

LAFAYETTE  

---

**COLLEGE**

**Grant Manual**

Updated: March 30, 2017

## Contents

Introduction.....	4
Pre-Award.....	4
Proposal Format .....	5
Fellowship Proposals .....	6
Research proposals.....	6
Budgets .....	7
Policies.....	8
Capital Project Policy .....	8
Certifications.....	8
Conflict of Interest Policy.....	8
Institutional Review Board Approval .....	9
Institutional Animal Care and Use Committee Approval.....	9
Lafayette College Specific Information.....	9
Proposal Submission.....	10
Post Award.....	10
Award Notification .....	10
Faculty Responsibilities .....	11
Policies, Procedures, Required Forms, and Approvals.....	11
Monitoring Grant Budgets/Cost Transfer Policy .....	17
Change of Project Budget/Prior Approval Policy.....	18
Certifications.....	18
Financial Conflict of Interest .....	18
Review Protocols (IRB and IACUC).....	19
eRA Commons Registration of Students Working on NIH-funded Grants.....	19
Export Controls.....	19
Intellectual Property Policies on Patents and Copyrights .....	20
Misconduct in Research.....	20
Responsible Conduct of Research .....	20
Public Access to Results of Federally-funded Research Results.....	21
Technical Reports .....	22

Time and Effort..... 22  
Change of Project Scope, Methods, Staff, and/or Duration/Prior Approval Policy ..... 23

## Introduction

The following grant manual provides information to assist faculty and others at Lafayette College prepare and submit research proposals to external organizations (pre-award) and manage awards received from outside agencies (post-award).

Faculty seeking support for their research should contact the Director of Sponsored Research (DSR), well in advance of the date by which funding is required. Due to the fact that proposal submission, review, and notification takes months by the agency, the Office of Sponsored Research suggests that those interested begin well before funding is needed - a good goal is to start at least one year from when funding is expected to be needed. [For the separate process of sabbatical or junior leave, a faculty member should contact the Executive Assistant to the Provost to discuss submission materials for the Committee on Promotion, Tenure, and Review (PTR).]

The Director of Sponsored Research supports faculty by providing information on funding resources, clarifying grant guidelines, reviewing proposal drafts, preparing budgets, determining needed institutional approvals prior to submission, and submitting grant proposals. The DSR is required to submit proposals that require institutional endorsement. Most proposals to government agencies and research proposals to corporations and foundations require institutional endorsement. The DSR will also assist faculty with proposals to other organizations that do not require institutional endorsement and are submitted by faculty as individuals (e.g., fellowships, awards). Once a proposal is funded, the Office of Sponsored Research and the Controller's Office will work with faculty members to assure proper management of the grant.

## Pre-Award

Who can be a Principal Investigator (PI)? The College will support applications by all full-time tenure-track and tenured faculty. Visiting faculty may be eligible to apply for external research funding through the Office of Sponsored Research (where institutional support is necessary) but the faculty member must discuss feasibility with the Director of Sponsored Research and seek approval from the Office of the Provost.

Preparing to Submit a Proposal: The PI is responsible for the preparation of a proposal to a granting agency. The Office of Sponsored Research provides assistance throughout the process.

A PI must strictly adhere to external agency deadlines. It is important that a PI:

- Plan for their proposal well in advance of the deadline;
- Work with the DSR to initially review requirements, etc.;
- Develop a schedule for preparing and submitting materials; and,
- Plan to submit well-before before the deadline.

Being prepared to submit prior to the official deadline date not only makes the submission process less stressful, it also provides time to address any problems that may arise. Occasionally, advice is needed from a Program Official or IT of the external agency. If you plan to submit close to or on the deadline, it is likely that questions may not be answered or that support will be difficult to access in order to have our questions answered.

Most federal agencies (National Science Foundation, National Institutes of Health, Department of Defense, Office of Naval Research, Department of Energy, etc.) require proposals to be submitted by an authorized institutional representative (AOR). At Lafayette, that person is the Director of Sponsored Research. Organizations that provide fellowship support (NEH, ACLS, Guggenheim, and Fulbright, for instance) usually require individual applicants to establish personal accounts and submit their proposals themselves. Those accounts should be created as early as possible but at least one week before the application deadline.

Faculty whose proposals must be submitted by the College's AOR should submit draft materials to the Director of Sponsored Research at least seven business days prior to the date by which the faculty member wishes to submit the proposal.

Additional guidance for faculty who are preparing collaborative research proposals with colleagues at other institutions: Be aware that you may encounter additional lead-time for administrative approval at the collaborative institution. It is imperative that the sponsored research offices at both Lafayette and the other institution(s) be made aware of the intent to apply for a grant well in advance of the deadline and have each other's contact information in order to communicate and set up the additional requirements of the collaborative proposal. Depending on the mechanism by which you are applying, the proposals would have to be submitted as one (as a subaward) or individually (as a Collaborative Research Proposal) but they are interdependent and you must work closely with the other institution.

### Proposal Format

Proposal requirements (format, page length, font size, font style, etc.) vary at each funding agency. Some of the guidelines also vary – sometimes in critical ways – from year to year for the same program, thus, it is imperative that applicants read the guidelines carefully and follow them exactly each time a proposal is submitted.

#### **Tip: Become a reviewer!**

NEH, NSF, and NIH seek faculty to serve as proposal reviewers.

