

# GUIDELINES

*for*

## Research & Sponsored Programs



Office of Research & Sponsored Programs  
**Florida Gulf Coast University**  
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Version 3.1

# Acknowledgement

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# Nomenclature

A&P Position	Administrative & Professional Position
AY	Academic Year
CFDA	Catalog of Federal Domestic Assistance (Assistance Listing number)
CFR	Code of Federal Regulations
COI	Conflict of Interest
CY	Calendar Year
E&G Funds	Education & General Funds
EPAF	Electronic Personnel Action Form
F&A Costs	Facilities & Administrative Costs (a.k.a. Indirect Costs)
FOAPAL	Fund Organization, Account, Program, Activity, Location
FTE	Full Time Equivalent
FY	Fiscal Year
GAAP	Generally Accepted Accounting Principles
HR	Human Resources
IACUC	Institutional Animal Care and Use Committee
IBS	Institutional Base Salary
ICF	Internal Clearance Form
IRB	Institutional Review Board (for Protecting Human Subjects in Research)
NIH	National Institutes of Health
NSF	National Science Foundation
OGS	Office of Graduate Studies
OMB	Office of Management and Budget (Federal)
OPRR	Office for Protection from Research Risks (Federal)
OPS	Other Personnel Services (short-term, time-limited employment)
ORI	Office of Research Integrity (Federal)
ORSP	Office of Research & Sponsored Programs
PA	Program Announcement
PI	Principal Investigator
PO	Purchase Order
RFA	Request for Applications
RFP	Request for Proposals
SPAN Form	Sponsored Program Award Notice form
SP	Support Personnel
SRC	Sponsored Research Compensation
SRBT	Sponsored Research Budget Transfer
TAR	Travel Authorization Request

# Definitions

## **Office of Research & Sponsored Programs (ORSP)**

ORSP provides service to manage and monitor extramural research grants/contracts and sponsored programs. ORSP also assists the University's research community in preparing, developing, submitting, securing, and administering externally funded grants/contracts for research, scholarly activities, instruction, community service and creative artistry. ORSP manages and monitors externally funded grants/contracts to ensure that these projects/programs are administered through sound management practices and in compliance with the regulations governing the management of externally funded projects/programs.

## **Principal Investigator**

The Principal Investigator is the individual with the primary responsibility for the overall conduct of the research. This includes the technical aspects and completion of programmatic work; compliance with university, sponsor and government, policies and regulations; stewardship of sponsored funds, and all administrative requirements of the project.

## **Departmental Chair**

The Departmental Chair is the significant authority over a specific college department, such as the Department of Biological Sciences, Department of Counseling, etc.

## **Dean of College**

The Dean of a College is the significant authority over a specific academic unit, such as the faculty or administrative division in a university or college.

## **Sponsored Project**

Sponsored projects are externally funded activities in which a formal written agreement, i.e. grant, contract, or cooperative agreement, is entered into by FGCU and the sponsor. Funding provided by a Federal, state or local government agency that supports FGCU research activities is treated as sponsored project funding. Funding from voluntary health organizations or associations, such as the American Heart Association or American Cancer Society, are typically treated as a sponsored project as well. The following conditions are among those that characterize a sponsored project:

- The proposed project binds the University to a specific scope or area of work
- Progress, technical, or final reports or other deliverables are required
- Billing, separate accounting procedures, or report of expenditures are required
- Unexpended funds must be returned to the sponsor at the end of the project
- The project has a specified performance period or completion date
- The project has budgeted indirect costs

## **Grant Agreement**

A grant agreement is a legal instrument of financial assistance between a Federal awarding agency, private or state organization, or pass-through entity and non-Federal entity (FGCU) that:

(a) Is used to enter into a relationship the principal purpose of which is to transfer anything of value from the Federal awarding agency, private or state organization or pass-through entity to FGCU to carry out a public purpose;

(b) Is distinguished from a cooperative agreement in that it does not provide for substantial involvement (research) between the Federal awarding agency, private or state organization, or pass-through entity and FGCU in carrying out the project activity.

## **Contract**

A contract is a legal instrument by which FGCU purchases property or services needed to carry out the project or program under a Federal, private or state organization or pass-through entity.

## **Cooperative Agreement**

Cooperative agreement means a legal instrument of financial assistance between a Federal awarding agency, private or state organization or pass-through entity and FGCU that:

(a) Is used to enter into a relationship the principal purpose of which is to transfer anything of value from the Federal awarding agency, private or state organization or pass-through entity to FGCU to carry out a public purpose and not to acquire property or services for the Federal Government, private or state organization or pass-through entity's direct benefit or use;

(b) Is distinguished from a grant agreement in that it provides for substantial involvement between the Federal awarding agency, private or state organization or pass-through entity and FGCU in carrying out the activity.

## **Cost Reimbursement Awards**

Funding may be provided by a sponsor on a cost reimbursement basis. This means that FGCU first incurs costs and then (ORSP) submits an invoice to the sponsor for payment. The award is issued on the basis of an estimate of the costs of performing research/project and is often arrived at by negotiation between the funding agency and FGCU. Work should stop when all of the funds are exhausted.

## **Cost Sharing or Match**

2 CFR §200.306: Cost sharing or match means the portion of project or program costs not paid by the Federal Government. Cost sharing or match is not expected in Federal projects unless specifically requested in the request for proposal. Cost sharing or match should never be volunteered. It is used only when required by the sponsor.

### **Fixed Amount Awards**

Fixed amount award means a type of agreement under which the Federal awarding agency, private or state organization or pass-through entity provides a specific level of support without regard to actual costs incurred under the award. This type of award reduces some of the administrative burden and record-keeping requirements for both FGCU and the awarding agency or pass-through entity. Accountability is based primarily on performance and results. If a project requires regular invoicing with documentation, it is generally not a fixed amount award.

### **Gift**

Gifts or donations are irrevocable awards of money or other tangible assets provided by a donor and do not require a line item budget. Please contact the FGCU Foundation for further explanation of gifts. Only gifts made with contractual requirements such as financial reporting, return of unexpended balances, and/or progress reports are classified as grants or contracts.

### **Subaward**

Enforceable agreement, issued under a prime sponsored project, between a pass-through entity and a subrecipient for the performance of a substantive portion of the program. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract. FGCU can be either the subrecipient or the pass-through entity based on its place in the award.

### **Authorized Signature**

Only the AVP for Research can sign on behalf of FGCU for grants, awards, or subaward agreements.

# Chapter 1: Scholarly Activities and Research

## 1.1 Scholarly Activities

The word “*scholarly*” is defined as “concerned with or relating to formal study or research” or “having the characteristics of a scholar”

The term “*scholarly activity*” can be viewed narrowly or broadly. Its coverage can vary from one discipline to another discipline, one program to another program, or even among faculty members. Research extensive organizations may define scholarly activities more narrowly with emphasis on competitive sponsored research grants and peer-reviewed publications. Although “*scholarly activities*” may vary with context and discipline, it generally includes curriculum and course development, fundamental or applied research, publications, conference presentations, workshops, consultancy to industry, etc.

The broad definition of academic *scholarly activity* may be divided into the following categories: peer-reviewed journal articles, abstracts, chapters and books, conference publications and presentations, research grants and projects, teaching, other creative works, and other activities. Other scholarly or professional activities may include service to professional societies and committees, serving on an editorial board, reviewing papers and proposals, consulting service, keynote and plenary addresses, research forums, etc. [Earl J. Reisdorff, Director of Medical Education, Ingham Regional Medical Center, Michigan State University Emergency Medicine Residency; *Scholarly Activity: A Personal Odyssey, Navigating the Academic Waters*; 2004] [The Board of Ethics of American Speech-Language-Hearing Association] [Seton Hall University; The Boonshoft School of Medicine of Wright State University; Carolinas Medical Center; Avondale College].

In Ernest Boyer’s book [Ernest L Boyer; *Scholarship Reconsidered: Priorities of the Professoriate*; The Carnegie Foundation for the Advancement of Teaching; Princeton, New Jersey; 1990, 1997], he describes the need to get beyond the “teaching vs. research” debate and give the term scholarship “a broader meaning that brings legitimacy to the full scope of academic work.” Boyer views the work of the academic professional as having four separate, yet overlapping functions:

- Discovery (to advance knowledge through research)
- Integration (to synthesize knowledge to make connections across disciplines)
- Teaching (to advance and apply knowledge about how to teach/promote learning)
- Service/Engagement (to utilize knowledge in practice and community service)

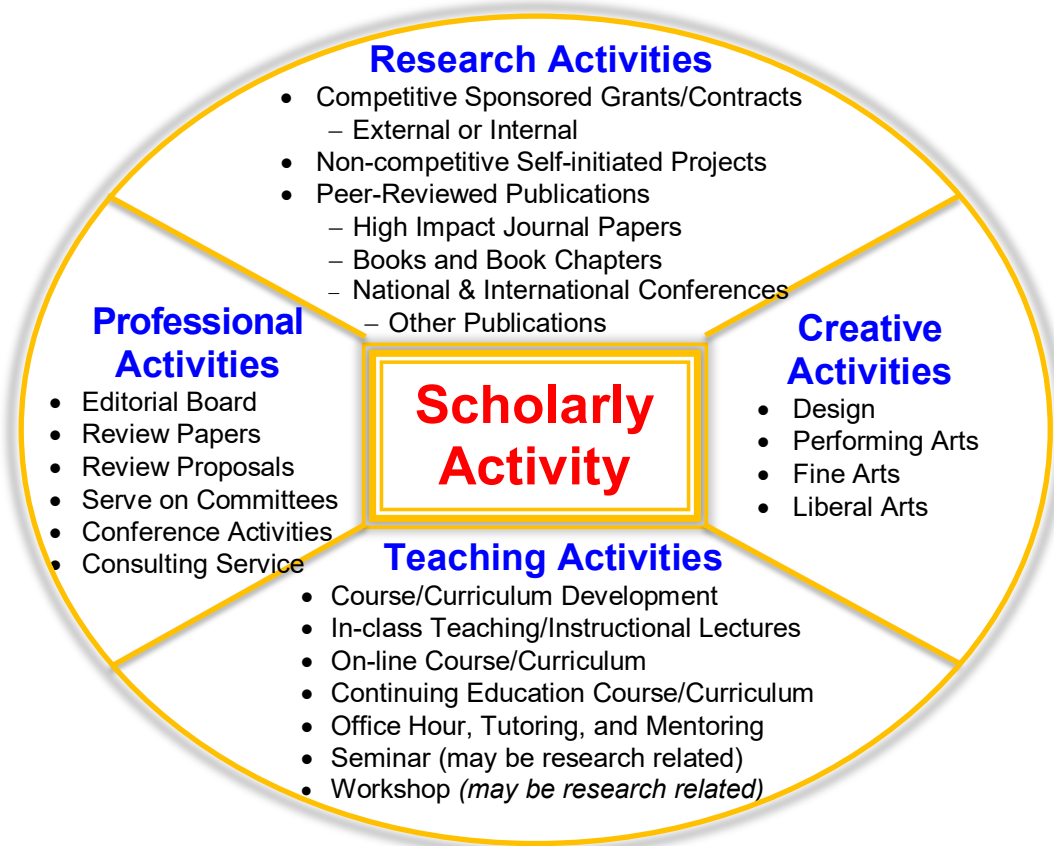
Research and scholarly activities are often considered hallmarks of the establishment in one’s own professional field. These activities validate professional practice standards and promote advancement of knowledge in the field. In academia, research is often an expectation of faculty and may be the major determinant in tenure and promotion decisions. Faculty therefore may be expected to engage in research and scholarly activities essential to the profession and to contribute to the research mission of the university [Kathy V. Waller, Diane Wyatt, and Karen R. Karni; *Scholarly Activities among Clinical Laboratory Science Faculty*; *Clinical Laboratory Science*; 1999].

Research and scholarship play a vital role in faculty, program and course/curriculum development contributing to both individual professional fulfillment and teaching excellence. Usually, faculty



members are collectively responsible for professional contributions to the areas of teaching, service, and research and scholarly activities.

Faculty may participate in applied and theoretical research and scholarship through activities which lead to the application or utilization of knowledge and invention, and to creative activities which produce new works of literature, music, and the fine arts. The results of scholarly, creative or applied research may be shared by performance, exhibitions, oral presentations, publications, or application of innovations on or off campus.



Empirical research has shown that increased productivity is associated with the presence of human resources to support research and protected research time. Others have noted benefits from fellowship programs, requirements for scholarly work, strategic planning for research, or increased support for scholarship [J. Hinojosa, K.L. Bene, C. Hickey, and K. Marvel, *Scholarly Activities of Family Medicine Faculty: Results of a National Survey*, Med Education Online; 2006]. Because of the disproportionate funding opportunity in different research fields, many universities (e.g. Texas A&M University, Southeastern Louisiana University) have established competitive Scholarly and Creative (S&C) programs to promote faculty and student creative and scholarly activities. These awards will support scholarly and creative activities primarily in the humanities, arts, social sciences, and other disciplines in which external funding are typically limited or unavailable.

## 1.2 Research

**Scientific research** relies on the application of the scientific method, a harnessing of curiosity. This research provides scientific information and theories for the explanation of the nature and the properties of the world around us. It makes practical applications possible. Scientific research can be subdivided into different classifications according to their academic and application disciplines. For instance, **Business Research** is the examination of statistics and other information regarding past, present, and future trends or performance that enables analysts to recommend to investors which stocks to buy or sell in order to maximize their return and minimize their risk. It may be used either in the top-down approach (where the investor evaluates a market, then an industry, and finally a specific company) or the bottom-up approach (where the investor selects a company and confirms his or her findings by evaluating the company's sector and then its market). Careful research is likely to help investors find the best deals, in particular value shares or growth equities.

### a. OMB Definition of (Research & Development)

The Office of Management and Budget (OMB), Executive Office of the President of the U.S., has defined Research & Development (both basic and applied, and all developmental activities) in its 2 CFR §200.87. "Research" is defined as a systematic study directed toward fuller scientific knowledge or understanding of the subject studied. "Development" is the systematic use of knowledge and understanding gained from research directed toward the production of useful materials, devices, systems, or methods, including design and development of prototypes and processes. 2 CFR Part 200 (Appendix III) further explains that "*Major Functions of an Institution*" refers to instruction, organized research, other sponsored activities and other institutional activities.

- 1) **Instruction** means the teaching and training activities of an institution. Except for research training, this term includes all teaching and training activities, whether they are offered for credits toward a degree or certificate or on a non-credit basis, and whether they are offered through regular academic departments or separate divisions, such as a summer school division or an extension division.
  - i. **Sponsored instruction and training** means specific instructional or training activity established by grant, contract, or cooperative agreement. For purposes of the cost principles, this activity may be considered a major function even though an institution's accounting treatment may include it in the instruction function.
  - ii. **Departmental research** means research, development and scholarly activities that are **not** organized research and are **not** separately budgeted and accounted for. **Departmental research is considered as a part of the *instruction* function of the institution.**
- 2) **Organized Research** means all research and development activities of an institution that are separately budgeted and accounted for. It includes:
  - i. **Sponsored research** means all research and development activities that are sponsored by Federal and non-Federal agencies and organizations. This term includes activities involving the training of individuals in research techniques (commonly called research training) where such activities utilize the same facilities

as other research and development activities and where such activities are not included in the instruction function

- ii. **University research** means all research and development activities that are separately budgeted and accounted for by the institution under an internal application of institutional funds. University research, for purposes of this document, shall be combined with sponsored research under the function of organized research.
- 3) **Other sponsored activities** mean programs and projects financed by Federal and non-Federal agencies and organizations which involve the performance of work other than instruction and organized research. Examples of such programs and projects are health service projects, and community service programs. However, when any of these activities are undertaken by the institution without outside support, they may be classified as other institutional activities.
- 4) **Other institutional activities** is defined as all activities of an institution except for instruction, departmental research, organized research, and other sponsored activities, as defined in this above

#### **b. Definitions of Research by Federal Sponsoring Agencies**

**National Science Foundation (NSF)** defines the term Research and Development (R&D):

- 1) Research is systematic study directed toward fuller knowledge or understanding of the subject studied. Research is classified as either basic or applied, according to the objectives of the investigator.
- 2) Development is systematic use of the knowledge or understanding gained from research, directed toward the production of useful materials, devices, systems, or methods, including design and development of prototypes and processes.

