

# **Davenport University**

## **Sponsored Programs and Grant Development**

### **Policies and Procedures**

The Office of Sponsored Programs and Grant Development has written and put into place policies and procedures by which Davenport and its employees are to prepare and submit (pre-award) and implement, manage, report on, and closeout (post-award and compliance) all federal and private grants awarded to employees of the University and, as such, to the University. All policies and procedures were written to ensure compliance with applicable federal, state, and local laws as well as sponsor and program regulation. Please refer to the following as applicable, for pre-award, post-award, and compliance resources.

#### **I.**

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will be forwarded through the processes described in the section below, *Conflict with Grant Submission*, for approval.

#### **b. Multiple Grant Submissions:**

When a conflict arises from more than one faculty/project wishing to submit to the same funder, all interested faculty/teams will fill out and submit to SP (as mentioned above). These forms will be sent to the decision-makers identified according to the following scenarios, which will determine which projects move forward:

First, a discussion will determine if the faculty could work together to combine the projects. Collaborations are always more easily funded than are smaller projects. Collaborations bring diversity to the project as interdisciplinary views/comparisons are brought to the table, providing a more holistic approach. If the projects cannot be combined, the following will be considered:

When funding IS NOT limited by either number of proposals allowed per institution per year/submission or number of awards granted to institutions, the following will occur, dependent upon which scenario best fits the case:

- If projects are from the same College/area the decision is left to the Dean/Shared Supervisor as to whether or not all projects can be submitted, knowing that they will compete with each other.
- If projects are from different Colleges/areas in other words, they do not share the same Supervisor the decision as to whether all projects move forward, or if not all, which project will move forward, will be decided by either the Provost (if solely academic), by the EVP of the area (if non-academic and only under one EVP), or by Senior Leadership (if more than one area).

When funding IS limited to either 1) number of proposals allowed per institution per year/submission or 2) number of awards granted to the institution, the following will occur, in this order:

- conjunction with the Office of Sponsored Programs and Grant Development will decide if the other project(s) may proceed as well.
- If submission of the identified projects will reach/exceed the maximum number allowed and the projects are from the same College/area the decision is left to the Dean/Shared Supervisor as to which one can be submitted.
- If submission of the identified projects will reach/exceed the maximum number allowed/awarded and the projects are from different areas/Colleges the decision is left to the Provost (if solely academic), the EVP of the area (if non-academic and only under one EVP), or by Senior Leadership (if more than one area).

In cases where a project is not allowed to move forward because of funder restrictions, the SP of Grant Development will make every effort to find a compatible funding opportunity for which the faculty/staff can pursue funding.

## **II. PREPARING the PROPOSAL**

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### **a. Assigning the writing of the proposal:**

Once approval has been obtained, SP will provide the project team (all persons involved in the proposal process) with the guidelines for proposal submission. These guidelines are set by the funders themselves  
Guidelines can include a

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(regardless of the period of performance of the subawards under the award). MTDC does **not** include: equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000.

#### **c. Writing Process:**

All assigned drafted sections from each proposal team member are to be emailed to the SP, who will reconstruct the proposal in whole for editing and review. While working on the sections initially, informal reviews/edits will occur between the SP and Project Team as needed. If an evaluative piece is required for grant compliance, Institutional Research will be able to assist in putting together a solid, strong evaluation plan that is measurable. Please include them early in the writing process.

#### **d. Subawards:**

If a portion of your grant award will go to a partner outside of Davenport University, a Subaward Contract must be acquired BEFORE the proposal is submitted for approval. A Subaward Contract must involve the Office of Sponsored Programs and Grant Development and Finance/Accounting, who will obtain a contract from the partner(s) and approve the expenses. Part of this process includes obtaining W9s and identifying payment/invoicing procedures. Subaward Contract Form can be used (see attachment C). There will be times that more lengthy contracts, such as Memorandums of Understanding will be required. The Office of Sponsored Programs and Grant Development and Finance/Accounting will facilitate the accrument of the appropriate forms with the partner(s).

