

**Policy Purpose**

The purpose of this policy is to serve as guidance to the Hope College community as to sponsored programs as well as comply with federal and sponsor regulations governing the preparation and submission of proposals and managing subsequent awards.

**Definitions**

**Authorized Organizational Representative (AOR):** The AOR serves as the official of Hope College who has the ability to bind the organization to sponsored programs. This may also be known as the Authorized Institutional Official, Institutional Signatory, or Authorized Official.

**Award:** The provision of funds from a sponsor to Hope College to carry out a proposed project.

**Co-Principal Investigator (Co-PI):** Co-PIs share the same level of institutional responsibility and accountability for a sponsored program as a PI. However, Co-PIs do not serve as a primary scientific or programmatic contact with the sponsor.

**Cost-Share:** This represents the portion of project expenses not paid by federal funds. This may include the value of third-party contributions.

**Facilities and Administrative Costs:** These are necessary costs incurred by Hope College in support of sponsored programs, but are not readily attributable to a specific project. Examples include pre-award services and support, post-award services and support, library services, equipment, research infrastructure, library services, payroll services, and utilities. Also known as indirect costs, F&A costs, and overhead.

**Gift:** Contributions to the institution in which there is no defined scope of work, no specific reporting requirements, no named project personnel, no expected delays for reporting, no defined period of performance, no ownership of intellectual property, and Hope College serves as the primary beneficiary.

**Overload Payment:** Represents a payment from the institution to a Hope College faculty or staff member above their contracted rate for services above their normal load. Overload payments may comprise research, teaching, or service.

**Principal Investigator (PI):** The PI serves as the primary individual at Hope College with the authority and responsibility for leading and directing the project, intellectually and logically. When a project proposes a PI/Co-PI model, all investigators share the same level of institutional responsibility and accountability for a sponsored program, although the PI serves as the primary point of scientific or programmatic contact between the sponsor and Hope College. PI may also be referred to as Project Director (PD), Program Director, or PI/PD.

**Proposal:** An application to an external sponsor that will commit the institution to a project if funded. Proposals typically include a full description of the research project and a detailed budget and require the certification of an AOR.

**Senior Personnel:** Individuals who contribute to the scientific development or execution of a project in a specific, substantive, and measurable way. This not only includes the PI and Co-

PI(s), but also other individuals who meet this definition but do not rise to the same level as PI or Co-PI.

**Sponsored Program:** Contributions to the institution with a defined scope of work, period of performance, project personnel, and reporting requirements. The primary beneficiary of this work is the public or the sponsor. The work may involve research with human subjects or animals. Sponsored programs typically include grants, contracts, and intergovernmental personnel agreements.

**Subaward:** An award provided to a third party to carryout part of a sponsored program. This excludes payments or arrangements to contractors or participants on a funded sponsored program.

### **Principal Investigator (PI) Eligibility**

All faculty and staff with an FTE of 0.5 or greater with an indefinite or multi-year appointment may be considered PIs or Co-PIs in proposals to external sponsors. Faculty and staff with appointments of less than 0.5 FTE or appointments of one year or less may request PI Status with approval from their dean. Students may not serve as principal investigators.

### **Signature Authority**

All proposals for external funding must be reviewed and approved by the Director of the Office of Sponsored Research and Programs (OSRP), or in his/her absence, the Associate Provost, both of whom serve as AORs.

The Director is charged with coordinating the review of the proposal from the PI's and Co-PI's department chair(s) and dean(s). Department and division approval is required at the pre-award stage to signify institutional commitment to carry out the project if funded. Proposals submitted without approval from the Director of OSRP may be withdrawn from consideration.

### **Open Campus**

Hope College recognizes the importance of our faculty and staff contributions to their higher education community. As such, Hope College will not accept any award which:

- Prohibits our PIs from publicizing the results of their work;
- Restricts who we may hire to work on our sponsored programs; or
- Requires Hope to accept export-controlled or classified information.