**The National Institutes of Health (NIH)** defines *research & development* as “All research activities, both basic and applied, and all development activities that are performed by HHS award recipients. The term research also includes activities involving the training of individuals in research techniques where such activities utilize the same facilities as other research and development activities and where such activities are not included in the instruction function. R&D Research” is defined as a systematic study directed toward fuller scientific knowledge or understanding of the subject studied. R&D Development is the systematic use of knowledge and understanding gained from research directed toward the production of useful materials, devices, systems, or methods, including design and development of prototypes and processes.”

**The National Endowment for the Humanities (NEH)** Division of Research Programs supports scholarly research that advances knowledge and understanding in all areas of the humanities. NEH provides funding to individuals as well as teams of researchers and institutions engaged in research, writing, editing projects, and publishing materials of historical or literary significance. Awards are made to scholars working on research projects of significance to specific humanities fields and to the humanities as a whole.

**The National Endowment for the Arts (NEA)** specifies that “research into the value and impact of the arts” is a core function of NEA.

**The Food and Drug Administration (FDA)** construes the term "science" broadly, as encompassing all of the disciplines and activities within the FDA that have a scientific basis, e.g., research. The term "scientific research" was taken to include both laboratory and non-laboratory investigation that addresses questions either of immediate applicability to present-day regulatory problems, questions that can be expected to arise in the near-term, and fundamental studies in areas of contemporary biomedical research that can reasonably be anticipated to affect FDA review and regulatory responsibilities over the longer-term, but foreseeable, future (an example of the last category might be research into candidate recombinant vaccines or biological response modifiers under development for commercial application). Under this definition, "scientific research" would exclude routine laboratory or non-laboratory testing and analysis using established methodologies, but would include the development of new analytical approaches and methodologies.

### 1.3 Medical Research

Other critical areas of research are in medicine and healthcare. The *Translational Research Working Group (TRWG)* of NIH's National Cancer Institute (NCI) defined Translational Research in the following way: "[Translational research transforms scientific discoveries arising from laboratory, clinical, or population studies into clinical applications to reduce cancer incidence, morbidity, and mortality.](#)"

NIH Clinical and Translational Science Awards (CTSA) explained that translational science is the link between the two disciplines of [basic \(i.e., bench\) research](#) and [clinical \(i.e., bedside\) research](#). It is about translating discoveries that scientists have made in the lab to develop real treatments that help patients. Translational science can also move in the other direction, when observations made at the patient's bedside stimulate new areas to explore in the lab.

#### a. Clinical Research

The term "clinical" is derived from the Greek *klinikos*, meaning 1) of a bed, or 2) a physician who attends bedridden patients. The term "*clinical research*" is used in a less strict sense to mean research involving human subjects that is designed either to enhance the professional capabilities of individual physicians or to contribute to the fund of knowledge in those sciences that are traditionally considered basic in the medical school setting, e.g., biochemistry, physiology, pathology, pharmacology, epidemiology, and cognate behavioral sciences [Robert J. Levine, *Ethics & Regulation of Clinical research*; 1988].

NIH defines *clinical research* as Research with human subjects that is:

1) Patient-oriented research. Research conducted with human subjects (or on material of human origin such as tissues, specimens, and cognitive phenomena) for which an investigator (or colleague) directly interacts with human subjects. Excluded from this definition are in vitro studies that utilize human tissues that cannot be linked to a living individual. It includes: (a) mechanisms of human disease, (b), therapeutic interventions, (c) clinical trials, or (d) development of new technologies.

2) Epidemiological and behavioral studies.

3) Outcomes research and health services research. Studies falling under 45 CFR Part 46.101(b)(4) (the "Common Rule" prior to July 19, 2018 and 45 CFR Part 46.104(d)

3) (the "Revised Common Rule" effective July 19, 2018 Exemption 4) are not considered clinical research by this definition.

NIH Clinical and Translational Science Awards (CTSA) further states that *clinical research* involves human subjects who volunteer to take part in scientific studies. Clinical research happens in hospitals, doctors' offices and communities. It includes trials that test new treatments and therapies as well as observational studies that help physicians see how disease changes over time and whether medications, lifestyle adjustments or other interventions affect it. Clinical research also involves taking proven research and finding ways to implement it to improve care.

#### **b. Experimental Research**

*Experimental Research* is an attempt by the researcher to maintain control over all factors that may affect the result of an experiment. In doing this, the researcher attempts to determine or predict what may occur [James P. Key, *Research Design in Occupational Education*; 1997].

The most common applications of these designs in marketing research and experimental economics are test markets and purchase labs. The techniques are commonly used in other social sciences including sociology and psychology.

#### **c. Bench Research**

NIH defines *bench research* that happens in laboratories and is focused on exploring the most basic functions of living systems, from humans down to single cell organisms. It may focus on a particular cellular substance or function, or a system in the body, and often uses model systems like human or animal cells, simple organisms like fruit flies or yeast, or higher animals like mice and rats.

Clinical research entails assisting doctors, nurses, and staff with patients enrolled in patient-focused studies whereas *bench research* entails working at a lab bench with test tubes, pipettes, gels, cells, and microbes.

Studies involving patients pose special methodological challenges that are not encountered in laboratory *bench research*. In bench research, the subjects of the experiment are selected to ensure that they are virtually identical. In clinical research, by contrast, the populations under study, even in studies involving identical twins, are never truly identical. Whereas in bench research experiments are conducted in such a manner that everything other than the experimental maneuver is applied to the control group, many aspects of clinical research studies cannot be controlled. Moreover, there are fewer constraints on how the results from bench studies can be assessed (i.e., isolation of cellular material, euthanasia of animals, *ex vivo* studies) [Careers in Clinical Research: Obstacles and Opportunities, Institute of Medicine, National Academy of Sciences; 1990].

Most nurses are well-acquainted with clinical research, in which investigators study how a new drug, device, or treatment affects patients. Bench research, however, may be less familiar. Unlike clinical research, bench research is generally performed in a laboratory and focuses on understanding the cellular and molecular mechanisms that underlie disease. While some bench research studies are conducted on single cells, a group of cells in culture, or tissue samples, other studies use animal models to examine how a particular gene or cellular mechanism relates to physiological or pathological systems. Although the settings and techniques associated with

clinical research and biomedical bench research differ, the two fields share a common goal; finding new, more effective ways to combat disease.

## Chapter 2: Pre-Award Grant Application

### 2.1 Proposal Preparation

The Office of Research & Sponsored Programs (**ORSP**) is the authorized body at FGCU to submit and accept externally sponsored research grants, contracts, agreements, projects and programs on behalf of FGCU. **All externally sponsored research grants, contracts, agreements, projects and programs must be processed through ORSP.** ORSP will negotiate all terms and conditions of agreements in accordance with State of Florida and FGCU Policies and Guidelines. ORSP reserves the right to deny acceptance of any externally sponsored research grants, contracts, agreements, projects and programs that are **not** processed through and submitted by ORSP. All award types must be approved by FGCU's General Counsel's Office for legality prior to execution.

The Principal Investigator (**PI**) is responsible for submitting, to ORSP, the complete **grant application package; including technical proposal, budget proposal, and additional documents and/or attachments required by the sponsor** in its final form, preferably no later than five business days prior to the submission deadline. Although ORSP strives to support all proposal submissions, sufficient time is necessary to coordinate the effort and guarantee successful submission of multiple proposals within the same timeframe. Please inform ORSP of a potential submission of proposal as far in advance as possible.

The PI is also responsible for completing the **Proposal Submission Form (PSF)**, initiating the routing process, obtaining required signatures, and submitting the PSF along with the complete grant application package to ORSP. Regardless of whether the award is Cost Reimbursable or Fixed Fee, a detailed budgetary plan and budget justifications (i.e. the budget proposal) must be included in grant application package. A timely approval and submission depends on the completeness of grant application package and PSF.

### 2.2 Preparation of Budget Proposal

A budget proposal comprises 1) itemized estimation of the budget needed to carry out the sponsored project, and 2) detailed budget justifications. The two primary components for estimating the budget needed to carry out a sponsored project are: 1) **Direct costs for the proposed project** and 2) **Facilities & Administrative (F&A) costs for the university** to mitigate expenses of support and service provided by the university.

#### a. Direct Cost

Direct costs are the funding requested by PI to carry out the proposed project as describes in the technical proposal. The PI is responsible for requesting adequate budget to complete the proposed project. Direct costs must only be expended for the proposed project and must not be used on any other projects. That is, **direct costs are not transferable among/between grants.**

Direct costs may include, but are not limited to, categories such as salaries for PI and Co-PI(s), faculty course buyout, staff time buyout, other personnel stipends, student wages, fringe benefits, consultant fees, technician expenses, statistician costs, travels, supplies and materials, sub-awards, equipment, alterations or renovations, other direct costs, etc.

In accordance with the Uniform Guidance (2 CFR Part 200), university policy, and guidelines specific to the sponsoring agency, all direct costs must be:

**Allowable:** Costs that are necessary and reasonable and are not designated as “unallowable” under Code of Federal Regulations (2 CFR Part 200), consistently treated and adequately documented, adhere to sponsor-specific policies and award-specific terms and conditions regarding specific items of cost, and adhere to university policies regarding specific items of cost.

**Reasonable:** Costs that are recognized as ordinary and necessary for the operation and performance of the sponsored agreement, use of sound business practices and a prudent person would pay this price (e.g. a \$50,000 beaker is NOT reasonable).

**Allocable:** Costs that are incurred to benefit the sponsored project and able to be assigned/charged to the project with a high degree of accuracy.

**Consistently applied:** Consistency in this context means that costs incurred for the same purpose, or in like circumstances, must be treated uniformly as either direct costs or as F&A costs. **Certain types of costs (e.g. salaries of administrative and clerical support/service, office supplies, postage, etc.) are normally treated as F&A costs.** The same types of costs cannot be charged directly to federally sponsored agreements, unless the circumstances related to a particular project are clearly different from the normal operations of the institution.

#### 1) **Base salary**

The cost attributed to the committed effort on a sponsored project must be based on individual’s Institutional Base Salary (**IBS**). The IBS is defined as:

*“The annual salary based upon the appointment, nine to twelve month, and does not include paid additives, such as stipends and overload.” (FGCU Collective Bargaining Agreement)*

The maximum allowable rate of compensation charged to a sponsored project, or sponsored projects in total, must **not** exceed the regular monthly and bi-weekly pay rates:

$$\text{Monthly Pay Rate} = \text{Base salary} \div \text{Length of appointment}$$

$$\text{Bi-weekly Pay Rate} = \text{Monthly pay rate} \div 2.175$$

The maximum allowable yearly compensation charged to a sponsored project, or sponsored projects in total, must **not** exceed the **Annualized Limit**; that is, the calculated equivalent of 12 months of salary based on the regular monthly pay rate. The annualized limit is calculated as:

$$\text{Annualized Limit} = \text{Monthly pay rate} \times 12 = (\text{Base salary} \div \text{Length of appointment}) \times 12$$

#### 2) **Salary support**

In general, salary support from externally funded research grants is calculated as follows:

$$\text{Salary Support} = \# \text{ Person-Months} \times \text{Monthly pay rate}$$

Section 2.3 below and Chapter 4 provide more details on the calculation of % effort and Person-Months.



**Summer Salary:** Under the condition that one's length of appointment is less than 12 months, salary may be requested for work performed outside of the academic year. The maximum allowable compensation for full summer salary is:

$$\text{Full Summer Salary} = \text{Monthly pay rate} \times (12 - \text{Length of appointment})$$

The **actual** summer salary compensated by a sponsored project, or sponsored projects in total, may be less than the Full Summer Salary in the event that one is also compensated by other types of compensation such as for teaching or service activities. In this case,

$$\begin{aligned} &\text{Actual/Allowable Summer Salary Compensated by Sponsor Project(s)} \\ &= \text{Full summer salary} - \text{Total other compensations received in summer} \end{aligned}$$

Furthermore, some agencies, like NSF, limit the amount of summer salary support to no more than 2/9 of the academic year salary.

Pursuant to rules and regulations set by federal sponsoring agencies, faculty charging Full Summer Salary to sponsored project(s) may **NOT** participate in activities including, but not limited to, vacations, mentoring of students, proposal preparation, etc.

**Course Buyout:** Faculty should consult with his/her department chair and/or college dean for the rate (e.g. full salary rate or replacement rate) of course buyout. If awarded, the budget for course buyout will be used to release the faculty from teaching a particular course, or courses, in order to commit oneself to the sponsored project(s). The released budget may be used by the department or college to hire a replacement, instructor, lecturer, etc. to teach the same course, other course(s), and/or to fulfill other required duties. It is at the discretion of the department chair and/or college dean to make the final decision for the best interest of students, department, college, and the university.

In cases where faculty members would like to use a portion of their departmental research or service time for sponsored projects, the appropriate percentage to budget can be calculated using the formula found in Section 2.3

**Time Buyout:** Staff (e.g. AP, SP) salary can be requested for "time buyout" to hire a staff replacement in support of grant activities. "Time buyout" is used to release staff from one's regular department and/or college routines to support specific grant activities. The released budget may be used by the department and/or college to hire a replacement (OPS) to fulfill the released job duty and/or other duties as required. It is at the discretion of the department chair and/or college dean to make the final decision for the best interest of the department, college, and the university.

To buy out release time for staff, it is required to obtain supervisor's prior approval at a cost consistent with one's level of effort on the sponsored project.

### 3) **Extra compensation**

In very rare cases, extra compensation exceeding the Institutional Base Salary within the appointment period (e.g. 9-month appointment during the Academic Year), or extra compensation exceeding the Annualized Limit, may be allowed. Please refer to the **Checklist on Compensation** (from Externally Sponsored Research Grant/Contract) for eligibility.

#### 4) Other personnel wages

In accordance with Office of the General Counsel Memorandum dated July 19, 2013 regarding Other Personnel Services (OPS) Employees, all Non-Student OPS workers may work an aggregate average of no more than twenty-nine (29) hours per week.

FGCU students may work no more than an aggregate total of 20 hours per week for international students, and 29 hours per week for U.S. students. An exception to this limitation is permitted when classes are not in session. Graduate Assistant Wages and Tuition remission (if applicable) should be separately budgeted in proportion to their effort on a sponsored project.