As noted in the Budget section above, when involving Subaward Contracts, allow an ADDITIONAL 5 days for approval.

#### **e. Deadlines:**

An important factor when determining the date for deadlines is the method for grant submission: is the proposal going to be submitted electronically, submitted by mail or submitted by FedEx (this can be a deadline is the date listed. If by FedEx, the due date would actually be the day before it is due since it would have to be FedExed the night before. If by postal mail, then at least two days are to be added to the deadline. The Office of Sponsored Programs and Grant Development will help identify under which deadlines we will be working at the time

#### **f. Potential Line-Item Budget Requests in Proposals:**

1. Faculty Release Time: Funders often expect to fund faculty salary and equivalent benefits for Faculty Release Time to ensure that faculty have the time required to do the intended research. Faculty Release Time should be discussed and calculated with the appropriate Department Chair before including it in the proposal/budget.

2. Cost Sharing Agreements: Sometimes, agencies and foundations expect a commitment from the institution for cost-sharing, either in terms of direct costs (e.g., 25% of total costs) or "in kind" contributions (e.g., faculty effort, release time, Graduate Assistant/Researcher or tuition support). Please discuss with the appropriate Chair/Dean any cost shares that will be included in the budget. These are real costs that must be incurred by the department. In many cases, they include salary, benefits and equipment that are already part student researchers, etc., which would require additional funding from the department.

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#### **g. Research Approval:**

When conducting research that involves human subjects, animals, environmental hazards, recombinant DNA, etc., federal and state laws govern how the research must be conducted. Institutional Review Board is a committee mandated by Federal laws to protect the rights and welfare of the human subjects participating in research activities. Compliance is monitored by the Office of Human Research Protection of the U.S. Department of Health and Human Services review and approve all proposed academic research at DU or by DU faculty, staff or students that involve certain criteria to ensure that the research meets these governmental standards for the safety and protection of any human subjects involved in the research. Research includes surveys and evaluations of those surveys, especially if they contain will determine through a pre-assessment if IRB approval is required.

For research that lies involves Human Subjects, the following steps are required BEFORE research can begin: Approval may be required from DU IRB any time humans are part of a research project. Seek approval from the IRB team, led by Lonnie Decker and Kathy Aboufadel, BEFORE submitting a proposal to assure that what is being proposed 1) does or does not require an IRB application and 2) is in compliance with government laws. If IRB approval is required, i.e., you must complete an IRB application, this step will not be required (in most cases) until after funding has been acquired, but BEFORE the actual research has taken place. In some rare instances, funders may ask for a timeline by which IRB approval will be sought and require documented proof that the approval has been obtained before releasing funds. See <http://www.davenport.edu/academics/institutional-review-board-irb/forms-procedures> for full details. Research **cannot** be approved at this time for: Animals, Environmental Hazards, or DNA.

All PIs/co-PIs of a grant involving research must undergo Collaborative Institutional Training Initiative (CITI Program) certification training and provide a copy of their certificate of successful completion to

#### **h. Approval Process:**

A Proposal Approval Routing Form is required before a proposal is allowed to be submitted. Once a final review is ready, the full proposal will need to be routed for approval at least 5 working days prior to the deadline. (See Deadlines section to determine what date is to be used as the drop-dead deadline date.) All documents, other than standard organizational documents, such as the 501(c)(3), 990s, etc., must be included for approval. Note, when more than one unit/department is involved as part of the Project Team, a Chair/Director and Dean/EVP will need to approve from each unit/department. Approvals will occur in the following order:

- Project Team
- Office of Sponsored Programs and Grant Development
- Institutional Research (if applicable, see Research Approval below)
- Finance/Accounting (unless a budget is not included)
- Chair/Director/Top Supervisor
- Dean/EVP

\*\*For subawards, written contract/approval must be obtained from partners involved (see Subawards section)

### **III. ALLOWABLE COSTS**

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As a recipient of federal funds, Davenport is required to adopt costing policies in conformance with Federal rules and regulations. The University's cost accounting practices are declared in the required filing of its Disclosure Statement (called the DS-2) to the audit agency of the US Department of Health



