



OFFICE OF  
SPONSORED PROGRAMS

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# OSP GUIDE

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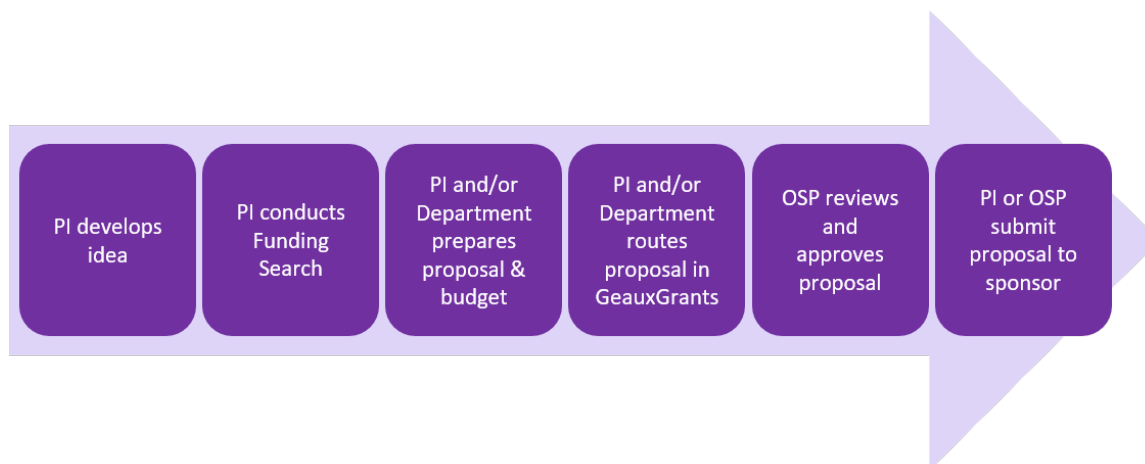
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## Overview of the Proposal Preparation, Routing and Submission

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### I. Proposal Preparation

#### A. Identification of Funding Resources

To assist faculty and staff with the identification of funding sources, the Office of Research and Economic Development (ORED) distributes funding announcements through a GeauxGrants Newsletter, which is emailed each week to faculty and staff. In addition, ORED maintains current website links to external (federal, state, and foundation) and internal funding sources.

An available information source containing thousands of funding opportunities is the Sponsored Programs Information Network (SPIN) database, operated by InfoEd Global. SPIN allows a faculty member to design a search for funding opportunities on a comprehensive database of over 10,000 programs. Faculty may access this database via GeauxGrants.

#### B. Types of Proposals

The following different types of proposals may be submitted to a potential sponsor:

Notice/Letter of Intent may be requested by a sponsor to ascertain interest in a project. If the notice/letter of intent requires a detailed budget or an Authorized Representative signature, it must be routed in GeauxGrants.

Pre-proposals, also known as preliminary proposals or white papers, may be requested by a sponsor to ascertain interest in a project. If the preliminary proposal or white paper requires a detailed budget or an Authorized Representative signature, the proposal must be routed to OSP.

New proposals are submitted for initial funding of a project, or a proposal that is being re-submitted after having been officially declined by the sponsor. Award transfers to LSU from another institution are considered new proposals for LSU.

Revised proposals modify a pending proposal in response to an indication by the Sponsor that a project may be funded. Revised proposals keep the same proposal number.

Renewal proposals, also known as a Competing-Continuation Proposals, request additional funding to continue an existing awarded project beyond its original term. This type of proposal requests additional funds to continue a project that has already been completed and proposes a new scope of work. It is considered a new proposal and receives a new proposal number.

Resubmission proposals modify an unfunded proposal following initial review and are resubmitted for consideration. This proposal type is typically reserved for the National Institutes of Health (NIH). Resubmission proposals receive a new proposal number.

Continuation proposals keep the same proposal number as the originally submitted proposal because the additional funding usually comes in the form of an amendment to the original award. There are two types of continuation proposals. The first is a competitive continuation or "Continuation-New," which is a proposal requesting additional funds and additional time not originally approved in a single year or multi-year award. The second type is "Continuation-Noncompeting," which is a proposal requesting next year funds already approved in a multi-year or multi-phase award. This proposal type is usually in the form of a progress report (e.g. NIH RPPR, DOE's plan for next year's funds).

Supplemental proposals request an increase in support for a funded project in the current budget period and may include expansion of the project's approved scope. A supplement is a request for additional funding within the original time period. Supplemental proposals keep the same proposal number as the originally submitted proposal.

## **C. Contents of Proposal**

The majority of funding agencies now require electronic submission of proposals with very specific application forms and submission guidelines. When no particular format or guidelines are required, the following items are considered typical of what should be included. At a minimum, all proposals should include a scope of work and budget.

### **1. Cover Page**

Most Sponsors require a particular format for a proposal cover page. If the Sponsor does not require a particular format then the sample proposal cover page available on the OSP website may be used.

### **2. Project Abstract**

An abstract of the proposed research which provides a brief description of the activity that would result if the proposal were funded.

### **3. Project Description (Scope of Work)**

A general plan for the work to be undertaken and the procedures to be followed should be stated in sufficient detail to permit an evaluation of the proposal. The relationship of the proposed work to the plan for the development of the institution, if significant, including effects on graduate and undergraduate education should be discussed.

#### **4. Personnel**

Include information required by the sponsor in your proposal.

In order to ensure compliance with University regulations and policies, the principal investigator (PI) and co-investigator (Co-I) must be an employee of the institution unless the proposal involves one of the following in which case, the non-LSU employee can be listed as Co-I:

- Non-LSU employees will participate on the project as part of a proposed subcontract.
- The sponsor requires the proposal to include non-LSU employees as Co-Is (i.e. NSF GOALI proposals).

For collaborative proposals where LSU is the lead institution, non-LSU employees should be listed as investigators on their institution's proposal cover page. A joint project narrative for the collaborative proposal may include the non-LSU employees as Co-Is.

With department and college approvals, the following individuals may be named as PI:

- Full or part time faculty and staff
- Prospective full or part time faculty and staff who will be on the University payroll (i.e. in a paid status) at the time of the award
- Visiting faculty who will be on the University payroll (i.e. in a paid status) during the time of the award
- Adjunct or gratis faculty who will be on the University payroll (i.e. in a paid status) at the time of the award
- Emeritus faculty may serve as PI provided they can fulfill the technical and administrative responsibilities of the project as well as meet Sponsor's approval

With department and college approvals, the following individuals may be named as Co-I:

- Anyone who can be named as a PI
- Graduate assistant (a faculty member or unit head must be listed as the PI)
- Adjunct or gratis faculty not on the University payroll (i.e. not in a paid status)
- Visiting faculty not on the University payroll (i.e. not in a paid status)

Sponsors may impose stricter regulations. Accordingly, PIs and Co-Is currently not in a paid status must disclose their current position classifications. If changes to position classifications occur during the course of a funded project, sponsor approval may be necessary.

#### **5. Other Financial Assistance**

If assistance on the same or other research projects involving the same personnel is received or sought from other federal or non–University sources, the extent of that assistance should be clearly stated, and the interplay of the arrangements explained.

#### **6. Facilities, Equipment, and Other Resources Available**

Describe facilities, equipment, and other resources available and indicate the ways in which they will support the proposed project.

## **7. Budget**

A budget for each year or other appropriate periods of time needed to complete the project should list in detail all expected items of cost by major cost categories such as salaries, wages, fringe benefits, operating services, supplies, equipment, publications, travel, consulting services, subcontracts, tuition remission, other direct expenses, and facilities and administrative (F&A) costs. If cost sharing is a requirement explicitly stated in the sponsoring agency's application guidelines, the budget should also include cost sharing amounts by major cost categories. A detailed budget justification explaining all budget items should be included if required by the sponsor. The budget justification should only include items of costs included in the budget.

Grant coordinators at the department and college levels can assist in completing a budget and budget justification. The GeauxGrants budget prepopulates salary and LSU's current negotiated rates.