Faculty who are considering applying for funding from these agencies are strongly encouraged to volunteer to be a reviewer. Contact the Program Officer.

Reading and critiquing proposals in your discipline and discussing strengths and weaknesses with other faculty provides valuable insight into what makes a strong proposal. It also gives you the opportunity to meet the program officer.

## Fellowship Proposals

Important note: It is essential to follow all the guidelines listed in each individual solicitation.

General Information: Proposals for a fellowship tend to be brief, 3-5 pages. The narrative typically includes an introduction, background information on the proposed topic and the applicant's interest/expertise in the subject, a discussion of the work accomplished to date and the work that will be undertaken during the fellowship, a description of the final product (if it's a book, the proposed chapter titles, etc.), and a statement about the significance of the project.

In addition to the proposal itself, faculty usually need to submit a one-paragraph abstract, a curriculum vita (two to five pages), bibliography, appendices (guidelines are very specific as to what may and may not be included), and the names of two or three references.

Planning in advance allows the faculty member time to share a draft of the proposal with his/her references in order to obtain input which could be very helpful in revising the draft. It also gives the references a chance to think about and compose a well written reference letter.

Fellowships can be found at the following agencies: National Endowment of the Arts, National Endowment of Humanities, Fulbright, Guggenheim, American Council of Learned Societies, American Philosophical Society, Newberry Library, and Institute for Advanced Study. You can also use SPIN to create a specialized list based on your area of expertise.

## Research proposals

Important note: It is essential to follow all the guidelines listed in each individual solicitation.

Typically included is a one-page summary, a 12-15 page project description, two page biosketch, references, a detailed budget, budget justification, current and pending support forms, facility and resource information. They may include appendices or supplementary documents (subaward materials, Research at Undergraduate Institution Impact Statement, and/or letters of support) depending on the solicitation requirements. Data management plans, project management plans, broader impact statements, intellectual merit, and postdoc mentoring plans may also be required.

### **Tip: Review copies of successful proposals.**

Even if they are in a different area of expertise, you can see detail, format, content, etc. of a successful award.

The National Endowment for the Humanities posts copies of funded proposals on its website ([www.neh.gov](http://www.neh.gov)).

You can contact the recipient and request a copy of their funded proposal.

Abstracts of NSF grants are accessible on the NSF website; full proposals can be requested from the faculty recipients.

Office of Sponsored Research may have copies of funded proposals.

Guidelines are very specific as to what may and may not be included so it is imperative to review the program solicitation each time.

When preparing a proposal, it is important to write clearly, not use jargon, define acronyms, and proofread carefully for spelling errors, garbled sentences, etc. Having others review your draft is particularly helpful, especially someone in your area of expertise or in your department, who can read for content. It is also important to have someone read it for clarity and adherence to guidelines, assisting with proofreading. The DSR will provide a review for proofreading and to ensure that all requirements are met as long as materials are submitted with significant lead-time prior to submission.

**Tip: Be sure to review your agency's FAQs.** There is very useful and important information provided in them.

Research solicitations can be found at the following federal agencies: National Science Foundation, National Institutes of Health, Office of Naval Research, Department of Defense, Department of Energy, etc.). This list is not exhaustive.

### Budgets

Each PI should design their research proposal and include the necessary items to complete all aspects of the research proposal. Review the design with the DSR to determine allowable expenditures under the funding agency guidelines. The DSR will provide the PI with budget templates. Whether or not a budget is required by the funder, it is best to calculate all expenses prior to submitting a proposal.

*Fellowship proposals* are used to fund the difference between a faculty member's sabbatical or junior leave salary and his or her regular salary. For example, if the salary is \$60,000 per year and the faculty member is eligible for a one-semester junior leave at full pay, the College will provide \$30,000 for the year and the funding agency could fund the other \$30,000. The American Council of Learned Societies, Guggenheim Foundation, and other organizations that award fellowships usually ask for a budget estimate at the time of proposal submission and, once the proposal is selected for funding, contact the faculty member to negotiate the final budget. The National Endowment for the Humanities and the Fulbright Commission are two notable exceptions. NEH provides a monthly stipend for fellowships and a set amount for summer stipends. Fulbright monthly stipends are dependent upon the country. Fulbright fellows also receive a travel allowance and may receive support for accompanying family members. Be sure to contact the DSR for assistance regarding fellowship budgets. In some circumstances, funding may be used for reasons other than to supplement salary. Be sure to discuss this with the DSR.

*Research proposals* require a detailed year-by-year budget and budget justification. The budget typically includes the following: personnel – senior and other, fringe benefits, travel, equipment, materials and supplies, publications, consultant services, computer services, subawards, other

expenses, and indirect costs. Cost sharing is a requirement for some agencies. If this is a collaborative research proposal with another institution, the PI should work closely with the DSR to determine if this is an award, subaward, or Collaborative Research, all of which hold different governing rules if received.

## Policies

Prior to proposal submission, a PI should familiarize themselves with policies which pertain to their project. If or when the project is awarded, all relevant policies must be certified and followed. Faculty are strongly encouraged to meet with the DSR well in advance of the proposal deadline to review pre-award policies.

## Capital Project Policy

For any equipment purchases over \$5,000, it is important to review the College's process for acquiring new equipment, changing space on campus, and other things that are associated with purchasing new equipment. Please visit these websites for more information prior to submitting any awards that will impact space on campus.

