS.

4.2 Routing of the Proposal Package

The Principal Investigator (PI) is responsible for the preparation of the proposal and for obtaining approval signatures on the IAS and Proposal Cover Sheet from the Department Head and the College, School, Center or Unit Official. It should be noted that approval signatures indicate that the Department Head and the College, or School or Unit Official concur with and approve of the proposed project, the allocation of personnel, the financial terms indicated, and any internal agreements shown.

4.3 The Internal Approval Sheet

The PI is responsible for completing and signing the IAS, and of obtaining the signatures of the Department Head and the College or School Official. For legibility, the form should be typed.

Because project abstracts are used widely in developing descriptions of MSU research activities, the PI is urged to take the short time required to write a brief but informative abstract, using lay language. If possible, explain the potential application of this work, and of what benefit it will be and to whom.

The PI must complete the entire form. If any of the regulatory elements on page 1 of the IAS are checked, the PI will either have to obtain the pertinent individual to initial the form if so indicated, or have made full and satisfactory arrangements to resolve the specific situation (i.e., planned renovations, commit the University after the end of the projects, etc.) prior to the proposal being processed. See section 1.4 of this guide for more information on completing the IAS form.

In the case of proprietary research, wherein there are stipulations on release of information journal publications, or use in theses and dissertations; claims to copyrights and/or patents, or other stipulations, the PI must ensure that all other researchers involved in the project understand fully, and accept, all restrictions that the terms of the proposal and resultant contract will impose upon them. The project director must read and agree to the terms of the Sponsored Programs Procedure Statement on Non-disclosure and Confidentiality available on the Sponsored Programs home page.

After completing the IAS form, the PI(s) will sign in the appropriate space under "Review and Project Approval", and obtain the signature of the Department Head(s) or Director(s), and of the appropriate College, School or Unit official.

4.4 SPA Responsibilities

As outlined in Section 1. Proposal Processing - An Overview, upon receipt of the proposal package, Sponsored Programs Administration personnel will:

- A. Assign a proposal log number.
- B. Review the budget and financial commitments.
- C. Review the proposal for regulatory compliance.
- D. Review the proposal for RFP or Proposal Terms and Conditions Compliance
- E. Evaluate, and if necessary negotiate, proposal RFP terms and conditions and if appropriate prepare an exceptions letter to accompany the proposal (only when terms and conditions are set forth in the RFP).
- F. Prepare the required "Representations and Certifications" (PI should alert SPA personnel of the need for "Reps and Certs" early in the proposal preparation process as these documents take considerable time to prepare).
- G. Sign on behalf of the institution as authorized.
- H. Prepare the required number of copies.
- I. Prepare a transmittal letter to the sponsoring agency.
- J. Forward the proposal, transmittal letter, etc. to the potential sponsor.

- K. Distribute a copy of the proposal, transmittal letter, etc., to the PI, Department Head, and College or School Official.
- L. Maintain records of proposal activities for periodic reporting to the President, Board, etc.

4.5 Proposal Processing Lead Time

Proposals that carry deadline dates fall into one of three categories. One stipulates that the proposal package carry a U.S. Postal Service mail date no later than a specified date. The Office of Sponsored Programs sends proposal packages by certified mail, return-receipt-requested, which satisfies the dating requirement. Please note - the cancellation date stamp at the mail counter will not satisfy this requirement. Some sponsors require that the proposal package either be hand-delivered on or before a specified date, or bear a mail date of at least 5 working days prior to the delivery deadline. Again, use of certified mail satisfies this requirement. Finally, some agencies require that proposal packages be received at a given location in the agency by the close of work on or before a specified day. Use of "Federal Express" or one of the several courier services assists in short time delivery and meeting tight deadlines. Use of these services is very expensive, and researchers are urged to get proposal packages to the Office of Sponsored Programs in sufficient time to avoid the necessity of using courier services.

The PI must allow sufficient time for orderly processing of the proposal package by the Department, College, School, or Unit and the Office of Sponsored Programs. Normally, 10 to 14 days should be allotted to this process. The process can be shortened by making a draft copy of the proposal available to these aforementioned offices prior to completion of the proposal. The proposal then can be walked through when completed.

Again, the PI is strongly advised to discuss and resolve with the appropriate persons such matters as the use of human subjects, generation of hazardous wastes, use of animals, proprietary agreements, and similar topics. Each of these is treated in prior sections of this manual.

A minimum of 3 full working days is required for the Office of Sponsored Programs to assure that the proposal can be reviewed, approved, duplicated, and mailed or submitted electronically. Remember that your peers are writing proposals also and an extraordinarily high volume is ultimately funneled through the Office of Sponsored Programs. Be sure you deliver your proposal to the Office of Sponsored Programs early to ensure that it is prioritized appropriately.

