

MONMOUTH UNIVERSITY  
OFFICE OF GRANTS AND CONTRACTS  
GRANTS POLICIES AND PROCEDURES MANUAL

## **1. Research and Grants at Monmouth University**

### **Monmouth University Mission Statement**

**Monmouth University is an independent, comprehensive institution of higher education committed to excellence and integrity in teaching, scholarship, and service. Through its offerings in liberal arts, science, and professional programs, Monmouth University educates and prepares students to realize their potential as leaders and to become engaged citizens in a diverse and increasingly interdependent world.**

### **Research and Scholarship at Monmouth University**

Monmouth University believes in leadership. The University's "brand" is *Where Leaders Look Forward*. The University is committed to building an academic culture that creates leaders who have the intellectual, social, and professional skills necessary to work toward the realization of goals without distraction or hesitation. In terms of grants and sponsored programs this philosophy is demonstrated in a desire shared within the University to maximize the ability of the University infrastructure and internal systems to support excellence in teaching and scholarship, inclusive of externally supported research and programs.

Monmouth University strongly asserts that sponsored programs are desirable and enhance the institution's standing and mission. Research and program funding increase the institutions status and prestige, attracts better quality faculty and students, enhances our training of future scientists and teachers, allows us to upgrade programs and build our infrastructure, and of course enhances the quality of service to country, state, and community. From a faculty member's perspective increased sponsored program activity can lead to knowledge generation and expansion, publications, career advancement, and enhanced public service and educational opportunities for our students.

### **The Grantsmanship Partnership**

Grantsmanship at Monmouth University is a partnership between the faculty, administration, staff, and the Office of Grants and Contracts. Each party makes unique and critical contributions that enhance the environment at MU in the pursuit if external funding and resources from private and public sources in support of excellence in teaching and learning. In this pursuit of excellence in the search for external funding Monmouth University seeks to balance the research, teaching, and public service activities of faculty and investigators with our need to accommodate the priorities and stewardship responsibilities of the University. A balance between the needs, interests, and priorities of investigators and the stewardship responsibilities of the University must be achieved. Our goal therefore is to create a research environment and climate that facilitates research and scholarship while at the same time ensuring the ability of the University to effect the substance of our stewardship responsibilities.

The Office of Grants and Contracts (OGAC) at Monmouth University provides the infrastructure that ties together the Grantsmanship Partnership.

## **2. The Office of Grants and Contracts**

### **OGAC Mission Statement**

The mission of the Office of Grants and Contracts (OGAC) is to enhance the University's internal capability to generate external funding. This is done by providing members of the University community with a variety of supportive services and assistance that is outlined below. The intention of the OGAC is to make the grant development and submission process as uncomplicated and as user friendly as possible for the Principal Investigator (PI) and the grant development team.

### **OGAC Philosophy**

- Grants are an exercise in creative scholarship.
- The role of OGAC is to enhance the internal capability of the University to generate external funding.
- OGAC should be the first and last step in the grant proposal process.
- OGAC should be proactive in working with faculty and administration.
- OGAC should be catalyst, i.e., internal procedures should facilitate and not impede, and
- Therefore OGAC should be as accessible and as user friendly as is practical within the context of University policy.

### **Grant Services Provided**

The Office of Grants and Contracts will provide interested faculty and staff with a wide variety of supportive services and assistance that includes researching prospective funders, assistance in writing (primarily, although not exclusively, editing), budget development, attendance at meetings and required technical assistance sessions, assistance in obtaining supportive documents, obtaining necessary University approvals, serving as the liaison to other University offices during the development of grant proposals, assistance in submitting all proposals, and by providing periodic workshops and technical assistance sessions to faculty and staff on issues of interest, such as the grant development process, budget development, and finding funding sources.

More specifically, the OGAC will:

- Develop, maintain, and update a current database and calendar of funding sources and opportunities that are applicable to the needs and interests of Monmouth University faculty, administrators, and other professional staff.
- Disseminate the database and calendar of funding sources and opportunities to all faculty and staff on a regular monthly basis.
- Meet with faculty/staff members either individually or in groups to ascertain interests and to discuss opportunities that may be of interest.
- Conduct focused research identifying specific funding sources for specific faculty initiatives.
- Serve as a conduit for communication and liaison with other University offices.

- Provide assistance in proposal development and preparation, to include the development of a common boilerplate, assistance in development of program narratives, edit and analyze content within the context of compliance with RFP requirements and evaluation criteria, and assist in budget preparation.
- Submit the final proposal package to the funding source. All electronic submissions must be sent by OGAC, and all paper proposals should include a cover letter signed by the Director of OGAC.
- To the extent possible and appropriate, attend workshops and technical assistance sessions required by the funding source.
- Provide assistance to the extent possible with the management and evaluation of funded projects and programs, as well as preparation and submission of required reports.
- Provide periodic workshops to faculty and staff in areas such as grant writing and the grant development process, budget development, and the identification of potential funding sources.

### **3. Pre-Award Policies**

#### **Federal Pre-Award Policies**

As a recipient of federal funding, Monmouth University is required to comply with a number of laws, policies, standards and regulations that are required by the funding source. Compliance with statutes, sponsor regulations, requirements and policies is a bargain we agree to when we accept funding and we are all responsible in one way or another to insure such compliance.

The following are MU policies formulated in response to certain federal regulations that govern the various aspects of externally funded research and programs.

#### **Responsible Conduct of Research –**

**Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act (America COMPETES Act) requires that “each institution that applies for financial assistance from the Foundation for Science and engineering research or education describe in its grant proposal a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduates students, and postdoctoral researchers participating in the proposed research project.”**

**With this in mind both NSF and NIH have implemented requirements concerning Financial Conflicts of Interest and Objectivity in Research that Monmouth University has chosen to make applicable to all University applicants for external research regardless of discipline.**

**Pursuant to these regulations MU is required to have a plan in place to provide for appropriate training and oversight in the responsible and ethical conduct of research to faculty members, undergraduates, graduates students, and postdoctoral researchers who will be supported by grant funds in the conduct of their research and programs. MU must certify to this effect within each proposal for external funding, and must publicly post this plan on our website. The Director of the Office of Grants and Contracts will serve as the University designated official to oversee compliance with these requirements.**

**The Policy of Monmouth University is as follows:**

**FINANCIAL CONFLICT OF INTEREST AND OBJECTIVITY IN RESEARCH**

**I. PURPOSE**

Monmouth University believes that it is vital to maintain objectivity in research and that all research must be conducted with the highest scientific and ethical standards and in a manner that assures the integrity of the scientific record. The purpose of this policy is to ensure that there is a reasonable expectation that the design, conduct, or reporting of research will not be biased by any financial interest of an investigator.

**II. PROCEDURES**

Each investigator applying for external funding must, at the time the proposal is being submitted, provide and submit to the designated institutional official, full disclosure of all significant financial interests, and those of his/her spouse/domestic partner and/or dependent children, that would reasonably appear to be potentially affected by the research or program for which funding is being sought. Furthermore, Investigators must update the disclosures for the duration of the funding, at least once yearly or as new reportable significant financial interests are maintained.

If Monmouth University is carrying out external funded research through a grantee, contractor, or collaborator, Investigators working for such entities must comply with this policy and provide written assurances to Monmouth University identifying conflicting interests and which actions will be taken to ensure that the conflicting interests will be managed, reduced or eliminated.