### **a. Direct Costs**

Direct costs are those costs which can be specifically identified to a proposed project. Typical direct costs include the following:

#### **(i) Salaries**

Personnel should be listed individually, giving name, salary rate, and percentage of time or person-months to be devoted to the proposed work. Salary must be based on the individual's current institutional base salary. Institutional Base Salary or IBS is annual compensation paid for an individual's appointment (9 or 12 months), whether that individual's time is spent on research, teaching, or other activities. IBS does not include any temporary funding (i.e. bonus, one-time payment, incentives). Additionally, IBS does not include payments from other organizations or income that individuals are permitted to earn outside of their University responsibilities, such as consulting. IBS must be used as the base salary on all grant proposals unless there is a statutory limit on compensation (i.e. NIH cap). Summer salary is calculated based on the IBS of the academic year.

Salary costs included in a sponsored project proposal are calculated by either 1) multiplying the IBS by the percent of effort expended on the particular sponsored project, or 2) multiplying the person months expended on a particular sponsored project by the individual's monthly salary. Anticipated salary increases and annual inflationary increases may be included but must be explained in the budget justification.

Compensation for academic employees, regardless of the source of funds, is subject to the limitations set forth in the Faculty Handbook under Summer Appointments, Outside Employment, and Additional Compensation through the University. Also, compensation limits for all employees are described in PM-11 regarding outside employment, PM-3 regarding compensation limitations, PM-67 on contracts between a faculty member and the University, and PS-77 on distribution of campus share of distributable royalties. Additional Compensation proposed must be disclosed to sponsor in the proposal budget and/or budget justification.

#### **Senior Personnel Effort**

Federal regulations require all proposal budgets to include commitment of effort commensurate with the level of effort individuals will devote to sponsored projects. Further, OMB Memorandum 01-06 requires that most federally-funded research programs should have some level of committed faculty (or senior researchers) effort, paid or unpaid by the federal government. Accordingly, it is LSU's policy that with the exceptions of equipment, instrumentation, doctoral dissertation, student augmentation grants and small research projects (\$50,000 or less), all research proposal budgets (federal and non-federal) must include some level of effort charged to the project by at least one



senior researcher (PI, Co-I or other senior personnel for each year of the project). The effort can only be cost-shared if the sponsor requires cost sharing.

For those other senior personnel who do not have effort budgeted, PIs will certify through the proposal routing and approval process that these individuals will devote less than 5% time on the project.

### **Administrative/Clerical Salaries**

In accordance with section 413 of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), for projects funded by federal dollars (either directly or "passed-through" another entity), administrative or clerical salaries should only be requested as direct costs when the following conditions are met: services are integral to the federal award; the individuals are specifically identified in the federal award; and the costs are not also recovered as indirect costs.

### **If Sponsor Requires Hourly Rates**

In accordance with 2 CFR 200, LSU's accounting system does not record salaried personnel time on an hourly basis, but rather on a percentage of effort basis. Accordingly, project effort should be budgeted in proposals on a percent of effort basis or person-month. Under normal circumstances, hourly rates should not be included. However, if sponsor guidelines require the inclusion of hourly rates, rates can be calculated using the following formulas:

Fiscal employees:  $12\text{-month salary}/2,080=\text{hourly rate}$

Academic employees:  $9\text{-month salary}/1,360=\text{hourly rate}$

In addition, the following disclaimer must be included in the budget justification:

Labor rates for employees appointed on a fiscal year basis are calculated on 2,080 direct labor hours per year; labor rates for employees appointed on an academic year basis are calculated on 1,360 direct labor hours (170 days during academic year x 8 hours per day). Hourly rates are presented in the budget for informational purposes only. Time will be recorded on a percentage of effort basis in accordance with 2 CFR 200. The cost of vacation, holiday, sick leave, and other paid absences are included in salaries and wages, and are charged to grants and contracts as part of the normal charge for salaries and wages. Separate charges for the costs of these absences are not made.

### **Salary Caps**

Some sponsors put caps on the amount of salary that can be charged to a sponsored agreement. In general, NSF limits salary compensation for senior personnel to no more than two months of their regular salary in any one year from all NSF-Funded projects. NIH limits the direct salary that an individual may receive under an NIH grant to a designated salary rate. A summary of the NIH salary caps can be found on the NIH Office of Extramural Research website.

### **(ii) Employee Fringe Benefits**

Fringe benefits include the University's contribution toward insurance, retirement, and other similar items. Fringe benefits are included on the salary of regular employees and are included as a direct cost when computing the Modified Total Direct Costs (MTDC). Benefit rates are established each fiscal year. Separate rates have been established for contingent labor or transient employees (employees appointed on a full-time, temporary basis). Fringe benefits are not charged to graduate assistants or undergraduate student workers. The current fringe benefits rates are available on the OSP website. Per Finance and Administration Operating Procedure (FASOP): AS-12, fringe benefits cannot be waived or reduced for any employee.

### **(iii) Graduate Assistants / Fellowships / Undergraduate Support**

Funds requested for graduate students should be based on the minimum salary for terminal degree graduate students and average departmental rates. Graduate students must be appointed as Graduate Research Assistants (as opposed to Graduate Teaching Assistants) in order to work on research projects.

At LSU, full-time (20 hour per week) graduate assistants receive tuition exemptions. See LSU Graduate School's website for more information. In addition, due to federal regulations, TOPS and other similar scholarships are not allowable as a cost sharing contribution. All project budgets that include graduate assistant support must also include the associated tuition remission for the graduate assistant using the established tuition remission rate and health insurance. If the sponsor has a published policy that does not allow tuition remission or health insurance, it should be removed from the budget. See OSP website and budget forms for the current tuition remission and health insurance rates.

Unlike assistantships, fellowships generally do not stipulate a work requirement in exchange for aid. Fellowships are based on academic merit and usually cover educational and living expenses. If allowed by the sponsor, full tuition and fees should be requested for the student because students appointed on fellowships are not eligible to receive tuition exemption by the University. If a fellowship does not cover full tuition and fees, the costs will be the responsibility of the student unless the Graduate School approves an exemption

Effort for undergraduate students should be presented as hourly.

### **(iv) Equipment**

Requests for equipment should be itemized and justified in relation to the project. LSU categorizes an item costing \$5,000 or greater, with a useful life of at least one year as equipment. Anything less than \$5,000 will be budgeted to supplies. However, the state of Louisiana requires the University to inventory items valued at \$1,000 or more. Consequently, LSU accounting spend categories have been created in the 6350 equipment/major repairs Workday ledger category to identify and record items between \$1,000 and \$4,999 as "expendable equipment." While this "expendable equipment" category will be budgeted as supplies in proposals for the purposes of MTDC calculation and F&A cost recovery, "expendable equipment" will continue to be inventoried in compliance with state law.

When the cost of equipment includes accessories, installation, delivery or software (in the case of a computer purchase) and is greater than \$5,000, the entire cost will be budgeted under the equipment category. Software is only budgeted under equipment when included in the purchase price of a computer which is greater than \$5,000. Otherwise, it is budgeted to supplies regardless of the costs. The need for general purpose equipment (computers, printers, etc.) must be clearly explained in the budget justification.

#### **Fabricated Equipment**

Fabricated equipment is defined as an item of equipment that is built or assembled in its original form from individual parts by a PI and/or other sponsored project personnel, or an internal or external shop. When a completed item of fabricated equipment has an aggregate cost of \$5,000 or more, when its service life is at least one year, and when that assembled item will be recorded as capital equipment, the individual component costs associated with the fabrication are to be budgeted in the equipment category. Any fabricated equipment less than \$5,000 will be budgeted to supplies.

## **Equipment Maintenance/Repair**

Maintenance/repair costs for general purpose equipment are not allowed on sponsored projects. Maintenance/repair costs for special purpose equipment which is used to support or advance the work of the project and which can be properly allocated to a project(s) is allowable on sponsored agreements, provided certain conditions for allowability are met. The costs must be proportionally allocated to each project or activity (externally or institutionally funded). When preparing proposal budgets, principal investigators are recommended to include planned maintenance/repair costs or special purpose equipment in the budget/budget justification, as needed. If such costs are not included in the budget/budget justification approved by the Sponsor, principal investigators will be required to submit form AS550 to Sponsored Program Accounting for necessary approval prior to charging the costs to a project.