### **Sponsored Projects versus Gifts**

There are several key differences between sponsored programs and gifts:

SPONSORED PROGRAMS WILL INVOLVE:	GIFTS WILL INVOLVE:
<ul style="list-style-type: none"><li>• Defined scope of work</li><li>• Defined period of performance</li><li>• Project personnel are identified</li><li>• Use of animals or human subjects implies a sponsored program</li><li>• Periodic reporting is expected or identified in the terms of the award</li><li>• Patent/copyright rights and ownership are identified</li><li>• The public and/or sponsor are the primary beneficiary of the work</li></ul>	<ul style="list-style-type: none"><li>• A brief description of the purpose/intent of the use of funds</li><li>• No defined period of performance</li><li>• No reporting requirements (a brief report of the use of funds may be expected)</li><li>• No expected delays for reporting</li><li>• Project personnel are not identified (although "use by named PI X" is appropriate)</li><li>• The sponsor does not retain ownership of any patents or copyrights</li><li>• Hope College is the primary beneficiary</li></ul>

The defining characteristics of the contribution will determine whether it will be defined as a sponsored program or gift.

OSRP is only authorized to accept sponsored programs on behalf of the institution, not gifts. PIs are encouraged to work closely with Development to accept gifts and follow any applicable institutional policies governing the gift acceptance process. However, any payments to faculty and staff from gift funds are subject to the overload and summer salary provisions identified below (see “Salary Costs for PI’s on Sponsored Programs” below).

### **7/5 Day Review Policy**

The completed proposal is due to OSRP seven business days before the sponsor deadline. The PI has five of these seven business days to finalize the scientific and/or programmatic components of the proposal.

In order to allow PIs additional time for a final read-through and last minute minor editing, including corrections or updates to proposals, the seven-day requirement is amended as follows:

1. Use the Early Notification Form to communicate your grant-seeking plans to your dean(s) and department chair(s). This will help in the process of confirming cost-share and/or course-release commitments, and complete all sponsor-related institutional and investigator assurances.
2. Complete proposals are due to OSRP seven days before the sponsor’s deadline.
3. PIs will have until Day 5 of the 7-business day period prior to the sponsor’s due date to replace a draft version of technical/science documents with the corresponding final version with OSRP. Before the end of business on Day 5, the Director of OSRP will confirm the final version of the proposal with the PI.
4. During this timeframe, the proposal will be circulated among the PI’s and Co-PI’s department chair(s) and dean(s) for approval via DocuSign. Proposals may not be submitted to the sponsor without the signed Proposal Approval Form on file with OSRP.
5. The final version of a proposal will be submitted by OSRP in advance of a sponsor’s due date whenever possible to ensure it is successfully received by the sponsor.

If a PI will not be able to meet the 7/5 business day requirement, they must request an exemption to this requirement from their chair and dean. The exemption approval should be forwarded to OSRP no later than five business days ahead of the deadline.

Letters of inquiry, letters of intent, pre-proposals, and other types of preliminary submissions that do not require the submission of a line-item budget or the approval of an AOR are NOT subject to this policy provision.

### **Salary Costs for PIs on Sponsored Programs**

As an institution, Hope College supports the research, education, outreach, programmatic, and entrepreneurial activity of its faculty, staff, and students. As such, these activities often require personnel to dedicate time and effort to proposed activities.

#### *Institutional Base Salary (IBS)*

For purposes of grant budgets, IBS determinations are based on a faculty member’s nine month academic year rate, excluding any amounts paid for other institutional appointments (i.e., department chair, other committee chair remuneration, etc.), bonuses, awards, or other incentives. The general professional obligations for faculty which constitute IBS are established in the Hope College Faculty Handbook.

IBS determinations for those on greater than nine month contracts (i.e., 10, 11, or 12 month contracts) exclude amounts paid for bonuses, awards, or other incentives.

For individuals granted PI status without an IBS (i.e., a Visiting Research Faculty), their IBS determination is based on 75% of the minimum salary for an assistant professor in their primary department.