It is ***strongly recommended*** that every investigator interested in or about to apply for external funding access take the NIH web based financial conflict of interest tutorial at <http://grants.nih.gov/grants/policy/policy.htm>

**A. DEFINITIONS:**

- A. Disclosure of Significant Financial Interest** means an Investigator's disclosure of significant financial interests to Monmouth University.
- B. Financial Conflict of Interest (FCOI)** means a significant financial interest (SFI) that could directly and significantly affect the design, conduct, or reporting of federally funded research.
- C. FCOI report** means Monmouth University's report of a financial conflict of interest to either a PHS Awarding Component or other federal organizational unit that funds the research.
- D. Financial Interest** means anything of monetary value, whether or not the value is readily ascertainable.

- E. Federal Awarding Component** means the organizational unit of a federal department or agency that provides federal funding through a grant or cooperative agreement
- F. Investigator** means the project director (PD) or the principal Investigator (PI), co-principal investigator (Co-PI), or any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research or educational activities federally funded or proposed for funding, which may include, for example, collaborators or consultants. **Note: Significant financial interests of spouses/domestic partners and dependent children must also be disclosed.**
- G. Institutional Responsibilities** means an Investigator's professional responsibilities on behalf of the Institution, and as defined by the Institution in its policy on financial conflicts of interest, which may include for example: activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as research ethics committees ( e.g., Institutional Review Boards, Institutional Animal Care and Use Committees) and other bodies monitoring the conduct of research.
- H. Manage** means taking action to address a financial conflict of interest, which can include reducing or eliminating the financial conflict of interest, to ensure, to the extent possible, that the design, conduct and reporting of research will be free from bias.
- I. Management Plan** means the prospective plan for financial conflict of interest mitigation.
- J. Mitigation Report** means a retrospective report for financial conflict of interest compliance with a federal funding agency/sponsor's requirements.
- K. PD/PI** means project director or principal Investigator of a federally funded research project; the PD/PI is included in the definitions of senior/key personnel and Investigator.
- L. Research** means a systematic investigation, study, or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug). The term includes any such activity for which research funding is available from a federal Awarding Component through a grant or cooperative agreement, whether authorized under the Public Health Service (PHS) Act (42 U.S.C. 201 et seq.) or other statutory authority, such as a research grant, career development award, center grant, individual fellowship award, infrastructure award, institutional training grant, program project, or research resources award.
- M. Senior/Key personnel** means the PD/PI and any other person identified as senior/key personnel by Monmouth University in the grant application, progress report or any other report submitted to the Federal Funding Agency by Monmouth University.
- N. Significant Financial Interest** means:

(a) A significant financial interest exists if the following situations apply to the Investigator and/or the Investigator's spouse, domestic partner and dependent children, involving companies that reasonably appear to be related to the proposed research:

(i) With regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve (12) months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated exceeds **\$5,000.00**. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;

(ii) With regard to any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve (12) months preceding the disclosure, when aggregate exceeds **\$5,000.00**, or when the Investigator or the Investigator's spouse, domestic partner or dependent children hold any equity interest (e.g., stock, stock option, or other ownership interest); or

(iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

(b) Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their Institution's responsibilities, provided however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. Investigators must disclose the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration of the trip. Monmouth University's Designated Officials will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI with the federally funded research.

(c) The term **significant financial interest does not include** the following types of financial interests:

(i) Salary, royalties or other remuneration paid by Monmouth University to the Investigator if the Investigator is currently employed or otherwise appointed by Monmouth University, including intellectual property rights assigned to Monmouth University and agreements to share in royalties related to such rights;

(ii) Any ownership interest in an Institution held by the Investigator, if the Institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a Federal, state or local government agency, and Institution of higher education,

an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or income from service on advisory committees or review panels for a Federal, state or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

**11. Subrecipient** means any Investigator outside the Monmouth University community receiving research funds from Monmouth University through subaward, subcontract, or consortium agreement.

## **B. FINANCIAL CONFLICT OF INTEREST DISCLOSURE FORM**

### **a. Disclosure Requirements**

No later than the time of application for submission of a grant to a federal agency, all participating investigators are required to fill out and submit a FCOI form to the Director of OGAC with the OGAC Routing Sheet which will be reviewed by the Director of OGAC (and if a conflict is noted, by the FCOI Review Team). In addition, all investigators must submit an updated FCOI form annually during the period of the award (by deadlines established by OGAC) to include any information that was not disclosed previously to Monmouth University, and to include updated information regarding any previously disclosed significant financial interest (e.g., the updated value of previously disclosed equity interest). Any newly discovered or acquired significant financial interest (e.g., through purchase, marriage, or inheritance) must be disclosed within thirty days.

### **b. Subcontracts**

If the federally funded research involves a subrecipient (e.g. subcontractors or consortium members), Monmouth University (as the awardee institution) will take reasonable steps to ensure that any recipient investigator complies with the federal policies by:

- i. Establishing in writing with the subrecipient whether the financial conflicts of interest policy of MU or that of the subrecipient will apply to the subrecipient's investigators.
  - a. If the subrecipient's investigators must comply with the subrecipient's financial conflict of interest policy, the subrecipient shall certify that its policy is in compliance with federal policies. In the absence of this certification, the agreement will state that subrecipient investigators are subject to the financial conflicts of interest policy of Monmouth University for disclosing significant financial interest that are directly related to the subrecipient's work for Monmouth University.
  - b. Additionally, if the subrecipient's investigators must comply with the subrecipient's financial conflicts of interest policy, the written agreement will specify a deadline for the subrecipient to report all identified financial conflicts of interest to Monmouth University so that Monmouth University can provide timely FCOI reports, as necessary, to the relevant federal agency.

- c. Alternatively, if the subrecipient's Investigators must comply with Monmouth University's financial conflict of interest policy, the written agreement will specify a deadline for the subrecipient to submit all Investigator disclosures of significant financial interest to Monmouth University so that Monmouth University can provide timely FCOI reports, as necessary, to the relevant federal agency.
- ii. Providing FCOI reports to the federal agency regarding all financial conflicts of interest of all subrecipient investigators consistent with this policy, i.e., prior to the expenditure of funds and within sixty (60) days of any subsequently identified FCOI.

## **C. REVIEW OF FCOI AND MANAGEMENT OF CONFLICTS**

### **1. Initial Review**

The initial review of the Financial Conflict of Interest Disclosure Form shall be done by the Director of the Office of Grants and Contracts (OGAC). An Investigator's significant financial interest is related to federally funded research when Monmouth University determines that the significant financial interest:

- a. Could be affected by the research, or
- b. Is in an entity whose financial interest could be affected by the research.

A FCOI exists when Monmouth University reasonably determines that the significant financial interest could directly and significantly affect the design, conduct or reporting of the federally funded research. At the time of the submission of a grant to a federal agency, all participating investigators are required to fill out and submit a FCOI Form along with a proposal and the Internal Approvals for Grant or Contract Proposals (OGAC Routing Sheet). If the Director of OGAC determines that no potential conflict of interest is revealed or indicated, the Director of OGAC shall approve the Financial Conflict of Interest Disclosure Form and forward it appropriately. If there is any indication of a potential conflict of interest, the Director of OGAC shall notify and confer with the Financial Conflict of Interest Review Team.