## **Animal Purchase**

Funds for the purchase of animals should be budgeted in accordance with [LAC Title 34, Part VII, Section 307](#) (page #93) which states in part:

“Livestock acquired for breeding, dairy, and experimental purposes are classified as property and, with the exception of fowl, and rodents, and any other similar type small mammals, must be recorded in the inventory regardless of the value per animal. Animals acquired for slaughter need not be placed on inventory. When an agency acquires livestock by birth and determination is made that such animals will be used for breeding, dairy, or experimental purposes, the animals shall be included in the inventory and noted as having been acquired by birth and given an appraised fair market value. At each annual inventory, the value of livestock acquired by birth and used for breeding, dairy, or experimental purposes will be reappraised by the agency property manager and the acquisition cost will be adjusted on the inventory in accord with current fair market value. When an agency acquires livestock by birth and determination is made that such animals will be slaughtered for food, the animals shall not be included in the inventory.”

Animal purchases that meet the criteria for inventory will be budgeted under equipment and charged to LSU accounting spend category SC0132. Animals that will not be inventoried will be budgeted and charged as supplies.

## **(v) Travel**

Travel necessary for the conduct of the project, or for the dissemination of project results should be requested. Travel should be estimated and budgeted according to University Travel Regulations (PM-13). Funds for consultant/non-LSU personnel travel should be budgeted under consultant/professional services with the justification stating that the amount budgeted includes non-LSU personnel travel costs. The expenses will be charged to LSU accounting spend category SC0288 entitled “Non-Employee/Guest Travel,” This is the preferred method for budgeting and charging non-LSU personnel travel.

Travel costs for non-LSU personnel may also be budgeted under travel with a justification stating that budgeted travel costs include travel for non-LSU personnel (the amount should be stated). This method should only be used when individual(s) cannot be justified as a consultant.

As specified in FASOP AS-18, travel to high risk regions may require special approvals and/or a signed travel release and waiver by the traveler. When travel to the “Restricted Regions” as described in the policy are budgeted, PIs must ensure appropriate University approvals are made prior to making travel arrangements.

#### **(vi) Materials and Supplies**

Expendable materials and supplies needed for the project should be identified and justified. Office supply costs are normally treated as F&A Costs and consequently not allowable as direct costs. If office supplies are needed beyond that which is provided by the PI's department (i.e. survey or workshop supplies), the need for office supplies must be clearly justified in relation to the project.

Pursuant to 2 CFR 200.453, computing devices can be direct charged as a supply cost if the acquisition cost is less than \$5,000. Charging computing devices is allowable for devices that are essential and allocable, but not solely dedicated, to the performance of a federal award.

Funds for the purchase of animals should be budgeted in accordance with [LAC Title 34, Part VII, Section 307](#). Refer to Animal Purchase under Equipment above.

#### **(vii) Subrecipients**

Before entering into a relationship with another entity under a sponsored award in which the other entity will provide goods or services or substantive, programmatic work, a determination must be made as to the nature of the relationship of LSU and the other entity, which in turn will determine the type of agreement required to document the relationship. 2 CFR 200.331 Subrecipient and Contractor Determinations, as well as 2 CFR 200.1 Definitions for Contractor, Subrecipient and Subaward provide guidance on making subrecipient and contractor determinations. Subrecipients are used only when a collaborator will be performing part of the proposed research through intellectual input and authoring or co-authoring papers describing research results. If a collaborator is providing a routine service (e.g. analyzing samples), the cost for the service must be budgeted as a Contractor (Supplier).

The following information must be provided with the proposal for each collaborating Subrecipient entity:

- **Subrecipient Data Form.** A completed, signed subrecipient data form (found on OSP's website) must be provided by the collaborating subrecipient.
- **Budget and budget justification.** If a particular budget format is required by the sponsor, the collaborator's budget should be prepared in the same format, with appropriate signatures, if required.
- **Copy of fringe benefit rate agreement.** If the subrecipient entity includes fringe benefit costs in its budget, a copy of subrecipient's government approved fringe benefit rate agreement is required at the proposal stage. If the subrecipient entity does not have a government approved fringe benefit rate agreement, documentation to support the inclusion of fringe benefits in the proposal budget must be provided.
- **Copy of facilities and administrative cost rate agreement.** If the subrecipient entity includes facilities and administrative costs (indirect costs or overhead), a copy of subrecipient's government approved facilities and administrative cost rate agreement is required at the proposal stage. If the subrecipient entity does not have a government approved facilities and administrative cost rate agreement, 2 CFR 200.414 allows subrecipient to charge a de minimis rate of 15% of modified total direct costs on federal awards. For non-federal awards, in the absence of government approved facilities and administrative cost rate agreement, subrecipient must provide documentation (e.g. financial statements) to support the charge of facilities and administrative costs or may opt to use the 15% de minimis rate .
- **Scope of work (only required for OSP expanded review).** The scope of work may be incorporated into the project narrative or included as a separate section of the proposal as long as the subrecipient's responsibilities are clearly identifiable.
- Any additional representations, certifications, collaboration letters and forms required by the specific proposal guidelines (RFP).

**(viii) Contractor (often referred to as Supplier or Consultant or Professional Services)**

A contractor (supplier) relationship (including that of an individual acting as a supplier of consulting services) is appropriate when the entity is providing a specified routine service (e.g. analyzing samples). LSU employees may not serve as contractors (suppliers) on sponsored projects awarded to LSU. If an LSU employee will participate in the project, their time must be budgeted under salaries, and fringe benefits are assessed.

**(ix) Service Centers**

Sponsored projects often require the use of on-campus laboratories or specialty shops for machining or testing. In order to charge sponsored program awards/grants for on-campus facilities usage, the facility must be an established "Service Center." Prior to budgeting for use of on-campus shops or laboratories, PIs should consult the LSU Office of Budgeting and Planning website to confirm that the facility is an established Service Center. For more information on Service Centers, please see Policy Statement 103. Service Centers should be included under Operating Services.

**(x) Other**

Costs that do not fall under the routine cost categories may be requested in the "Other" category. (Note: If funds are being requested for a specific activity such as a conference or a field study, the requested funds should be budgeted under the appropriate direct costs categories, not as a lump sum under "Other").

**(xi) Operating Services**

**Rental Costs of Off-Site Facilities**

Rental costs of off-site facilities are budgeted under Operating Services. Rental expenses charged to LSU accounting spend category SC0016 are excluded from MTDC. An example is rental of off-campus space to teach classes offered in sponsored instruction projects.

**Animal Per Diem**

Animal per diem should be budgeted to the Operating Services budget category, and the unit charging the animal per diem must be a University approved service center. Per diem expenses will be charged to LSU accounting spend category SC0046 entitled "Other Operating Services – Laboratory Fees" which covers fees paid for laboratory services.

**(xii) Participant Support Costs**

Participant support costs are direct costs for items such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid to or on behalf of participants in connection with trainings or conferences. Participant Support costs are excluded from MTDC. (Note: If funds are being requested for payment to participants of a research study (i.e. research subject fees; LSU spend category SC0086), the requested funds should be budgeted under "Other") and are included in MTDC.

**b. Indirect Costs, or Facilities and Administrative Costs**

Indirect costs or Facilities and Administrative costs are those costs which are incurred for common objectives, and cannot be specifically identified to a particular sponsored project. The cost of utilities, facilities maintenance, library support, use of departmental equipment, departmental and general University administration, and other institutional support activities associated with research and related activities are allocated to sponsored programs in accordance with 2 CFR 200.

At LSU, indirect costs or Facilities and Administrative Costs (F&A) are computed by multiplying the applicable federally negotiated rate by the Modified Total Direct Cost (MTDC). MTDC is defined as total direct costs less:

- Subgrant and subcontract costs in excess of \$25,000 each (only the first \$25,000 of each subcontract or subgrant is included in calculation)
- Equipment (items costing \$5,000 or more with a useful life of at least one year)
- Capital expenditures
- Scholarship or Fellowship stipends permitted by the awarding agency (i.e., fellowships or scholarships to persons not employed by the University). Salary for graduate assistantships is included in the MTDC
- Participant Support Costs
- Rental costs of offsite facilities
- Tuition Remission

The current Facilities and Administrative Cost Rates for LSU are available on the OSP website. To determine the applicable F&A rate, you must first determine the project function. Functions are defined as follows:

**1. Research** - All sponsored research and development activities, and research training activities and other separately budgeted research. Research is further categorized into Basic, Development and Applied for reporting purposes:

a) **Basic Research** - Research undertaken primarily to acquire new knowledge without any particular application or use in mind.

b) **Applied Research** - Research conducted to gain the knowledge or understanding to meet a specific, recognized need.

c) **Development** - The systematic use of the knowledge or understanding gained from research directed toward the production of useful materials, devices, systems, or methods, including the design and development of prototypes and processes.