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When there are inconsistencies, the most restrictive regulations of federal, state, university or agency must be followed. **For** budgeting/direct costs of a sponsored project are appropriate, the cost must:

Be **reasonable**, i.e., the cost is generally recognized as necessary for the performance of the project and is one that a prudent person would consider reasonable given the same set of circumstances;

Be **allocable** to the sponsored project, i.e., the cost is incurred for the benefit of only one project, or the item can be easily assigned to multiple benefiting projects. A specific project may only be charged that portion of the cost that represents the direct benefit to that project

Be **treated consistently** with other similar costs incurred in like circumstances in accordance with generally accepted accounting principles; and

**Conform to any limitations/exclusions** stated in generally accepted accounting principles or in the sponsored agreement, i.e., the cost must be **allowable** and not designated as **unallowable** by regulation or sponsored project specific award conditions.

If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects based on the proportional benefit. However, this allocation cannot be used to eliminate cost overruns.

#### Allowable Direct Costs

##### Salaries, Wages and Fringe Benefits



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The Fly America Act requires that all air travel and cargo transportation services funded by the federal government must use a "U.S. flag" air carrier service. You can find a complete list of certified U.S. flag air carriers on [transportation.gov](http://transportation.gov). This requirement applies to:

Federal government employees and their dependents;

Consultants, contractors, and grantees; and

Other travelers whose travel is paid for by the federal government.

You cannot cross the U.S. border to use a foreign airline to avoid being subject to the Fly America Act. If travel does not comply with the Fly America Act, the government will not reimburse your airline ticket!

**Consultants /Independent Contractors\_** Services of consultants may be required to accomplish some of the project work. The consultant may be a member of a profession or a person possessing special skills who is not a Davenport employee. A consultant may not be a university employee. An Independent Contractor Agreement must be completed outlining the services to be performed. The consultant will submit an invoice when the services are provided. Prepayment for a service is not allowable. To pay the consultant the following must be submitted to Accounts Payable:

1. Check Request form signed by PI, Department Chair, and Office of Sponsored Programs and Grant Development.
2. Copy of approval for the Independent Contractor Determination
3. Invoice from Consultant

**Equipment** Equipment is defined in accordance with University policy as property having a useful life of more than one year and a minimum acquisition cost of \$500. When equipment is specified in the proposal budget, further approval is required by IT to ensure that it can be supported by our IT department. Documentation of the approval must be provided to the Office of Sponsored Programs and Grant Development with the Grant Proposal Approval Routing Form. In accordance with University policy acquisition of special purpose equipment costing in excess of \$50,000 must be in compliance with the bidding process.

Equipment is used only for specific research, medical, scientific, or other technical activities and is an allowable cost to a funded project. General purpose equipment cannot be charged to a sponsored project fund. Examples of general purpose equipment would be computers, office machines, furniture, air conditioners, and vehicles. (In some circumstances, computers can be charged to a sponsored program if it is found to be necessary for attaining the objectives of the sponsored program and it will be used only for the purposes of the sponsored program. Pre-approval from the federal funde/F4 182.38 249.83 Tm0 G[(a)-10(ppr)-7(ov

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terminated due to Never Contract with the Enemy as a Termination for Material Failure to Comply. The revisions also require agencies to insert terms and conditions in grants and cooperative agreements regarding non-Federal entities' responsibilities to ensure no Federal award funds are provided directly or indirectly to the enemy, to te

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ducts, and materials produced and offered in the United States. It seeks to create demand for domestically produced goods. It seeks to help sustain and grow domestic manufacturing and the millions of jobs it supports throughout product supply chains. Buy America Sourcing Requirements for Federal financial assistance infrastructure projects require that

All iron and steel used in the project are produced in the United States;

Manufactured products used in the project are produced in the United States; and

Construction materials used in the project are produced in the United States.

BABAA applies to formula and discretionary grants. At ED, it applies to construction, remodeling, and broadband infrastructure, and only to those grant projects or activities that focus on infrastructure. Other non-infrastructure projects and activities within a grant are not subject to BABAA.