#### *Course Release*

Course releases may be requested from sponsor funds as allowable. It is the responsibility of the dean(s) and department chair(s) of the Senior Personnel to determine whether a course release is appropriate, although care should be taken with regard to course releases such that it will not negatively impact the student experience. The dean and department chair have the authority to deny course releases on a sponsored program, regardless of whether funding is available. Approval for course releases on a sponsored program are documented on the Proposal Approval Form at the pre-award stage.

The cost of course releases will be calculated as a percentage of the Senior Personnel's time, regardless of source (federal vs. non-federal). The percentage is determined by the department and division's expectations for contact or credit hours. The cost of hiring adjuncts or temporary staff will not be charged to sponsored programs unless the sponsor's policies specifically stipulate otherwise.

#### *Summer Salary*

The maximum request for summer salary for faculty and staff on nine month contracts will be 3/9<sup>th</sup> of their academic year salary across all sources, including teaching, service, and sponsored programs. Summer salary maximums may be also impacted by external sponsor regulations (i.e., NSF).

For those on 10 or 11 month contracts, the maximum summer salary will be 2/9<sup>th</sup> or 1/9ths of their contracted salary across all sources, respectively.

#### *Overload Payments*

Overload payments to faculty and staff for their participation on sponsored programs is prohibited unless it is included in the original proposal and subsequent award or prior approval is provided by the sponsor.

Across the institution, it is recognized that overload payments during a faculty or staff member's contracted period are required due to various circumstances, including timely matriculation of students, colleague absences, course scheduling challenges, and other circumstances which makes an overload payment to a faculty or staff member necessary. It is expected that chairs and deans will make a reasonable attempt to prevent overload payments to faculty and staff during their contracted period, including balancing workloads across an academic year, examining whether a temporary increase in base salary is warranted, and/or scheduling workload responsibilities during off-contract periods.

If it is determined an overload is warranted during the faculty or staff member's contract period, the following terms apply to overload payments regardless of whether the activity is or personnel are related to a sponsored program:

1. Overload compensation may not exceed 20% of the faculty or staff member's IBS during their contract period.
2. The 20% limitation applies to all sources of overload, not each individual request.

3. Requests to exceed the 20% limitation may be submitted to the Associate Provost for consideration along with a justification. The justification should include why compensation at a level greater than 20% is required as well as plans to minimize interruption in the faculty or staff member's teaching, service, or research responsibilities during their contract period.
4. All faculty or staff member effort, including overload, will be documented via the Effort Reporting process for those individuals working on sponsored programs.
5. Any policies enforced by a sponsor governing overload payments that may be more restrictive than this policy shall govern overload payments as applicable.

### **Cost-Share on Sponsored Programs**

In some instances, cost-share is a requirement of a sponsor and/or program. All cost-share must be reviewed and approved by the relevant department chair(s) and dean(s) prior to submission of a proposal to an external sponsor.

Care should be taken to not pledge cost-share on any project for which it is not required—once pledged, it becomes auditable and committed once awarded.

#### *Academic Year Effort as Cost-Share*

In recognition of the fact that our PIs, Co-PIs, and Senior Personnel often have responsibilities which cross their role as a teacher and scholar, PIs may pledge up to 15% of their academic year effort on sponsored programs as cost-share in accordance with Hope College's Key Academic Administration Definitions. PIs with additional, dedicated research time in their contract may pledge additional effort as applicable. Additional academic year cost-share above the 15% may be approved by the department chair and dean of the PI, Co-PIs, and Senior Personnel. Additionally, those faculty on an approved Faculty Sabbatical may pledge a portion or all of their Sabbatical towards a sponsored program so long as the project plan of the Sabbatical aligns with the scope of work of the proposal. All requests for academic-year time and effort commitments require the review and approval of the relevant chair and dean.

#### *Minimum Effort on Sponsored Programs*

In 2001, the [Office of Management and Budget](#) clarified it is expected “most Federally-funded research programs should have some level of committed faculty (or senior researchers) effort, paid or unpaid, by the Federal government.” Furthermore, the National Institutes of Health through its Grants Policy Statement indicates that Senior Personnel are required to devote and maintain a minimum level of effort to an award.