- <http://facilitiesplanning.lafayette.edu/about/>
- <http://purchasing.lafayette.edu/purchasing-policies/>

## Certifications

Upon submission, the College must certify that the PI and other faculty and senior personnel involved in the project will abide by various government requirements (i.e., Drug-Free Workplace policies, proper scientific and technical conduct and reporting), have disclosed any lobbying related to the proposed project, and are not debarred or suspended from receiving federal funding.

In addition to the aforementioned, applicants to NIH and other organizations that fall under the purview of US Department of Health and Human Services (HHS) must certify that:

- The information submitted within the application is true, complete and accurate to the best of the PI's knowledge;
- Any false, fictitious, or fraudulent statements or claims may subject the PI to criminal, civil, or administrative penalties; and
- The PI agrees to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant is awarded as a result of the application.
- When multiple PIs/Co-PIs are involved in a proposal, assurances must be obtained from each individual.

## Conflict of Interest Policy

The College's Conflict of Interest Policy is designed to assure objectivity in research conducted by our faculty and their research students. The full policy is available in Appendix V of the



Faculty Handbook (<http://provost.lafayette.edu/>). Faculty must submit signed Conflict of Interest forms to the Office of Sponsored Research prior to the submission of proposals to NSF, NIH, and other federal agencies. These must remain up-to-date for the duration of the award, completing them annually.

#### Institutional Review Board Approval

Lafayette College and its faculty have an obligation to protect the welfare of human subjects as participants in research. The Institutional Review Board (IRB) is charged with reviewing research which involves the use of human subjects. IRB approval is required for all research, including surveys, involving human subjects. Proposals for research involving human subjects in disciplines where there is no code of ethics must be reviewed by the IRB prior to the research taking place. Proposals in departments which have one or more disciplinary codes of ethics must be reviewed either through the approved departmental process or the IRB. Lafayette's IRB policies and procedures are detailed in Appendix P in the Faculty Handbook (<http://provost.lafayette.edu/>).

The IRB will accept proposals at any time during the academic year and act on them at least monthly. If data collection needs to occur during the summer or early fall, researchers should submit proposals for review before the end of the preceding spring semester; no review occurs in the summer. Completed Review Forms should be returned to the designated administrator listed on the Provost Office's website (<http://researchsupport.lafayette.edu/>).

#### Institutional Animal Care and Use Committee Approval

Lafayette College and the faculty commit to ensuring the humane treatment of animals in research and adherence to applicable federal and state guidelines for their care and use. It is the responsibility of the College's Institutional Animal Care and Use Committee (IACUC) to review all proposed research protocols involving the use of animals and to regularly inspect animal facilities. The IACUC must review all proposed research involving animals (defined as warm-blooded vertebrates) regardless of source of funding (internal, external or unfunded), prior to the initiation of the research. The IACUC may withhold approval for the use of animals that, in its opinion, is in violation of the law. Lafayette's Institutional Animal Care and Use Policies and Procedures are detailed in Appendix O of the Faculty Handbook (<http://provost.lafayette.edu/>).

The Committee will accept proposals at any time and review them at least monthly. Proposals to be submitted to outside agencies must be reviewed prior to submission. Completed Review Forms should be returned to the administrative official listed on the Provost Office's website (<http://researchsupport.lafayette.edu/>).

#### Lafayette College Specific Information

Institutional information - DUNS, EIN, Congressional District number, indirect cost rate, fringe benefits rates, etc. - is sometimes required for fellowship and research proposals. This information is available from the DSR.

## Proposal Submission

It is important to follow all of the requirements for submission, including have the appropriate person or entity submit the application. Most applications submitted electronically go through a compliance check during the submission, one important way the funding agency confirms all required materials are included. Submitting well before the due date assures that, if anything is non-compliant, you have ample time to correct and re-submit before the due date. If a proposal needs to be mailed or emailed to the sponsor, ample time must be allowed to assure delivery by due date.

## Post Award

This section provides guidance for faculty members who receive a grant or fellowship award. For all awards, it is very useful to contact the Office of Sponsored Research.

## Award Notification

If the Office of Sponsored Research is notified of a fellowship or research award, either through the PI or the awarding agency, the award will be included in the annual listing of faculty grants on the Provost Office webpage and provided to the Directors. If a fellowship is paid directly to a faculty member, that person is encouraged to share it with OSP so that it can, too, be included in list.

## *Fellowship Proposals*

Generally, the faculty member receives an award notification from the funding agency. Financial arrangements are negotiated between the funding organization and the individual. The institution does not need to be included in this negotiation unless it is required by the funding agency. The NEH, however, does give faculty the option of receiving the funding directly or having it sent to his or her institution. NEH recipients should discuss advantages and disadvantages of receiving the funds directly or having them sent to the College for dispersal with the DSR in order to make their decision. All award recipients are encouraged to discuss awards and negotiations with the Office of Sponsored Research in order to weigh all options.

## *Research Proposals*

An award notification is sent to the Office of Sponsored Programs, sometimes with a copy to the faculty member. If the award notice is sent to the faculty member, he or she should forward the letter and any other materials to the Office of Sponsored Programs. Once the notification has been received, the Office of Sponsored Programs will request that the Controller's Office establish a FOPAL in Banner for the grant. The faculty member will then receive this information. It is important that any expense for this project use this number. A list of the account numbers matching the line items in the grant budget will be forwarded to the faculty member along with other information.