The BABAA Buy America Sourcing Requirement, or Domestic Content Procurement Preference as established in section 70912(2) of BABAA, <https://www.congress.gov/117/plaws/publ58/PLAW-117publ58.pdf>. BABAA section 70914 requires implementation effective no later than May 14, 2022.

In addition, for Department of Education grants, BABAA policy:

Applies to new, non-competing continuation, and supplemental grants awarded by ED on or after October 1, 2022 (not before)

Applies to Formula and Discretionary Grants

Applies to infrastructure related to construction remodeling, and broadband infrastructure

Only applies to those activities in each grant project related to infrastructure

**Evaluation** As program/grant evaluation is a critical part of grant funding, program evaluation is considered a direct cost as it pertains to relating the progress and success of the grant-funded program, research, and/or services. Evaluation costs include time and effort and/or consultant fees for an evaluator

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**Goods and services** for personal use

**Housing and personal living expenses**, unless on travel status

**Insurance and Indemnification**

**Interest**

**Lobbying**

**Losses/over expenditures on other sponsored agreements**

**Memberships, subscriptions, and professional activity costs**, unless specifically required by the federal funder

**Postage/Copying** Routine mailings and copying to sponsored projects.

**Pre-agreement costs** - Costs incurred prior to effective date of sponsored agreement

**Public relations**

**Salaries** of individuals engaged in routine departmental or administrative work that benefits all activities of the department (instruction, research, training, public service, etc.), i.e., there is no direct relationship to a specific sponsored project's scope of work

**Selling and marketing costs**

**Severance costs**

**Student activity** costs unless specifically approved in program regulations

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may have related to the P - Federally funded project that meets or exceeds regulator definitions of SFI (See definitions at the end of this policy).

All significant financial interest disclosures must be forwarded to the Executive Director of Sponsored Programs, as Signing Officer (SO) for grants, to determine if a significant FCOI has occurred and, thus, require a FCOI form to be filled out and reported. This will occur: before submitting any proposal for Federal funding as well as any time during the grant period. The disclosure must be emailed to the SO within 30 days of the conflict and include the following information:

For remuneration or financial affiliations:

Name of PI/co-PI;

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Review all PI/co-PI disclosures of SFI;  
Determine if any SFIs relate to Federally funded research;

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Based on the results of the retrospective review, if appropriate, Davenport will update the previously submitted FCOI report, specifying the actions that will be taken to manage the FCOI going forward. If bias is found, Davenport is required to notify the Federal awarding Component promptly and submit a mitigation report to the Federal awarding Component. The mitigation report must include, at a minimum, the key elements documented in the retrospective review above and a description of the impact of the bias on the research project and Davenport's plan of action or actions taken to eliminate or mitigate the effect of the bias (e.g., impact on the research project; extent of harm done, including any qualitative and quantitative data to support any actual or future harm; analysis of whether the research project is salvageable). Thereafter, Davenport will submit FCOI reports annually, as specified in 42 CFR Subpart F. Depending on the nature of the FCOI, Davenport may determine that additional interim measures are necessary with regard

- PI's participation in the Federally funded research project between the date that the
- PI's noncompliance is determined and the completion of Davenport's retrospective review.

**Management:**

Davenport will take such actions as necessary to manage FCOIs, including any financial conflicts of a subrecipient PI/co-PI pursuant to 42 CFR 50.604 (c). Management of an identified FCOI requires development and implementation of a management plan and, if necessary, a retrospective review and mitigation report pursuant to §50.605(a). Davenport will also provide





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Any FCOI report required under paragraph the federal funder 42 CFR 50.605(b)(1) or (b)(2) will include sufficient information to enable the Federal awarding Component to understand the nature and extent of the financial conflict, and to assess the appropriateness of Davenport's management plan. Elements of the FCOI report will include, but are not necessarily limited to the following:

Project number;

PD/PI or Contact PD/PI if a multiple PD/PI model is used;

Name of PI/co-PI with the FCOI;

Name of the entity with which the PI/co-PI has a FCOI;

Nature of the financial interest (e.g., equity, consulting fee, travel reimbursement, honorarium);

Value of the financial interest (dollar ranges are permissible, or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value);

A description of how the financial interest relates to the Federally funded research and the basis for Davenport's determination that the financial interest conflicts with such research; and

A description of the key elements of Davenport's management plan, including:

- Role and principal duties of the conflicted PI/co-PI in the research project;
- Conditions of the management plan;
- How management plan is designed to safeguard objectivity in the research project;
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- How the management plan will be monitored to ensure PI/co-PI compliance; and
- Other information as needed.