In preparing proposals, it is expected that all PIs, Co-PIs, and Senior Personnel will include some level of committed effort in proposals. (See below for exclusions.) All levels of effort must be quantified (i.e., a percentage of time, number of person months, dollar amount of salary, etc.). At a minimum, PIs, Co-PIs, and Senior Personnel must devote at least 1% of their university's effort (based on their contract term) to the sponsored program. However, effort commitments may be fulfilled via sponsor funds or cost-share funds and include time during the academic year, summer, or both.

Minimum effort requirements may be superseded by sponsor and/or program requirements for the PI, Co-PI, or Senior/Key Personnel as relevant.

In some instances, minimum effort requirements are not necessary based on the nature of the project. Exclusions to the minimum 1% effort requirement include:

- Equipment or instrumentation grants;

- Mentor effort on undergraduate research projects/awards;
- Specific purpose awards such as travel, workshops, or conferences;
- Supplements to existing awards (as the original effort would cover likely cover effort commitments); or
- NIH projects where a Hope College faculty or staff member meets the definition of an “Other Significant Contributor” and are therefore not expected to provide measureable effort during the project.

The above list may not be exhaustive based on the nature of individualized projects and sponsor or program limitations. Additionally, the above list does not prohibit PIs, Co-PIs, and Senior/Key Personnel from pledging effort on any of these types of projects as circumstances dictate.

### **Facilities and Administrative Costs**

Facilities and Administrative Costs are real costs associated with the management of sponsored programs. When applicable, F&A costs must be included in proposals submitted to external sponsors.

- For federal proposals, Hope College must use its federally-negotiated rate in effect at the time of submission unless restricted by the sponsor or the program.
- For non-federal proposals, Hope College must use the rate provided in the sponsor’s published policies or guidelines.
- For sponsors which do not provide a published policy regarding F&A Costs, Hope College will include F&A at 10% of Modified Total Direct Costs (MTDC) in all proposal budgets. MTDC are defined as total costs less equipment, participant support costs/scholarships, and up to the first \$25,000 of each subaward. Exemptions to this provision may be requested by the relevant dean.

### **Subawards**

Hope College recognizes sponsored programs involve the participation of multiple individuals from a variety of institutions. Hope College has established a process for administering sponsored programs across multiple institutions via subawards in order to comply with federal regulations governing subrecipient oversight.

OSRP reserves the right to decline a subaward to a partner institution based on the following requirements:

- Being barred or suspended from receiving federal funds, regardless of whether the proposed funds are federal or non-federal;
- Conflicts of interest between the Hope project personnel and the subawardee personnel; or
- A review of financial statements indicate the subawardee does not have sufficient infrastructure or internal controls to manage a sponsored program.

### **Award Acceptance and Management**

For incoming awards, PIs and Co-PIs will be expected to acknowledge the terms and conditions of their award. Once acknowledged, OSRP will sign/certify the official award and return it to the sponsor. Hope College’s Business Services will establish a fund code for project expenses.

Project expenses will be subject to Hope College’s [Expense and Resource Stewardship Policy](#). While Hope College provides oversight to sponsored programs, PIs and Co-PIs are ultimately responsible for managing the finances associated with their awards and ensuring expenses are allowable, allocable, and reasonable.

OSRP is charged with initiating requests for award modifications with our sponsors. This includes changes related to personnel, budget, scope of work, and other terms and conditions of the individual award; please consult your award documentation to determine when prior approval of project changes are necessary.

For projects involving changes in budget, please complete a Sponsored Project Budget Modification Request and route to OSRP (electronic to [sponsoredresearch@hope.edu](mailto:sponsoredresearch@hope.edu) is preferred). Sponsored Project Budget Modification Requests will be reviewed by OSRP and Business Services; budget changes cannot be implemented until the Request is reviewed, including all sponsor notifications as appropriate.

If you are requesting a change to project personnel, scope of work, or other term or condition of your award, please contact OSRP to initiate the necessary sponsor approval process for your request.