SPONSORED RESEARCH & PROGRAMS HANDBOOK

A Guide for Principal Investigators and Grant Administrators

** This is a "living" guide. Research procedures, guidance and policies are subject to continuous updates and revisions in response to the changing landscape. Please note although the Sponsored Research & Programs Handbook is available for printing, it is subject to constant change and would render printed versions obsolete.*

Published March 2026

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CONTACT OFFICE OF SPONSORED RESEARCH & PROGRAMS (OSRP)

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Metropolitan State University of Denver (MSU Denver) receives awards for research, training, programs, and technical assistance from extramural funding sources, including federal, state and local governments and private organizations. MSU Denver refers to this funding as Sponsored Programs. Policies and procedures governing research and sponsored programs are diverse and complex. The Sponsored Research & Programs Handbook serves as a guide with instructions for getting started, seeking appropriate approvals, and conducting research or managing programs that are compliant with relevant government laws and regulations and MSU Denver policies and procedures.

Office of Sponsored Research & Programs

The Office of Sponsored Research & Programs (OSRP) at Metropolitan State University of Denver provides quality service and timely support to the MSU Denver community. The OSRP team partners with faculty members, administrators, and many other stakeholders across campus to facilitate the navigation of the sponsored programs and grantsmanship journey. OSRP provides support to faculty and staff to acquire funding for research and programs from federal, state, and local agencies. From initial concept to proposal and budget development through to funding decision, OSRP is available to guide the MSU Denver community along the journey to submit high quality, competitive, and innovative proposals. OSRP specializes in facilitating each step in the pre-award grants process through notice of grant award. After award, OSRP collaborates with internal and external stakeholders to support and facilitate the non-financial administration of an award. OSRP also houses human subjects protection and the Institutional Review Board (IRB). These teams work to ensure the safety of all subjects and the integrity of the University. OSRP is committed to advancing excellence through teaching, service, scholarship, and research and striving to meet MSU Denver's strategic goals by growing the research enterprise.

Sponsored Project Accounting & Compliance

Sponsored Project Accounting and Compliance (SPAC) provides support to the University in administering sponsored projects. SPAC works closely with OSRP. SPAC assists Principal Investigators with oversight of the finance and regulatory administration of grants and contracts. SPAC interprets policies of government and private funding agencies to ensure expenditures adhere to regulations and guidelines. SPAC specializes in facilitating each step in the post-award grants process through award closeout.

MSU Denver Foundation/Advancement and Corporate & Foundation Relations (CFR)

The MSU Denver Foundation Inc. is a 501c3 nonprofit, direct-support corporation governed by a volunteer board of directors. The Foundation is also known as University Advancement. Their mission is to promote the development and general welfare of the University by receiving, investing and administering private support.

The Corporate and Foundation Relations (CFR) team at Metropolitan State University of Denver focuses on philanthropic relationships and aids members of the MSU Denver community build relationships with corporate and foundation entities to secure support for scholarships and programming. CFR's teamwork is holistic in approach, collaborating with campus partners in all stages of the foundation grants process, from concept development to post-award, all while engaging corporate and foundation partners in transformative, mission-driven philanthropy.

HANDBOOK PURPOSE

The funding landscape and federal regulatory environment are ever-changing. As such, the Sponsored Research & Programs Handbook is a "living" document that will be revised and updated in response to these changes. This handbook is intended to serve as a guide—a useful "tool" for MSU Denver faculty and staff to refer to when questions about finding and applying for external funding might arise, or questions on award management might come up in the course of carrying out their funded projects. Where further clarification is needed, members of the MSU Denver community should always feel free to contact OSRP, SPAC, and CFR.

This handbook provides guidance on:

- Services provided by OSRP and SPAC
- Responsibilities of PIs, research staff, and administrative personnel
- Sponsored project policies, procedures and practices (e.g., pre- and post-award, research compliance, contracts, and human subjects)
- Brief list of policies and procedures for MSU Denver Foundation and CFR
- Definitions and available resources

Metropolitan State University of Denver encourages faculty and others to seek external funding and engage in projects related to the mission and goals of the University. When external funding is awarded, OSRP acts as the Authorized Organizational Representative and sponsored project administrator and SPAC as the fiscal liaison on behalf of the University. OSRP and SPAC have a fiduciary responsibility to monitor sponsored programs in such a way that ensures compliance with applicable policies and regulations, avoid fines, prevent fraud, and maintain the integrity of financial and project records.