### **2. Financial Conflict of Interest Review Team**

(a) The University designates the following officials as the review team:

- 1. Director of the Office of Grants and Contracts
- 2. Representative of the Office of the General Counsel
- 3. Representative of the Controller's Office

(b) The designated officials will review the financial disclosure and determine whether a conflict of interest exists and, if so, determine what actions should be taken by the institution to manage, reduce or eliminate the conflict.

### **3. Conflict Management Plan**

(a) The University's designated officials may determine that it is in the best interest of the Investigator and the University to jointly develop and agree to a conflict management



plan prior to the expenditure of any grant funding, and to then monitor compliance with the plan. The conflict management plan will include all actions, restrictions, and conditions, including timelines, that the Investigator will be required to take to manage or eliminate the conflict. **All conflicts of interest must be resolved and management plans approved before the research project can begin.**

(b) If a disclosure of a new conflict arises or the discovery of an undisclosed conflict is uncovered, the FCOI Review Team will review and make recommendations within 60 days of the new conflict disclosure or unreported disclosure recovery.

(c) The FCOI Review Team will review all of the submitted material and either accept or suggest modifications to further eliminate the conflict. This could involve, at either the Review Team's request or at the Investigator's request, a meeting with the Review Team, involving the Department Chair, School Dean, or Provost as needed. Expert opinions may also be sought by the Review Team.

(d) Examples of conditions or restrictions that might be imposed to manage or eliminate conflicts of interest include, but are not limited to:

1. Public Disclosure of significant financial interests (e.g. when presenting or publishing the research);
2. For research projects involving human subjects research, disclosure of FCOI directly to participants;
3. Monitoring of research by independent reviewers capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the FCOI;
4. Modification of the Research Plan;
5. Change in personnel or personnel responsibilities, or disqualification of personnel from participating in all or a portion of the funded research that would be affected by the significant financial interests;
6. Reduction or elimination of the financial interest (e.g., sale of an equity interest); or
7. Severance of the relationships that create the conflict of interest.

(e) Whenever Monmouth University implements a management plan, the FCOI Review Team will monitor compliance with the management plan on an ongoing basis until completion of the affected federally funded research project. In the event of any significant conflicting financial interest that is discovered subsequent to initial reports to federal agencies, the FCOI Review Team shall within sixty (60) days: review the significant financial interest; determine whether it is related to the federally funded research; determine whether a financial conflict of interest exists; and if so:

i. implement a management plan that shall specify the actions that have been, and will be, taken to manage such financial conflict of interest going forward; and

ii. (A) in addition, whenever a financial conflict of interest is not identified or managed in a timely manner including failure by the Investigator to disclose a significant financial interest that is

determined by the FCOI Review Team to constitute a financial conflict of interest; failure by the FCOI Review Team to review or manage such a financial conflict of interest; or failure by the Investigator to comply with a financial conflict of interest management plan, Monmouth University, shall within 120 days of Monmouth University's determination of noncompliance, complete retrospective review of the Investigator's activities and the federally funded research project to determine whether any federally funded research, or portion thereof, conducted during the time period of noncompliance was biased in the design, conduct or reporting of such research, and, if so, provide a mitigation report if required by the relevant federal agency.

(B) Monmouth University is required to document the retrospective review. Such documentation shall include, but not be limited to all of the following key elements:

- Project Number;
- Project Title;
- PD/PI or contact PD/PI if a multiple PD/PI model is used;
- Name of the Investigator with the FCOI;
- Name of the entity with which the Investigator has a financial conflict of interest;
- Reason(s) for retrospective review;
- Detailed methodology used for 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.

iii. based on the results of the retrospective review, if appropriate, Monmouth University shall update the previously submitted FCOI report, specifying the actions that will be taken to manage the financial conflict of interest going forward. If bias is found, Monmouth University 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 minimum, the key elements documented in the retrospective review and a description of the impact of the bias on the research project and Monmouth University'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, Monmouth University will submit FCOI reports annually as specified in the policy.

(f) If an Investigator fails to comply with this conflict of interest policy and the University determines that the conflict has or can bias the design, conduct, or reporting of research findings, the University will promptly notify the program sponsor and corrective action will be taken or proposed. The University will seek direction and advice from the program sponsor concerning appropriate corrective action. Monmouth University may, at its own discretion, cease the expenditure of any funds under the award until the University determines that the conflict has been managed, reduced, or eliminated and that the research is protected from bias.

(g) If the University's designated officials determine that imposing conditions or restrictions would be ineffective or inequitable, and that the potential negative impacts that may arise from significant financial interest are outweighed by interests in scientific progress, technology transfer or the public

health and welfare, the designated officials may allow the research to go forward without imposing such conditions or restrictions.

#### **D. REPORTING OF CONFLICTS**

1. Monmouth University must certify in each application for funding to which this policy applies, that:

i. Monmouth University has a written and enforced administrative process to identify and manage conflicts of interest and that they will ensure compliance with all such related federal policies regarding FCOI;

ii. Shall promote and enforce Investigator compliance, including those pertaining to disclosure of significant financial interests;

iii. Shall manage conflicts of interest and provide initial and ongoing FCOI reports to the federal awarding agency as required;

iv. Agrees to make information available, promptly upon request to the federal agency relating to any Investigator disclosure of financial interests and Monmouth University's review of, and response to such disclosure, whether or not the disclosure resulted in Monmouth University's determination of a conflict of interest and all actions under Monmouth University's policy, or retrospective review, if applicable, for at least for five years from the date the final expenditures report is submitted to the federal agency, or as required by the specific agency.

v. Monmouth University must also monitor Investigator compliance with approved management plans throughout the duration of the funded project.

2. Prior to Monmouth university's expenditure of any funds under a federally funded research project, Monmouth university shall provide to the Federal Awarding Component, if required, an FCOI report regarding any Investigator's significant financial interest found by Monmouth University to be conflicting and ensure that Monmouth University has implemented a management plan. In cases in which Monmouth University identifies a financial conflict of interest and eliminates it prior to the expenditure of federally awarded funds, Monmouth University shall not submit an FCOI report to the Federal Awarding Component.

3. For any significant financial interest that Monmouth University identifies as conflicting subsequent to Monmouth University's FCOI report during an ongoing federally funded research project (e.g., upon the participation of an Investigator who is new to the research project), Monmouth University shall provide to the Federal Awarding Component, within 60 days, and FCOI report regarding the FCOI and ensure that Monmouth University has implemented a management plan. Where such FCOI report involves a significant financial interest that was not disclosed timely by an Investigator or, for whatever reason, was not previously reviewed or managed by Monmouth University (e.g., was not timely reviewed or reported by a subrecipient), Monmouth University also is required to complete a retrospective review to determine whether any federally funded research, or portion thereof,

conducted prior to the identification and management of the financial conflict of interest was biased in the design, conduct or report of such research. If bias is found, Monmouth University is required to notify the Federal Awarding Component promptly and submit a mitigation report to the Federal Awarding Component.