4.6 Intergovernmental Review Process

Additional processing time may be required if the proposal is subject to the Intergovernmental Review Process. Mandated by Presidential Executive Order 12372 of 1982, this process provides for state and local review and comment on proposed federal financial assistance and direct federal development programs and activities. The intent of the program is to assure that a proposal is in agreement with approved state plans and policies, does not result in duplication of effort, and has no adverse environmental or economic impact.

If the federal program to which the proposal is to be submitted is covered under this order, Sponsored Programs Administration must forward a copy of the proposal and a copy of the completed Standard Form 424 (the face sheet that accompanies proposals to federal agencies) to the Mississippi Department of Planning and Policy. The Department has been designated as Mississippi's single point of contact and has the responsibilities of coordinating and managing the review and comment process and assigning a unique number to each proposal.

The Department of Planning and Policy notifies Sponsored Programs Administration what number has been assigned to the proposal, and that number is entered on the original Standard Form 424 that accompanies the proposal to the federal agency. However, federal action on a proposal is not completed until results of the review process are received.

If the PI prefers that the Intergovernmental Review take place before submission of the proposal to the federal agency, the proposal must be received by Sponsored Programs Administration well in advance of the deadline for proposal receipt or transmittal. For more information on which federal programs require Intergovernmental Review and how much time must be allowed for the process, contact Sponsored Programs Administration.

5. PROPOSAL NEGOTIATION/AWARD

Negotiations regarding the technical content of the proposal are the responsibility of the PI. Any questions relating to the financial and administrative aspects of the proposal must be referred to the Office of Sponsored Programs. Researchers are reminded that they do not have the authority to commit the University contractually.

5.1 Revision of Proposals

On occasion a sponsor will express interest in supporting a proposed project, provided that certain changes are made. These may include changes in the budget (usually a reduction), the addition, modification, or deletion of objectives, or a change in performance period. The PI should review the proposed revision and determine if it fits the interest of the University. For instance, if a sponsor wishes to reduce the amount of a budget (that has been calculated carefully and realistically) without a comparable reduction of objectives or scope of work, the project probably is not in the best interest of the University. [Also, accepting such a change is a tacit admission that the original budget was inflated.] However, if the sponsor-suggested changes can be made realistically, the PI will prepare and sign a letter to the sponsor that describes the proposed changes, and attach a revised budget sheet, statement of work, or other requested material. The letter to the sponsor should provide places below the PIs signature for approval signatures by the Department Head, College or School Official, and the University Official (Office of Sponsored Programs coordinates). The package then will be routed via normal channels to Office of Sponsored Programs.

5.2 Proposals Approved for Funding

When a proposal is approved for funding, the sponsor will normally generate a sponsored agreement in the form of either a grant, a contract or a cooperative agreement. The sponsored agreement should be sent directly to the Office of Sponsored Programs. If the project director, department head, dean or director or vice president receives an original sponsored agreement all documents should be routed to the Office of Sponsored Programs immediately.

5.2.1 Components of a Sponsored Agreement

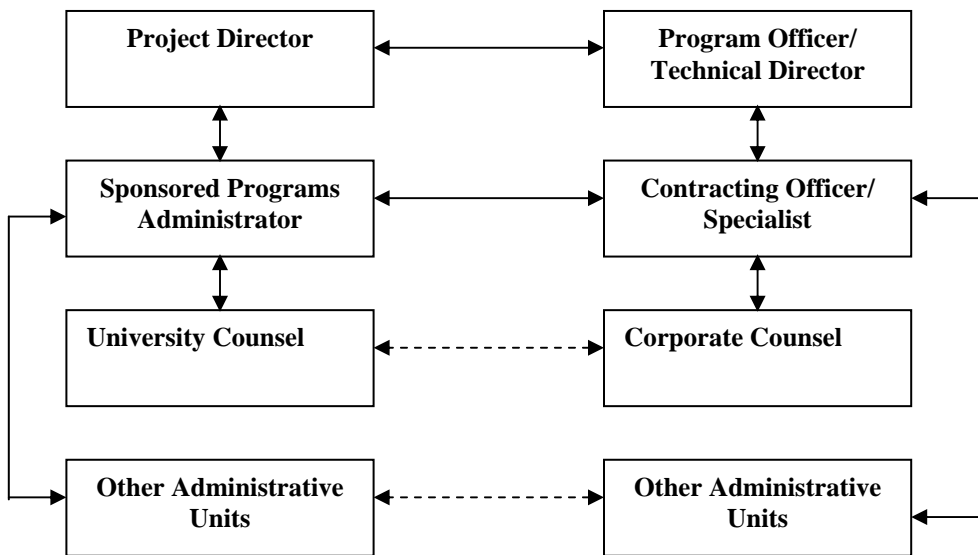
Upon receipt of a sponsored agreement the Office of Sponsored Programs will commence a comprehensive review. The first step in this review process includes an initial evaluation of the availability of all necessary documents that constitute a sponsored agreement. The necessary components of a sponsored agreement include:

- a) Grant or Contract Document
- b) Negotiated Award Budget
- c) Proposal Narrative
- d) Proposal Budget
- e) Internal Approval Sheet
- f) Correspondence from appropriate leadership authorizing/reconciling institutional commitments identified in the grant or contract and the commitments initially authorized in the internal approval sheet.
- g) Other documents necessary to convey appropriate administrative authorization and acceptance of the award document.

5.2.2 Sponsored Agreement Negotiation

The Office of Sponsored Programs is responsible for coordinating the entire negotiation process. The key participants in the negotiation process are the project director, sponsored programs administrator, sponsors technical or program officer, and the sponsor's contracting specialist or officer. The communication flow should adhere to a strict protocol as illustrated in figure 2 following.

Figure 2. Appropriate Communications during Award Negotiation



The negotiation process includes a comprehensive evaluation of the requirements of the agreement including all components of a Sponsored Agreement identified above. Following are highlighted elements of primary concern in a contract with the corresponding participants that Sponsored Programs will engage to facilitate the negotiation process:

Sponsored Agreement Element

Negotiation Responsibility

Contract Recitals (Identification of the parties)

Office of Sponsored Programs

Authorities/Reason for contract

Office of Sponsored Programs

Contract Management

Office of Sponsored Programs

Special Conditions

Office of Sponsored Programs/
Sponsored Programs Accounting/
Office of Technology Commercialization/
General Counsel/
Project Director

General Terms and Conditions

Office of Sponsored Programs/
Sponsored Programs Accounting/

	Office of Technology Commercialization / General Counsel/ Project Director
Statement of Work/Objectives	Project Director/ Department Head/ Unit Head/ Regulatory Compliance Office/ Office of Technology Commercialization
Award Budget	Office of Sponsored Programs/PI

The ultimate outcome of the negotiation process is to arrive at a mutually acceptable agreement. The goals of the Office of Sponsored Programs are to ensure that the agreement is legally acceptable, fits the mission and objectives of the institution, all commitments are formalized with the appropriate offices, and the agreement is manageable and fits into the existing administrative infrastructure.

5.3 Grant/Contract Acceptance

Contracts, grants, and other binding documents must be signed (approved) by an authorized signatory. As stated in the introduction of this guidebook the Office of Sponsored Programs is authorized to coordinate the acceptance of sponsored agreements on behalf of the President, Vice President for Research & Economic Development and the Vice President for Agriculture, Forestry and Veterinary Medicine. Once the award document has cleared the comprehensive review and evaluation process, the Office of Sponsored Programs will process the document as required. A copy of the award document, the IAS, and the transmittal letter will be forwarded to, at a minimum, the project director or department contact. A set of these documents, plus a copy of the proposal, are held by the Office of Sponsored Programs; they constitute a copy of the contractual agreement. The original of the award document, plus copies of the proposal, transmittal letter, and other documents, will be forwarded to Sponsored Programs Accounting. Once monthly, the Office of Sponsored Programs prepares the “Monthly Report of Awards” for submittal to Deans and appropriate Vice President.

5.4 Cancellation or Withdrawal of Proposals

Should it become desirable or necessary to withdraw or cancel a proposal before it has been acted upon by the sponsor, the project director will notify the Office of Sponsored Programs as soon as such a decision has been reached. Office of Sponsored Programs personnel will take appropriate action.

Should the occasion arise where, for administrative reasons, the institution must withdraw a proposal, the appropriate administrator should contact the Director of Sponsored Programs for appropriate action.

5.5 Proposals Declined for Funding

When notice is received that a proposal has been declined by a sponsor, the Office of Sponsored Programs will notify the project director, the department head, and the college, school or unit official; the Office of Sponsored Programs copy of the proposal is returned to the project director. In those cases where the project director receives the notification, he/she should forward a copy of the notification to the Office of Sponsored Programs as soon as possible.

For proposals that undergo peer review, we urge the project director to request a copy of the evaluation summary from the sponsoring agency. Review and analysis of these evaluations may point out omissions or weaknesses in the proposal and give the author the information needed to rethink and restructure the proposal for resubmission.