#### 5) Fringe benefits

Fringe Benefits are based on the following percentages of requested salary/wages. These rates are stated in FGCU's Federally Negotiated Indirect Cost Rate Agreement:

These consistently change so check the [ORSP website](#) for the most recent rates.

#### 6) Equipment

A non-expendable item with a unit cost  $\geq$  \$5,000. In the budget justification, information on name, model number, manufacturer, shipping, and installation costs should be included. Unless approved in advance by the sponsoring agency, equipment must be defined as "special purpose" and used only for research, medical, scientific, or other technical activities. Equipment must be tagged and tracked as a university asset. While computers may be less than \$5,000, they also must be tagged and tracked when purchased by grant funding.

#### 7) Travel

Reimbursement of travel expenses would be subject to F.S.1004.22. Justification for travel should include costs of airfare (coach) and/or mileage for each planned round trip. If travel spans multiple days, lodging and per diem should also be justified. Rates may be limited by university and/or sponsoring agency guidelines. Although definitions may vary among sponsoring agencies, per University Policy:

- All states within the continental USA are considered domestic travel.
- Alaska, Hawaii, Puerto Rico and all foreign countries are considered International travel and require the President's signature before funds can be encumbered.
- Any funds requested to be re-budgeted to travel from another expense category must be **clearly** and **thoroughly** justified.

Foreign Travel is subject to further rules and regulations, including additional approvals and export controls. The PI should work closely with ORSP if planning to include Foreign Travel in a proposal.

Registration fees for conferences or events are considered a travel expense when travel is involved, otherwise (ex., local events) they should be listed under Other (Other Direct Costs). Fees/costs for the travel of consultants or independent contractors should be included under Consultant Services and **not** separately budgeted under Travel.

## 8) **Materials & Supplies**

Materials and Supplies are defined as consumable supplies, regardless of cost, and equipment with a unit value of under \$5,000 or a useful life under two years. Supplies should be listed by general type such as chemicals or glassware. Cost should be a best estimate (***number of items x unit price***) and may include incoming shipping/freight charges.

General office supplies, such as paper, staples, pencils and pens and non-capital equipment such as **personal computers, laptops, tablets, and smartphones**, are generally **not** allowable on federal grants unless they can be directly allocated to specific project and are fully explained in the budget justification.

## 9) **Subrecipients/Sub-agreements (2 CFR §330-332)**

A Subrecipient is a collaborating entity that is expected to contribute a significant portion to the project and should be named in the proposal. Characteristics of a sub-recipient may include:

- Integral part of a team whose performance is necessary to meet program objectives
- Responsibility for programmatic decision making
- Responsibility for adherence to compliance requirements (IRB, IACUC, etc.).
- Ongoing collaborative relationship

If funding is an Award (Grant or Cooperative Agreement), FGCU may issue a **Subaward Agreement**. If funding is a Contract, a **Sub-Contract** may be issued.

Total Costs for subrecipients should be listed under Contractual or Subaward in the Budget. When including a subrecipient in a proposal, the following are required:

- Subrecipient Profile
- Statement of Work
- Complete detailed budget and budget justification
- Documentation of negotiated F&A cost rate
- Letter of Commitment signed by authorized official (if required)
- Most recent Federal audit
- Active SAM registration and Unique Entity Identifier (UEI.)

Additional documentation may be needed per guidelines of the sponsoring agency (e.g. data management plan, post-doc mentoring plan, facilities, equipment, other resources, current and pending support, etc.). PI should work with ORSP to appropriately address all collaborations.

See attached Subrecipient required documents: Subrecipient Monitoring Guidelines and Subrecipient Profile.

## 10) **Consultants**

Consultants are individuals whose involvement in the project is short term and/or sporadic and the services they provide do not include programmatic decision making. If possible, consultants should be named in the proposal and a letter of commitment to participate in the project should be included. Characteristics of a consultant may include:

- Provides services within normal business operations
- Provides similar services to many different purchasers
- Operates in a competitive environment
- Provides services that are ancillary to the operation of the project
- Has no responsibility for adherence to compliance requirements (IRB, IACUC, etc.).

Consultant costs should be budgeted to include: number of days, daily rate, fees, travel, etc. and be within the sponsoring agency's fee limit if applicable.

Current employees of FGCU may **not** be categorized and paid as Consultants on sponsored projects.

If Consultant is **not** the proper category for other FGCU participants involved in the sponsored project, salary or wages should be budgeted based on the expected level of effort to be contributed to the project. To comply with IRS guidelines, PI must work with ORSP and Human Resources to determine whether the classification as an **Independent Contractor** is appropriate.

#### 11) **Vendors**

A Vendor is an entity that provided goods and/or services that are ancillary to the operation of the project. Similar to Consultants, Vendors do not have responsibility for programmatic decision making, and are not subject to the same compliance requirements as sub-recipients. If possible, to expedite procurement, Vendor should be named in proposal and listed under Other (Other Direct Costs) in the Budget. PI's should work with ORSP and Procurement Services to determine if the classification as a Vendor is appropriate.

#### 12) **Cost-share**

Cost-Share (i.e. matching cost) is a component of a proposed project that will not be funded by the sponsoring agency. Cost-share may be covered by the university or a third-party. Usually, cost-share may **not** come from Federal sources. All forms of cost-share must be *reasonable*, *allocable*, and *allowable*. Typically, there are two forms of contributions:

- i) **Cash Match:** Cash **transaction** (salary, fringe benefits, monetary donations, etc.)
- ii) **In-Kind:** No cash transaction (donated supplies, equipment use, forgone F&A, etc.)

Different types of cost-share may include:

**Mandatory Committed Cost-Share:** Contributions required specifically in writing by the sponsoring agency in its guidelines, request for proposals (RFP), program announcement (PA), or solicitation. This type of cost-share **requires prior approval** of Department Chair, College Dean, ORSP and/or the Provost.

**Any committed cost-share must be accounted for separately from the sponsor's award funds by the PI's department or college and certified as required by the awarding agency at the end of the project.**

**Voluntary Committed Cost-Share:** Contributions **not** required by the sponsoring agency, but committed in the proposal budget. For example, not requesting a level of salary support that is

commensurate with the proposed level of effort would be voluntary cost-share. It is the practice of FGCU to **not** offer voluntary cost sharing to a sponsor unless it is mandatory.

**Voluntary Un-Committed Cost-Share:** Contributions **not** required by the sponsoring agency and **not** committed in the proposal budget. An example of this type of cost-share is working on an NSF-funded project during the academic year without committing a specific number of person-months (section 2.3) under the budget category of 'academic year effort'. Voluntary Un-committed Cost-Share is not permitted unless required by sponsor.

### 13) **Program income**

Program Income is the gross income directly generated by a supporting activity or earned as a result of an award and earned by the recipient during the period of the sponsored award. The treatment of Program Income on federal grants is stipulated by the administrative requirements of the sponsoring agency. There are three methods for treating Program Income:

**Additive:** Program Income funds are added to committed funds of the project by the sponsoring agency and recipient thus increasing the amount available to accomplish program objectives.

**Cost-Share:** Program Income is used to finance the non-federal share of the project (offset to cost sharing or matching). Program income is used for costs during the project period unless the sponsor authorizes deferral to a later period.

**Deductive:** Total funds available to the project remain the same and the funds generated through program income are deducted from the financial commitment of the sponsor.

### 14) **Participant support costs**

This category is normally used only for conference proposals or training proposals and not used in research proposals. Participant Support Costs are direct costs for items such as stipends or subsistence allowances, travel allowances and registration fees paid to or on behalf of participants or trainees (**but not employees**) in connection with meetings, conferences, symposia or training projects. Participant Support Costs may **not** be used by grantees for other categories of expense without the specific prior written approval of the sponsoring agency. Many sponsors also restrict Participant Support Costs from calculations of F&A even when costs may be otherwise charged on Total Direct Costs. (CFR §200.75)

In very rare cases, when participants are faculty or staff, Participant Support Costs will be counted as part of the Annualized Limit (section 2.2 a.1).

### 15) Participant **incentives**

Participant incentives are payments or other form of compensation made to participants of research studies. Participant Incentives are **not** subject to the same budgetary restrictions and requirements as Participant Support Costs. However, the PI is strongly advised to work with ORSP when participants are involved, as they may be subject to IRB regulations.

**b. Facilities & Administrative (F&A) costs**

Facilities and Administrative (F&A) costs is also known as the Indirect costs or Overhead costs. In general, sponsoring agencies allow the home institution, such as a university, of the PI to request the F&A costs to mitigate expenses of supports and services provided by the university. F&A costs are costs incurred for common or joint objectives or costs that cannot be specifically attributed to an individual project. For example, it is difficult to calculate how much of a PI's laboratory space is used for a specific research project especially when multiple research projects are being conducted there simultaneously. We know the project is benefiting from the laboratory space, but how do we calculate the cost associated with that benefit? Other examples include, but are not limited to, services rendered by the university and salaries of personnel engaged in providing a broad range of support to research activities (e.g. research administrators such as ORSP staff, purchasing staff, legal services, IT support, communications infrastructure, telephone, etc.), the cost of utilities for a laboratory or building housing research projects, office supplies, copying, etc.

Please note that certain expenses mentioned above as being typically covered by F&A may be charged to a sponsored project as direct costs only if clearly justified as being solely dedicated or clearly allocable to a specific project.

Unless otherwise stipulated in writing by the sponsoring agency, the federally negotiated on-campus F&A cost rate must be applied. Any deviation from this on-campus F&A rate requires a written approval from the AVP for Research *prior to* submitting the ICF and grant application package to ORSP.

### 2.3 Effort and Person-Months

For **all** externally sponsored projects –Federal, Non-federal, Cost Reimbursement, and Fixed Fee– faculty and staff listed as PI, Key Personnel (e.g. Co-PI), etc. on the proposal are expected to commit certain level of effort ( $\geq 0\%$ ) to the project, **with or without any compensation from the sponsored project**. Exceptions include, but are not limited to, equipment and instrumentation grants, doctoral dissertation grants, student augmentation grants, and institutional training grants.

The **total effort ( $\leq 100\%$ )** of a faculty member is the sum of one’s **% effort** committed to teaching, research, and service activities. The total effort of a faculty compensated by the IBS usually equals to 100% during each semester or the Academic Year. **% Effort** is calculated as:

$$\% \text{ Effort} = \frac{\# \text{ of hours/week required to complete a specific activity}}{\text{Total \# of hours/week } \textit{one is willing to commit} \text{ to all activities}}$$

For example, for a faculty who is willing to commit 50 hours per week to all activities accounted for one’s 100% effort, and it is estimated that 5 hours per week is needed to work on a proposed, or awarded, project X, then the % effort committed to project X is:

$$10\% = 5 \text{ hours/week committed to sponsored project X} \div 50 \text{ hours/week total on all activities}$$

Most budget proposals require effort to be converted into **Person-Months**. To convert % Effort to person-months:

$$\text{Person-Months} = \% \text{ Effort} \times (\# \text{ of weeks in the term} \div 4.333)$$

In general, terms are described as follows:

- Calendar Year = 12 Months = 52 weeks
- Academic Year = 9 Months = 39 weeks
- Summer Term = 3 Months = 13 weeks

Please refer to “Chapter 4: Effort Reporting” for more details.

## Chapter 3: Post-Award Grant Administration

### 3.1 Post-Award Grant Administration

All awards, both federal and non-federal sponsored research grants/contracts and projects/programs are subject to rules and regulations of research compliance. The process of managing sponsored research funds is a shared responsibility between the PI, ORSP, Finance & Accounting, Human Resources, Procurement, and other University offices. Each department has unique areas of primary responsibility.

ORSP, on behalf of FGCU, serves as the primary administrative liaison to manage and monitor sponsored research grants/contracts and projects/programs among PI, sponsoring agencies, and other FGCU University offices in the post-award period in accordance with award-specific sponsor guidelines and regulations. The Associate Vice President for Research has been delegated the authority by the Provost to serve as authorized institutional representative for the purposes of administering and executing agreements related to the Office of Sponsored Programs (ORSP).

Services provided by ORSP include, but are not limited to, monitoring account activity, preparing required financial reports, managing invoicing of an award, coordinating audits, administering government property accounting inventory, and reviewing requests for personnel compensation.

### 3.2 Prior to Award Agreement

When a proposal is awarded for funding an assessment must be made by the PI and PI's department/college to determine whether accepting this award will overcommit the PI and subsequently the PI's total effort will exceed 100% (i.e. >100% total effort). If effort commitments for other activities cannot be negotiated to accommodate the new award to enable PI's total effort to be 100%, this sponsored research award should **not** be accepted. In this case, PI must inform ORSP of the decision and ORSP will notify the sponsoring agency that the award will not be accepted by FGCU. If the PI has had agency contact indicating that a project has been funded, the PI should contact ORSP to inform them that an award is impending.

It is essential that all PIs do **not** start working or incur any costs on any research awards without a fully executed award agreement between ORSP/FGCU Board of Trustees and the sponsoring agency. Any work done or costs incurred prior to the full execution of the award agreement is **not** guaranteed to be reimbursed by the sponsoring agency and **will not be covered by the University** if the agreement is **not** accepted by both parties. A meeting will be held between ORSP and the PI, grant manager and/or departmental personnel to discuss the rules and requirements of the project. **Any required approvals (IRB, IACUC, Institutional Safety) must be approved prior to the commencement of work.**



### 3.3 Sponsored Research Agreements

Sponsored projects are externally-funded activities in which a formal written agreement (i.e. grant, contract, or cooperative agreement) is entered into by FGCU Board of Trustees and the sponsor.

All externally sponsored research grants, contracts, and cooperative agreements must be processed through ORSP. ORSP will facilitate negotiations for appropriate terms and conditions to protect the best interests of the PI, the University, and the sponsoring agency. Any sponsored research agreements are subject to review and approval by the FGCU Office of General Counsel and may not be entered into without the signature of the Associate Vice President for Research.

Subaward Agreements will be initiated by ORSP based on the budget, budget justification, and scope of work of the collaborating institution. ORSP will be responsible for flowing down the appropriate clauses from the prime award's terms and conditions and facilitating any negotiations with the collaborating institution. Consultant and vendor agreements will be facilitated through Procurement Services.

### 3.4 Types of Funding

Usually, research funds are made available with two different types of award agreement:

**Fixed Fee Awards:** Based on milestones or receipt of deliverables, the sponsoring agency is invoiced according to a payment schedule set forth in the award agreement. Unless otherwise stated in the award agreement, unexpended funds do not need to be returned at the end of the project period.

**Cost Reimbursable Awards:** The sponsoring agency is invoiced, usually no more than monthly, for allowable project expenses incurred during the preceding billing cycle. The period for the billing cycle should be outlined in the award agreement. Any unexpended funds remaining at the end of the project period are forfeited to the sponsoring agency.

Regardless of the type of award, the full amount awarded for the current budget period will be available upfront. In cases where the award is incrementally funded, the sponsoring agency's terms will dictate whether any balance remaining from the previous budget period may be carried over to subsequent periods.