**2. Instruction** - All activities which are part of the instructional program, including teaching and non-research training activities, organized activities relating to educational departments, extramural teaching and correspondence study; excludes office of college deans and equivalent academic administration.

**3. Public Service** - Cooperative extension, short courses and conferences, institutes and other non-instructional services beneficial to external groups.

If a project includes more than one of the above functions, the preponderance of effort devoted to a given function will be the determinative factor, much in the same manner by which the on-campus or off-campus F&A rate is determined.

The University's federally negotiated Indirect (F&A) rates must be included in all proposal budgets, unless a sponsoring agency's written published policy, consistently applied, does not allow full recovery of indirect (F&A) costs.

**Off-Campus F&A Rate** - Projects that will be conducted primarily off-campus may apply the off-campus F&A rate. The on-campus vs. off-campus rate is determined on the basis of the preponderance of the project expenses. In proposals in which the appropriate rate is not obvious, PIs will provide an internal breakdown of the budget. All direct costs (less subawards) to be incurred for on-campus activities will be listed in one column, and all direct costs (less subawards) to be incurred for off-campus activities will be listed in another column. When salary is split between on-campus and off-campus activities, then fringe benefits and tuition remission, if applicable, should also be split proportionally. The column with more than 50% of the expenditures will determine the rate to be applied to the proposal. Sponsored projects cannot be subject to more than one F&A cost rate. An alternate work location such as employee's home office or another approved office location does not justify use of the off-campus rate.

### **c. Cost-Sharing and Matching**

According to 2 CFR 200.306, cost sharing should only be included when required by sponsor guidelines. If cost sharing is not required by sponsor guidelines, it is considered voluntary cost sharing and requires special approval by the Office of Research and Economic Development. Approval can be sought by using ORED's form entitled "Request Approval of Cost Sharing or Indirect Cost Waiver."

When cost sharing is required by sponsor guidelines or the Office of Research and Economic Development has permitted voluntary cost share, University-contributed cost-sharing are normally budgeted in the following cost categories: salaries, wages, and related fringe benefits and facilities and administrative costs. Other non-salary related cost sharing contributions may be used and must be documented in a separate grant line. Cost sharing commitments of any kind which are pledged in the proposal must be honored in full if the proposal is funded. Thus, only cost sharing which can realistically be provided should be included in the proposals. Each line item of cost sharing (institutional or external) generally should be fully explained in the budget justification.

#### **(i) Definition**

Cost sharing or matching is defined as that portion of sponsored project costs not borne by the project's sponsor. Cost sharing expenditures must be incurred within the period of performance of the sponsored project. Cost sharing must meet the same standards of allowability as the sponsored project funds.

In order to cost share to a sponsored project, the function of the cost-sharing funds must match the function of the sponsored project. Thus, sponsored research projects must be matched by research funds, training projects by instruction funds, and public service projects by public service funds. Using the same logic, non-federally funded restricted awards may also be used to satisfy a cost-sharing obligation in a like function with sponsor approval. However, federally funded restricted awards/grants cannot be used to match federally sponsored projects. Salary for graduate students appointed solely as Teaching Assistants may not be cost-shared to research projects.

#### **(ii) Types of Cost-Sharing**

##### **a) Institutional**

All institutional match contributions are "In-Cash," and are normally limited to Salaries and Wages, Fringe Benefits, and Indirect Costs. All University cost sharing funds will be department or college contributions unless otherwise approved by the other contributing unit.

##### **b) External**

All proposals which include support (in-cash or in-kind) from an external organization must contain a written commitment from the organization's authorized representative. For those proposals which include in-cash or in-kind support, the commitment must include at a minimum:

- A statement that the funds will be provided in support of the specific project proposed.
- The amount of financial support which will be provided.
- The period for which the funds will be available (must coincide with proposed project period).
- A commitment to provide the cash contribution at the beginning of proposed project or at the beginning of each budget year of a multi-year project.
- A statement that documentation of in-kind match (e.g. equipment loan) will be provided through quarterly invoices to LSU showing the value of the match and reflecting no cost to the University.
- A copy of external organization's published rates to substantiate budgeted in-kind match.

Indirect costs at LSU's federally negotiated rate will be applied to in-cash cost sharing funds from all organizations. (Note: The indirect cost rate is not applied to in-kind contributions.).

## **II. Proposal Routing, Approval and Submission**

A proposal to a potential external sponsor represents a formal offer by LSU acting as an agency of the State of Louisiana. As such, any proposal submitted must be endorsed by the individuals who are agreeing to conduct the project and their respective chairs and deans, and the person authorized to commit the University to the offer. The authority to commit the University to the offer has been delegated to the Assistant Vice President of Sponsored Programs. LSU has developed a routing procedure to ensure that all proposals submitted are in compliance with University policies and procedures, and are submitted with the endorsement of the University. Under no circumstances may a proposal be submitted without prior University approval.

### **A. Proposal Routing**

#### **1. Proposal Routing using GeauxGrants**

All proposals requesting support for sponsored programs require University approval. All proposals must be routed and approved electronically using GeauxGrants. At a minimum, PIs, Co-Is, senior personnel, individuals receiving project and/or F&A credit and their respective department heads and deans must approve the proposal in GeauxGrants. Questions regarding GeauxGrants should be directed to the Office of Sponsored Programs.

The submission of Revised, Resubmission, Continuation, Supplemental and Renewal Proposals require the same processing and approvals as New Proposals. The type of proposal being submitted must be identified on the GeauxGrants New Proposal Questionnaire. See the GeauxGrants Help Desk for detailed instructions on proposal routing and approval in GeauxGrants.

#### **2. OSP Review/Approval**

OSP review, at a minimum, consists of the GeauxGrants Setup Questions, LSU Questionnaire, Budget, Personnel and Internal Uploads and Routing tabs, institutional approvals, and other agency required forms which include financial information or require Authorized Representative signature, such as a proposal cover sheet. Approval of proposals by OSP on behalf of the University is contingent on the PI/PD(s) disclosing in GeauxGrants all special requirements associated with the project, and the certifications by the PI/PD(s), Co-investigators, Senior Personnel, Department Chair/Head(s), and Dean/Director(s).

#### **3. Proposal Routing Process**

##### **a. Streamlined Review (Required)**

The following information must be loaded and routed in GeauxGrants at least seven business days prior to the proposal mailing or electronic submission deadline:

- Proposal cover sheet (if required)
- Budget and budget justification
- Any special approvals/proposal information
- Any sponsor forms which contain budgetary information and/or require Authorized Organizational Representative signature

If electronic submission is required, the electronic proposal must be released in the sponsor system simultaneously. If Grants.gov submission is required, the proposal will be routed as a Grants.gov Proposal in GeauxGrants and OSP will submit via System-to-System (S2S).

If the proposal is submitted in response to a Request for Proposals (RFP) or program announcement, a copy of the RFP/program announcement must be loaded into GeauxGrants or a website must be indicated in the space provided on GeauxGrants LSU Questionnaire. The Principal Investigator is responsible for



maintaining a copy of the complete, original proposal submitted to the sponsor, and if funded, will forward a copy to the Office of Sponsored Programs upon receipt of the award.

#### **b. Expanded Review (Optional)**

OSP staff are available to review the complete proposal for adherence to sponsor guidelines at the request of PI/PD provided that the proposal is submitted timely (at least seven business days prior to the deadline). If PI desires an expanded review, the final, complete proposal must be loaded into GeauxGrants for review/approval per the timeline above.

In addition, time permitting, a complete review of proposals will be conducted for: 1) Proposals to private entities when a standard agreement is prepared by OSP; 2) Non-Competing Continuation Proposals (e.g. NIH RPPR); 3) Revised proposals in anticipation of receiving an award; and 4) when sponsor requests additional information in order to issue an award (e.g. Just In Time).

#### **4. Lead Time For Proposal Routing**

At least seven business days prior to the proposal mailing deadline or electronic submission deadline are required for OSP review. Additional time should be provided if the proposal is interdisciplinary or multi-institutional, or includes matching commitments from third parties. Proposals that do not meet the above routing deadlines run the risk of not being fully reviewed and approved prior to the submission deadline. Routing incomplete proposal packages to satisfy the seven (7) business days deadline is not acceptable and can delay processing.