4. Any FCOI report required shall 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 Monmouth University's management plan. Elements of the FCOI report shall include:

- i. Project number;
- ii. PD/PI or contact PD/PI if a multiple PD/PI model is used;
- iii. Name of the Investigator with the FCOI;
- iv. Name of the entity with which the Investigator has a financial conflict of interest;
- v. Nature of the financial interest (e.g., equity, consulting fee, travel reimbursement, honorarium);
- vi. Value of the financial interest (dollar ranges are permissible) or a statement that the interest is one the value of which cannot be readily determined through reference to public prices or other reasonable measures of market value;
- vii. A description of how the financial interest relates to the federally funded research and the basis for Monmouth University's determination that the financial interest conflicts with such research; and
- viii. A description of the key elements of the plan, including:
  - A. Role and principal duties of the conflicted Investigator in the research project;
  - B. Conditions of the management plan;
  - C. How the management plan is designed to safeguard objectivity in research;
  - D. Confirmation of the Investigator's agreement to the management plan;
  - E. How the management plan will be monitored to ensure Investigator compliance; and
  - F. Other information as needed.

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

#### **E. PUBLIC ACCESSIBILITY TO FCOI INFORMATION**

1. Prior to Monmouth University's expenditure of any funds under a federally funded research project, Monmouth University shall ensure public accessibility via a written response to any

requestor within five (5) business days of a request, of information concerning any significant financial interest disclosed to Monmouth University that meets the following three criteria:

- i. The significant financial interest was disclosed and is still held by the senior/key personnel;
- ii. Monmouth University determined that the significant financial interest is related to federally funded research; and
- iii. Monmouth University determines that the significant financial interest is a financial conflict of interest.

2. The information that Monmouth University shall make available via written response to any requestor within five (5) business days of a request shall include:

- i. the Investigator's name;
- ii. the Investigator's title and role with respect to the research project;
- iii. the name of the entity in which the significant financial interest is held;
- iv. the nature of the significant financial conflict of interest;
- v. the approximate dollar value of the significant financial interest (either by dollar ranges 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).

#### **F. INVESTIGATOR'S NON-COMPLIANCE**

1. Investigators will not be able to access funds prior to disclosure of a FCOI and approval of a management plan. Noncompliance must also be reported to the appropriate federal funding agency. Certain agencies (e.g., NIH grants for clinical research) require public disclosure of FCOI on all public presentations (including addendums for previously published items) for any funded research that did not comply with federal disclosure regulations.

2. Failure of Investigators to comply with this policy, including restrictions by the management plans, will be grounds for discipline and sanctions under the appropriate University policy or provisions of any applicable Collective Bargaining Agreement.

#### **G. INVESTIGATOR TRAINING**

In order to facilitate compliance with federal policy, Monmouth University is responsible for investigator training, collection and evaluation of FCOI forms, and enforcement of this policy. In addition to making this policy and associated forms available on the OGAC website, training will be provided by OGAC for all investigators prior to engaging in federally funded research. Training must be repeated every four (4) years, and immediately with Monmouth University revises its FCOI policies or procedures in any manner that affect the requirements of Investigators; and investigator is new to Monmouth University; or an Investigator is found to be in non-compliance with Monmouth university's FCOI policy or management plan.

#### **H. RETENTION OF RECORDS**

Monmouth University will maintain all records of financial disclosures and Monmouth University's review of, and response to such disclosures (whether or not a disclosure resulted in Monmouth University's determination of a financial conflict of interest) and all actions under Monmouth University's policy or retrospective review, if applicable, for at least three (3) years from the date the final expenditure report is submitted to the federal funding agency.

## I. RESOURCES

[http://www.nsf.gov/pubs/policydocs/pappguide/nsf09\\_1/aag\\_4.jsp#IVA](http://www.nsf.gov/pubs/policydocs/pappguide/nsf09_1/aag_4.jsp#IVA)

<http://grants.nih.gov/grants/policy/coi/index.htm>

<https://grants.nih.gov/policy/index.htm#gps>

**Human Subjects** – The Institutional Review Board (IRB) at Monmouth University was created to monitor and oversee research activity conducted at or sponsored by Monmouth University that involves human participants. The IRB was established to protect the rights and welfare of human subjects recruited to participate in research activities conducted by MU faculty, staff, or students, including all projects whether unfunded, internally funded, or externally funded through grants and contracts. The IRB has the responsibility and authority to approve, require modification in, halt unapproved or no-compliant research, or disapprove research activities involving humans. Investigators MUST obtain IRB approval prior to beginning a research project or expending funds on a grant project.

### I.R.B. Contact Information

Deborah N. Smith - IRB/IACUC Administrator  
Office of the IRB and IACUC  
Library, Lower Level 006  
400 Cedar Avenue  
West Long Branch, NJ 07764  
Phone: 732-263-5726  
Fax: 732-263-5728  
E-mail: [irb@monmouth.edu](mailto:irb@monmouth.edu)

**Animal Subjects** - Monmouth University is committed to the humane care and use of animals in activities related to research, testing, and teaching.

The Institutional Animal Care and Use Committee (IACUC) at Monmouth University was created to monitor and oversee research activity conducted at or sponsored by Monmouth University that involves vertebrate laboratory animals. Federal and university regulations require that all research involving animals conducted by Monmouth University faculty, staff, and students be reviewed and approved by the IACUC before initiation. Therefore, the mission of the Monmouth University IACUC is fourfold: to assure the safe and ethical treatment of animals in research, to facilitate research and research careers, to ensure compliance with federal regulations, and to protect the interests of the institution.

Monmouth University has established policies on the use of animal subjects to promote their humane care and use in research and instruction and to ensure instructional compliance with all applicable federal and state laws and regulations and University policies governing the use of animals.

IACUC Contact Information  
Deborah N. Smith, Administrator  
Telephone: 732-263-5726  
Fax: 732-263-5728  
E-mail: dnsmith@monmouth.edu

### **Intellectual Property Rights at Monmouth University**

Monmouth University's policy on Intellectual Property affirms the University's commitment to academic freedom and is intended to create an environment that encourages creativity and innovation among its faculty, staff, and students. The University actively encourages the development of new ideas, discoveries and inventions resulting from University research and scholarship and gives adequate recognition and incentives to developers while recognizing and protecting the intellectual property rights of faculty, staff, students, and the University.

The Monmouth University Policy on Intellectual Rights may be found at [http://www.monmouth.edu/resources/general\\_counsel/intellectualproperty.asp#income](http://www.monmouth.edu/resources/general_counsel/intellectualproperty.asp#income)

### **Monmouth University Pre-Award Policies**

#### **General Principles**

- External Funding is awarded to the University and not to individuals. As the official recipient of all awards, Monmouth University is obligated to and will comply with all applicable rules, laws, and regulations governing institutions of higher education as recipients of public support. This includes reference to any and all tangible property and equipment purchased under an award. All such property shall remain in the custodial care and ownership of Monmouth University subject to the application of appropriate property disposition procedures specified and required by the funder.
- Monmouth University is guided by federal regulations for all grants regardless of funding source, except in those cases where internal University regulations are more stringent, in which case the more restrictive regulation is adhered to.
- Only the University has the legal authority to apply for and accept grants, contracts and agreements on behalf of the University. This authority is delegated to the President, the Provost, the University Vice-President and Counsel, and the Director of the Office of Grants and Contracts who may sign proposal documents only after they have been approved through the

University's internal routing system. The Director of the Office of Grants and Contracts is authorized to sign and submit electronic submissions as the University's Authorized Organizational Representative, and only after the proposal has been approved through the internal routing system.