### 3.5 Commencement of the Sponsored Research Project

Upon receipt of a fully executed award agreement, the budget, as approved by the sponsoring agency, will be translated into a Grant Worktag (GRXXXXX) in Workday. This Grant Worktag will be used for appropriate spending for the assigned Award (AWD-XXXXXX.) Award funds (Plan) will be allocated into spend categories as represented by the following categories of expense (not a complete list):

Reference ID and Spend Category Name  
SC213, Graduate Assistant  
SC164, Supplies and Non-Capital Equipment - Lab  
SC160, Supplies - Educational  
SC216, Research Assistant  
SC125, Advertising - Promotional  
SC010, Scholarships

SC012, Independent Contractors  
SC195, Summer Faculty Salary  
SC214, Student Assistant  
SC187, 12 Month Faculty Salary  
SC093, Lab Test / Analysis  
SC127, Consulting Services  
SC053, Equipment - Other  
SC056, Equipment - Science  
SC066, Equipment (Capital) - Laboratory  
SC150, Publications  
SC188, 9 Month Faculty Salary  
SC206, Support Personnel Pay  
SC204, Administrative & Professional Salary  
SC305, Software (Requires ITS Approval)

For awards with **Participant Support Costs**, a separate Grant Worktag will be set up to account for these expenses separately.

For awards with **Committed Cost-Share**, Match needs to be tracked by the PI/Department. If the match will be from E&G funding (besides committed percentage of salaries and fringe benefits), the PI's department needs to track that match on a separate spreadsheet. Since many sponsors require that the expenditure of committed cost-share to be certified at the end of the project period, sources of cash match, such as donations from the FGCU foundation or portions of faculty salary from E&G accounts, must be tracked by the PI or Department.

Once the Award and Grant Worktag is created, a meeting will be scheduled with the PI, grant manager(s) and other departmental support personnel. Following this meeting a **SPAN** (Sponsored Program Award Notice) will be issued via email to the PI for signature. The SPAN contains general information about the award such as the agency, project title, Grant Worktag (GRXXXXX), budget allocation, invoicing and reporting requirements, etc.

The SPAN also includes a Sponsored Project and Research Obligations (SPARO) document that describes specific guidelines necessary to administer the project: purchasing, travel, transfers, effort and compensation, closeout. The SPARO also explains the obligations of the PI in relation to the terms and conditions of the award. In practice, the PI is responsible for any technical reports requested by the Sponsoring agency. ORSP is responsible for invoicing and financial reports. To ensure that reports are submitted in a timely manner, the PI must be aware of upcoming deadlines and be prepared to provide any necessary information on the sponsored project's status.

The official award document also becomes part of the SPAN. All materials should be carefully reviewed to ensure compliance with all award requirements. The PI should return the signed SPARO to ORSP after reviewing the information.

PI may commence working on the project and the Workday Grant Worktag may be charged as of the start date set forth in the fully executed award agreement and recorded on the SPAN. Any work done, or costs incurred prior to the full execution of the award agreement is **not** guaranteed to be reimbursed by the sponsoring agency and **will not be covered by the University** if the agreement is **not** accepted by both parties.

### **3.6 Allowability of Charges**

FGCU expects that costs directly charged to federally sponsored awards received by the University will comply with the cost principles outlined in 2 CFR§200.403

Some practices are unacceptable because they do not meet federal standards for assigning costs to sponsored agreements with a high degree of accuracy. Some examples are:

- rotation of charges among sponsored projects without establishing that the rotation schedule credibly reflects the relative benefit to each grant
- assigning charges to the sponsored project with the largest remaining balance
- charging the budget amount in contrast in advance of the time the cost is incurred
- identifying a cost as something other than what it actually is (e.g. use of an incorrect account code)
- charging expenses exclusively to sponsored projects when the expense has supported non-sponsored project activities
- assigning charges that are part of the normal administrative support (e.g., proposal preparation, accounting, payroll)
- assigning charges to the sponsored project that will be ending the soonest

Expenses for alcoholic beverages and entertainment expenses cannot be charged to a federal grant or contract.

### **3.7 Personnel Compensation**

Personnel Compensation from an award for all existing employees is started through a costing allocation in Workday. For OPS (Other Personnel Services) (Student or part-time) hires, a Create Job Requisition is initiated. The PI is responsible for completing the appropriate personnel action forms to appoint an employee to a sponsored project. All grant-related personnel/payroll action forms must be initiated in Workday and will be routed to the ORSP team for approval.

When a costing allocation is received, the sponsored research project is reviewed to verify that the budget allows for salary, and that the start and end dates on the form are appropriate. For employees that are paid hourly, the end date must show on the Workday form. If the award is cost reimbursable, the salary for the position must be redistributed or terminated on or before the award's end date. If the award is fixed fee, please refer to section "3.16 Program Reports and Financial Closeout" for more details.

It is the PI's responsibility to work with one's departmental grant business manager to monitor the employee's end date and terminate the position in a timely manner. Appointments of all personnel to sponsored projects are subject to the University policies of Human Resources (HR). Please contact HR directly for additional information.

### **3.8 Procurement**

When goods and/or services are needed for the execution of a sponsored project, the PI should work closely with their college/departmental administrative support and Procurement Services to facilitate the purchasing process.

## a. Purchasing

Purchases can be made through Procurement Services using:

### 1. Purchase Requisition (PR)

A Purchase Requisition (PR) is used to request Procurement Services to issue a Purchase Order (PO) to secure commodities/services needed in the ongoing operations of a sponsored project. These requisitions are initiated in Workday and will be routed for approval by an Accountable Officer (an assistant, associate, or full dean/ director or above) with authority to approve such requisitions. Departments must not place orders directly with vendors for goods or services. Information for purchasing can be found at Procurement Services website (<https://www.fgcu.edu/adminservices/officeofthecontroller/procurementservices>)

### 2. Purchase Card (P-Card) and Travel Card (T-Card)

An FGCU Purchase Card (P-Card) can be used by the PI to make routine purchases without having to go through the Purchase Requisition process. The PI should only use a P-Card to purchase goods necessary to the sponsored project's performance. Please note that certain items (e.g. equipment, other attractive property) may be restricted from the use of a P-Card. For further assistance with the P-Card process, contact Procurement Services or access the [Purchasing Card Holder Manual](#).

## b. Chargebacks

Chargebacks represent a system of allocating the costs of services FGCU regularly provides to all departments on campus. Examples of chargebacks for a grant include postage, freight, copy charges, long distance phone charges, etc. The correct, active grant index, fund, and organization number to which chargebacks should be posted, must be provided.

## c. Travel

Approval of travel expenditures from Sponsored Project funds requires that the travel must benefit the project as established in the Sponsor approved statement of work and budget. All Official University travel should follow the guidelines outlined in Florida Statute 112.061 and FGCU's [International Travel Policy 2.020](#).

A **Spend Authorization** is used to establish that the expenditure of funds is approved, and that an adequate budget is available to reimburse the traveler. The spend authorization should be completed and submitted through Workday. Approval from one's direct supervisor is sufficient for spend authorization involving domestic travel. Spend authorizations for foreign travel carry the additional requirement of approval from both ORSP, Global Engagement and the Office of the President 45 days before the date of departure.

**Fly America Act:** For international air travel, Federal requirements state that American carriers must be used when a traveler is flying between the United States and another country or between other countries unless proof is provided that the use of such is not a viable option for planned travel.

A **Travel Reimbursement Request Form** is used to establish a claim for the total amount to be reimbursed to a traveler. All travel reimbursement requests should be submitted no later than 10 days after the date the traveler returns.

For additional information on travel regulations please see:  
[https://www2.fgcu.edu/secure/AS/Section\\_10-ADA.pdf](https://www2.fgcu.edu/secure/AS/Section_10-ADA.pdf)

### **3.9 Capital Equipment, Attractive Property, and Computers**

#### **a. Capital Equipment**

Capital equipment is defined by the University as an item costing \$5,000 or more with a useful life of more than a year. The University must properly classify, safeguard, and depreciate its equipment and abide by federal guidelines and sponsored awards regarding the purchase, use, and disposition of equipment.

The Property Manager is responsible for the accounting control, records, operations, and reporting for moveable equipment. The Property Manager is also responsible for all assets procured by, or with, his/her department.

The PI's responsibility includes protection against abuse, theft, movement, disposal, or unauthorized use of the equipment. Accurate inventory records are necessary for insurance purposes, maximum equipment utilization, and planning for replacement.

The Property Manager is responsible for the disposal of equipment acquired through the University by purchase, lease, donation, loan, etc. All disposals must have prior approval from Finance and Accounting. Additional approvals may be needed depending on the funding source; for example, equipment purchased with sponsored project funds requires the approval of ORSP.

[Unless otherwise noted in the sponsored agreement, all equipment is owned by the University.](#)

#### **b. Attractive Property**

Attractive property is defined as University owned tangible property with the characteristics of Equipment, but with a value or cost less than \$5,000. Examples are mobile/computer systems, laptops, notebooks, netbooks, tablets, cellular phones, etc. Since Attractive Property does not meet the State guidelines for capitalization, it is not maintained in the University financial system and therefore requires departmental oversight. The Department Property Managers are responsible for monitoring, tracking, and disposing of Attractive Property according to the guidelines established by Finance & Accounting and communicating these guidelines to employees within their area. Procedures and forms are available on the [Controller's website](#).

#### **c. Computers**

If the computer(s) have been itemized and justified in the sponsor-approved budget, they can be purchased with no additional concerns. If computers have not been itemized and justified in the budget, appropriate documentation must be obtained before purchasing the computer(s).

### 3.10 Change of Scopes and Budget

Prior approval by the sponsoring agency is required for changes in the objectives or scope that significantly alter an original statement of work. Restrictions on budget revisions, including transferring funds from one pool to another, may not be allowed. Prior approval, in writing, from the sponsoring agency must be obtained if the cumulative direct cost budget transfer exceeds **10%** of the total budget or the effort of the PI is reduced by **25%** or more. The ORSP Sponsored Research Budget Transfer (SRBT) form can be found on the [ORSP website](#).

If a PI requests a leave of absence from FGCU, his/her sponsored grants/contracts can be reassigned to another FGCU faculty member with prior approval from the sponsoring agency. All requests for changing the PI must be processed through ORSP.

Any request requiring prior approval by the sponsoring agency must be justified in writing and submitted by ORSP no later than 90 days before the project period's end date.

### 3.11 Financial Monitoring

The responsibility for monitoring the budget is shared by the PI and ORSP. Overspending can imply poor financial oversight. [If a PI's sponsored award ends in a deficit, the college of the PI is responsible for covering the deficit from its F&A return account or its Miscellaneous Sponsor Account.](#) To avoid this situation, careful planning, monitoring and constant communication between the PI and ORSP should occur throughout the life of the sponsored award. The Budget can be viewed in Workday using the Budget to Actual Report by ORSP, the PI, grant manager, and grant financial analysts.

### 3.12 Cost Transfer

A cost transfer is the reassignment of an expense to a sponsored project after the expense was initially charged to another sponsored or non-sponsored account. The University expects that all costs charged to a sponsored project are correctly charged at the outset. When errors are discovered, the University is committed to ensuring that all cost transfers (either in the form of a labor distribution adjustment or non-salary journal entry) are legitimate and are conducted in accordance with sponsoring agency's terms and conditions, and University policy.

Cost transfers must not be used to manage awards. Except salary redistributions generated from effort reports, cost transfers must be prepared and submitted as soon as the need for a transfer is identified. Frequent, poorly explained, or transfers made more than **90 days** after the initial charge can raise serious questions about the propriety of the transfers, the accounting system, and internal financial controls. All cost transfers must be completed no later than **90 days** from the end of the calendar month in which the transaction appears on the project.

The PI is responsible for ensuring that cost transfers are made promptly for corrections of errors. Cost transfers must be supported by documentation which contains a full explanation/justification of how the error occurred and a correlation of the charge to the sponsored project to which the transfer is being made. Explanations/justifications such as "to correct an error" or "to transfer to correct project" are unacceptable.

An overdraft or any direct cost item incurred in the performance of one sponsored project may **not** be transferred to another sponsored project account merely for the sake of resolving a deficit or an allowability issue.

### **3.13 Relinquishment of an Award**

**Sponsored awards are made to the University, and not to the individual Investigator.** The University and sponsoring agency may allow the grant/contract to be transferred to another qualified FGCU faculty member to serve as the PI. The departing faculty member may be able to secure a subcontract from FGCU to continue working on the project. If there is no suitable FGCU faculty member to assume the role of PI, the University may relinquish an award to the departing faculty member. The sponsor would need to approve this and the new institution would have to accept the award. ORSP must be consulted for the specific requirements of the sponsored award and sponsoring agency.

### **3.14 No-Cost Extension**

No-cost extensions are requests made to the sponsoring agency to extend the termination date of a project without additional funding. The request must be processed at least 30 to 90 days before the project's scheduled termination date. PIs must continue to devote the same level of effort as in the period preceding the extension unless prior approval for reduced effort has been received. **All requests for No-Cost Extensions must be made through ORSP.** Requests for No-Cost Extensions must be clearly justified to meet the sponsored project's requirements and not to spend remaining funds.

### **3.15 Report Requirement**

Sponsoring agencies typically require both financial and programmatic reports. These are outlined in the sponsor's notice of award. PIs are responsible for the completion of the programmatic reports and ORSP is responsible for the completion of the financial reports including but not limited to the SF 425 Federal Form and the DOE 399 with Florida Department of Education.

### **3.16 Closeout and Residual Fund**

Upon termination of the project and verification that all obligations of the award have been met, ORSP will initiate award closeout. Closeout is the process of collecting funds that were not needed in the completion of the sponsored project and dealt with in accordance with the terms of the award.

For Cost Reimbursable accounts, the closeout process entails reconciling the revenue versus expenditures and reducing budget in Workday to zero. ORSP will then convert the grant worktag and award to inactive.

For Fixed Fee accounts, any unexpended balance will be classified as a residual fund. A residual fund occurs when the income or revenue is greater than the expense incurred upon project completion. Depending on the terms of the award agreement, residual funds may need to be returned to the Sponsor as the award directs. For awards that do not require the return of residual funds, ORSP will act within **90 days** of the completion of a sponsored project/program. The F&A costs will be deducted from the total amount of the residual fund, and the remaining balance will then be distributed among PI, Dean, Provost, and/or ORSP. ORSP will be responsible for notifying

the PI and Dean when initiating the closeout process. The AVP for Research will facilitate negotiation of the rate of distribution among PI, Dean, Provost, and/or ORSP.

### **3.17 Audits**

Sponsoring agencies of externally funded awards have the right to audit the FGCU's financial records including Effort Reporting documentation. If the PI or College is contacted by the sponsoring agency ORSP must be informed immediately.

2 CFR Part 200.501 requires an annual audit of a non-profit entity that expends \$750,000 or more in federal sponsored awards. This annual audit is performed to reassure the Federal Government that the awarded funds are managed and used in accordance with federal guidelines.

The State of Florida established the Florida Single Audit Act to parallel the Federal Government's 2CFR Part 200.501 Single Audit. This Florida statute is intended to promote accountability and assurance that the federal and state rules and regulations are followed.