## Faculty Responsibilities

Faculty are responsible for conducting the research in a manner that adheres to ethical standards of research and fulfills the goals and objectives outlined in the proposal to the extent possible. The PI of the project is responsible for monitoring the grant budget; preparing and submitting required technical reports; notifying the Office of Sponsored Research and, work in coordination with that office, to inform the funding organization of potential patents and proposed changes in scope, staff, duration, and/or budget.

Faculty must be cognizant of and diligent about abiding by all policies of both the College and the funding organizations.

## Policies, Procedures, Required Forms, and Approvals

All grant-related expenses must adhere to both the funding agency policies and the College policies. Faculty be familiar with both sets of guidelines. All charges made to grants must be valid, accurate and, if the awards are from federal agencies, comply with the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, aka Uniform Guidance<sup>1</sup>.

The funding organization's policies take precedent over the College's. Alcohol and "Fly America" are, for example, two areas where federal policies and College policies differ. Expenses that are typically not permitted by funding organizations include alcoholic beverages, fundraising expenses, charitable contributions, entertainment costs, fines and penalties, goods or services for personal use, lobbying, and professional services rendered by College employees (unless specifically detailed in the grant budget). Regulations concerning the "allowability" of meetings, memberships, and subscriptions should be reviewed because these expenses are permissible in some circumstances but not in others. Funding organizations usually specify acceptable and unacceptable expenses on their websites and/or in their award documentation.

All expenses charged to a federally-funded grant must be:

- allowable under federal cost principles, agency policies, terms and conditions of the specific grant, and Lafayette policies; required for the performance of the project; and adequately documented.
- allocable to the project because they are required to conduct the work funded by the award and assigned to the award in accordance with the relative benefit to the project.
- consistent, that is, consistently charged by Lafayette as direct costs rather than indirect costs.

---

<sup>1</sup> You may visit [https://www.whitehouse.gov/omb/circulars/a133\\_compliance\\_supplement\\_2016](https://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2016) for the complete OMB.

- reasonable which, according to federal regulations means, "...if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

Questions concerning the "allowability" of an item should be directed to Office of Sponsored Research or the Controller's Office. Expenses that either of these offices deem unallowable based on the award letter or funding organization's guidelines will not be approved. If the faculty member has already incurred the expenses, he/she will not be reimbursed or must provide another account to which the expenses can be charged.

### *Expenditure of Funds*

**Senior Personnel:** Salary authorizations for faculty and other senior personnel will be prepared by the Sponsored Programs Office.

**Hiring Employees (including students):** The following procedures apply when hiring personnel on a grant. Please remember, when contemplating hiring someone, it is best to confirm policies and procedures with the Sponsored Programs Office and/or Human Resources Office prior to making any commitments to individuals.

**Lafayette Students:** Faculty who have budgeted external funds to support student research assistants need to follow the application procedures for the EXCEL Scholar Program at Lafayette College. (For grant-funded students, the EXCEL GPA requirement may be waived.) EXCEL forms and deadlines are available on the Office of the Provost webpage under Research Support/ARC Forms and Deadlines.

Lafayette students working on externally-funded research grants are eligible for free on-campus housing during January interim and summer sessions. It is especially important that faculty meet the deadlines for January interim and summer EXCEL applications in order that arrangements can be made for the on-campus housing.

During the fall and spring semesters, student hours are limited to 10 per week. During January interim and the summer, students typically work 36.25 hours per week; student hours should not exceed 40 hours per week.

Grant funded students will follow the pay scale of the EXCEL Scholars unless otherwise directed by the grant. Student timesheets need authorization by the PI and the DSR before submitting to Payroll. The calendar for time submission and payment is the same as the College published Excel Scholar.

Note: Students eligible for College Work Study (CWS) may work on federally-funded grants, however, their pay needs to be handled so that it is not in violation of CWS regulations. Please contact the Sponsored Programs Office for further clarification.

***Research Experiences for Students (REU Students):*** NSF mandates that students who receive their wages through REU Site grants and REU Supplements be US citizens or permanent residents of the U.S. or its possessions.

Faculty hiring REU students from other institutions must contact Lafayette's Human Resources Office to arrange for the students to complete the necessary tax forms and employment paperwork.

Student timesheets for REU students should be signed by the faculty member and submitted to the Office of Sponsored Research.

***Non-Lafayette Students (Other):*** Before committing to hire a non-Lafayette student who is not an REU student, the faculty member should contact the Sponsored Programs Office. Once the non-Lafayette student is hired, his or her timesheets should be signed by the faculty member and submitted to the Sponsored Programs Office.

***Other Personnel:*** If funding is included in the budget to hire post-doctoral scholars or other researchers, administrative or technical support, or other staff, the faculty member must discuss hiring procedures with the DSR and the Human Resources staff. Salary authorizations for full-time employees (typically post-docs) will be prepared by the Office of Sponsored Programs. Timesheets for part-time employees should be signed by the faculty member and submitted to the Sponsored Programs Office.

**Fringe Benefits and Indirect Costs:** Based on the salary authorizations and timesheets, fringe benefits and indirect costs (aka overhead) will be charged directly to the grant by the Controller's Office.

**Materials and Supplies:** Materials and supplies may be purchased through one of two ways, via a purchase requisition order (for items costing \$5,000+) or via p-card (for items costing less than \$5,000). P-cards may also be used for vendors that do not accept purchase orders.