#### **5. Limited Submission Programs**

Limited submission programs typically allow only one or a small number of proposals to be submitted by a given institution to a sponsoring agency. The guidelines require the institution to internally screen applications and determine which research project(s) will go forward to the agency. At LSU, this responsibility lies with the Office of Research & Economic Development (ORED). Should a researcher identify a limited opportunity of interest, it is the responsibility of the researcher to notify ORED by submitting a Notice of Intent. ORED requires an internal Notice of Intent (NOI) for all limited submission programs. For more information about the limited submission process, visit the Limited Submission page on the ORED website.

#### **6. Proposals to Industry Sponsors**

Proposals submitted to industry sponsors have special requirements because this type of support typically requires extensive negotiations. Commercial contracts/purchase orders can contain requirements which are inappropriate for research agreements with educational institutions (e.g. warranty, indemnity, intellectual property, governing statutes, etc.). In an effort to expedite the negotiation process, OSP will prepare a suitably tailored agreement and a transmittal letter to be forwarded along with the full proposal. In order to prepare the agreement, the researcher should provide to OSP the name, title, address and phone number of the Authorized Representative (Business Contact) and the Technical Contact for the potential sponsor. Information and sample templates of the different types of agreements are available on the OSP website under Industry Research.

The "**Express Research Agreement**" provides companies a simple way to fund a University project in a manner similar to federal grants. This one-page document covers the terms of the agreement. Industry sponsors are given an option to negotiate a license for technology, faculty and students are free to publish their results, and the industry sponsors receive a technical report. This one-page agreement will simplify the funding process for any company that wants to support research at the University.

The "**Sponsored Research Agreement**," which has been used by the University for many years was modeled after the "Simplified and Standard Model Agreements for Industry-University-Cooperative

Research" that was a joint effort of the Government-University-Industry Research Roundtable of the National Academy of Sciences and the Industrial Research Institute.

The “**Academic Research Services Agreement**” is used when measuring, testing, or fabricating sponsor owned proprietary materials. Ownership of all inventions which involve the use of, composition of, or improvement to Sponsor provided materials or information, or a derivative, analogue thereof will be owned by the Sponsor while protecting the University’s rights to publish.

The “**Clinical Study Agreement**” is similar to the Academic Research Services Agreement, but used when the Sponsor requests the University to conduct a clinical trial or clinical study. In order to assure these agreements are used to fund only projects for which intended, the Principal Investigator must complete a questionnaire to address potential intellectual property issues, conflicts of interest, etc.

With these templates, custom contracts with industrial sponsors, which often require extensive negotiations, should be minimized.

## **7. Preproposals/Notices of Intent**

For programs that limit the number of applications that may be submitted by an institution, approval from the Office of Research and Economic Development is required (see Section 5. above) before OSP may approve a pre-proposal/notice of intent for submission to the sponsor. Otherwise, the following internal rules will apply:

- a) Preproposals/Notices of Intent which do not require Authorized Representative signature and which provide only a total cost estimate, rather than a detailed budget, may be submitted directly to Sponsor by the PI without routing in GeauxGrants.
- b) Preproposals/Notices of Intent which require 1) a detailed budget, and/or 2) Authorized Representative signature, and/or 3) Electronic Submission by OSP, must follow the same routing and approval process as new proposals.

## **B. University Approval**

### **1. Authorized LSU Signature**

The Assistant Vice President of Sponsored Programs is authorized to sign for the University on all proposals, grants and contracts. The name, title, address and other information for the Assistant Vice President of Sponsored Programs should be inserted for “Authorized Representative” on all application forms and contract documents.

### **2. Required Departmental, College, and Special Approvals**

#### **a. Principal Investigator, Co-Investigator(s), Senior Personnel, Project and F&A Credit Recipients, Department Chair, Dean**

The Principal Investigator, Co-Investigator(s), Senior Personnel, Project and F&A Credit recipients and their respective Department Chair(s)/Head(s) and Dean(s)/Director(s) must approve proposals electronically in GeauxGrants. If approval is not recommended for a proposal, the dissenting party must include comments in GeauxGrants for the dissent. A positive or negative recommendation must be given by all required reviewers. A proposal with a negative recommendation will require approval of the Vice President for Research and Economic Development for the proposal to be submitted.

Also, if the proposal requires the cooperation and/or use of facilities of another campus unit, the persons responsible for that unit must approve the proposal. Approvals by non-key personnel are not required in GeauxGrants. However, if these non-key personnel are receiving funds or cost sharing, then their

respective department heads or college deans must give their approval in GeauxGrants with any dissent provided in the comments section.

## **b. Special Approvals**

Certain proposed activities may require special institutional approvals (e.g., involvement of Human Subjects or Animals, Extra Compensation, proposed new courses, etc.). It is the investigator's responsibility to indicate whether a proposal includes research that requires committee or special approvals by answering the LSU Questionnaire in GeauxGrants when the proposal is created. Department administrators who assist their faculty by creating and routing proposals on behalf of their faculty should consult investigator(s) to answer the LSU Questionnaire. Investigators will give their approval in GeauxGrants.

Approval of the proposed research as it pertains to the special approval requirements identified below is required.

### **(i) Oversight Committee Approval**

Oversight committees have been established for the University to ensure proper planning, use of the University's specialized research facilities and compliance with University, state, and federal policies and regulations. Formal committee approval must be received before commencing work on the project or OSP's acceptance of the award.

The information below identifies the committees responsible for reviewing and approving proposals and awards.

#### **a) Radioisotopes or Radiation Sources**

The Radiation Safety Office is responsible for review and approval of all projects that requires the use of radioisotopes or other sources of ionizing or non-ionizing radiation and radioactive materials within LSU. See Permanent Memorandum 30 for details on compliance with regulations and policies established by the LSU System Radiation Safety Committee. Funds should be included in the proposal to pay for the disposal of radioactive waste generated during the project. The Radiation Safety Officer can advise on the appropriate amount of funds to include in the proposal.

#### **b) Human Subjects, Records or Samples**

The Institutional Review Board (IRB) is responsible for the review and approval of all projects involving the use of human subjects. Human Subject Protocols will only be required at the time of submission of an application if required by the funding agency. If no protocol is required at the time of proposal submission, investigators will select "Pending" in GeauxGrants and the proposal forms. Some grant applications require an Assurance Number. For LSU, our Office of Human Research Protection Federal Wide Assurance number is FWA00003892 for Human Subjects.

When an investigator becomes aware that the proposal will be funded, a Human Subject Protocol should be submitted immediately (even prior to award receipt) via GeauxGrants. OSP cannot accept the new award until an IRB determination has been received for the project.

#### **c) Vertebrate Animals**

The Institutional Animal Care and Use Committee (IACUC) is responsible for the review and approval of all projects involving the use of animal subjects in research. A "Just-in-Time" review process has been implemented in order to 1) eliminate the need for investigators to write Animal Use Protocols for projects that are not funded, 2) reduce the time spent by IACUC members reviewing and discussing protocols, and 3) establish a mechanism to assure that animal use described in grants is covered by an approved Animal Use protocol, in accordance with federal law.

Animal Use Protocols will only be required at the time of submission of an application if required by the funding agency. Under the Just-in-Time procedures, if no protocol is required at the time of proposal submission, investigators will select "Pending Submission (Just-in-Time)" in GeauxGrants. Some grant applications require an Assurance Number. LSU's OLAW Animal Welfare Assurance Number is D16-00372.

When an investigator becomes aware that the proposal will be funded, an Animal Use Protocol should be submitted immediately (even prior to award receipt) via GeauxGrants. OSP cannot accept the new award until an Animal Use Protocol has been approved and the IACUC has conducted a congruency comparison of the proposal.

#### **d) Recombinant DNA, Agents Infectious to Animals/Plants**

As required by federal regulations, the Inter-Institutional Biological and Recombinant DNA Safety (IBRDS) Committee must approve projects involving the use of recombinant DNA and potentially biohazardous materials which include infectious organisms which can cause disease in humans, animals or plants.

#### **e) Export Control**

LSU's Principle of Openness in Research is an important element of the University's compliance with U.S. export control regulations. In many situations, the transfer of information that would otherwise be restricted by export controls will be exempted from regulation in the context of University fundamental research, as long as the research does not carry any restrictions on publication, disclosure or participation. See Policy Statement 119 for details on compliance with export control regulations.