For any FCOI previously reported by Davenport with regard to an ongoing Federally funded research project, Davenport will provide to the Federal awarding Component an annual FCOI report that addresses the status of the FCOI and any changes to the management plan for duration of the Federally funded research project. The annual FCOI report will specify whether the FCOI is still being managed or explain why the FCOI no longer exists. Davenport will provide annual FCOI reports to the Federal awarding Component for duration of the project period (including extensions with or without funds) in time and manner specified by the Federal awarding Component.

Federally funded research project, the University will ensure public accessibility, via a written response to any requestor within five business days of a request, of information concerning any significant financial interest disclosed to Davenport that meets the following three criteria:

- SFI was disclosed and is still held by the PI/co-PI as defined by 42 CFR Subpart F;
- Davenport determines that the SFI is related to the Federally funded research; and
- Davenport determines that the SFI is an FCOI.

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The information that Davenport makes available via a publicly accessible Web site or written response to any requestor within five business days of a request, will include, at a minimum, the following:

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- Name of the entity in which the significant financial interest is held;
- Nature of the SFI; and
- Approximate dollar value of the SFI or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value.

Davenport will update this information at least annually. In addition, Davenport will update within 60 days of the University's receipt or identification of information concerning any additional SFI of the PI/co-PI for the Federally funded research project that was not previously disclosed, or upon the disclosure of an SFI of PI/co-PI new to the Federally funded research project, if Davenport determines that the SFI is related to the Federally funded research and is an FCOI. Responses to written requests for the purposes of this subsection will note that the information provided is current as of the date of the correspondence and is subject to updates, on at least an annual basis and within 60 days of Davenport's identification of a new FCOI, which should be requested subsequently by the requestor.

Information concerning the SFI of an individual subject to paragraph 42 CFR 50.65(a)(5) will remain available, for responses to written requests by Davenport for at least three years from the date that the information was most recently updated.

### **Reporting Bias:**

Davenport will, during the course of the review, notify NIH promptly if bias is found with the design, conduct, or reporting of NIH-funded research and submit a mitigation report in accordance with 42 CFR 50.605 (a)(3)(iii). The mitigation report must include, at a minimum, the following:

- Project number;
- Project title;
- PI or contact PI if a multiple PI model is used;
- Name of the PI/co-PI with the FCOI;
- Name of the entity with which the PI/co-PI has a FCOI;
- Reason(s) for the retrospective review;
- Detailed methodology used for the retrospective review (e.g., methodology of the review process, composition of the review panel, documents reviewed);
- Findings of the review;
- Conclusions of the review;
- Description of the impact of the bias on the research project; and

(e.g., impact on the research project; extent of harm done, including any qualitative and quantitative data to support any actual or future harm; analysis of whether the research project is salvageable).

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Davenport will enforce PI/co-PI compliance through thorough the abovementioned reporting and monitoring processes. When an FCOI is not identified or managed in a timely manner, including failure by the PI/co-PI to disclose an SFI that is determined by Davenport to be an FCOI; failure by Davenport to review or manage the FCOI; or failure by Davenport to comply with a FCOI management plan, Davenport will, within 120 days of the University's determination of noncompliance, complete a retrospective review of the PI/co-PI Federally funded research project to determine whether any Federally funded research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of such research.