State of Florida's Auditor General's office

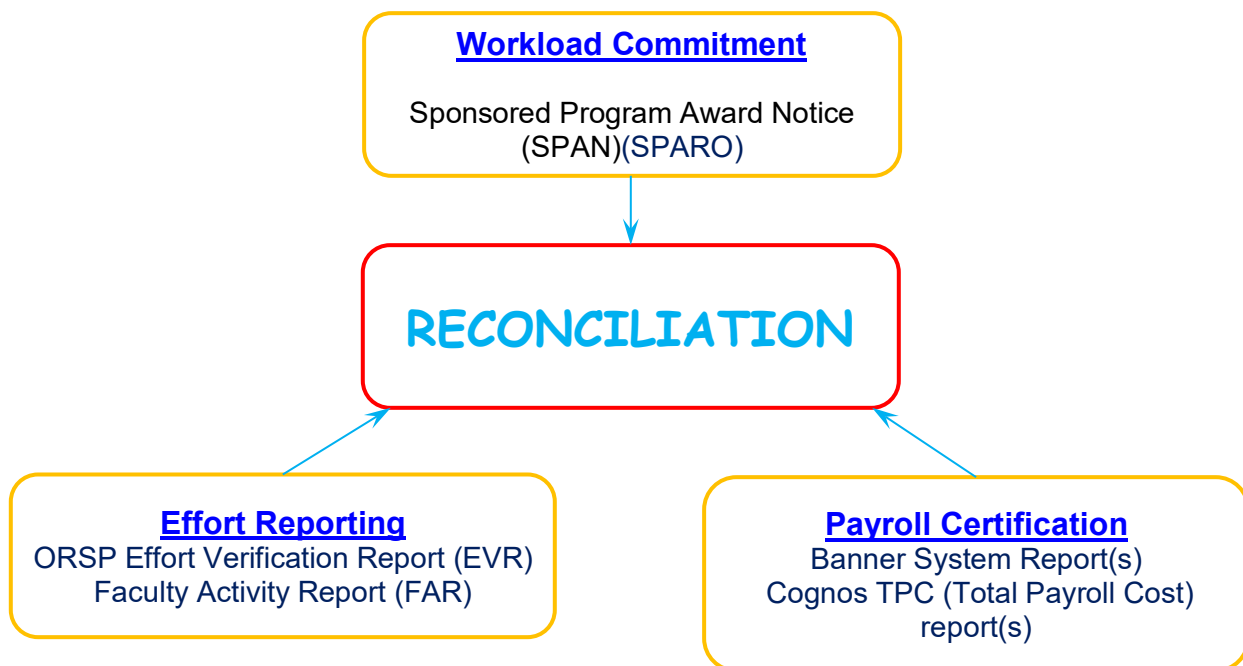
**ORSP is the prime contact for the coordination and conduct of financial audits related to grants.** ORSP will inform the Office of Internal Audit and the PI when notification is received. The PI must not speak with an auditor without being accompanied by someone from ORSP or General Council.



## Chapter 4: Effort Reporting

### 4.1 Effort Reporting

Effort Reporting is a Federal requirement and mandated by the Office of Management and Budget (OMB) in the Uniform Guidance (2 CFR, Part 200). The federal government requires a confirmation of effort of all individuals performing services on a sponsored project when all or a portion of their salary is charged to the sponsored project. FGCU uses the “after-the-fact activity records” to demonstrate that individuals who are compensated by federal funds have actually contributed the reported effort. The section J.10 of 2 CFR, Part 220 addresses effort reporting requirements. The following figure illustrates how the most important three components – Workload Commitment, Effort Reporting, Payroll Certification– are validated through reconciliation.



Effort is the **proportion of time** spent on any activity (e.g., teaching, research, service, etc.) and is expressed as a percentage of the total professional activities for which an individual is compensated by one’s Institutional Base Salary (IBS). On the other hand, the **total effort** is the sum of **percentage (%) effort** committed to different professional activities covered by one’s IBS. Regardless of FTE, total effort must always be equal to 100%.

For examples,

During the academic year, the total effort for a faculty with an appointment of 1.0 FTE must be:

$$\text{Total Effort} = 1.0 \text{ FTE} = 100\% \text{ effort} = \% \text{ teaching} + \% \text{ research} + \% \text{ service}$$

During the summer term, the total effort for a faculty with an appointment of 0.62 FTE must be:

$$\text{Total Effort} = 0.62 \text{ FTE} = 100\% \text{ effort} = \% \text{ teaching} + \% \text{ research} + \% \text{ service}$$

Effort describes how an individual spent his/her time on the sponsored project(s), but **not** how the individual's salary was funded or compensated. The TE is **not** based on 40 hours per week, it is based on "**the total hours, which can be  $\geq$  40 hours/week, the person is willing to work**" (e.g. 55 hours/week, 60 hours/week, 80 hours/week, etc.). Please refer to "2.3 Effort and Person-Months" for more details.

The % Effort is calculated by estimating the number of hours required by a specific activity and dividing it by the total number of hours spent on all activities covered by the IBS. For example, it is estimated that a weekly effort of five (5) hours is needed for Project Y, and the total hours/week committed to all activities is 50 hours, the % effort on Project Y is,

$$10\% = 5 / 50$$

For faculty members, the assigned workload for a teaching faculty may be 75% teaching, 15% research, and 10% service. The assignment for a research faculty may be 30% teaching, 60% research, and 10% service. For a staff member, it may be 0% teaching, 0% research, and 100% service for a full-time staff committed to providing support/service to sponsored project(s).

It is important to notice that if a faculty or staff is compensated by any **externally** sponsored project(s), the Total Effort must **not** exceed 100% under the stipulation of limits on regular pay rate (bi-weekly at FGCU) and annualization of one's total compensation charged to the sponsoring agency.

Total effort includes only those activities compensated by the Base Salary, which may be funded by FGCU and/or sponsored accounts. Activities related to compensation above the Base Salary, such as teaching overload and external consulting activities, are excluded from total effort.

During the pre-award proposal preparation, the PI must declare to the sponsoring agency his/her % Effort to be spent on each sponsored project. **The projected effort is used as the basis for budgeting requested salary in the budget proposal.** In turn, effort reporting serves as the basis to verify that the salary charged to the sponsored project(s) matches the actual, after-the-fact effort certified by the PI. In short, **effort reporting is required for each PI to certify the actual, after-the-fact effort of all individuals working on the sponsored project(s).**

FGCU and the sponsoring agencies recognize that activities related to individual sponsored projects are often inextricably intermingled with other sponsored projects and/or other non-sponsored FGCU activities (e.g. teaching, departmental research in FAR, service, etc.). **Since effort reports serve as the auditable documents to substantiate salary charges, the documents must be defensible in an audit.** A defensible effort reporting is certified by someone (e.g. PI, Department Chair) who has knowledge of 100% effort of the individual's activities. Effort reporting must be completed timely and be reasonable and consistent with evidence of other activities performed (e.g. progress reports, class schedules, proposals submitted, clinical schedules, etc.).

## 4.2 After-the-Fact Effort Reporting

As a condition of receiving funding from the federal government, FGCU must maintain an acceptable system of reporting effort devoted to sponsored projects. A critical aspect of any effort reporting system is that the system must require individuals with reasonable means of verification to certify the effort expended on a project. Once an award is received and effort is devoted to the sponsored project, FGCU is responsible for providing a mechanism through which the effort devoted to the project is certified.

Under the requirement of “**after-the-fact**” reporting, the distribution of salaries and wages from the sponsored project(s) must be supported by activity reports (FAR and/or EVR) that reflect the distribution of activity expended by employees.

Notifications will be sent from ORSP with prefilled EVR forms for certification six weeks after the initial end of the academic year and/or summer semester. Principal Investigators and employees are responsible for certifying their after-the-fact percent of effort

For **faculty**, the records will reflect an **after-the-fact** reporting of the percentage distribution of their activity on the Effort Verification Report (EVR) form and the Faculty Activity Report (FAR).

For **exempt personnel (A&P)**, only the EVR form will need to be certified.

For **non-exempt personnel (SP, OPS)**, the records on the Workday system timesheet signed by the employee, immediate supervisor, and the PI will show the employee’s effort. The timesheet is combined with the Workday payroll report, stamped with the federally mandated statement of certification, and signed by the PI. These documents will be prepared to coincide with FGCU bi-weekly pay periods and placed in a federal payroll certification book, which is maintained by departmental business support staff.

It is appropriate for administrators to play a role in assisting faculty with the completion of the effort reporting; however, under no circumstances should the department administrator or staff certify the effort for any PIs or research staff.

### **4.3 Activities Associated with Sponsored Project Effort**

Identification of the appropriate activities that can be supported by a sponsored project is critical to the accuracy of reporting effort. Some activities may or may not be appropriate for a sponsor to support.

Activities that are part of effort devoted to sponsored projects may include:

- Conducting research as identified in the proposal supported by Sponsoring Agencies
- Writing a progress report for an existing award
- Holding a research meeting with lab staff
- Attending a scientific conference related to the research being conducted and held by an outside professional society
- Reading scientific journals to keep up to date with the latest advances in the field of research

Activities **not** part of a sponsored project effort may include:

- Writing a new proposal (especially if charging full summer salary to another grant)
- Mentoring students (unless specifically part of a funded project)
- Attending departmental faculty meetings
- Serving on the IRB/IACUC
- Serving on an NIH Study Section

#### 4.4 Monitoring Effort Commitments

Whether the salary associated with a Sponsored Project is funded by the Sponsoring Agency or cost shared, the committed effort must be met and documented via reporting. Effort levels may fluctuate during the award; however, over the life of the award the effort commitment must be met. For example, a faculty member may meet a 20% year-long effort commitment by working and certifying 10% effort for the first semester and 30% effort for the last semester.

It is a Federal requirement that the sponsoring agency be notified in advance if:

- The PI or key personnel will withdraw from the sponsored project entirely, be absent from the project during any continuous period of three months or more
- Reduce effort by **25%** or more from the level that was approved by the Sponsoring agency
- Transfer of funds among direct cost categories for an award in which the cumulative amount of such transfers exceeds or is expected to exceed **10%** of the total budget as last approved by the Federal awarding agency

#### 4.5 Effort Reporting and Payroll Distribution

There is a direct relationship between the **actual** effort and salary/payroll distribution. Payroll charges may be made initially on the basis of estimates set forth in the sponsor approved budget before the services are performed, provided that such charges are promptly adjusted if significant differences are indicated by activity records.

When an award is setup, the Departmental Business Manager will adjust the payroll distribution through a payroll costing allocation in Workday in accordance with projected effort. At the end of the semester, the **actual payroll** must be reconciled. If there is a discrepancy of more than **5%** of effort, the payroll charges must be adjusted to make the distribution reflect their actual effort.

Payroll distributions do not need to be adjusted for short-term fluctuations in effort, as long as the distribution of payroll charges is reasonable given the effort distribution over the entire semester.

For the PI and other project personnel, salary must be charged to a sponsored research account Workday Grant tag during the period in which the individuals are expending effort on the project. For example, if summer salary is being charged to a sponsored project, it is expected that the corresponding effort will take place during the summer. In conclusion, **effort reporting drives the payroll distribution; the payroll distribution does *not* drive the effort reporting.**

#### 4.6 Effort Reporting and No-Cost Extension

In the event of a no-cost extension request, unless otherwise communicated to the sponsoring agency, **the effort commitment percentage is assumed to be consistent with the commitment for the immediately preceding budget period.** If a faculty member expects effort to be reduced during the no-cost extension period by **25%** or more from the level approved at the time of award, the sponsoring agency must be notified at the time the no-cost extension is requested by ORSP.

#### 4.7 Retroactive Cost Transfer after Effort Reporting

When effort has been reported for a given period, a retroactive salary adjustment that is not in line with the effort that was reported calls into question the reliability of the reporting process. This is particularly true if the retroactive cost transfer is attempting to move costs on to the sponsored award. In order for this cost transfer to be allowable, the effort will need to be recertified at the higher effort level that will support the additional cost. The PI will have to submit a letter requesting recertification and explaining why the original reporting was not appropriate. The request and justification will be reviewed and approved by ORSP.

Sponsoring agencies expect  
auditable evidence  
that the effort was  
performed as committed!

## **Chapter 5: Guidelines on Establishing and Reviewing Centers and Institutes**

### **5.1 Introduction**

In accordance with Florida Board of Governors (BOG) Regulation 10.015 Institutes and Centers, the Office of Research & Sponsored Programs (ORSP) has developed the following guidelines for establishing a Center and/or Institute (Center/Institute) at Florida Gulf Coast University (FGCU).

A Center/Institute is an organizational entity which carries out research activities, scholarly/creative activities, university or community services, instructional activities, training programs, etc. that cannot ordinarily be accommodated within existing departmental structures. Establishment of a Center/Institute can be initiated by a faculty member, a group of faculty, Department Chair(s), Dean(s), and/or university administrator(s).

An Institute that covers a broad area may contain other more specialized units; for instance, an Institute may be comprised of several Centers or of several facilities. In general, a Center/Institute may be established as a supportive infrastructure for research and/or scholarly/creative activities to enhance or complement the vision, mission and goals of the BOG, University, college(s), department(s), and/or other academic units or programs. In this case, Centers/Institutes are expected to promote research and innovation; facilitate multi-/inter-disciplinary research collaboration; disseminate research findings and results by organizing conferences, meetings, workshops, etc.; enrich graduate and undergraduate student education by involving students in research project(s); provide research or training opportunities to other faculty or staff; offer faculty, staff, and students with accessibility to Center/Institute facilities; and secure extramural research funding.

BOG Regulation 10.015 Institutes and Centers, (2) Definitions, (c) Exclusions states that *“There are entities that use the term ‘Institute’ or ‘Center’ in their titles, as well as some other service units, that are excluded from this policy.”* Entities approved to use the title "Centers/Institutes" whose purpose is to provide services to the University community (i.e. FGCU faculty, students, staff, etc.) shall not be considered Centers/Institutes for this policy. Examples of these units may include, but are not limited to, the First Year Advising Center, Testing & Assessment Center, and the Center for Academic Achievement, etc. Entities approved to use the title of "Centers/Institutes" whose purpose is to provide services to the community at large (i.e., non-FGCU faculty, students, staff, etc.) may or may not be considered Centers/Institutes for the purposes of this policy. Please refer to Section II.B.4 for more details.

### **5.2 Classification of FGCU Centers/Institutes**

Based on different missions and roles of each Center/Institute, Centers/Institutes can be classified as:

#### **a. State Level Center/Institute – State of Florida Institute or Center**

Pursuant to the BOG Regulation 10.015 Institutes and Centers, (2) Definitions, (a) State of Florida Institute or Center:

*“An organization with a statewide mission that may include two or more state universities established to coordinate interinstitutional research, service, and teaching across the State University System. State of Florida institutes and centers must be approved by the Board of Governors. State of Florida institutes and centers’ operational budgets reside within the bases of their host institutions. Additional budget requests must be reviewed by the Council of Academic Vice Presidents and only those with a positive recommendation are carried forward to the Board of Governors for consideration.”*

Centers/Institutes at the state level are established in response to the State initiative. The Director reports to the Provost or Provost’s designee. Performance of the Center/Institute and the Director are evaluated by the Provost or Provost’s designee.

## **b. University Level Center/Institute**

Pursuant to the BOG Regulation 10.015 Institutes and Centers, (2) Definitions, (b) University Institute or Center, and (3) University Policies for Institutes and Centers:

*“An entity that is generally established by a single university to coordinate institutional research, service, and/or educational/training activities that enhance existing instruction, research, and service at the university. This includes centers of excellence that were established by the Florida legislature. The budget of a university institute or center and any requests for additional funding are wholly within the purview of the host university.”*

Due to different purposes, roles, scopes, and reporting requirements, university level Centers/Institutes can be further categorized as:

### **1. University Center/Institute**

University Centers/Institutes are established in response to the University initiative(s) to enhance and/or complement the university wide mission, vision and/or goals. The Director reports to the Provost or Provost’s designee. Performance of the Center/Institute and the Director are evaluated by the Provost or Provost’s designee.