In general, export control regulations apply to the following:

- the transfer or "export" of specified materials, information, items or technology outside the U.S.;
- the disclosure of certain information to certain foreign nationals inside the U.S. ("deemed exports");
- the training or offering of services involving controlled equipment or information to foreign nationals;
- the design or production of items related to defense services; and
- transactions with certain foreign countries or individuals who are on embargo or restricted lists.

Proposals which include any of the above must be carefully reviewed by the ORED's Export Control Team. Accordingly, the GeauxGrants LSU Questionnaire includes Export Control questions, and when any are marked "yes" the proposal is routed for approval.

#### **f) Classified Material**

LSU is not a cleared facility and does not normally conduct classified work. The Research Policy Committee must approve proposals involving classified work. The Assistant Vice President of Sponsored Programs is the appropriate person to contact for guidance on the approval process of proposals that require the use of classified materials. The Research Policy Committee reports to the Vice President for Research and Economic Development. The members include: Vice President for Research and Economic Development; Chair/Dean of College in which proposal has originated; President of the Faculty Senate; Vice President for Academic Affairs, Ex-officio; and Security Officer, Ex-officio.

### **(ii) Other Special Approvals**

#### **a) New Courses or Programs**

A proposal which includes the development of a new course or program which carries degree credit must be approved by the Office of Academic Affairs, which will verify that the proposal does not include expectations, explicit or implied, that a new course or program will be offered without appropriate approval through University channels. The Faculty Senate Courses and Curricula Committee is charged to review and approve or disapprove proposed additions to, alterations of, and elimination of all courses, curricula, and degree programs submitted by colleges and schools, or referred by the Office of Academic Affairs. The Committee's approval is never automatic; therefore, proposals may include course or program development but may not include a schedule for implementation except as a trial special topics course, if one already exists in the departmental rubric. Please see Policy Statement 45, Courses and Curricula for additional information.

#### **b) Extra Compensation**

If additional compensation is proposed for a University full-time employee, the Dean(s)/Director(s) of the college(s)/unit(s) affected, Human Resource Management (HRM) and the Office of Research and Economic Development must certify both of the following: (a) the employee is already committed to other assigned duties for 100% time; and (b) these duties cannot be rearranged or reassigned to permit the ones described in the proposal to be included in the regular assignment of the employee. Approval by the Chair and Dean/Director in GeauxGrants certifies the department and college's approval of (a) and (b) for additional compensation. For the Office of Research and Economic Development and HRM approval of extra compensation, a memo to the Vice President for Research and Economic Development requesting approval must be attached in GeauxGrants on the LSU Questionnaire for review and approval. See Policy Statement 43 and Permanent Memorandum 3 available on the LSU website for details on extra compensation.

#### **c) Intellectual Property**

Proposals involving ceding of intellectual property ownership, patenting expenses, exclusive or non-exclusive rights, licenses, royalties, etc. require review of the Director of the Office of Innovation & Technology Commercialization. Policy Statement 68 governs the policies and procedures for the management of Intellectual Property rights.

Proposals to sponsors who claim rights to intellectual property and agreements containing nonstandard intellectual property arrangements along with all supporting documents must be routed in GeauxGrants for review by the Office of Innovation, Technology & Commercialization.

Upon notification of an award, the Office of Innovation, Technology & Commercialization will work with OSP to attempt to negotiate a mutually satisfactory arrangement, or failing that, determine the minimum cession of rights acceptable to the sponsor.

#### **d) Involvement of Research Centers and Non-Academic Units**

The need for LSU resources or facilities (excluding approved service centers) which are not under the control of the Principal Investigator(s) or his department or college must be disclosed on the GeauxGrants LSU Questionnaire, and the Principal Investigator is responsible for receiving proper approval of the appropriate Director or other official responsible for the special facilities and/or services.

#### **e) Disclosure of Significant Financial Interests**

Federal guidelines and university policies aim to promote integrity in research as well as provide transparency where there may be a perceived bias because of financial holdings of researchers. The PI will identify on the GeauxGrants Personnel tab which investigators meet the PS-98, Financial Conflicts of Interest in Research, definition of an Investigator by including a checkmark

in the Responsible column. All PS-98 investigators must have a current Significant Financial Interest disclosure on file at the time of proposal submission.

**f) Facilities and Administrative (F&A) Cost Reduction or Waiver**

F&A is charged at LSU's federally negotiated rate. Current rates can be found on the OSP website. If a sponsor has a written policy that restricts the reimbursement of F&A, then LSU will honor the restricted rate and no additional approval is needed. Proposals requesting a reduction or waiver of F&A require the approval of the Office of Research and Economic Development. Approval can be sought by indicating a F&A Reduction or Waiver is requested on the GeauxGrants LSU Questionnaire and attaching the ORED Request for Approval of Cost Sharing or Indirect Costs Waiver form..

**g) PreK-12 School Involvement**

Any proposals involving PreK-12 school involvement must be identified on the GeauxGrants LSU Questionnaire. OSP will make this information available to certain administrative units upon request.

**h) Financial Interest (PM-67 Compliance)**

Act 229 of the 1987 Regular Session of the Louisiana Legislature, which became R.S. 42:1123 (10), amended the Ethics Code to authorize contracts between a university and members of its faculty or a company in which faculty members have an interest. PM-67 clarifies those situations in which a faculty member, research staff employee, athletic coaching staff employee, or a legal entity in which such an employee has an interest can contract with the University. If an employee or entity in which the faculty member has an interest intends to enter into a contract with the University, disclosure of such ownership interest must be made at the proposal stage so that proper institutional review is conducted and approval is received before LSU accepts funding from such sponsor.

**3. LSU and LSU Agricultural Center (Ag Center) Joint Proposals**

The non-lead institution (either LSU or Ag Center) is treated like any other subaward. The lead institution will recover F&A on the first 25K of the subaward to the other when F&A is calculated using MTDC. For proposals where LSU is the lead institution, LSU will accept Ag Center approval via Ag Center's OSP routing sheet or email from the Ag Center OSP office.

When Ag Center is the lead, list "Louisiana State University Agricultural Center" as the Sponsor in GeauxGrants. Ag Center personnel should not be listed in GeauxGrants. Subawards to Ag Center are not processed through Workday and no POs will be generated for these subawards.

If a proposal is submitted through LSU by a faculty member who has a joint appointment between LSU and Ag Center where research is paid by the Ag Center, approvals in GeauxGrants by his/her LSU department head and LSU college dean ensures release time from teaching, and the investigator will be appointed to an LSU research account. Ag Center approval is not required.

**4. LSU and Pennington Biomedical Research Center (PBRC) Joint Proposals**

The non-lead institution (either LSU or PBRC) is treated like any other subaward at the proposal stage. The lead institution will recover F&A on the first 25K of the subaward to the other when F&A is calculated using MTDC. For proposals where LSU is the lead institution, LSU will accept PBRC approval via PBRC's OSP routing sheet or email from the PBRC OSP office.

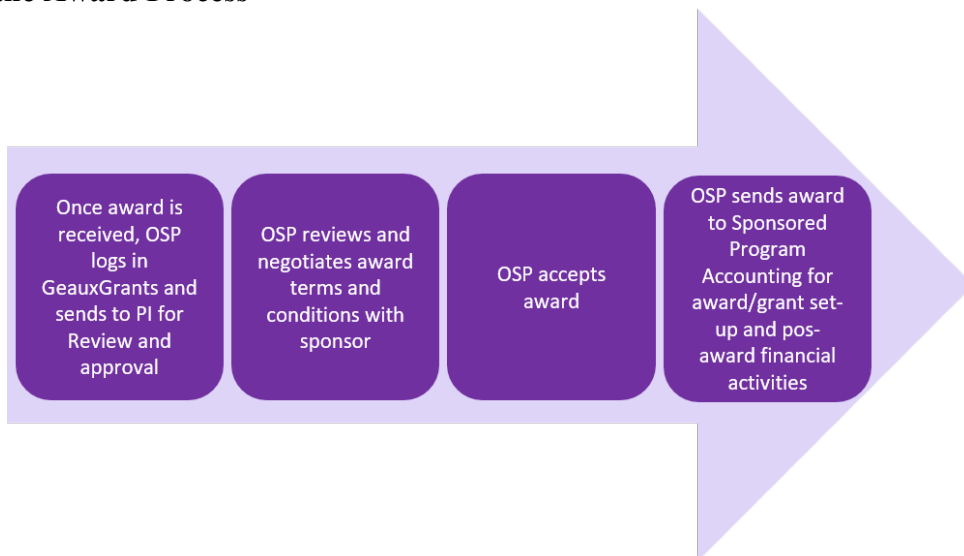
When PBRC is the lead, list “LSU Pennington Biomedical Research Center (PBRC)” as the Sponsor in GeauxGrants. PBRC personnel should not be listed in GeauxGrants. Subawards to PBRC are not processed through Workday and no POs will be generated for these subawards.