- No grant or proposal will be submitted to a funding source unless the proposal has been approved through the University's internal routing system (to be discussed in detail below).
- The individual writing the proposal for a sponsored program is known as the Principal Investigator (PI) or Program Director. Only full-time faculty members and/or professional staff may serve as a PI. Part-time faculty, adjunct faculty, and/or visiting faculty may develop a proposal as a PI only if his/her department chair and school dean agree in writing to assume the role of PI should the original PI leave the employ of the University. Post-doctoral fellows may also develop proposals only if his/her chair and school dean agree to assume the responsibility of the PI should the Post-doctoral appointment be concluded prior to the conclusion of the grant funded program.
- The PI (or lead PI should there be more than one PI included in a proposal) or the Program Director on a sponsored program is solely responsible for every aspect of the project. Therefore it is assumed that the PI or Program Director are aware of and know all applicable regulations guiding the project and are responsible for ensuring that the commitments made to the funding source are fully met and complied with.

## **4. Proposal Development Process**

### **Common Definitions of Funding Mechanisms**

- Grant – An award of money, property, or services to a grantee institution to accomplish a public purpose. The project is conceived and defined by the investigator of the grantee institution, and the sponsor is not significantly involved in the conduct of the project. The investigator retains his/her academic freedom and the results of the project are not guaranteed.
- Cooperative Agreement – An award of money, property, or services to a grantee institution to accomplish a public purpose. The project idea may originate with either the sponsor or the investigator at the grantee institution with the project details often developed jointly. There may be substantial involvement of the sponsor during the conduct of the project. The investigator maintains his/her academic freedom and the results of the project are not guaranteed.
- Contract – The principal purpose of a contract is to acquire property or services for the direct benefit of the sponsor. The idea originates with the sponsor who determines the nature of the contract and who exercises discretion and control through specified deliverables and time frames with legal remedies available for breach. Contracts may be fixed-price or cost-reimbursement.



- Sub-award – An award of money, property, or services to a sub-grantee written under the authority of and consistent with the terms, conditions and requirements of the prime award (grant), that allocates a portion of the prime award to another institution to conduct a portion of the program or research for which the prime award was given. A sub-award may be formalized via a sub-recipient contract.

## Steps in Proposal Development

1. Starting Assumptions - It is suggested that when preparing a proposal for funding, the writer of the proposal begin with the following basic *assumptions*:
  - Keep in mind the “Golden Rule” of grant seeking: “He who has the gold makes the rules.” Funding decisions are based on the values and needs of the grantor, not the grantee. Don’t confuse your needs with their needs. The request for proposals document should be seen, read, and treated as the final word in terms of what the program sponsor is requiring. Adhere to the call for proposals very closely. Call the Program Officer identified within the request for clarification and or simply for a general discussion of your idea. The program Officer should be seen as your colleague, i.e., your partner working toward a common goal with you.
  - Successful grant writing is a *craft* and is all about attitude. You will become as successful as you believe you will be, but you must *plan* your work. Remember the “Five-P” Principal: Poor Prior Planning makes for Poor Programs. Plan your work and work your plan.
  - Program sponsors *want* to give you the funding. You are offering them a solution to the problem they’ve identified in the call for proposals. Other than that *assume nothing...assume* that the sponsor knows nothing about you, your organization, your problems, your needs, desires, intentions or your competency. Therefore you want to manage their impression of you and of what you’re trying to do. But this has to happen within *the context of their needs and desires and not yours*.
  - You must be a clear, precise, persuasive and compelling witness to your own story.
2. The Idea – All grant seeking begins with an idea. The idea can manifest itself as a service initiative, as a research or scholarly endeavor that is an extension and/or continuation of the work of the investigator; it can be an artistic expression or the spontaneous manifestation of creative genius. It is important to realize that project ideas are not simply linear expressions of thought, but are highly interactive and impacted by the external environment including potential sponsors, the investigator’s previous works, the mission and goals of the investigator’s department, school, college or university. Within this context, ***the grant seeker’s task*** may be simply stated: to persuade a project sponsor to give you substantial sums of money to carry out your program or research, i.e., to bring your *idea* to life. For this reason successful grant writing is referred to here as *the art of written persuasion*. You are attempting to persuade a sponsor to

bring your idea to life while at the same time convincing them that it is in their best interests to do so.

3. Identify Funding Sources – The search for a funding source is often the beginning of the interactive process within which a well developed idea serves as the foundation of the identification of potential sponsors. It has often been said that the search of funding source may be thought of as ***the search for a partner with a mutual goal.***

The Office of Grants and Contracts (OGAC) at Monmouth University subscribes to the Grant Resource Center of the American Association of State Colleges and Universities and receives comprehensive bulletins and a monthly database of available funding from public and private sources. From this information OGAC develops a monthly calendar and database of available funding that MU faculty and staff may have an interest in. This calendar and data base may be found on the OGAC website. OGAC will also alert specific faculty and staff via e-mail each time a funding source appropriate to the needs and interests of that individual is identified. *For this reason it is strongly suggested that faculty and staff meet with OGAC to identify specific needs and interests so that OGAC can more effectively identify funding sources for that particular individual.*

Specific URLs for available grants from widely used federal agencies are:

For the National Institutes of Health (NIH) - <http://grants.nih.gov/grants/oer.htm>

For the National Science Foundation (NSF) - <http://www.nsf.gov/funding/>

For the U.S. Department of Education -  
<http://www.ed.gov/fund/grant/apply/grantapps/index.html?src=rt>

For the National Endowment for the Humanities - <https://www.neh.gov/grants>

For daily updates of funding announcements from all 26 federal grant-making agencies, please go to [www.grants.gov](http://www.grants.gov) and then click on “Find Grant Opportunities.” You can also do a keyword search by clicking on Grant Search on the right hand side of the page.

If your interest is specifically in private funding sources (corporate and/or foundation), Monmouth University subscribes to the Foundation Center database and their CD-Rom which includes descriptions and contact information for foundation funding sources and which is available for everyone (faculty, staff, students, and the larger community) to use free at the Monmouth University Library.

Faculty can also contact the Monmouth University Office of Institutional Advancement at 732-263-5256 for foundation information and support on specific projects that might be eligible for foundation funding.

The staff of the OGAC will be happy to meet with and provide any required assistance in identifying potential funding sources for any scientific research or programs that faculty and/or staff may have an interest in.

4. Proposal Components (A Brief Tutorial on Writing a Proposal) – Note: When submitting a grant proposal you are in a fierce competition in that only a small percentage of proposals submitted actually receive funding. EVERY POINT AWARDED DURING THE EVALUATION COUNTS. ONE POINT CAN AND OFTEN DOES MAKE THE DIFFERENCE BETWEEN A WELL FUNDED PROJECT AND JUST ANOTHER INTERESTING IDEA. The following commentary presents the reader with the generic components of any grant proposal. These components are presented in a logical sequence that manifest the reality that each section is NOT a standalone component, but is logically related to and flows from the previous component. Regardless of the order in which the call for proposals requires, it is essential to realize that each component is inextricably intertwined and related to all other program components.