### **2. College Center/Institute**

A college Center/Institute is expected to enhance faculty’s expertise and the mission, vision and/or goals of the department(s), college(s), and university. The Director reports to the Dean. Performance of the Center/Institute and the Director are evaluated by the Faculty Senate GRT, Dean(s), AVPR, and Provost.

### **3. Centers/Institutes originated from an agreement**

Centers/Institutes established according to the terms and conditions of an officially executed university agreement (e.g., an endowment) abides by BOG Regulation 10.015 Institutes and Centers, FGCU Board of Trustees (BOT) Policy 2.001 Centers and Institutes, as well as the mission, vision and goals described in the agreement. Performance of the Center/Institute and the Director are evaluated by the Provost or Provost’s designee.

### **4. For a Center/Institute whose purpose is to provide services mainly to the community at large (i.e., non-FGCU faculty, students, staff, etc.), the two categories are:**

a) When the University

- identifies that services provided to the community at large also complement, strengthen and/or serve the need of the University community (i.e., FGCU faculty, students, staff, etc.),
- initiates the establishment of the Center/Institute, and/or
- funds the Center/Institute.

b) When the faculty member(s), department(s), and/or college(s)

- identifies those services provided to the community at large complement, strengthen and/or serve the need or interest of a specific group of faculty members in different program(s), department(s) and/or college(s),
- initiates the establishment of the Center/Institute, and/or
- secures fund(s) through the department, college, fund raising, grants, contracts, etc.

### 5.3 Procedures for Establishing a Center/Institute

It is feasible to establish a Center/Institute when the resources are available, and the establishment of the Center/Institute is consistent with the vision, mission, and goals of the University and/or College. The various academic units should be selective in establishing new Centers/Institutes.

The initial step in the review and approval for the establishment of a Center/Institute is the submission of an application proposal by the prospective Center/Institute Director to his/her Chair(s) and Dean(s). Once approved by the Dean(s), the proposal should be forwarded, by the prospective Director of the Center/Institute, to the Office of Research and Sponsored Programs (ORSP). ORSP will conduct the initial review to assure the proposal conforms to regulations and procedures established by FGCU and BOG. Should the proposal be in compliance with the aforementioned, it will be forwarded to the Faculty Senate Grants & Research Team (GRT) for review and recommendation. Subsequently, after reviewing recommendations and comments made by the GRT and Dean(s), if any, AVPR will make an independent recommendation to the Provost. The Provost shall determine if the proposed Center/Institute is in the best interest of the University and will present the proposal to the President's Cabinet for consideration.

The President, or designee, shall make the final determination regarding the approval of establishing a "University Level Institute or Center". A copy of the approved proposal for establishing a new "University Institute or Center" containing basic descriptive, contact, and fiscal information shall be submitted by ORSP to the BOG Office of Academic and Student Affairs.

To establish a state level "**State of Florida Institute or Center**," please refer to BOG Regulation 10.015 (4) (a). An application to establish a state level Center/Institute shall follow the same approval procedure described above but must also be approved by the University BOT and Florida BOG before implementation. The Provost shall prepare and submit the approved proposal to the BOT in accordance with BOG Regulation 10.015. Upon approval of the BOT the proposal shall be submitted by ORSP to the BOG Office of Academic and Student Affairs.

#### a. Application Proposal for Establishing a Center/Institute

A written proposal requesting the establishment of a Center/Institute must be submitted to ORSP. The proposal must include the following items and substantiating documentation. The proposal is limited to fifteen (15) 8.5"x11" pages with one-inch margins on all sides, single-spaced, in Arial 11-point font.



1. Introduction
  - a) Justification of the need to establish the Center/Institute
  - b) Added value(s) to the department, college, university and/or the community
  - c) How will the Center/Institute impact and/or strengthen the existing academic programs?
  - d) Why the above cannot be achieved within existing campus academic programs and/or units
2. Vision, Mission, and Goals
3. Nature and scope of activities to be performed
4. Five-year strategic plan and expected outcomes (Attachment I)
5. Organizational structure and personnel
  - a) Director – A Center/Institute is operated under the administration of one Center/Institute Director. The Center/Institute Director will be appointed or reappointed by the Provost and/or President. The Center/Institute Director may invite other colleagues to serve as the Co-Directors.
  - b) Affiliated Members – Membership in a Center/Institute shall be defined in the application proposal or conform to specifications required by the sponsoring agency. Centers/Institutes shall not discriminate in membership or participation on the basis of race, sex, religion, national origin, age, sexual preference, or disability. Faculty or staff shall consult with one's direct supervisor (e.g., Department Chair, Dean) before committing oneself to any activities in a Center/Institute that carry workload credit.
  - c) Advisory Board – It is mandatory for each Center/Institute to establish an External Advisory Board (EAB), description of the structure and members of the EAB must be a part of the application proposal.
6. Financial resources – Justify the financial needs and anticipated sources of funding for the Center/Institute. Provide a plan and timeline for the Center/Institute to achieve financial independence and self-support.
  - a) Funding source(s)
  - b) Plan and timeline
  - c) Annual breakdowns and the total budget for five years (Attachment V)
7. Other required resources (Attachment VI)
  - a) Location of the Center/Institute
  - b) Space (e.g., location of the Center/Institute, offices, labs, size, etc.)
  - c) Equipment (>\$5,000)
  - d) Supplies and consumables
  - e) Services and service contracts

The following documents, **excluded** from the 15-page limit, must be attached to the application proposal:

- Attachment I – Five-year strategic plan and expected outcomes
- Attachment II – Organizational chart of the proposed Center/Institute
- Attachment III – Organizational chart of the External Advisory Board (EAB)
- Attachment IV – Two-page resume of the Center Director, Co-Director(s), senior personnel, affiliated members, EAB members, etc.
- Attachment V – Five-year budget plan (with projected revenues and expenditures)
- Attachment VI – Five-year projection of needs of additional resources
- Attachment VII – Letters of support (from the Department Chair, Dean, etc.)
- Attachment VIII – Other supporting documents

## **b. Evaluation Criteria for the Center/Institute Application Proposal**

The following criteria will be used to evaluate Center/Institute proposals:

1. The potential for the enhancement of the FGCU mission and goals.
  - a) How will the Center/Institute enhance the University's mission and goals in a manner not currently accomplished by existing programs?
  - b) What unique activities, capabilities, and opportunities would be fostered with establishment of the Center/Institute?
2. Appropriateness of planned administrative and organizational structure.
  - a) Does the proposal outline to whom the Center/Institute reports?
  - b) How and where does the Center/Institute fit in the overall FGCU structure?
3. The feasibility and appropriateness of the budget plan.
  - a) Does the proposal outline a reasonable expectation of E&G funds and non-appropriated funds (research grants/contracts, fees, etc.)?
  - b) Does the proposal illustrate the potential for acquiring non-appropriated funds in addition to its current grant funding efforts?
4. Does establishment of the Center/Institute provide FGCU with a competitive advantage that enhances and/or complements the strength of our faculty/staff, research and scholarly/creative activities, and/or service areas in general?
5. Is there a need for additional space and facilities? If so, is there a plan to provide more space and a timetable for doing so?

#### **5.4 Annual Review – Continuation, Probation, or Disestablishment**

In accordance with BOG Regulation 10.015 Institutes and Centers (5)(c)(2), a university level Center/Institute must have a formal review conducted at least every seven years. BOG Regulation 10.015 (5)(d)(3) requires that at a minimum, all evaluations/reviews include:

- A determination of the institute or center’s progress against defined goals and objectives within the context of the institute or center’s mission, participating university missions, and current Board of Governor’s Strategic Plan;
- An assessment of the return on investment of State dollars, if applicable;
- The need for continuation of the Institute or Center;
- Possible changes in mission or organizational structure;
- Budget reduction or expansion;
- Recommendations for change of classification (State of Florida, Infrastructural, or University Institute/Center, if applicable; and
- Recommendations for status change (active, inactive, terminated), if applicable.

FGCU’s regional accreditor, The Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), also requires centers and institutes to demonstrate their effectiveness through comprehensive standard 3.3.1 which states in part:

*“The institution identifies expected outcomes, assesses the extent to which it achieves these outcomes, and provides evidence of improvement based on analysis of the results.”*

Consequently, to ensure compliance with SACSCOC standards and Board of Governors’ expectations, each center/institute will be reviewed to establish an ongoing record of activity, and to ensure the activities of a Center/Institute are current and fiscally sound. The formal annual review and evaluation will include an annual report supplement to the Web-based BOG annual reporting requirement and will be conducted through the GRT. Only Centers and Institutes that have received formal designation as defined in this policy are subject to these ongoing review procedures. All other university entities will follow the reporting requirements contained in university policy 2.010.

##### **a. Annual Report**

By August 15 each year, the Center/Institute Directors shall report the activities and financial condition of the Center/Institute during the past fiscal year. The Director shall submit the annual report to ORSP. ORSP is responsible for coordinating the effort of annual review and evaluation of all FGCU Centers/Institutes. The Center/Institute Director is solely responsible for providing all necessary details in the annual report. An acceptable report must demonstrate defined outcomes, the assessment of attainment of those outcomes, and efforts made to use the results of the assessment to improve the attainment of goals of each Center/Institute.

Moreover, the Director shall convene the EAB at least once a year to review the performance and productivity of the Center/Institute during the past year, provide recommendations for the advancement and progress of the Center/Institute, review the annual report of the Center/Institute, etc. Minutes of the EAB meetings must be attached to the Annual Report

## **b. Annual Evaluation**

Specific review and evaluation criteria for each Center/Institute may include, but are not limited to: annual achievements in support of the BOG and FGCU vision, mission, and goals; viability and sustainability; accountability; implementation of last year's recommendations from all levels, etc. As a result of the annual review and evaluation, a Center/Institute may be granted one of the three statuses: Continuation, Probation, or Disestablishment.

A highly achieving and performing Center/Institute shall be recommended to "Continue." For a Center/Institute that consistently demonstrates superior performance and a high level of productivity, the GRT may recommend to the AVPR that the Center/Institute Director submit a summary report for the following year. Once approved by the AVPR, the Center/Institute Director will only need to submit a summary of accomplishments resulted from the last year in place of the full annual report.

A Center/Institute that fails to fulfill its vision, mission, and/or goals shall be recommended to be placed on "Probation" or "Disestablishment." If a Center/Institute receives the status of "Probation" twice in five consecutive years, it may result in the disestablishment of the Center/Institute. To exit from "Probation," the Director of the Center/Institute must take immediate actions to address all recommendations and comments raised by the EAB, GRT, Dean(s), AVPR, and/or the Provost. The progress must be documented in the annual report of the following year.

After reviewing recommendations and comments made by GRT and Dean(s), if any, the AVPR will make his/her own independent recommendation to the Provost. Final determination to continue, to place the Center/Institute on probation, or to disestablish a Center/Institute resides with the Provost and/or President.

When a Center/Institute is disestablished, ORSP shall notify the Director, Dean(s), and the Office of Academic and Student Affairs in the BOG office.

### **5.5 Five-Year Review – Renew or Sunset**

All Centers/Institutes are authorized for an initial period of five years. In addition to the annual review, each Center/Institute is subject to a five-year review. The five-year review is a comprehensive review and evaluation of the overall performance, productivity, viability, accountability, etc., of a Center/Institute during the last five years. The five-year review may lead to the change (e.g. vision, mission, goals) of the Center/Institute, or sunset as the need or resources dictate. The five-year review will determine whether the Center/Institute will be "Renewed" for another five years or "Sunset" at the end of the sixth year of its establishment or last renewal.

ORSP is responsible for coordinating the effort of five-year review and evaluation of all FGCU Centers/Institutes. The Center/Institute Director is solely responsible for providing all necessary details in the annual report. After reviewing recommendations and comments made by GRT and Dean(s), if any, the AVPR will make his/her own independent recommendation to the Provost. Final determination to renew or sunset a Center/Institute resides with the Provost and/or President.

When a Center/Institute is sunset, ORSP shall notify the Director, Dean(s), and the Office of Academic and Student Affairs in the BOG office.

## **5.6 Administrative and Financial Oversight**

The Provost and/or Provost's designee oversees the operation, performance, and financial soundness of all Centers/Institutes at FGCU. Also, each Center/Institute must have daily administrative and financial oversight provided by the Director and by the department/school/college in which it was established. One of the major responsibilities of the Center/Institute Director and Dean is the oversight of the Center/Institute budget, which entails compensating the University for excessive expenditures of the Center/Institute.

## **5.7 Annual Reporting to BOG**

Pursuant to the BOG Regulation 10.015 (5) Institute and Center Reporting Requirements, each Center/Institute established at FGCU must submit an annual report to the BOG online Institute and Center Reporting database no later than September 30 of each year. The report must include the activities, actual and estimated expenditures, and position data for the fiscal year running from July 1 of the previous year to June 30 of the current year. Before submitting the report, The Grants & Research Team will review it and once deemed to comply with BOG procedures, it will be submitted to the BOG online Institute and Center Reporting database on behalf of the Center/Institute Director.

## **5.8 Conclusion**

All information pertaining to FGCU Centers/Institutes shall be maintained by the following offices:

- ORSP maintains the original documents

ORSP shall be the primary contact for University faculty and staff in providing information, appropriate forms, and application procedures related to Centers/Institutes in general.

## **Subrecipient Monitoring Guidelines**

### **Guidelines Statement**

Florida Gulf Coast University (FGCU) is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure proper stewardship of sponsor funds. The following guidelines apply to all subawards issued under sponsored programs made to Florida Gulf Coast University Board of Trustees, without regard to the primary source of funding. Additionally, these guidelines address institutional responsibilities and assist Principal Investigators (PI) and administrators to ensure that, in addition to achieving performance goals, subrecipients comply with applicable federal laws and regulations and with the provisions of each subaward agreement.

### **Reason for Guidelines**

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) ("Uniform Guidance"), specifically §200.331, requires pass-through entities to evaluate each subrecipient's risk of noncompliance in order to determine the appropriate monitoring level, monitor the activities of subrecipient organizations to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verify that subrecipients are audited as required by Subpart F of the Uniform Guidance.

For non-federal awards, FGCU may also be required by the sponsor to provide evidence of due diligence in reviewing the ability of a subrecipient to properly meet the objectives of the subaward and account for the sponsor's funds.

Failure to adequately monitor the compliance of subrecipients could result in reputational damage to FGCU and jeopardize current and future funding. It is the responsibility of FGCU, as the pass-through entity, to ensure the good stewardship of sponsored funding. All funds assigned to subrecipient organizations should receive the same diligence as sponsored funds that remain at FGCU.

### **Applicability and/or Accountability**

All PIs and administrators at FGCU within all colleges, units, divisions, University-wide initiatives, institutes, and centers, who are involved with the administration and conduct of sponsored awards that issue and manage subawards must adhere to these guidelines.

### **Subaward Relationship**

The document that ORSP generates to formalize a third-party relationship with another organization to perform substantive work based upon an award made to FGCU is a subaward agreement. The third party performing the effort under a subaward agreement is the subrecipient.

### **Subaward Check on SAM.Gov**

All subaward recipients on Federally funded awards must be checked for eligibility or disbarment on SAM.gov and documentation of said check placed in the file for auditing purposes. See Subaward Check Procedures.