A significant number of awards received by MSU project directors - and those at other institutions - have been the result of proposals submitted a second or third time, after revisions resulting from peer evaluations.

5.6 Summary Record

The Office of Sponsored Programs maintains a record of proposals submitted and awards received. This information is summarized monthly and annually, and distributed to the President, other University administrators, and the Board of Trustees.

If reports regarding proposals or awards are needed, please contact the Office of Sponsored Program, 133 Etheredge Hall (5- 7404), with your request.

6. PROJECT MANAGEMENT

When a proposal is approved and a grant or contract awarded, the project director, department head, and college or school official share the incurred responsibility for the satisfactory and timely performance of the work for which funds are provided. They also are responsible for the management of the project within the policies and procedures of both the sponsoring agency and Mississippi State University. On some occasions, the policies and procedures of the two will differ. However, the grantor's policies and procedures must be complied with, as well as those of the University. In such cases, project directors are advised to discuss problems of this nature with the Director of Sponsored Programs. Project directors are advised that any deviation from either the grantor's or the University's policies must have explicit approval in writing from a proper authority.

The project director must be alert to bring to the attention of the department head and the college/school official any circumstance that threatens to prevent or delay satisfactory and timely completion of the project. In addition, it is advisable to keep the Office of Sponsored Programs conversant with any such real or potential problems. The project director also must keep the sponsor informed of progress through formal reports and letters, as specified in the contract/grant agreement. When a project is to be extended in time or modified, the project director is responsible for initiating the action necessary in sufficient time to allow for agency response. Project directors are reminded that no-cost extensions of grants/contracts must be processed through appropriate University channels culminating with notification from the project director routed to the sponsor via the Office of Sponsored Programs.

Project directors are reminded also that, in their discussions with sponsor representatives, most Federal agencies have both a Program Officer, who is responsible for the technical performance of the program, and a Contracting Officer, who has responsibility for any deviation from the time schedule, budget, shifting of funds within a budget, and similar matters. Thus, while a Program Officer may give verbal permission for a time extension or for fund transfer from one line item to another, the written concurrence of the Contracting Officer is mandatory. In general, the project director has contact with the Technical Officer, while all contact with the Contracting Officer should be through the Office of Sponsored Programs (the schematic in Figure 2. of Section 5.2.2 is a general guide to be followed throughout project management).

6.1 Establishing a Project Account

For funds to be expended in support of an approved project, a project is established and assigned a project number. This is done by the Controller's Office on transmittal of an executed agreement and supplementary documentation from the Office of Sponsored Programs. At that time, administrative support of the project is, in general, transferred from the Office of Sponsored Programs to the Controller's Office. Once this transfer has been accomplished, the project director typically should contact the Controller's Office with questions concerning agreement administration.

Occasionally a project director will need to establish a project account prior to receipt of a formal award document or prior to the successful completion of the negotiation process. The Office of Sponsored Programs provides a highly flexible tool for such action: The Preliminary Account Request Form, is available on www.spa.msstate.edu. Note, the Preliminary Account Request form may be used to extend a project prior to receipt of a renewal, continuation, no-cost extension or other formal notification from the sponsor that the project termination date is extended.

6.2 Role of the Principal Director in Project Management

The project director is responsible for all aspects of the day-to-day administration of the project by:

- insuring that funds are expended for, and at rates specified by, items and missions delineated in the contract/grant instrument,
- providing guidance for other project personnel, continually reevaluating project plans and results toward determining if and when unforeseen developments require major or minor changes,
- providing technical liaison with the sponsoring agency, and timely preparation and submission of responsive technical reports as required in the contract/grant instrument, especially the final report,
- assuring that the department head is fully apprised of project performance and progress.

6.3 Project Accounting

The project director is accountable for all charges and transactions made to the sponsored account. These transactions include, but are not limited to: initiating requisitions for purchase of services, supplies, or equipment, salaries and wages, travel authorizations, and any type of expenditure required to conduct the project. The timely initiation of a Personnel Action Form for each individual assigned to the project is of great importance. This action will result in the correct salaries being charged to the project. The percent of time charged to the project by each person must be debited against the project account. Personnel Forms are routed in the normal manner.

Charges to the project must be coded and charged correctly at the time documentation is prepared to avoid extra cost and audit risks. Also, all expenditures charged to the project account must be for items required to further the accomplishment of the project, and must be based on the budget as approved by the sponsor. Charges that do not meet these criteria, as well as post facto cost transfers, may be disallowed by Federal auditors at a later date - several months to several years. Also, excessive cost transfers alert auditors to a serious breakdown in the controls in place to ensure proper classification and codification of expenditures.