- Problem Statement –A clear, precise statement of the problem indicates to the reader the extent to which you understand the problem you are addressing. However, the Problem Statement is *NOT* the need statement. The Problem Statement expresses the overall issue, but does not at this point indicate specific needs. Keep in mind that many entities and investigators are presented with substantially similar or identical problems but have some very different needs. Your major guidance in expressing the problem clearly is the problem statement that is contained within the call for proposals. If the problem statement in the call does not match the problem you are seeking to address within the proposal, you are probably in the wrong competition.
- Needs Statement – The needs statement will tell the reader how the problem manifests itself in your setting. This must be very specific and is NOT simply a matter of presenting a plethora of facts and statistics. It's a matter of placing your facts and statistics within a specific context to demonstrate a specific issue. Any statistics must be local and applicable to your target and identified problem. It is also essential that the needs statement identifies gaps in existing resources as well as include an analysis of previous attempts to address the issue. Needs may also include anecdotal information, statements from authorities and/or experts, results of previous studies, and/or any other data and information that will contribute to the “web-of-evidence” that helps to identify the specific needs you are focusing on. It again bears repeating – The Needs Statement is NOT the Problem Statement, but is an indication of how the problem manifests itself in your setting, e.g., many organizations are faced with similar and/or identical problems but have some very different needs based upon their internal and local conditions.
- Project Goals – Project Goals are NOT Project Objectives, but may be thought of as general statements of what you ultimately want to achieve relative to the problem and needs you've identified. The Goals are closely related to and flow from the needs. You should not have very many project goals, and it is oft times legitimate to borrow the project goal (s) directly from the request for proposal. Remember – if you've chosen the right sponsor you are partners in seeking mutual goals.
- Project Objectives – Objectives may be thought of as the steps you must reach if you are to achieve your goal(s). Please remember that objectives are not methods (this is a common mistake), they are what you want to accomplish by the methods that you use.

To put this within context – you’ve identified a *problem* that you want to address, and have proceeded to identify how this problem manifests in your setting by identifying the specific needs you must address. The project *goals* have been logically derived from the identified needs and the *objectives* are the steps you must take to achieve your goals. There are several types of objectives: (1) behavioral - example: 50 children will learn how to swim; (2) performance – 50 children will learn how to swim within 6 months; (3) process – within 14 days of program approval a committee will be established to contact 50 children who....; (4) product – a DVD will be produced that teaches swimming instruction.... Despite the nature and type of objectives utilized it is strongly suggested that they be SMART, i.e., specific, measureable, achievable, realistic, and timely. The “SMARTER” the objective the easier it will be to evaluate the project.

- Methodology – Your methodology may consist of the specific research design, hypotheses, methods, procedures, strategy, techniques, instruments, tools, processes, and program/project management requirements that you intend to utilize in the conduct of your project. Methodology has been referred to as the who, what, when, where, and how of the project.

But the PI should also be aware that *methodology* is much more than a simple set of methods. It also refers to and includes certain philosophical assumptions that underlie the study or program and may include concepts and ideas that relate to a particular discipline or field of inquiry. The methodology should be closely related to and logically flow from the nature and type of study, and the methodology selected should be appropriate to the nature of the study or program identified in the call for proposals. The methodology selected should reflect the epistemological perspective of the funder. For purely scientific research the question is less complex. For other proposals it is strongly suggested that the PI closely analyze the call for proposals to determine the perspective of the sponsor in this regard. The PI is again reminded that proposals are often funded based on the *needs of the funder and not the applicant*.

Regardless of the methodology utilized the PI should always keep in mind the need for rigor, consistency, coherence, and logic, and that the methodology is undergoing close scrutiny under peer review.

- The Budget – Reduced to its simplest terms, the budget is a tool that numerically represents a plan for a specified period of time; it is an itemized representation of estimated or intended expenditures over a given period. The most important thing to keep in mind when developing a *grant budget is that the grant budget is your program or research plan expressed in the language of the dollar*. It is of critical importance to understand that a grant budget cannot be developed in isolation or as an independent component. It cannot and should not be developed separately from the program narrative. A grant budget can only be developed and understood within the context of the development of the specific proposal. It is NOT a standalone component. The link between the project and the budget is a direct link and it must be made crystal clear to the grant reviewer. All activities that are identified in the grant narrative must be represented in the budget, and the budget should include NOTHING that has not been identified in your program plan. The clearer the link between your proposed expenditures and the project objectives and activities, the less likely it is that the

expenditure will be questioned. Again for the purpose of emphasis: the grant budget is your program or research plan expressed in the language of the dollar.

When developing a grant budget there are several preliminary considerations that must be kept in mind. All requested costs must be allowable and in accordance with the following three items:

- a. The limitations and or exclusions specified in the call for proposals;
- b. All applicable Federal Office of Management and Budget policies, and
- c. Monmouth University policies guidelines.

**a. Limitations and/or exclusions specified in the call for proposals** – The call for proposals will indicate the funding limits of that particular competition as well as the number of years the funding will cover. Funding limits will include allowable direct costs, cost sharing if required, and indirect costs. The total program cost will be a combination of these categories.

Direct Costs are costs that can be identified specifically within a particular sponsored project. These are costs that can be directly assigned with a high degree of accuracy to activities required by the project. What constitutes an allowable cost will be discussed within the next section. Examples of direct costs would be the salary and benefits of the PI, salary and benefits of personnel to be working specifically on the project, necessary supplies and equipment purchased specifically for the project, consultants and/or other contracts working specifically on the funded project, and any other allowable expense that are directly linked to project implementation.

Indirect Costs – Also known as facilities and administrative costs (F&A costs), indirect costs are “costs that are incurred for common or joint objectives and ... cannot be identified readily and specifically with a particular sponsored project...” (OMB Circular A-21). Put differently, indirect costs are those real costs incurred by an institution during the grant development process that cannot be easily defined and identified with a specific project activity, but that are none the less essential activities. Examples of indirect costs would include such items as building utility and maintenance costs, administrative time of the offices of the President, Provost, Controller, and Office of Grants and Contacts, department clerical salaries, facilities depreciation, and the like. Unless disallowed by the sponsor, it is the policy of Monmouth University to charge our federally approved indirect cost rate, or the maximum indirect cost rate allowed by the sponsor, on every proposal budget. The current MU indirect cost rate may be obtained from the Office of Grants and Contracts.

Cost Sharing – Cost sharing may or may not be required by the sponsor. Cost sharing, also referred to as a “match” or “matching funds” is that portion of the project budget that is not being paid for by the project sponsor. The call for proposals will indicate whether or not cost sharing is required, and if so, the required cost share percent. It is important to keep in mind that matching funds are subject to the same budgetary and audit requirements that all direct costs are subject to, i.e., they must be allowable per OMB guidelines. For this reason if cost sharing is required, the PI is required to indicate the specific account from which the matching funds will be taken; will be required to identify the activities/supplies/equipment within the program that the matching funds are paying for, and will be required to obtain the initials of the

individual who is responsible for the administration of that account from which the matching funds are being taken.

**b. Applicable Office of Management and Budget Policies Concerning “Allowable” Costs** – The following comments are taken from and consistent with Office of Management and Budget (OMB) Circulars A- 21, A-110 and A-133.

What is an allowable cost? - To be considered an allowable cost any item in the budget must satisfy four standards: (1) reasonableness, (2) allocability, (3) consistently treated, and (4) conformance with terms of OMB circulars and the sponsored agreement.