### **The Subaward Process**

At proposal stage, before submitting the proposal, ORSP shall require the following information from all prospective subrecipients:

1. Subrecipient Commitment Form, ORSP sends to subrecipient institution's sponsored research office for completion
2. Preliminary Budget for the subaward(s) - including the subrecipient's direct and indirect costs, calculated using the subrecipient's approved Facilities & Administration ("F&A") rate and fringe benefit rate, and verifying any committed cost sharing
3. Preliminary Statement of Work for the subaward(s) - including a clear description of the work to be performed, the proposed timelines and deliverables
4. CV/Biosketch of co-project director/co-principal investigator
5. F&A rate agreement or indirect cost rate agreement
6. Letter of Commitment confirming institutional support for participation
7. Link to or copy of most recent Federal audit

After award notification, but before executing the subaward agreement, ORSP shall require the following information from subrecipient:

1. Final Budget for the subaward(s)
2. Final Statement of Work for the subaward(s)
3. Any information previously requested by FGCU from the subrecipient not yet received or finalized
4. Institutional Review Board (IRB)/Institutional Animal Care and Use Committee (IACUC), Institutional Safety Committee (ISC), and export control approvals, if required

During the term of the award, the PI shall receive from the subrecipient:

1. Periodic progress reports may be requested from the subrecipient's Co-PI to FGCU
2. All deliverables per the project/subrecipient scope of work schedule/timeline
3. Quarterly invoices to ORSP/PI for approval and subsequent processing
4. Any requests for changes in personnel through the PI for guidance by ORSP and possible sponsor approval
5. Any requests for changes in budget or work statement, which the PI will forward to ORSP for guidance and possible sponsor approval.

At Amendment (including renewal or no-cost extension) of a subaward, ORSP shall require the following information from subrecipient:

1. Revised Budget for the subaward (if applicable)
2. Revised Statement of work for the subaward (if applicable)
3. Current F&A rate agreements
4. Annually, federal Single Audit information

At conclusion of the subaward and close-out, ORSP must receive from subrecipient:

1. Final invoice
2. Evidence of submission of final report from FGCU's PI
3. Evidence that all deliverables due under the agreement have been met from FGCU's PI
4. Evidence of all technical information, data, reports and other information required by the sponsor through FGCU's PI

## **Summary of Roles and Responsibilities**

### **A. Subrecipient**

The subrecipient shall:

1. Provide the necessary personnel, material, facilities, and other direct costs reasonably required to accomplish the work set forth in the work statement.

2. Deliver all reports, documentation, data, hardware, software, and other deliverables to be furnished under the subcontract as set forth in the delivery schedule.
3. Ensure that all technical and administrative effort and delivery of all reports, documentation, data, hardware, software, and other deliverable end items are submitted by the contract end date.
4. Ensure that all personnel working on the project complete the mandated Time & Effort reporting with their agency.
5. Submit all program status reports and final performance reports within the timeframe outlined in the subaward.
6. Notify FGCU's PI immediately if a personnel substitution is needed. Personnel substitutions must be approved through the PI and ORSP.
7. Invoice FGCU as stated in the subaward agreement for work performed in accordance with the subaward. Invoices shall cover allowable costs incurred for work performed as outlined in the work statement. Invoices shall conform with sponsor and FGCU requirements.
8. Submit any budget or work statement modifications to ORSP, through FGCU's PI. Changes to the original subaward will only be approved in justifiable cases and must remain in accordance with the prime contract.
9. Provide access to records and financial information as requested by FGCU.
10. Provide, as requested, audited financial statements or its federal Single Audit.

#### B. FGCU Principal investigator

FGCU's PI is the individual primarily responsible for monitoring the programmatic and financial performance and progress on a subaward. In no event may such monitoring and compliance obligations be delegated to a non-FGCU employee. As part of FGCU's monitoring responsibilities, the duties of the PI (working in conjunction with ORSP) during the life of the subaward are as follows:

1. Understand the terms and conditions of the prime award, including those flowed down to the subrecipient and those that may have been imposed by FGCU
2. Regularly monitor the subrecipient's adherence to the subaward's terms and conditions. Such monitoring may take place through phone calls, emails, site visits, meetings, or other regular contact.
3. Ensure the subrecipient provides timely submission of all required materials to ORSP, including documents needed for issuance of the proposal approval and the subrecipient contract.
4. Review subrecipient's statement of work and budget to determine reasonableness.
5. Review the subrecipient's invoices to confirm:
  - a. Invoices are prepared in accordance with subaward requirements,
  - b. Costs incurred are in accordance with the approved budget during the approved period of performance and overall cost limitations,
  - c. Costs incurred are aligned with the scientific progress reported to date, and
  - d. Costs are allowable, allocable and reasonable relative to the sponsor's terms and conditions and the subaward issued by FGCU. *In the event the level of detail included on an invoice is not sufficient to fully understand the costs, or if it appears that some costs may be excessive or understated, the PI is responsible for questioning the subrecipient's expenditures or requesting further documentation or explanation prior to approving an invoice. Such inquiries should be done in a timely manner (e.g., within thirty (30) days after receipt of an invoice) so that the subrecipient can be promptly paid for approved costs.*



6. Accept satisfactory (as described above) subrecipient invoices, review expenditure statements and submit subrecipient invoices for institutional approvals and payment in a timely manner to ORSP consistent with the terms of the subaward.
7. Monitor the subrecipient's performance (i.e. scientific or *programmatic progress*) in terms of the Statement of Work and any required milestones. If progress is not satisfactory, or if performance reports required of the subrecipient are not submitted timely, the PI is responsible for contacting the subrecipient to address these issues.
8. Verify that the subrecipient is adequately meeting any cost-sharing commitments made for the subaward, and that the subrecipient's indirect costs charged are in compliance with the indirect cost rate specified in the subaward.
9. Verify that any human subject, animal subject, export control, biosafety or other compliance approvals applicable to the subrecipient's Statement of Work are kept current throughout the performance of the subaward. In the event of a lapse in approval, the PI is responsible for immediately notifying ORSP. Costs incurred by a subrecipient during a lapse period may not be charged to a subaward.
10. Act as the primary point of contact for the subrecipient during performance of the subaward. The PI may delegate those responsibilities on a day-to-day basis to another member of the research project (designee), so long as such other member is a full-time, regular FGCU employee.
11. Ascertain whether the subaward Statement of Work or Budget, or both, require modification to add funding, time, or other considerations; secure justification from the subrecipient for such changes, and notify ORSP in a timely manner so it can review and, if necessary, prepare an amendment.
12. Plan for efficient completion of performance and close-out of the Subaward by requiring that the Subaward period of performance end no later than the end date of the prime award, and that the subrecipient's final invoice, final technical report, and any required reports, including those on property, use of small businesses, or inventions, be submitted to FGCU as described in the subaward agreement.
13. Assist ORSP, upon request, in obtaining or reviewing reports, advising ORSP during risk analyses, complying with additional monitoring responsibilities for high-risk auditees, obtaining audit information or monitoring a subrecipient's adherence to corrective action plans.

### C. ORSP

ORSP is responsible, in coordination with other FGCU offices, for the following:

1. Maintain a subrecipient database of FGCU subrecipient organizations.
2. Collect the subrecipient's audited financial statements or federal Single Audit summary information from the Single Audit Clearinghouse website, prior to the initial subaward and annually thereafter for renewed agreements.
3. Prepare, negotiate, and ensure the execution of the subaward agreement, including renewals and extensions, in accordance with the budget and work statement as outlined in the prime contract.
4. Advise subrecipients of requirements imposed on them by the Uniform Guidance, other federal or state laws, sponsor regulations, and the provisions of contract and grant agreements as well as any supplemental requirements issued by grant office.
5. Ensure all federal flow-through subawards shall include appropriate debarment language requiring the subrecipient to assure the PI, principals on the project, and FGCU that they are not debarred from receiving federal funds.
6. Consult with the PI when a subrecipient invoice (or any invoice) contains costs which differ from the approved budget or appear to be unclear, unusual or unallowable.

7. Require each subrecipient to permit FGCU and its auditors to access the records and financial statements as needed to ensure that the subrecipient complies with the Uniform Guidance.
8. Coordinate FGCU response to any subrecipient's audit findings, including demonstration that the subrecipient makes necessary corrections.
9. Review and act on all subrecipient invoices after departmental review and approval of each invoice.
10. Request additional information, or confirmation, for any invoiced cost which appears to differ from the approved budget or appears to be unclear, unusual or unallowable and do so in consultation with the PI.
11. Ensure accurate and timely payment of all invoices.
12. Provide subrecipients with up-to-date budget information as needed.
13. Coordinate through the PI to assure that proper financial close out procedures are followed.

### **Definition of Terms**

**Contractor (Vendor)** – Organization that provides goods and services within normal business operations. Contractors (vendors) provide similar goods and services to many different purchasers, operate in a competitive environment, and provide goods or services that are ancillary to the operation of the sponsored program.

**Designee** – An individual who the PI has delegated who has first-hand knowledge of the PI's sponsored award(s) and programmatic progress of the subrecipient.

**Federal Audit Clearinghouse** – Division of the Office of Management and Budget (OMB) that collects information on Single Audit results.

**Pass-through entity** – Non-federal entity that provides a federal award to a subrecipient to carry out a federal program; sometimes referred to as the “prime” or “lead” organization.

**Sponsored award** – Funding arrangement in which FGCU is providing a return benefit to, or agrees to provide a defined deliverable or complete a set of activities for, the sponsor in exchange for the funds, regardless of whether the funding instrument is designated a contract, cooperative agreement, grant, consortium agreement, or otherwise.

**Subaward** – Enforceable agreement, issued under a prime sponsored project, between a pass-through entity and a subrecipient for the performance of a substantive portion of the program; these terms do NOT apply to the procurement of goods or services from a contractor (vendor).

**Subrecipient Database** –A database managed by ORSP of all FGCU's Subrecipient organizations.

**Subrecipient (subcontractor or subawardee)** – Organization eligible to receive a financial award. A subrecipient's performance is measured against whether the objectives of the sponsored program are met; subrecipients have responsibility for programmatic decision-making and for adherence to applicable program compliance responsibilities. Subrecipients are responsible for performing a substantive portion of the program, as opposed to providing goods and services.

**Uniform Guidance** – OMB publication entitled “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (2 CFR 200).

**Subrecipient Commitment Form**

All subrecipients should complete this form when submitting a proposal to Florida Gulf Coast University. This form provides a checklist of necessary documents, certifications, and AOR approval for submission.

Subrecipient's Legal Name:

Business Address:

Street address

City, State, ZIP

Congressional District

Project Title:

Prime Sponsor: Florida Gulf Coast University

Subrecipient PI:

Performance Period Start Date:

DUNS Number

EIN / Tax ID:

FGCU PI:

Performance End Date:

**The following documents are included with this form and are covered by the certifications below:**

*\*Required for ALL submissions*

- |  |   |
|--|---|
| <input type="checkbox"/> STATEMENT of WORK *               | <input type="checkbox"/> Current & Pending Support for all Key Personnel  |
| <input type="checkbox"/> BUDGET with JUSTIFICATION *       | <input type="checkbox"/> Letter of Commitment to include in proposal to prime Sponsor   |
| <input type="checkbox"/> Biosketches for all Key Personnel | <input type="checkbox"/> Copy of NICRA- Federally <u>N</u> egotiated <u>I</u> ndirect <u>C</u> ost <u>R</u> ate <u>A</u> greement |
| <input type="checkbox"/> Other: <input type="text"/>       | <input type="checkbox"/> Other: <input type="text"/>  |

**SUBRECIPIENT BUSINESS STATUS:**

- 1. Entity Type:**  Foreign Entity  U.S. Entity with Congressional District #
- Public Institution of Higher Education  Private Institution of Higher Education  School District
- State Governmental Agency  County Governmental Agency  City Government
- Non-Profit Organization  Large business (for-profit)  Small Business

*If Small Business, identify business classification:*

- Small Disadvantaged (SDB)  Women-Owned (WOSB)  Veteran-Owned (VOSB)  Other:

## 2. Debarment and Suspension

The subrecipient hereby certifies that:

- The PI or any other employee or student participating in this project is NOT debarred, suspended or otherwise excluded from or ineligible for participation in federal assistance programs or activities.
- The organization is not presently debarred, suspended, proposed for debarment or declared ineligible for award of federal contracts.
- Has not, within three (3) years preceding this offer, had one or more contracts terminated for default by any federal agency.
- Has not, within three (3) years preceding this offer, been convicted of or had a civil judgement rendered against them for commission of fraud or criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) contract or subcontract; violation of Federal or State antitrust statutes relating to the submission of offers; or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property.

## 3. For-Profit/ Commercial Entities please respond to the following: (If not applicable, skip to # 3.)

- a. The goods and/or services we will provide under this transaction will be comparable to the goods and/or services we provide to many difference customers during the course of our normal business operations:
- Yes    No

*If "No", please describe how these goods and/or services will differ from those offered to other customers:*

- b. The goods and/or services we will provide under this transaction will be supplementary or ancillary to the operation of the sponsored program, and we will not be responsible for programmatic decision making:
- Yes    No

*If "No", please describe how your goods and/or services will contribute to the objectives of the program, how your performance will be measured against these objectives, and name the representatives who will be responsible for making programmatic decisions:*

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## AUDIT AND FISCAL COMPLIANCE CERTIFICATIONS

### 1. Audit

Organization receives an annual audit in accordance with 2 CFR 200 Subpart F (A-133)?  Yes    No

*If "Yes":*

- a. Has the audit been completed for the most recent Fiscal Year?    Yes    No

*If "No", when is it expected to be completed?*  

- b. Were any audit findings reported for the organization?    Yes    No
- c. Has the organization been determined to be a high-risk auditee?    Yes    No

**Please attach a copy of the Audit Report for the most recent Fiscal Year or provide the link below:**

URL Link:

**If "No":**

- a. Does the subrecipient receive overall federal funding of at least \$500,000 per year?  Yes  No
- b. If not subject to Subpart F, are annual financial statements reviewed by an independent audit firm?  Yes  No

**Please attach a copy of the audited statements for the most recent Fiscal Year.**

## 2. Other Audit

Other than financial statements, has any aspect of your organization's activities been audited within the last two years by a government agency or independent audit firm?  Yes  No

## 3. Generally Accepted Accounting Principles (GAP)

The organization certifies that its financial system is in accordance with generally accepted accounting principles and:

- can identify in its accounts all Federal awards received/expended and the Federal Program under which they were received;
- can prepare appropriate financial statements, including the schedule of expenditures of federal awards;
- maintains Internal Controls to assure that Federal awards are managed in compliance with applicable laws and regulations, and the provisions of contracts or grants;
- complies with applicable laws and regulations;
- has no outstanding audit findings which would impact contract costs.