The project director must be aware that certain items may require specific written prior approval by the sponsor, irrespective of their inclusion in an approved budget, if they are to be allowed as acceptable charges. Foreign travel, for example, almost always requires the approval of most federal sponsor prior to the trip, even though justified in the proposal and accepted in the award. Foreign travel also requires the permission of the university administration. As a project progresses, it may become apparent that the purchase of equipment not specified in the original budget is mandatory for the successful completion of the project. While the Program Officer may concur with the necessity for such expenditure, the written permission of the Contracting Officer is required for such expenditure to be considered an allowable expense.

6.4 Accounting Adjustments

6.4.1 Transfer of Expenditures (Cost Transfers)

All requests for transfer of expenditures between two or more sponsored projects must be explained completely and fully supported for audit purposes. The same is true for transfer of funds between sponsored programs and

University funds. Transfers requested more than ninety days after initial assignment of the cost will be approved on an exception basis. The Controller's Office will provide guidance in making the necessary transfers.

6.4.2 Budget Adjustments

Adjustments in the authorized award budget may require prior approval from the sponsoring agency. The project director is responsible for consulting the sponsored agreement for guidance as to whether such an adjustment requires external approval (approval from the sponsor) or not. Where adjustments require sponsor approval, the project director should prepare a revised budget and fully justify, in narrative form, the reason for the requested adjustment. Such correspondence should be prepared in memorandum or business letter format and contain sufficient space for signatures of the project director, department head and Director of Sponsored Programs. All such correspondence must be routed through the Office of Sponsored Programs. Once approval from the sponsor is received, the Office of Sponsored Programs must be notified immediately. Forward the original approval notification to the Office of Sponsored Programs. Upon receipt, the Office of Sponsored Programs will route a copy of the request for adjustment along with the original approval notification to the Controller's office for maintenance of the BANNER accounting system and update of the official contract file.

6.5 Certification of Time and Effort

All salaries and wages charges to sponsored projects must be certified both by the employee and by the department head to assure federal sponsors that the efforts of each individual were consistent with salary charges. To satisfy this requirement, a computer listing that shows the percentage of time allocated to each project is distributed to appropriate department heads. This report must be certified by both the department head and the individual, and then returned to the Controller's Office no later than 30 days following the reporting period specified. Any exceptions are to be noted on the report.

6.6 Intellectual Property (Patents, Copyrights, etc.)

Various sponsors have different policies regarding inventions resulting from work done on sponsored projects. The project must be familiar with the intellectual property policies both of the University and of the sponsor. The project director is not authorized to negotiate intellectual property matters with potential sponsors. If the project director feels that an invention has resulted from the work of any faculty or staff members involved in the project, the Director of the Office of Technology Commercialization (325-9263), should be contacted before any action is taken with respect to the possible invention. It is important that adequate records be kept by all project participants, preferably in bound notebooks, with notebook entries dated and signed by a witness. It is a good idea to contact the OTC to develop sound lab management practices relating to record keeping to ensure adequate protection of intellectual property.

6.7 Revision of Projects

Should the need arise to revise a project, as a major revision in the statement of work requiring approval from the sponsor through a modification of the sponsored agreement, the project director should prepare a formal letter outlining the requested action. Such letter should provide space for the department head, college, school or unit official and sponsored programs signatures. The request letter should be forwarded to the sponsor via the Office of Sponsored Programs. Receipt of approval must be forwarded to the Office of Sponsored Programs immediately. Changes regarding fiscal aspects should follow the guidelines provided in section 6.4 above.

6.8 Reports

The project director will make every effort to meet the sponsor's schedule for technical reports. Some agencies place a primary emphasis in having publications appear in refereed journals and want only very brief technical

reports, with copies of reprints of publications forwarded to the Project Officer. Other sponsors require a comprehensive final report. Until such a report is received in acceptable format and content, the project is not closed and generally final payment is not made. Failure to properly close the project resulting in under-recovery of reimbursable expenditures is the responsibility of the department.

6.9 Completion of Projects

At the completion of a project, the project director should make sure that all technical reports, all final reports on patents, and any other deliverables required by the sponsor be completed as soon as is practicable. The Controller's Office will close the project after all requirements have been met and final payment received.

6.10 Subcontracting and Consulting Agreements

Consult the Policy and Procedure Statement on Securing and Paying for Consultants available on the Sponsored Programs home page for consulting arrangements. For subcontracting consult with your designated sponsored programs administrator by contacting the Office of Sponsored Programs at 662/325-7404.