Davenport is required by 42 CFR 50.605(a)(3)(ii)(a) to document the retrospective review and to include, but not necessarily be limited to, all of the following key elements:

- Project number;
- Project title;
- PI or contact PI if a multiple PI model is used;
- Name of the PI/co-PI with the FCOI;
- Name of the entity with which the PI/co-PI has a FCOI;
- Reason(s) for the retrospective review;
- Detailed methodology used for the retrospective review (e.g., methodology of the review process, composition of the review panel, documents reviewed);
- Findings of the review; and
- Conclusions of the review.

Davenport does not conduct clinical research and, therefore, does not have any current written policies adherent to 42 CFR 50.606(c). If Davenport does move into the realm of clinical research, Davenport will include policies for this section.

#### **SUBRECIPIENT REQUIREMENTS**

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When Davenport carries out Federally funded research through a subrecipient (e.g., subcontractors or consortium members), Davenport (awardee Institution) will take reasonable steps to ensure that any subrecipient PI/co-PI complies with 42 CFR Subpart F by:

- Incorporating as part of a written agreement with the subrecipient terms that establish the FCOI policy of Davenport by which the subrecipient will apply to the subrecipient's PIs/co-PIs.
  - All subrecipient's PIs/co-PIs must comply with the subrecipient's FCOI policy and must certify as part of the agreement referenced above that its policy complies with 42 CFR Subpart F. If the subrecipient cannot provide such certification, the agreement will state that subrecipient PIs/co-PIs are subject to the FCOI policy of Davenport for disclosing SFIs that are directly related to the subrecipient's work for Davenport;
  - The written agreement referenced above will specify time period(s) for the subrecipient to report all identified FCOI to Davenport. Such time period(s) will be sufficient to enable Davenport to provide timely FCOI reports, as necessary, to THE FEDERAL FUNDER as required by 42 CFR Subpart F;



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Stewardship of grants is extremely important. It could mean the difference between first time funding or only-time funding. Most funders will outline the reporting requirements and dates within the confines of the Grant Agreement. These are to be strictly enforced. Financial reports will be prepared by Finance/Accounting and the Office of Sponsored Programs and Grant Development. Narrative Reports will be prepared by the Principal faculty or staff for the funded project and the Office of Sponsored Programs and Grant Development. The Office of Sponsored Programs and Grant Development will coordinate gathering the reports and submitting them to the funder. If a funder does not lay out the specifics of reporting within the Grant Agreement, then the Office of Sponsored Programs and Grant Development will determine dates by which reports will be sent to the funder.

For Sponsored Projects, closeout is critical. Per §200.344 Closeout:

- (a) The recipient must submit, no later than 120 calendar days after the end date of the period of performance, all financial, performance, and other reports, or earlier per each federal agency as required by the terms and conditions of the federal award. A subrecipient must submit to the pass-through entity, no later than 90 calendar days (or an earlier date as agreed upon by the pass-through entity and subrecipient) after the end date of the period of performance, all financial, performance, and other reports as required by the terms and conditions of the federal award. The federal awarding agency or pass-through entity may approve extensions when requested and justified by Davenport, as applicable.
- (d) Davenport must promptly refund any balances of unobligated cash that the federal awarding agency or pass-through entity paid in advance or paid and that are not authorized to be retained by Davenport for use in other projects. See OMB Circular A-129 and see §200.346, for requirements regarding unreturned amounts that become delinquent debts.
- (i) If Davenport does not submit all reports in accordance with this section within one year of the period of performance end date, the federal awarding agency must report Davenport's material failure to comply with the terms and conditions of the award with the OMB-designated integrity and performance system (currently FAPIIS). Federal awarding agencies may also pursue other enforcement actions per §200.339.

#### **VI. DOCUMENTATION of PERSONNEL EXPENSES**

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As a recipient of federal funds, Davenport University must comply with the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for

expended on sponsored awards. Davenport requires all individuals who receive federal sponsored funding to comply with institutional policies and sponsoring agency regulations regarding the proposing, charging, and reporting of effort on those awards.

Davenport faculty and staff are expected to charge their time to sponsored awards commensurate with the committed effort expended on all activities they perform. All individuals who receive any compensation from a federal award or a non-federal award where the non-federal sponsor requires effort reporting

properly expended and that actual effort is consistent with the committed and budgeted effort.