**Purchase Requisitions:** A purchase requisition form should be prepared on Banner Self-Service and forwarded to the Sponsored Programs Office for approval. It will then be sent to the Procurements Office which issues a Purchase Order to the vendor and sends a copy to the faculty member. When the requested items are received, the faculty member should sign, date, note the grant number (FOPAL) on the invoice, and forward it to the Sponsored Programs Office. Payment will then be issued to the vendor.

**P-card Purchases:** Grant purchases made using a departmental P-card must be pre-approved by the Sponsored Programs Office. The request should be submitted on a P-card Grant Approval Form which is available on the Finance and Administration webpage; see section on Procurement and Payment. Please review the guidelines for P-card purchases carefully. Certain

items such as computers, office furniture, office supplies, and restaurant food may not be acquired with a P-card.

**Hazardous Materials Purchases:** Purchases of hazardous materials including radioisotopes must be discussed with and approved by the Office of Public Safety.

More detailed information about the College's procurement procedures and policies is available on the Finance and Administration webpage.

**Equipment Purchases:** In order to purchase equipment from a grant budget, the equipment must be in the budget approved by the funding organization. Equipment purchases must follow both the College's and the funding organization's guidelines. Lafayette's policies and procedures are detailed on the Finance and Administration webpage; see Procurement and Payment section. Please carefully review the guidelines from the funding organization. Some funders, notably federal agencies, have guidelines that vary slightly from Lafayette's policies. For example, Lafayette requires three quotes for purchases of \$5,000 or more while the federal government's threshold is \$3,000.

As the equipment is federally funded, the OSR should approve all purchases in the process and be informed when the equipment arrives. The equipment will be tagged and monitored during its operation. The College will maintain a list of equipment with identifying tag numbers and building/room locations. Faculty should notify the Sponsored Programs Office if equipment is moved from its original location.

**Computer Purchases and Software:** As with equipment, computer and software purchases should be detailed in the approved grant budget. The faculty member should work with both the Procurement Office and the Instructional Technology staff to obtain the best prices. Before software is ordered, faculty should contact the Instructional Technology staff – engineering faculty should also check with the Engineering Computing Coordinator – to confirm that the College does not already have a license for the desired software.

**Travel Expenses:** Faculty need to follow the travel policies of the College. Faculty should submit a Travel Notice via their Department Head to the Sponsored Programs Office. This form serves as the official approval form for College Travel. It also assures that faculty members are covered by the College insurance policy while engaged in travel for official business. For any part of the travel that is charged to a grant, all policies agency policies must be followed.

Upon receipt of the approved Travel Notice Form, the faculty member may make travel arrangements. Please investigate the lowest possible fares and be aware of any cancellation or change fees associated with booking airfares. The College will ordinarily not reimburse faculty

for these charges. **Note: Faculty whose travel is being paid by a federal grant should use the lowest available airfare, book coach seats, and abide by the Fly America Act (see below).**

**Pre-paid Travel Expenses and Travel Advances:** Faculty can request that the College pre-pay travel expenses such as registration fees and airplane reservations. Conference registration fees can usually be paid in advance on-line using the College's credit card. The fees will be charged directly to the grant account. Contact the Sponsored Programs Office to obtain information about this option.

Airfares can be charged directly to the grant account by using one of the College's approved travel agents, Emanuel Travel or American Express on-line. If using Emanuel, the contact number is 610-252-7376. To sign up for the American Express account, contact Lafayette's Procurements Office.

If the faculty member is anticipating significant out-of-pocket expenses while traveling, he or she may request a cash travel advance. The request should be made to the Sponsored Programs Office at least two weeks prior to the trip. The cash travel advance must be cleared within two weeks of the conclusion of the trip.

Faculty who pay for their tickets personally will need to submit evidence of payment; a receipt or credit card statement is acceptable, a boarding pass is not.

**Foreign Travel:** If foreign travel was not budgeted in the proposal and the faculty member would like to attend a conference or conduct other grant-related work in a foreign country, faculty should obtain permission (in writing) from the funding agency.

**Fly America Act - Selection of Air Carriers for Federally-funded Travel:** In general, funding agencies allow faculty to follow the travel and expense policies of their home institution. A notable exception is the requirement that recipients of federal grants must abide by the Fly America Act which requires that air travel be on U.S. carriers or with foreign carriers with whom there is a transport agreement. Per federal guidelines,

Federal travelers are required by 49 U.S.C. 40118, commonly referred to as the "Fly America Act," to use United States air carrier service for all air travel and cargo transportation services funded by the United States Government. One exception to this requirement is transportation provided under a bilateral or multilateral air transport agreement, to which the United States Government and the government of a foreign country are parties, and which the Department of Transportation has determined meets the requirements of the Fly America Act.

The United States Government has entered into several air transport agreements that allow federal funded transportation services for travel and cargo movements to use foreign air carriers under certain circumstances.

There are currently four bilateral/multilateral “Open Skies Agreements” (U.S. Government Procured Transportation) in effect:

- [United States \(US\) Government and the European Union \(EU\) effective April 30, 2007](#) [US-EU Amendment effective June 24, 2010](#), and [US-EU Amendment effective June 21, 2011](#)
- [United States \(US\) and Australia effective October 1, 2008](#)
- [United States \(US\) and Switzerland effective October 1, 2008](#)
- [United States \(US\) and Japan effective October 1, 2011](#)

Information on the four Open Skies Air Transportation Agreements (U.S. Government Procured Transportation) and other specific country agreements may be accessed via the [Department of State’s website](#).