### **C. Proposal Submission**

Once a proposal has been routed and approved in GeauxGrants, OSP contacts the PI or designated contact person to pick up any hard copy signature pages that must be sent to a sponsor. The PI is responsible for mailing the approved, complete proposal, with any required copies to the sponsor. If electronic submission by OSP or the authorized representative is required by sponsor, OSP will transmit the proposal to sponsor electronically via email or sponsor system. Otherwise, the PI is responsible for electronic submission.

### III. Award Information

#### Overview of the Award Process



#### A. Types of Awards:

Below are types of awards received for sponsored projects.

##### 1. Grant

The principal purpose of a grant is the transfer of money, property, services, or anything of value to the recipient in order to accomplish something for the public good. Most federal agencies use a grant document for research awards to universities. For grants, there is little involvement between the governmental agency and the recipient during the performance of the activity.

##### 2. Cooperative Agreement

The principal purpose of a cooperative agreement is the transfer of money, property, services or anything of value to the recipient in order to accomplish something for the public good. A cooperative agreement is like a grant except that the sponsor will have substantial involvement in the activity that is being funded, perhaps bringing sponsor personnel to the University to work on the project.

##### 3. Contract

The principal purpose of a contract is for the sponsor to acquire by purchase, lease, or barter property or services for the direct benefit and use of the sponsor. For contracts, there is substantial involvement between the sponsor and the recipient during the performance of the activity.

##### 4. Cost-Reimbursable

Type of contract or grant for which the sponsor will reimburse the University for any actual, approved costs incurred in the conduct of the work up to an agreed-upon amount.



## **5. Fixed Price**

Type of contract or grant for which the sponsor will pay the University a predetermined amount, regardless of actual costs, for satisfactory performance of work.

## **B. Receipt of Award**

In general, the organization funding the sponsored program notifies the Office of Sponsored Programs and the Principal Investigator of the award. When this notification is received in the Office of Sponsored Programs, the award document is processed.

### **1. Award Acceptance**

All award documents are forwarded to the Principal Investigator for review in GeauxGrants. After reviewing the award document, the Principal Investigator must approve the award in GeauxGrants. If during the proposal submission process, only a streamlined review was conducted by the Office of Sponsored Programs, a complete review of the full proposal is required prior to award acceptance. Principal Investigators must provide OSP with a copy of the full proposal submitted to the Sponsor. Significant errors or unsubstantiated commitments may result in declination of the award by the University.

If the funded amount is reduced or increased and a revised budget is not required by the sponsor, unless the PI instructs otherwise, either the original budget will be prorated equally across all budget categories or the difference will be applied to supplies and the associated F&A, depending on the size of the difference. In addition, when the funded amount is reduced, the PI certifies that the original scope can be completed at the reduced funding level, or provides a comment when approving the award in GeauxGrants. The PI would submit a revised scope of work to OSP should the original scope be affected.

Awards (federal, state, industrial, and private) obtained by University employees should be awarded to LSU and not an outside organization or the employee. When a sponsor mandate does not allow the award to be made to LSU, adequate rationale for not awarding the agreement in the name of the University must be submitted to OSP for review. (This does not apply to scholarships/fellowships made to individuals). See PM-27, available on the LSU website.

The Office of Sponsored Programs will coordinate with the Principal Investigator and Sponsor to negotiate a mutually acceptable agreement between the Sponsor and the University. Upon receipt of a fully executed award document, the award document and the proposal will be forwarded to the Sponsored Program Accounting Office (SPA) to establish an award/grant in Workday. A copy of the fully executed award document is forwarded to the Principal Investigator.

### **2. Award/Grant Setup**

When the Sponsored Program Accounting Office receives the award document, proposal and authorization from the Office of Sponsored Programs, it will establish a restricted award/grant in Workday for the project. The Principal Investigator will receive a notification from SPA with the award/grant number assigned to the project. Upon establishment of a restricted award/grant, the Principal Investigator can initiate the necessary appointment forms, purchase orders, etc. to conduct the project. Additional information on managing a funded sponsored project can be found in the Sponsored Program Accounting Post Award Administration Manual, available on the SPA website.

### **3. Tentative Grants**

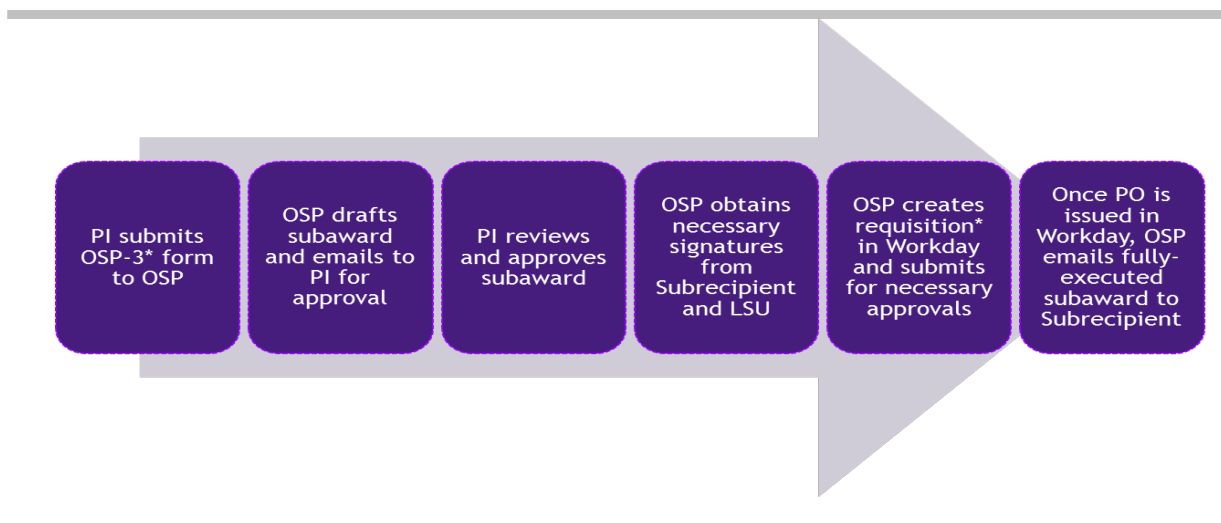
If expenditures will be incurred before an agreement is fully-executed, the PI may request a "tentative grant." A tentative grant should only be requested when a PI is sure of funding. Obtaining a tentative grant will allow a PI to begin working on a project in anticipation of the fully-executed agreement. However, the tentative grant may not be established until all required Special Committee and compliance approvals are

obtained, and any outstanding issues identified at the proposal stage related to acceptance of the agreement are resolved.

To obtain a tentative grant, a PI must complete and submit a Tentative Grant Request Form (AS494) to the Office of Sponsored Programs. The Request Form must be approved by the PI's department chair, who certifies that the department will be responsible for any unallowable charges, or for costs incurred should the project not be funded. The AS494: Request to Establish a Tentative Grant form is available on the Sponsored Program Accounting website.

#### 4. Awards Which Involve Subrecipients

##### Overview of Subaward Processing



When an award is received that involves a Subrecipient, the Principal Investigator should complete and forward to OSP the OSP-3 Form, available on the OSP website, to [subs@lsu.edu](mailto:subs@lsu.edu). The Office of Sponsored Programs will collect necessary information to conduct a subrecipient risk assessment, (when required by 2CFR200), draft the subaward and send to the PI for review and approval. After receiving the PI's approval, OSP will obtain necessary signatures (Subrecipient and LSU). Once all signatures are obtained, OSP will create a requisition in Workday, attach the subaward and route in Workday for necessary approvals (Cost Center Manager, Procurement). Once the Purchase Order is issued by Procurement, OSP will email a fully executed copy to the subrecipient and PI. The Principal Investigator should complete and forward to OSP the OSP-4 Form to request an amendment to an existing subaward.