In addition to this Handbook, PIs may schedule appointments with the staff in the Office of

Sponsored Research & Programs to discuss pre-award and post-award programmatic activities or contact SPAC to review post-award financial activities in the administration of sponsored projects.

OSRP MISSION

The Office of Sponsored Research & Programs supports faculty and staff to pursue funding opportunities from federal, state, and local agencies, and private foundations who support research projects. We partner with the research and sponsored programs community and provide oversight, administrative structure and consultation to enhance Principal Investigators' abilities to obtain and manage sponsored programs.

OSRP VISION

The Office of Sponsored Research & Programs provides a customer-centric approach to walk Principal Investigators (PI) through the research and proposal development cycles to secure sponsored funding. We strive to provide the highest level of professionalism and expertise to support and promote a world-class sponsored programs and human ethics environment.

SERVICES PROVIDED BY OSRP AND SPAC

Office of Sponsored Research & Programs (OSRP)

OSRP is the pre-award office. OSRP specializes in facilitating each step in the pre-award grants process through notice of grant award. OSRP provides support to faculty and staff to acquire funding for research and programs from federal, state, and local agencies, and private foundations.

OSRP is the university's authorized unit to submit proposals on behalf of MSU Denver. OSRP is also authorized to negotiate and sign grant-related contracts on behalf of MSU Denver.

Services:
- Grant seeking/find funding
- Review notice of funding opportunities
- Create checklist and timeline towards submission
- Assist with developing a proposal budget
- Seek internal approvals
- Assemble full proposal package
- Review and submit proposals
- Negotiate sponsored programs contracts
- Accept awards
- Request work tags
- Obtain prior approvals from the sponsor for post-award modifications (i.e. changes in scope of the work, project personnel, and budget)
- Manage no-cost extensions
- Manage change in scope and PI

- Manage budget modifications and transfers
- Manage human ethics, human subject applications, and Institutional Review Board
- Provide sponsored programs related training and education to campus community

Sponsored Projects Accounting & Compliance (SPAC)

SPAC is the post-award office. SPAC provides support to the University in administering sponsored projects.

SPAC assists Principal Investigators with oversight of the finance and regulatory administration of grants and contracts, as well as interpret policies of private and government funding agencies to ensure that expenditures adhere to regulations and guidelines.

SPAC provides assistance in the implementation of a grant award once it has been funded and any training or computer access that will assist the PI in the management of the grant.

Services:

- Grant kick-off
- Establish work tags
- Financial reporting
- Time & effort reporting
- Sub-recipient monitoring
- Assist with corrections
- Billing/Invoicing
- Reimbursement draws
- Audit responses
- Federal Funding Accountability and Transparency Act reporting

ROLES & RESPONSIBILITIES

To effectively manage sponsored research awards at MSU Denver, various individuals/groups must work together throughout the life of an award. This section describes the primary responsibilities of these individuals/groups once a project has been awarded to the University. All these individuals/groups rely on each other for the successful fiscal management of the award.

Principal Investigator / Project Director (PI/PD)

The PI/PD serves as the primary individual responsible for scientific integrity and the fiscal and administrative management throughout the period of the award. The PI/PD's specific responsibilities include:

a. Being cognizant of, and adhering to, all contractual/award terms and conditions, as well as MSU Denver policies and procedures related to administering sponsored projects. (This includes all relevant government and MSU Denver regulations regarding human and animal subjects, conflicts of interest, purchasing and equipment management policies)
b. Developing proposal ideas
c. Ensuring that all project personnel are eligible
d. Supervising project personnel including co-investigators, post-doctoral associates, and students
e. Notifying OSRP of intent to submit proposals
f. Managing proposal content by following OSRP checklist
g. Completing and submitting the IRB application for human subject protocol
h. Certifying time & effort
i. Reviewing and approving grant expenses while managing the budget in a practical manner and expending funds in accordance with the restrictions imposed by the award terms and conditions and MSU Denver policy. *Funds may only be expended to directly support the project effort and expenditures should not exceed the total amount*
j. Working with subawards (as applicable) and communicating any operational and/or performance issues to OSRP throughout the life of the project
k. Developing and submitting timely performance/technical/progress reports to the sponsor as required by the terms and conditions of the award
l. Observing MSU Denver policies and procedures to protect intellectual property rights and academic freedom

While responsibility for certain day-to-day management of the project finances may be delegated to administrative or other staff, accountability for compliance with the sponsor requirements and University policy ultimately rests with the PI/PD.