The rights given to airlines concerning U.S. Government procured transportation under the Open Skies Agreement do not apply to transportation obtained or funded by the Secretary of Defense or the Secretary of a military department.

Federal Travel Regulation (FTR) [Bulletin 11-02](#) and [Bulletin 12-04](#) provides additional information and guidance on Open Skies agreements.

For more information on Fly America Act and Open Skies, please send e-mail to [travelpolicy@gsa.gov](mailto:travelpolicy@gsa.gov)

Questions concerning the Fly America Act should be directed to the Sponsored Programs Office. If booking tickets through Emanuel Travel, please inform the ticket agent that your trip is being paid with federal funds.

**Automobile Travel:** The College reimburses automobile transportation at the federally-approved rate. The mileage reimbursement does change, with changes usually taking effect January 1; changes are announced via email by the Controller’s Office. Current rates are posted on the Finance and Administration website.

If planning to rent a car for grant-related travel, please review the College’s policies which are available on the Finance and Administration webpage.

**Travel Expense Report:** Upon returning from a grant-funded conference or other research travel, the faculty member should submit a signed travel expense form to the Sponsored Programs Office within two weeks of the conclusion of the trip. Fully documented receipts for expenditures for meals, hotels, mileage, etc. should be attached to the expense report. Do not include any expenses such as airfare or conference registrations that have been prepaid by the College.

For foreign travel, please indicate the exchange rate(s) in effect at the time of the trip. Also, please convert expenses on receipts to U.S. dollars.



**Research Travel by Students:** Funding for student travel is often budgeted in research grants. Student travel must abide by the policies outlined on the Provost Office webpage under Research Support/Research by Students. Students whose travel is funded by a grant must complete the Travel Expense Report, sign it, and have it reviewed and signed by the faculty member before forwarding it to the Sponsored Programs Office.

Travel Notice Forms are available on the Provost Office webpage; Travel Expense Forms are available on the Finance and Administration webpage.

- **Subawards:** For a subaward to be issued, it must be included in the approved grant budget or, if not in the original budget, a request must be submitted by the Sponsored Programs Office and approved by the funding organization. Subaward agreements will be issued to the subawardee by the Sponsored Programs Office. All negotiations between Lafayette College and the subawardee will be conducted by the Sponsored Programs Offices of the respective institutions.

### Monitoring Grant Budgets/Cost Transfer Policy

Once an account is established for a grant, the faculty member is responsible for monitoring all expenses charged to the grant. If a faculty member does not already have access to Banner, he or she should request access through the Sponsored Programs Office; that office as well as the Controller's Office can provide instruction in using Banner.

To comply with the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance"), and federal agencies, Lafayette has established the following policy and procedures for processing cost transfers.

Faculty have primary responsibility for reviewing their grant budgets to verify that expenses charged to their grants (1) are part of the budget approved by the funding organization, (2) are permissible according to the guidelines of both the funding organization and the College, (3) do not exceed the approved budget, and (4) are charged to the appropriate Fund-Organization-Account-Program (FOAP).

The OMB and federal agencies expect faculty to review their budgets on a regular basis, ideally monthly, to insure the accuracy of expenses charged to federal grants and, if an error does occur, a prompt correction. Examples of errors include charging an expense to a grant when it should have been charged to the faculty member's start-up fund or using the wrong account number (e.g, charging an equipment purchase to materials/supplies). If an expense or deposit is allocated to the wrong FOAP, an adjustment should be requested by completing a Transfer of Charges Form and e-mailing it to the Sponsored Programs Office. The Transfer of Charges Form should indicate which FOAP should be credited and which should be debited. If the form is submitted within 90 days of the expense appearing in Banner, the faculty member can simply provide a brief explanation for the requested transfer. If the error is not caught within 90 days, a more detailed explanation is required. Once the form is submitted to and approved by the Sponsored

Programs Office, the cost transfer, which is a journal entry in the College's general ledger, will be processed by the Controller's Office. The Transfer of Charges Form is available on the Finance and Administration webpage.

Regular monitoring of the budget will also reduce the chance of overspending the grant. If a faculty member overspends his or her budget, the faculty member will need to provide an account number to which the excess charges can be transferred.

#### Change of Project Budget/Prior Approval Policy

As mentioned earlier in this document, faculty should carefully review the grant guidelines. Most funding organizations provide some leeway in re-budgeting between budget categories; others, however, permit only a slight deviation from the proposed budget. Some reallocations can be made at the grantee institution's discretion; others require approval of the funding organization. Requests for changes should be made in writing via email, memo, or, in the case of NSF, via Fastlane and forwarded to the Sponsored Programs Office. These requests should be made well in advance of any expenditures.

#### Certifications

Prior to submitting proposals to federal agencies, faculty are required to submit a certifications form, verifying that they are not debarred or suspended from receiving federal funds, that they have not paid anyone to lobby for the funding, that they will abide by the College's Workforce Drug-free Policy, and that they accept responsibility for the scientific/technical conduct of the research. If, at any point, after the proposal is submitted or funded, an individual's circumstances change, the individual should promptly submit a new certifications form.