Subpart E 200.430 of the Uniform Guidance includes the federal regulatory requirements for compensation for personal services. This includes but is not limited to the specified Standards for

to meet these requirements.

1. Time and effort reports must reasonably reflect the percentage distribution of effort expended by Davenport employees involved in Sponsored Projects. The Time and Effort report must represent,

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in percentages totaling 100%, a reasonable estimate of an employee's activity is reported. These reports must reasonably reflect the activity for which the employee is

research, teaching, administration, service, and any other activity for which an individual received compensation from the University.

teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards for IHEs [Institutions of Higher Education], a precise assessment of factors that contribute to costs is therefore not always

2. appropriate. All Cost Sharing must be pre-approved. These resources may include but are not limited to matching funds, facilities, and/or faculty or staff time. When Cost Sharing resources are committed and budgeted for in a proposal or sponsored agreement, external sponsors consider the proposed cost sharing to be institutional commitments if such proposals are funded. As such, any voluntary cost sharing commitment should only be made when there are perceived advantages to the institution in receiving the award.
3. Each employee whose time is partially or fully committed to a federally Sponsored Project must complete Time and Effort reports as required. Reporting is required regardless of whether such time is paid by the sponsor, or is an unpaid contribution, i.e. cost share match. Committed cost sharing must be included in effort reports.
4. The distribution of salaries and wages charged or cost-shared to Sponsored Projects are reasonable and consistent with the work performed. This indicates that the distribution of salaries and wages will be supported by activity reports signed by the employee and certified by a responsible person with suitable means of verification that the work was performed, generally the Principal Investigator (PI), at the end of the specified reporting periods. Time and Effort reports must be incorporated into the records of the University and retained in accordance with the University's Records Retention schedule.
5. The federal government can impose severe penalties and funding disallowances as a result of missing, inaccurate, incomplete, or untimely effort reporting. Davenport expects that PIs will complete time and effort reports completely and in a timely manner. Consequences to not doing so may include, at the discretion of the administration, withholding submission of a new grant proposal and/or withholding compensation on effort expended. Davenport University also

failure to submit appropriate time and effort reports to the departmental operating account.

In addition, for any employee who is paid hourly instead of through salary, and who also receives any compensation from a federal award or a non-federal award where the non-federal sponsor requires effort reports, the employee must submit effort reports on a regular basis, including time toward the Sponsored

Project. Employees fill out timesheets electronically through e-time as they clock in and clock out for work each day. Every two weeks, at the end of a pay period, their Principle Investigator will approve the timesheets of their hourly grant staff. At the end of each grant program year, hourly staff who receive

policy and procedures.

#### **VII. PARTICIPANT SUPPORT**

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Funds identified as "participant support costs" are those direct costs paid to (or on behalf of) participants or trainees in grant-funded training programs, such as degree programs, support-services programs, etc., if



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When a sponsored project includes Participant Support Costs, the principal investigator and administrative support personnel are required to be familiar with the specific requirements as set forth by the sponsor, and to ensure compliance with those requirements. Evidence of attendance of participants in the form of daily logs or similar documentation must be maintained within the project's records.

When participant support has been awarded as part of a grant award, Sponsored Programs will notify the Financial Grant Administrator in Finance and Accounting, who will use separate account numbers specific to Participant and Trainee costs that will be used with the corresponding grant org (an 800 number specific to the grant award) to specify the budgeted participant and trainee costs, including the budgeted amounts awarded by the Sponsored Agreement. These budgets and accounting codes will reside in and be accounted for in Banner by Ellucian. Accounting codes for Participant and Trainee Costs are as







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3. properly documented;
4. That Subrecipient invoices are submitted in a timely manner and that invoices are accurate.

In addition, the University must ensure that Subrecipients meet the audit requirements in CFR part 200 and use funds in accordance with applicable laws, regulations and terms of the award. This will also include a pre-subaward and annual, thereafter, check of SAM.gov to determine if subrecipients and vendors are debarred or suspended from doing business with the federal government.