## IV. Post-award Modifications

At any time during the life of a sponsored project, a variety of modifications may be necessary. The possible modification types are identified below. Any request to modify any aspect of a sponsored project must be approved by LSU prior to submission to sponsor. A request to modify a project may include one or several of the types identified below.

- No-Cost Extension
- Revised Budget
- Change of Principal Investigator
- Transfer of an Award
- Termination of an Award
- Change in Scope/PI Effort
- Other

### A. Modifications Which May Be Approved Internally

Under 2 CFR 200.308 federal agencies have been authorized to waive certain cost-related and administration prior written approval requirement on grants and cooperative agreements, but not on contracts. This authority is administered by the University as an "Internal Prior Approval." The University must document approvals and inform the federal agency of the changes authorized, when required. Complete details of these procedures are set forth in the agencies grant policies and award administration manuals. Special terms and conditions of a specific award may limit the Internal Prior Approval authority of the University.

Any request for prior approval requires the approval of the department head, dean (if required by college policy), SPA and OSP. All rebudgeting must meet the established standards of allowability. If the award document places special restrictions on rebudgeting and related actions, the University may not overrule them. A narrative justification of the change is required.

The following changes (or any combination thereof) may be internally approved by the University on federal grants and cooperative agreements(unless prohibited in the award document):

1. **Additional Compensation:** Compensation above base pay for work by non-faculty employees that is in excess of the regular appointment for the employee.
2. **Special Purpose Equipment Acquisition:** An item with a unit cost of at least \$5,000 per item which is used only for research, medical, scientific, and other technical activities.
3. **General Purpose Equipment Acquisition:** An item with a unit cost of \$5,000 or more when its use is primarily for technical activities associated with the project (e.g., cameras, personal computers, etc.). An explanation of the primary technical use on the project is required.
4. **No-Cost Extension:** Grantee may extend research project for up to twelve months without additional funding. (Note: Only one no- cost extension may be approved by LSU.) Any additional no-cost extensions must be approved by the sponsor.
5. **Pre-Award Costs:** Grantee may incur and recover from the federal sponsor costs incurred within 90 days prior to the effective date of the research award that are necessary to the project.
6. **Domestic Subawards not originally included or modified from original proposal (NIH only):** Attach scope of work, budget, and letter of collaboration from the proposed subcontractor, signed by their authorized institutional representative.

- 7. Alterations/Renovations:** Funds for rearrangement and alterations that do not constitute construction. Alterations/renovations under \$25,000 may be approved by the Grantee.

## **B. Procedures for Obtaining Internal Prior Approval**

Any request for internal prior approval requires the approval of the Principal Investigator, department head, SPA and OSP. To obtain internal prior approval, the Principal Investigator's department must electronically route a Modification/Prior Approval Request in GeauxGrants and attach all necessary documents in GeauxGrants. The justification should describe the requested action and demonstrate:

- The necessity to achieve the project objectives supported by the grant.
- The request is consistent with the award terms and conditions
- The request is consistent with the awarding agency and University policies
- Represents an effective utilization of resources
- Does not constitute a change in scope or key personnel, or require additional funding for the grant

Upon final approval, the documentation will be filed in the Sponsored Program Accounting (SPA) Office. The Office of Sponsored Programs will notify the awarding agency, if required.

## **C. Modifications Which Require Sponsor Prior Approval**

Any request for sponsor prior approval requires the approval of the Principal Investigator, department head, SPA and OSP. A narrative justification of the change is required. Because the University is the legal entity that must request the prior approval, the Office of Sponsored Programs must review and approve any requests. The request must be routed electronically as a Modification/Prior Approval Request in GeauxGrants. The request letter to the sponsor must include an approval line for the signature of the Assistant Vice President of Sponsored Programs.

The following changes (or any combination thereof) may require prior approval from the sponsor: No-cost extension, revised budget, change in scope, disengagement from a project for more than three months, reduction of effort, change in personnel, transfer of an award, termination of an award, addition of a subaward, pre-award costs greater than 90 days, pre-award costs not under 2 CFR 200, transfer of funds from participant support costs and additional compensation (for faculty). This list is not exhaustive and prior approval should be in accordance with the award.

### **1. Revised Budget:**

Sponsors specify in their award documents how much flexibility the Principal Investigator has to move funds between categories without specific written approval from the sponsor.

Contracts are typically restrictive in their terms and conditions concerning the amount of rebudgeting permitted. Permission to rebudget should always be secured in writing before committing the expenditure. All rebudgeting must meet the established standards of allowability. If the award document places special restrictions on rebudgeting and related actions, the University may not overrule them.

## **2. Transfer of Grants and/or Equipment**

Principal investigators who leave LSU may wish to transfer grants to their new institutions. Prior approval must be obtained including written approval from their department chair, dean, LSU co-investigators, OSP, the new institution, and the sponsor. Consultation with Co-Investigators (if any) should occur prior to initiating a transfer. Normally, the sponsor will request the principal investigator to provide a formal notification of the impending transfer countersigned by the authorized organizational representatives of both the University and the new institution. The notification may include the original grant or contract number, expiration date of the grant or contract, effective transfer date, identity of new institution, a brief summary of progress to date, description of work yet to be accomplished, and a budget for the amount to be transferred.

In situations where the amount of time and funds remaining in a project are modest, and if the University and the new institution agree, the University may subcontract to the new institution for completion of the project. This and other possible alternatives should be discussed between the University, the new institution, and the sponsor.

Equipment purchased with grant or contract funds for a specific project should remain available for use for the duration of the project. Principal investigators whose projects included funding for equipment and who will continue the project at a new institution with sponsor's support generally may arrange with the University to have the equipment transferred with them. Shipping costs for such equipment may generally be charged to the original or transferred award as an allowable cost.

Equipment transfers require approval from the department chair, dean, SPA, OSP, Property Management, the new institution, and the funding agency. In addition, Louisiana State Property Regulations require written approval from the Louisiana Division of Administration through LSU's Office of Property Management prior to transfer/removal of any equipment. Awards which have expired may not qualify for the equipment transfer. Principal investigator(s) expecting to relocate and transfer equipment should allow sufficient lead-time for this transfer.

## **V. University Policies for Sponsored Programs**

The Principal Investigator (PI) holds primary responsibility for the technical conduct of the project, and for administrative and budgetary management. The PI is responsible for complying with all contractual obligations, including technical and administrative requirements and restrictions. The PI, as well as the Department Chair and College Dean are collectively responsible for the conduct of research programs with respect to both sponsor and University policies and procedures. Charges incurred on projects which are later deemed unallowable due to sponsor restrictions are the responsibility of the PI's department and/or college. PIs are encouraged to seek assistance from SPA and OSP in the management of sponsored projects.

The University policy documents listed below apply to the administration of sponsored programs at LSU. The Principal Investigator is responsible for complying with these policies, as well as with all other University policies and procedures. These policies define the responsibilities of the Principal Investigator or Project Director and those responsible for approving various aspects of the proposal. All are available on the LSU website.

### **Policy Statements:**

PS-32	Proposal Review and Approval Procedures
PS-40	Confidentiality of Personnel Records of University Employees
PS-51	Confidentiality in Sponsored Projects
PS-67	Misuse of Drugs or Alcohol (provides for compliance with the Drug Free Workplace Act of 1988)
PS-68	University Intellectual Property Rights in Sponsored Research Projects
PS-69	Research Misconduct
PS-75	Illegal/Abusive Alcohol/Other Drug Use by Students
PS-77	Distribution of Campus Share of Distributable Royalties
PS-98	Financial Conflicts of Interest in Research
PS-103	Service Centers and Recharge Operations
PS-119	Compliance with Export Control Regulations

### **Permanent Memorandums:**

PM-3	Additional Compensation and Compensation: Faculty and Full-Time, Non-Classified Employees
PM-10	Indirect Cost Allowances on Grants & Contracts
PM-11	Outside Employment of University Employees
PM-27	Placement of Sponsored Agreements
PM-30	Radiation Protection Program
PM-67	Contracts between the University and its Faculty Members

## **VI. LSU Information and University Contacts**

LSU Information and University contacts to include in proposals can be found on the OSP Website