## 4. Subrecipient Policies

Organization has formal, written policies that address: *(Check all that apply)*

- Pay Rates and Benefits       Time and Attendance       Effort Reporting
- Purchasing       Travel       Leave

## 5. Conflict of Interest

- Not Applicable- sponsor is not NIH, NSF, or other agency that has adopted the federal disclosure requirements.
- Subrecipient hereby certifies that it has an active and enforced conflict of interest policy that is consistent with the provisions of 42 CFR Part 50, Subpart F, "Responsibility of Applicants for Promoting Objectivity in Research". Subrecipient also certifies that, to the best of organization's knowledge:
- (1) All financial disclosures have been made related to the activities that may be funded by or through a resulting agreement, and required by its conflict of interest policy; and
  - (2) All identified conflicts of interest have or will have been satisfactorily managed, reduced, or eliminated in accordance with subrecipient's conflict of interest policy prior to the expenditure of any funds under any resulting agreement

**6. Facilities and Administrative/ Indirect Costs in this proposal are calculated:**

In accordance with our attached Federally Negotiated Indirect Cost Rate Agreement for this type of work

At a reduced rate of % of  that we hereby agree to accept.

**7. Fringe Benefits included in this proposal are calculated:**

In accordance with our attached federally negotiated rates

Based on Actual Rates

**8. Cost Sharing is included in this proposal:**  Yes  No

If "Yes",  is the Total Amount of Cost Share included with justification in attached budget.

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**REGULATORY APPROVALS**

**1. Human Subjects**

Status of IRB Review:  Not Applicable to this Project  Pending  Approved

If "Approved", Date IRB Approved or determined research to be exempt:

IRB Number:  Federal-wide Assurance Number (FWA):

**2. Animal Subjects**

Status of IACUC Review:  Not Applicable to this Project  Pending  Approved

If "Approved", Date IACUC Approved or determined research to be exempt:

IACUC Number:  PHS Animal Welfare Assurance Number:

**3. Recombinant DNA**

Status of IBC Review:  Not Applicable to this Project  Pending  Approved

If "Approved", Date IBC Approved:  IBC Number:

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The information, certifications, and representations above have been read, signed, and made by an authorized official of the subrecipient named herein. The appropriate programmatic and administrative personnel involved in this application are aware of sponsor policies in regard to subawards and are prepared to establish the necessary inter-organizational agreement consistent with those policies. Any work done and/or expenditures incurred prior to execution of a subaward agreement are at the subrecipient's own risk.

---

Signature of Subrecipient's Authorized Official

---

Date

---

Name (please print or type)

---

Title

**Application for the Establishment of a Center/Institute at FGCU**

**Name of the Center/Institute:**

**Host College Submitting the Application:**

**Proposed Implementation Date:** July 1, 20\_\_\_\_\_

**Proposed Center/Institute Director:**

**Department/Unit:**

**College/Division:**

**FGCU email: FGCU Phone #:**

**Classification of Center/Institute:**

**State Level:**  *(Legislature/State funded reports to Provost/designee)*

**University Level:**

- University Center/Institute – *(reports to Provost/designee)*
- College Center/Institute – *(reports to Dean)*
- Endowed Center/Institute – *(reports to Provost/designee)*

=====

**APPROVED BY**

\_\_\_\_\_  
President Date

\_\_\_\_\_  
Provost & Vice President for Academic Affairs Date

\_\_\_\_\_  
Vice President for Administrative Services & Finance Date

\_\_\_\_\_  
Associate Vice President for Research Date

\_\_\_\_\_  
Dean or Provost/Designee to whom the Director reports to Date



**FGCU Center/Institute Annual Review Routing Form**

**IMPORTANT DEADLINES (2nd Monday of the following months)**

**August** Director of each Center/Institute submits the Annual Report (see "Instructions on FGCU Center/Institute Annual Report") to his/her supervisor (e.g., Dean) **AND** to ORSP ([ORSP General Email](#)).

**October (OPTIONAL)** Dean, or Center/Institute Director's supervisor, submits input and recommendations (Continuation, Probation, Disestablishment, or Sunset) to ORSP ([ORSP General Email](#)).

**October** Faculty Senate Grants & Research Team (GRT) completes its annual review and forwards recommendations to the Associate Vice President for Research (AVPR).

**March** Dean, or Center/Institute Director's supervisor, submits his/her appeal to the AVPR regarding the review result (e.g., to disestablish or sunset a Center/Institute).

**May** Provost makes the final determination on disestablishing or sunsetting a Center/Institute. AVPR will notify the Dean, or the supervisor of the Center/Institute Director, of the final determination made by the Provost.

=====

**Annual Review Period:** Fiscal Year 20 \_\_\_\_ – 20 \_\_\_\_

**Center/Institute:**

**Director:**

**Department/Unit:**

**College/Division:**

**FGCU email:**

**FGCU phone #:**

**SIGNATURE**

**Faculty Senate Grants & Research Team**

**Recommendation:**  Continuation  Probation  Disestablishment \* Sunset  
or, **Voting Result:** \_\_\_\_ Continuation \_\_\_\_ Probation \_\_\_\_ Disestablishment/\*Sunset

**GRT Chair Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Associate Vice President for Research**

**Recommendation:**  Continuation  Probation  Disestablishment \* Sunset

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Provost & Vice President for Academic Affairs**

(Optional for continuation or probation. **Required** for disestablishment or sunset)

**Final Decision:**  Continuation  Probation  Disestablishment \* Sunset

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

\* For five-year review only

**FGCU Center/Institute Five-Year Review Signature Form**

**Important Deadlines** (*2nd Monday of the following months*)

**September** Center/Institute Directors submit the Annual Report to ORSP (research@fgcu.edu) with a copy to one's own Dean.

**October** Dean submits input, at his/her discretion, to the Associate Vice President for Research (AVPR).

**January** Faculty Senate Grants & Research Team (GRT) completes its annual review and forwards recommendations to the AVPR.

**February** AVPR completes his/her annual review and forwards recommendations to the Provost & Vice President for Academic Affairs (Provost) with a copy to the Center/Institute Director and the Director's Dean respectively.

**March** Dean, at his/her discretion, submits the appeal regarding the recommendation of disestablishing or sunseting a Center/Institute to the AVPR.

**May** Provost makes the final determination on disestablishing or sunseting a Center/Institute. AVPR will notify the Dean and Center/Institute Director the final determination made by the Provost.

=====

**5-Year Review Period:** Fiscal Year 20\_\_\_\_ – 20\_\_\_\_

**Center/Institute:**

**Director:**

**Department/Unit:**

**College/Division:**

**FGCU email:**

**FGCU phone #:**

**Dean** (*optional, refer to the Center/Institute Annual Report*)

**Recommendation:**  Renew  Sunset

**Faculty Senate Grants & Research Team**

**Voting Result:** \_\_\_\_\_ Renew \_\_\_\_\_ Sunset

**GRT Chair:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Associate Vice President for Research**

**Recommendation:**  Renew  Sunset

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Provost & Vice President for Academic Affairs** (*optional but required for sunset*)

**Final Decision:**  Renew  Sunset

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## Instructions on FGCU Center/Institute Annual Report

The Director of each Center/Institute is responsible for submitting the annual report, in the PDF format, via email to his/her direct supervisor (e.g. Dean) **AND** to ORSP (research@fgcu.edu) by the second Monday of September each year. ***The standard format of the annual report is: Arial 11-point font, single line spacing, and 1" margin on all sides.*** The annual report is limited to 15 pages, excluding the cover page and attachments. Annual reports not conforming to the required format will be returned, without review, to the Director for revision.

The annual report must include the following sections. All sections are required.

### **COVER PAGE** – FGCU Center/Institute Annual Review Routing Form *(excluded from the 15-page limit)*

- A. CENTER/INSTITUTE VISION, MISSION, GOALS, AND OBJECTIVES**
  - 1. Vision
  - 2. Mission
  - 3. Permanent Goals
  - 4. Objectives of the Reporting Year
  - 5. Objectives of the Next Reporting Year
- B. PERSONNEL**
  - 1. Center/Institute Director's Course Release and Compensation  
*(Provide itemized description, period (mm/yy–mm/yy), \$ amount/equivalent)*
  - 2. University Positions (faculty, staff, adjuncts, etc.) Funded by the Center/Institute  
*(Provide individual name, department/college, funding source, FTE)*
  - 3. Student Employees (undergraduate and graduate) Funded by the Center/Institute  
*(Provide individual name, department/college, funding source, FTE)*
- C. SELF-ASSESSMENT OF THIS REPORTING YEAR**
  - 1. Self-Assessment on Strengths, Weaknesses, Opportunities and Challenges
  - 2. Additional Resources Needed
- D. IMPLEMENTATION OF LAST YEAR'S RECOMMENDATIONS**

### **ATTACHMENTS** *(excluded from the 15-page limit)*

#### **ATTACHMENT I – Accomplishments in This Reporting Year**

- 1. Externally Funded Grants/Contracts (a) *(i.e. Non-FGCU sponsored research)*
- 2. Peer-Reviewed Journal Publications, Book and Book Chapter (b)
- 3. Conference Papers/Presentations and Other Publications (b)
- 4. Student Publications (b) *(e.g. theses, dissertations, conference papers/posters)*
- 5. Professional Services *(e.g. conference hosted, book/journal editor, proposal/paper review, consultant)*

#### **ATTACHMENT II – Budget Reports** (use the attached **Budget Forms**)

- 1. Reporting Year Budget
- 2. Next Reporting Year Budget

#### **ATTACHMENT III – Evaluation by the External Advisory Board (EAB)**

- 1. Letter of EAB Evaluation
- 2. Current List of Members of EAB  
*(provide the name of each member, title, affiliated university/organization, expertise in keywords)*

#### **ATTACHMENT IV – Supplementary Information** *(if none, please specify by "NA")*

- 
- (a) List only those ***already funded or submitted*** during this reporting period – provide names of the PI and Co-PIs, title of the grant, sponsoring agency, grant \$ amount, and grant period.
- (b) List only those ***already published or accepted*** during this reporting period – provide names of all authors, title of the publication, title of the Journal/Publisher/Conference, page number(s), and month/year published/accepted

## **Instructions on FGCU Center/Institute Abridged Annual Report**

The Director of each Center/Institute is responsible for submitting the annual report, in the PDF format, via email to his/her direct supervisor (e.g. Dean) **AND** to ORSP (research@fgcu.edu) by the second Monday of September each year. ***The standard format of the annual report is: Arial 11-point font, single line spacing, and 1" margin on all sides.*** The annual report is limited to 6 pages, excluding the cover page and attachments. Annual reports not conforming to the required format will be returned, without review, to the Director for revision.

The annual report must include the following sections. All sections are required.

**COVER PAGE** – FGCU Center/Institute Annual Review Routing Form (*excluded from the 6-page limit*)

**A. CENTER/INSTITUTE VISION, MISSION, GOALS, AND OBJECTIVES**

1. Vision
2. Mission
3. Permanent Goals
4. Objectives of the Reporting Year
5. Objectives of the Next Reporting Year

**B. SELF-ASSESSMENT OF THIS REPORTING YEAR**

1. Self-Assessment on Strengths, Weaknesses, Opportunities and Challenges
2. Additional Resources Needed

**C. IMPLEMENTATION OF LAST YEAR'S RECOMMENDATIONS**

**ATTACHMENTS** (*excluded from the 6-page limit*)

**ATTACHMENT I – Accomplishments in This Reporting Year**

1. Externally Funded Grants/Contracts (a) (*i.e. Non-FGCU sponsored research*)
2. Other Accomplishments-Including Journal or other Publications and Conference Papers/Presentations

**ATTACHMENT II – Budget Reports** (use the attached **Budget Forms** for Items 2 and 3 below)

1. Budget Narrative
2. Reporting Year Budget
3. Next Reporting Year Budget

**ATTACHMENT III – Evaluation by the External Advisory Board (EAB)**

1. Letter of EAB Evaluation
2. Current List of Members of EAB  
(*provide the name of each member, title, affiliated university/organization, expertise in keywords*)

**ATTACHMENT IV – Supplementary Information** (*if none, please specify by "NA"*)

**Attachment IIa: Reporting Year Budget**

(Please provide the Fiscal Year End revenues and actual expenses for the current Reporting Year)

	Educ & General (E&G)	Contracts & Grants	Private	Other (ID below)
<b>A. REVENUE (please show revenue by category)</b>				
A.1 Carry Over Funds				
<b>A. TOTAL REVENUE</b>	\$0.00	\$0.00	\$0.00	\$0.00
<b>B. EXPENSES</b>				
<b>B1. Salaries &amp; Benefits (Pool 6100)</b>				
Salaries & Wages				
Fringe Benefits				
Other				
<b>B2. Temporary Employment (Pool 6200)</b>				
OPS Salaries & Wages				
OPS Fringe Benefits				
Undergrad Assist/Student Salaries & Wages				
Undergrad Assist/Student Fringe Benefits				
Grad Assistant/Student Salaries & Wages				
Grad Assistant/Student Fringe Benefits				
Other				
<b>B3. Operating Expenses (Pool 7300)</b>				
Publications, Internal/External				
Repairs, Maintenance				
Contracts, Consulting				
Office Supplies				
Other Supplies				
Total Equipment (<\$1,000/item)				
Rent				
Other				
<b>B4. Charge Back (Pool 7300C)</b>				
Telephone				
Postage				
Copying				
Other				
<b>B5. Travel (registration, transportation, meals, etc.) (Pool 7300T)</b>				
In-state				
Out-of-State (incl Canada & Mexico)				
International				
<b>B6. Capital Expenditures Pool (&gt;\$1,000) (Pool 7500)</b>				
Office Equipment				
Lab Equipment				
Other				
<b>B7. Other Expenditures (please list below)</b>				
<b>C. TOTAL EXPENSES</b>	\$0.00	\$0.00	\$0.00	\$0.00
<b>D. BALANCE (revenue - expenses; A - C)</b>	\$0.00	\$0.00	\$0.00	\$0.00

**Attachment IIb: Next Reporting Year Budget**

(Please provide the projected revenues and expenses for the next Reporting Year)

	Educ & General (E&G)	Contracts & Grants	Private	Other (ID below)
<b>A. REVENUE (please show revenue by category)</b>				
A.1 Carry Over Funds				
<b>A. TOTAL REVENUE</b>	\$0.00	\$0.00	\$0.00	\$0.00
<b>B. EXPENSES</b>				
<b>B1. Salaries &amp; Benefits (Pool 6100)</b>				
Salaries & Wages				
Fringe Benefits				
Other				
<b>B2. Temporary Employment (Pool 6200)</b>				
OPS Salaries & Wages				
OPS Fringe Benefits				
Undergrad Assist/Student Salaries & Wages				
Undergrad Assist/Student Fringe Benefits				
Grad Assistant/Student Salaries & Wages				
Grad Assistant/Student Fringe Benefits				
Other				
<b>B3. Operating Expenses (Pool 7300)</b>				
Publications, Internal/External				
Repairs, Maintenance				
Contracts, Consulting				
Office Supplies				
Other Supplies				
Total Equipment (<\$1 ,000/item)				
Rent				
Other				
<b>B4. Charge Back (Pool 7300C)</b>				
Telephone				
Postage				
Copying				
Other				
<b>B5. Travel (registration, transportation, meals, etc.) (Pool 7300T)</b>				
In-state				
Out-of-State (incl Canada & Mexico)				
International				
<b>B6. Capital Expenditures Pool (&gt;\$1 ,000) (Pool 7500)</b>				
Office Equipment				
Lab Equipment				
Other				
<b>B7. Other Expenditures (please list below)</b>				
<b>C. TOTAL EXPENSES</b>	\$0.00	\$0.00	\$0.00	\$0.00
<b>D. BALANCE (revenue - expenses; A - C)</b>	\$0.00	\$0.00	\$0.00	\$0.00