Department and Principal Investigator Responsibilities:

1. The PI must review technical performance reports or other specified deliverables in a timely manner. Any issues must be documented, investigated, resolved, and the documentation retained
2. The PI and/or Financial Grant Administrator must ensure that the final technical report and final invoice from the Subaward is received within the timeframe specified in the Subaward.
- 3.

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of Sponsored Programs and Grant Development before initiating discretionary audits. Formal audits of a Subrecipient are typically initiated outside of the university.

9. In the event that the Sponsor requires an audit of a Subaward provided by Davenport University, the department is responsible for the cost of this audit. If allowable or required by the Sponsor, the cost of the Subrecipient audit can be included in the budget.

#### **Sponsored Programs Responsibilities:**

1. Prior to issuing a federal or federal pass-through Subaward, the Office of Sponsored Programs and Grant Development will be responsible for the following:
  - a. Office of Sponsored Programs and Grant Development shall complete Davenport appropriately monitor the Subrecipient. These may include additional monitoring procedures, additional contract language or inclusion of special terms and conditions.
  - b. Office of Sponsored Programs and Grant Development shall verify whether the Subrecipient has completed a Single Audit when a risk assessment is completed.
  - c. Office of Sponsored Programs and Grant Development shall confirm that Subrecipient has a DUNS number.
2. Office of Sponsored Programs and Grant Development will include in the Subaward the necessary terms and conditions from the Prime Award, and will also include the CFDA Number and title for any federal or federal pass-through Subaward. Other identifying information will be included when the CFDA information is unavailable.
3. Office of Sponsored Programs and Grant Development will inform the Principal Investigator and Financial Grant Administrator of the additional terms and conditions included in the Subaward or other appropriate actions for high-risk Subrecipients.
4. Office of Sponsored Programs and Grant Development will provide the PI and Financial Grant Administrator a copy of the fully executed Subaward.
5. Office of Sponsored Programs and Grant Development will maintain documentation regarding ongoing risk analysis of Subrecipients.

#### **Subaward Close-out:**

A subaward is closed out when its period of performance comes to an end, regardless of whether

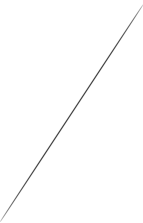
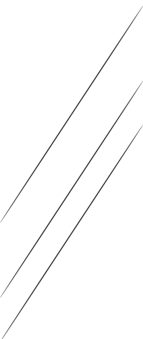
collection and review of the Subrecipient's final reports, verification of subrecipient data, and incorporation of the Subrecipient's research results into Davenport's final technical report to the sponsor.

subrecipients, and retaining a copy in their project file. PIs are encouraged to remind subrecipients of this need well in advance of the due date for such reports.

Other final reports, including property reports, patent reports, small disadvantaged business reports, Assignment and Release forms, and other documents as required by the Sponsor may be required.

In order for Davenport to comply with its financial report requirements, subrecipients are required to submit a final invoice, clearly marked Final, to Davenport no later than the date specified in the Subaward. In the event a Final invoice is not received within the required timeframe, Davenport may treat the Subrecipient's last invoice as its final invoice. Late Final invoices submitted to Davenport may not be paid.

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UNIVERSITY ACCOUNT/FUND #	AMOUNT CHARGED	ACTUAL EFFORT (%)	[REDACTED] DATE	END DATE
[REDACTED]				

# Davenport University

## Sponsored Programs and Grant Development

### Policies and Procedures


If declined, please detail amendments that are needed:

Supervisor:

Chair, Dean (academic); ED or VP (Non-academic)  
Name/Title

Approved	Declined	
		Narrative
		Budget

If declined, please detail amendments that are needed:

Top Supervisor:

Dean (academic); ED or VP (Non-academic)  
Name/Title

Approved	Declined	
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If declined, please detail amendments that are needed:

**Davenport University**  
**Sponsored Programs and Grant Development**  
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For questions, please contact Michele R. Davis, Executive Director of Sponsored Programs and Grant Development, at [mdavis130@davenport.edu](mailto:mdavis130@davenport.edu) or 616-233-3414.