Faculty with federally-funded grants are required to submit new certification forms each year of their grant even if their circumstances have not changed. The Sponsored Programs Office will contact faculty when the forms are due. Certifications forms are available from the Sponsored Programs Office.

#### Financial Conflict of Interest

Faculty are required to submit financial conflict of interest forms prior to submitting proposals to federal agencies. If, at any point, after the proposal is submitted or funded, an individual's circumstances change so that there may be a conflict or a perceived conflict, the individual should promptly submit a new conflict of interest form which is available from the Sponsored Programs Office. Once an award is issued, updated financial conflict of interest forms must be submitted on an annual basis. The Sponsored Programs Office will contact faculty when the forms are due.

Faculty who receive support from NIH are required to complete Financial Conflict of Interest training prior to undertaking their research. An on-line tutorial developed by NIH is available at <https://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm>. A certificate of completion, which

should be submitted to the Sponsored Programs Office, is available at [http://grants.nih.gov/grants/policy/coi/tutorial2011/FCOI\\_certificate.pdf](http://grants.nih.gov/grants/policy/coi/tutorial2011/FCOI_certificate.pdf).

Lafayette's Financial Conflict of Interest Policy is detailed in Appendix V of the Faculty Handbook.

#### Review Protocols (IRB and IACUC)

Per Lafayette's Academic Research Committee guidelines, "Lafayette College and its Faculty are committed to the protection of human subjects who participate in research and to ensuring the humane treatment of animals in research and adherence to applicable federal and state guidelines for their care and use."

Faculty with external grants that involve the use of animals and/or human subjects must complete the appropriate forms (available on Provost Office website) prior to undertaking their research and, during the course of the research, abide by the guidelines outlined in Lafayette's IRB and IACUC policies.

Information about Lafayette's IRB and IACUC policies and procedures can be found at the following locations:

- [Institutional Animal Care and Use Committee](#) - in Appendix O of the Faculty Handbook and at <http://iacuc.lafayette.edu>.
- [Institutional Review Board](#) - in Appendix P of the Faculty Handbook and at <http://irb.lafayette.edu>.

#### eRA Commons Registration of Students Working on NIH-funded Grants:

All students working on NIH grants should be registered in eRA Commons by the Sponsored Programs Office. The Sponsored Programs Office will register the students and then provide them with their account IDs and instructions for accessing eRA Commons. Each student should access his or her account and complete the requested information. NIH may contact a student to discuss their research experience.

#### Export Controls

Export controls may apply to a faculty member's work and travel in foreign countries especially those on the Treasury Department's Office of Foreign Assets Control list. Regulations developed by the U.S. State Department, Commerce Department, and Treasury Department restrict access and use of information and technology that could hamper the economic vitality of the United States or provide military/technological assistance to adversaries of the United States. These regulations control the export of commodities (equipment, computers, chemicals, biological substances, and other materials), software, technical data, and other information that may be shared with individuals in those countries as well as access that a foreign national working in the U.S. has to that information/technology. Faculty should contact the Office of Sponsored Programs to determine if export controls apply to the research that they are pursuing.

This is especially important if the faculty member is collaborating with a foreign national and/or the faculty member or members of the research team will be traveling outside the United States for research-related purposes, including conferences.

### Intellectual Property Policies on Patents and Copyrights

Both Lafayette College and funding agencies are eager to have faculty and other personnel pursue patents for ideas or products that develop as a result of funded research. Faculty and others involved in the development of the idea or product should contact the Lafayette's General Counsel and the Sponsored Programs Office promptly in order to review both the College's patent policy and the policy of the funding organization. Patent policies for federal agencies and other funding organizations are listed on their website and/or in the award documents.

Lafayette's Patent and Copyrights Policy is described in Appendix E of the Faculty Handbook.

### Misconduct in Research

As noted in Lafayette's Misconduct in Research Policy, "The Lafayette College Faculty believes that its mission as a community of teacher/scholars and the fundamental integrity of the academic institution are best served when faculty scholarship in all disciplines, whether or however funded and wherever pursued, reflects high standards of professional ethics." Funding organizations expect faculty and others involved in the project to conduct research in an ethical manner and refrain from fabricating, falsifying, or plagiarizing results. If misconduct is suspected or known to have occurred, it should be reported immediately to the Provost and the Sponsored Programs Office. If, following the procedures outlined in Lafayette's Misconduct in Research Policy, the fraud or misconduct is verified, the College is obligated to abide by the funding organization's misconduct policies and procedures which are usually listed on their website and/or in the award documents.

To review Lafayette's Policy and Procedures for Dealing with Fraud or Misconduct in Scholarship, please see Appendix N of the Faculty Handbook <https://provost.lafayette.edu/faculty-handbook/>.

### Responsible Conduct of Research

It is the expectation at Lafayette College that everyone who conducts research, faculty and students, will do so in a responsible and ethical manner. Research mentors will be responsible for oversight of their research assistants, post-docs (if any) or graduate students. For issues with faculty research conduct, see above Misconduct in Research.

Institutions submitting proposals to the National Science Foundation must certify that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research."

In response to the mandate from the National Science Foundation and in recognition of the importance of preparing students in the appropriate conduct of research, all students selected to participate in research funded by the National Science Foundation must, prior to beginning the research, complete one of the free, on-line courses offered by the Collaborative Institutional Training Initiative (CITI). This requirement applies to (1) Lafayette students whose wages/stipends are paid by the grant, (2) non-Lafayette students whose wages/stipends are paid by the grant, and (3) students who are working on a federally-funded project whose wages may not come from the federal source.