1. Reasonableness – The test of reasonableness is in many ways a test of common sense. Often referred to as “the prudent person test”, a cost is considered reasonable if the nature of the good or services and the amount of the cost reflect the action of a prudent person, i.e., would a prudent business person have purchased this item and paid this price? In determining the reasonableness of a cost the determination has to be made that the item is necessary for the performance of the sponsored agreement; that the cost has been determined by “arm’s length bargaining” of a prudent person; that the cost is in accordance with the terms and conditions of the sponsored agreement, and that it is consistent with the established policies and practices of the grantee institution. More will be said on institutional policies below.
2. Allocability – A cost may be allocable as either a direct or indirect cost. A cost is allocable as a direct cost if the goods or services provided are assignable in accordance with the relative benefits received, i.e., the cost is incurred solely to advance the work under the sponsored agreement in proportions that can be approximated. When developing a budget narrative, the PI must be able to demonstrate (1) that the cost being identified is reasonable (as defined above) and that the item or service being purchased is necessary and benefits the work that is necessary under the project. The amount allocated to the grant budget should be in direct proportion to project benefit. **It is to be emphasized that there are circumstances when costs may not be allocated.** Costs from one grant may NOT be allocated to a different grant simply to meet deficiencies caused by overruns, or to avoid restrictions imposed by the sponsored agreement, or because one of the projects has more funding than the other, or for any other reason of convenience.

What is an unallowable cost? – A cost is not allowable if it is not eligible for reimbursement by a sponsor either directly or indirectly. It should be noted that a cost that is unallowable under the provisions of a sponsored agreement may still be permissible to charge against institutional funds with the prior approval of appropriate institutional officials. Consequently, care should be taken to categorize such costs so that they can be charged and reimbursed correctly. Generally speaking, if an item of expense cannot be allocated to the activities identified with the sponsored agreement is an unallowable cost. The expense must be directly attributed to activities that have been approved and deemed necessary for the conduct of the sponsored agreement. Examples of unallowable costs and activities under sponsored agreements would include, lobbying, athletics, the purchase of alcoholic beverages, general public relations , advertising, entertainment, the payment of fines and penalties, interest

payments, first class travel expenses, memberships in social clubs, severance pay, and other institutional activities not related to the sponsored agreement.

**c. Specific Monmouth University Policies Concerning Grant Budgets -**

- Salaries and Wages on Grants – It is the policy of Monmouth University that grant project personnel seek maximum allowable compensation from the grant for their work on the sponsored program. Full-time faculty members may apply for released time from their regular teaching load and will be compensated from the grant in direct proportion to the released time approved. Pursuant to the requirements of OMB Circular A-21, faculty paid under a sponsored agreement will be required to complete and sign a salary certification verifying the time expended and proportionate salary received. All grant compensation will be based on the individual faculty member's regular compensation for the continuous period which constitutes his/her Monmouth University Contract salary, and will be calculated at the base salary rate. If appropriate, a program investigator may be compensated as a percent of effort, i.e., compensated in direct proportion to the percent of effort to be devoted to the grant funded program. For example if a principal investigator will be devoting 20% of his/her time to working in the funded program their compensation will be calculated on the basis of 20% of their contract salary. Regardless of the basis of the compensation under no circumstances will charges to sponsored agreements exceed the proportionate share of the base salary for that period. Normally, compensation from grant funding may not be used to augment the total salary or salary rate of faculty members during the period covered by the term of the faculty appointment.

Under rare circumstances a faculty member may wish to apply for funding over and above his/her base contract salary. This will only be considered if (1) the request is consistent with the provisions of the Monmouth University FAMCO written agreement, and (2) the activities within the funded program for which compensation is being sought are not part of the normal and expected contractual responsibilities, activities and obligations. In such a case the specific written approval of the program sponsor will be required prior to the compensation being allowed by the University.

Concerning summer salary, an individual seeking compensation for their work on a sponsored program during the summer months will be reimbursed at a monthly rate not in excess of the base salary divided by the number of months for which the base salary is paid, i.e., a faculty member on a ten (10) month contract will receive compensation calculated on the basis of 1/10<sup>th</sup> of the contract salary for each of the months of July and August.

No less than once per academic year personnel receiving compensation from a sponsored program will be required to sign a statement verifying that the work was performed and also verifying the hours, time and effort expended under the program.

- Facilities and Administration (F&A), also known as indirect costs are those expenses that are not readily identifiable with a particular project but nevertheless are necessary and real costs to the institution in the operation and conduct of its activities. Unless disallowed by the sponsor it is the policy of Monmouth University to charge our federally approved indirect cost rate, or the maximum indirect cost rate allowed by the sponsor, on every proposal budget. The current federally approved indirect cost rate may be obtained from the Office of Grants and Contracts. It

should also be noted that unless specified differently by the program sponsor, MU indirect costs are calculated on the basis of all salaries and wages NOT including fringe benefits. Should indirect costs not be allowed or should another compelling reason present itself to not charge our full indirect cost rate, the permission of the Provost and Vice President for Finance must be obtained before the proposal is submitted.

- In some circumstances a sponsoring agency may require the applicant to share a percent of the total program cost as a way of demonstrating institutional commitment to the scholarly activity. Also referred to as matching funds, there are generally two types of cost sharing: voluntary and mandatory. Mandatory cost sharing is required by the program sponsor at a rate and type specified within the call for proposals. Voluntary cost sharing is provided by the applicant regardless of the requirements of the funding source. It is the policy of Monmouth University to consider voluntarily providing cost sharing (matching funds) only when it can be demonstrated by the PI that the provision of these funds will significantly enhance the chances of success for the proposal in question.

In all cases whether voluntary or required, all matching funds are subject to the same budgetary and audit requirements that all direct costs are subject to whether matching or not. For this reason the PI will be required to indicate the specific account from which the matching funds will be taken; will be required to identify the activities/supplies/equipment within the program that the matching funds are paying for, and will be required to obtain the initials of the individual responsible for the administration of that account prior to the submission of the proposal to the sponsoring agency.

- The budget narrative – also known as the “budget detail” or “budget justification” page is that portion of the budget within which the PI has the opportunity to identify all of the calculations, computations, and budget assumptions that the proposed budget is based on. It is essential that a budget narrative be able to inform the reviewer exactly how each and every figure was arrived at, i.e., the basis of the calculation, and the link of that particular budgeted item to the overall project. Oversimplified, the budget narrative indicates the basis of the calculation, why any particular line item is both necessary and reasonable, and - very importantly - places the item or service within the context of the proposed program. Whether or not a detailed budget narrative is required by the call for proposals, the PI is required to develop a detailed budget narrative and submit same to OGAC as part of the documentation required for internal approval of the routing sheet (to be discussed in detail below).

To briefly summarize, the grant budget is your program or research plan expressed in the language of the dollar. The link between the project and the budget must be made crystal clear to the grant reviewer. All activities that are identified in the grant narrative must be accounted for in the budget and the budget should include nothing that has not been identified in your program plan. All costs identified in the budget, whether direct or indirect, should be necessary, reasonable, allocable, consistently treated, have a cost basis and be in conformance with the terms specified in the call for proposals, with applicable OMB circulars, and with the internal policies and guidelines of Monmouth university.

## **5. The Grant Submission Process**



As indicated earlier, external funding is awarded to the University and not to the individual, and only the University has the legal authority to apply for and accept grants, contracts and agreements on behalf of the University. Consequently all proposals for external funding must be submitted through, by or in conjunction with the Office of Grants and Contracts. Any proposed project, whether it is for submission to a public entity or private foundation, and that potentially commits time, effort, finance, personnel and/or other University resources over a specified period of time, and that holds the University accountable and potentially liable for the appropriate use of any funding, must be reviewed by the Office of Grants and Contracts prior to submission. This also includes any and all projects where Monmouth University may be a sub-recipient of funding awarded to another entity.

**Given the nature of the review process it is strongly suggested that OGAC be informed of any potential submissions and be involved in the grant development process as early as possible, and that the internal routing sheet and all supporting documentation be submitted to OGAC no later than (and hopefully much sooner than) five (5) business days prior to the date it is due to be submitted to the project sponsor. While OGAC will not turn away proposals submitted closer to the due date, we cannot guarantee that the proposal will be reviewed and approved in time for submission to the project sponsor.**

- a. **The Routing (Transmittal) Sheet** – As indicated previously, no grant may be submitted to a public or private sponsor unless and until a Routing Sheet has been completed and signed. It is the responsibility of the PI to initiate the Routing Sheet Process. The Routing sheet is a single page internal document (see appendices) that includes within it specific information and internal approvals required by the University prior to proposal submission. The Routing Sheet includes information on the PI or Co-PIs, the title of project, the effective dates of the project, information on the entity that the proposal is being submitted to, the proposed effective dates of the project, the submission deadline and the type of submission, the amount requested, the amount and percent of indirect costs included, information and approvals for any required matching funds, and information on any special approvals that may be required such as space modifications, IRB and IACUC approvals info on hazardous substances.

Note please that completion and submission of the Routing sheet is also required when and if Monmouth University is collaborating as a sub-recipient with another university or college who is serving as the prime applicant/recipient of an external award.

Regardless of whether MU is the prime applicant or a sub-recipient, the routing sheet MUST also be accompanied by the proposed project line item budget indicating all direct and indirect costs, as well as a budget narrative and backup that shows cost calculations and the basis for the allocation, i.e., the PI should be able to demonstrate the basis for the cost and how it was arrived at.

When the Routing Sheet is completed and all documentation attached, the PI is required to sign and date the sheet, and then obtain the signatures of his/her department chair and school dean. The sheet, signed by the PI, chair, and dean is then given the Director of OGAC

for review and approval. OGAC will review the sheet for compliance with both University and sponsor policies, guidelines and regulations. The budget will also be reviewed for accuracy. The PI will be notified if any major changes are required. Minor changes and corrections will be made jointly with OGAC and the PI.

Upon completing the review the Director of OGAC will sign the sheet and submit the sheet and all required documentation to the Office of the Controller. The Grant Accountant will again review the budget to be certain that all internal policies and budgetary guidelines have been adhered to. When it is determined that the budget is accurate and in compliance with all applicable policies and guidelines the sheet will be approved and signed by the Controller and then brought to the Office of the Provost and then President of the University for approval and signature. A proposal for external funding may not be submitted until and unless all internal approvals have been rendered.

**A note on the Responsible Conduct of Research requirement** – As indicated earlier, MU is required to have a plan in place to provide for appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduates students, and postdoctoral researchers, and must certify to this effect within each proposal for external funding. Consequently all applicants for external funding will be required to undergo on-line training provided in the responsible and ethical conduct of research. All applicants will be required to certify on the routing sheet that they will complete the appropriate training in the responsible and ethical conduct of research prior to commencing any work funded under the grant within the internal routing sheet at the time the proposal is submitted to the Office of Grants and Contracts for internal routing. All applicants for external funding are required to access free training modules (see page 4 of this manual for further instruction). **NOTE: Although proposals may be submitted prior to certifications of training completion being submitted to OGAC, NO GRANT ACCOUNT WILL BE ESTABLISHED AND NO EXPENDITURE OF FUNDS ARE PERMITTED UNTIL COPIES OF ALL TRAINING CERTIFICATIONS ARE PROVIDED TO THE OFFICE OF GRANTS AND CONTRACTS.**

- b. Financial Conflict of Interest (FCOI) Disclosure Form** – The purpose of the Monmouth University Financial Conflict of Interest Policy is to ensure that all research is conducted with the highest scientific and ethical standards and in a manner that assures the integrity of the scientific record, and that therefore there is a reasonable expectation that the design, conduct, or reporting of research will not be biased by any financial interest of an Investigator. At the time of the submission of the proposal the Principal Investigator and all other major investigators must complete and submit a Monmouth University FCOI disclosure form (see appendices) to the Director of the Office of Grants and Contracts. The form requires the full disclosure of all significant financial interests, and those of his/her children, that would reasonably appear to be potentially affected by the research or program for which funding is being sought. (See Policies and Procedures section Financial Conflict of Interest and Objectivity in Research).

The FCOI disclosure form will be reviewed by the Director of the Office of Grants and Contracts and if no conflicts or potential conflicts are revealed the form shall be filed and recorded appropriately. Should, in the determination of the Director, the form reveal a conflict or potential conflict that could potentially effect the design, conduct or reporting of the research, the Director shall notify the appropriate designated University Officials who shall review the disclosure and determine whether a conflict exists and, if so, determine what actions should be taken by the Institution to manage, reduce, or eliminate the conflict.

PLEASE NOTE: The FCOI Disclosure form must be submitted to OGAC at the time that the proposal is submitted to the program sponsor. The actual review and disposition may occur after submission, but must occur prior to the expenditure of any funding approved by the project sponsor.

## **6. Post-Award Activities**

The Principal Investigator bears the responsibility for the overall administration of the funded project. The Office of Grants and Contracts concerns itself primarily with pre-award activities but will assist the PI wherever required and necessary. The Principal Investigator will work directly with the Office of the Controller in the management of all financial aspects of the project and in all matters concerning finance. A Grant Project Account and the subsequent expenditure of funds may only occur after a written notice of grant award is received by the University and is received by the Office of the Controller. In cases where MU is a sub-recipient of a grant award all contracts and contractual obligations must be reviewed and approved by the Office of the General Counsel. In those cases where MU is a sub-recipient of a grant award, the written notice of award received by the prime grantee, along with a copy of the draft sub-recipient agreement and budget must be sent to the Office of the General Counsel for review and approval prior to being signed by the authorized individual on behalf of Monmouth University. Contracts and sub-recipient agreements shall only be signed by the appropriate authorized individual on behalf of Monmouth University as set forth in Monmouth University's Contractual Obligations Policy. A copy of the Policy can be found on the General Counsel's website at [http://www.monmouth.edu/resources/general\\_counsel/contract\\_obligs.asp](http://www.monmouth.edu/resources/general_counsel/contract_obligs.asp). A grant project account for MU as a sub-recipient will only be established upon the sub-recipient agreement being signed by the appropriate University official.

In certain cases OGAC, as the Authorized Organizational Representative on electronic submissions will be required to assist the PI in filing for project extensions and/or modifications. OGAC will also assist the PI in the preparation of program reports, should the PI require and request such assistance.

## **APPENDICES**

- Monmouth University Routing Sheet
- Monmouth University FCOI Disclosure Form