Prior to taking a course, students should confer with their research mentor to determine which course options are most relevant. The program will take no more than four hours to complete. It need not be taken in one sitting; in fact, CITI recommends that it be taken in increments.

Upon completion of the training program and passing the related tests, a note will be displayed indicating that the student has passed the course(s). The student should print, sign and date that screen and have the faculty mentor sign and date it. (Students required to take RCR training should NOT pay for a certificate.) Once the student and the faculty member have signed the printed screen page, it should be sent to the Director of Sponsored Programs. It will be placed in the grant file as proof of compliance should NSF request documentation, a right the agency has reserved.

Instructions for accessing the CITI program are available from the Sponsored Programs Office or on the Sponsored Research Website.

### Public Access to Results of Federally-funded Research Results

Because these grants are supported with taxpayer dollars, to reduce the chance of work being unnecessarily duplicated, and to make results readily and easily available to both other researchers and to the public, NSF and NIH developed policies requiring the immediate accessibility of research results funded by those organizations.

The NIH Public Access Policy mandates that the public has access to the published results of NIH-funded research. It requires faculty to submit final peer-reviewed journal manuscripts that evolve from NIH grants to the digital archive PubMed Central *upon acceptance for publication*. The Policy requires that these papers be accessible to the public on PubMed Central no later than 12 months after publication (<http://publicaccess.nih.gov/>).

NSF Information Sharing/Open Access (aka Data Management) Policy: Open access to data and other information resulting from NSF-funded research is an active concern of NSF management, the National Science Board and the research communities. NSF's Award and Administration Guide contains the agency's current policy on Dissemination and Sharing of Research Results. The overarching expectation is that NSF grantees will share their data with other scientists and will submit their findings for publication (<https://www.nsf.gov/bfa/dias/policy/dmp.jsp>).

The repository available through Lafayette (contact the Skillman Library staff) is an option for meeting the NSF data management plan requirement.

Appendix Q of the Faculty Handbook (<https://provost.lafayette.edu/faculty-handbook/>) provides guidance on reporting the results of faculty research.

### Technical Reports

Most organizations require regular accounting of the progress being made on a funded project. Many organizations notify the faculty member via email when the reports are due. Other organizations state in the award letter the dates by which technical reports should be submitted but do not send reminder notes. It is the faculty member's responsibility to submit reports in a timely fashion. Faculty members should be aware that organizations will not award new grants to individuals who have overdue reports. There may also be an impact institution-wide if faculty are late with their reports.

### Time and Effort

Via the Office of Management and Budget (OMB) Circular A-21, Section J.10, the federal government requires effort certification of work conducted on federally-funded grants. Institutions must document that the labor charged to a grant is consistent with the actual effort expended on the project. The definition of "effort" as it relates to federal grants is as follows: "Work or the proportion of time spent on research as a percentage of total time." Effort is not defined by a standard number of hours but rather by the number of hours that an individual typically works. If a faculty member usually works 40 hours per week and worked 40 hours per week each week during June, devoting all of his or her time to research, that constitutes 100% effort. If another faculty member regularly works 60 hours per week but devoted only 40 hours per week to research during June, that faculty member committed 67% effort. Total effort may not exceed 100%. Note: Time spent preparing a new proposal should not be considered part of "effort" and cannot be charged to an existing grant.

Estimated effort – the effort projected in the proposal – and actual effort may differ. "Short-term fluctuation between workload categories need not be considered as long as long as the distribution of salaries and wages is reasonable over the longer term..." However, if a faculty member anticipates that his or her commitment to the research project needs to be significantly modified, he or she should contact the Sponsored Programs Office to determine the appropriate procedure for informing the funding agency and obtaining its approval.

To comply with the federal certification requirement, Lafayette uses as "after-the-fact activity" system. The Sponsored Programs Office obtains from faculty and other exempt staff whose salaries are being charged to the grant estimates of their time commitments and prepares salary authorizations based on that information for a specific work period (summer, semester and/or academic year). At the conclusion of the work period, each individual must verify his or her effort spent on the grant project. Completed reports should include all effort – even if not

compensated by the grant – that was committed to the research. Time and effort certification forms are distributed to federally-funded faculty and exempt staff by the Sponsored Programs Office at the conclusion of each work period (summer, semester, and/or academic year). Faculty must complete their own form and countersign the forms of the exempt staff. All completed forms must be returned to the Sponsored Programs Office within two weeks. Reports are retained by that office.

For work performed on a federally-funded project by undergraduate students, timesheets signed by the supervising faculty member serve as verification of the time and effort. Copies of the timesheets are retained by the Sponsored Programs Office.

For further information about time and effort, contact the Sponsored Programs Office.

### **Change of Project Scope, Methods, Staff, and/or Duration/Prior Approval Policy**

The approval of the funding organization is required if there a change in the scope of the research project, a significant change in methods or procedures, a change in the Principal Investigator, a change or addition of a Co-Principal Investigator, a change in the length of the project period, the addition of a subaward, and/or to transfer the grant to another institution. Other conditions which require the funding organization's approval are detailed in the award letter and/or on the funding organization's website. Requests for changes should be made in writing via email, memo, or, in the case of NSF requests, via Fastlane, and forwarded to the Sponsored Programs Office. The requests will then be submitted to the funding organization.