Chronic failure to carry out the responsibilities incumbent upon a PI/PD or chronic noncompliance with sponsor regulations, can result in nonpayment to MSU Denver. Ultimately, this may jeopardize future funding to the PI/PD, as well as to MSU Denver.

Refer to the Roles & Responsibilities Matrix for a full list.

Co-Principal Investigator/Co-Investigator
A Collaborating Principal Investigator (Co-PI) or Co-Investigator (Co-I) is a researcher that takes a secondary role in the project's direction, completion, and reporting to the sponsoring agency.

Key/Senior Personnel
Individuals that contribute to the development and execution of a project in a substantive, measurable way. Typically, these individuals have doctoral or other professional degrees. These individuals must devote a measurable effort to the project.

Department/School/College Administration
Administrative staff at the department, school, or college are a critical component of successful sponsored project administration and therefore are strongly encouraged to provide administrative and fiscal support to their faculty and staff for all sponsored project activity within that unit. It is essential that administrative staff maintain current knowledge of sponsor regulations and MSU Denver policies and procedures related to sponsored projects management and compliance.

OSRP Staff
Pre-award and human ethics staff in the central pre-award office known as Office of Sponsored Research and Programs. *Refer to Services Provided section*.

SPAC Staff
Post-award financial staff/accountants in the central post-award office known as Sponsored Projects Accounting & Compliance. *Refer to Services Provided section*.

Sponsor Agency
Sponsor agencies are institutions that are either part of the federal, state, or local government, or a non-profit, corporation, or other institutes that provides funding for a sponsored project.

PI ELIGIBILITY

Since a proposal and subsequent award are a commitment for MSU Denver in many ways, it is important to establish the qualifications and ability of PIs and Co-PIs to carry out the work on externally funded grants and sponsored projects.

The Principal Investigator (PI) has primary responsibility for achieving the technical success of the project, while also complying with the financial and administrative policies and regulations associated with the award. Although Principal Investigators may have administrative staff to assist them with the management of project funds, the ultimate responsibility for the management of the sponsored project award rests with the Principal Investigator.

To serve as PI, one must be a full-time employee of MSU Denver. Several employment titles automatically confer PI/co-PI status due to the roles and responsibilities that come with that title. Titles of Professor, Associate Professor, and Assistant Professor and to library faculty holding the titles of Senior Librarian, Librarian, and Associate Librarian. Other administrative titles are also eligible for automatic PI status provided the individual is a full-time employee: Vice President, Associate Vice President, Assistant Vice President, Dean, Associate Dean, Assistant Dean, Executive Director, and Director. However, Emeritus faculty do not automatically confer PI status. Emeritus faculty may serve as co-PI or senior key personnel but not as PI.

The PI must have an active appointment with MSU Denver and is responsible for executing and financially managing the grant or project. Since a proposal and subsequent award are a commitment for MSU Denver in many ways, it is important to establish the qualifications and ability of PIs and Co-PIs to carry out the work on externally funded grants and sponsored projects.

MSU Denver - Grant Responsibilities Reference Chart			
	Principal Investigator (PI)/Project Director (PD) Department/Dean's office	SPAC/Office of the Controller	OSRP
Proposal Development and Budgeting			
Complete Intent to Submit Form	X		
Conduct Funding Opportunity Search/Identify Funding	X		X
Ensure that all proposal submissions to OSRP indicate eligible individuals as PI, co-PI or program director and have received the appropriate prior approvals	X		X
Initial RFP review	X		X
Develop internal checklist and timeline to submission			X
Develop Proposal Idea	X		X
Complete PI Certification Program and other required trainings	X		
Communicate with program officer (pre-award)	X		X
Request adjunct replacement costs & obtain approval	X		X
Initiate Budget Development			X
Develop Budget & Budget Justification to align with proposal	X		X
Verify that there is some level of effort included in proposal			X
Manage Proposal Content	X		X
Identify the need for Subawards	X		X
Issue Subrecipient Commitment form			X
Proposal Processing Form	X		X
Complete FCOI Form	X		
Route Proposal for Approvals			X
Review final application for completion of all documents, internal & external compliance	X		X
Subrecipient Risk Assessment			X
Submit Application/Proposal Package			X
Prior to Award			
Human Subject Protocol Submission to OSRP	X		
Budget Modification Request/Impact Statement	X		X
Review & approve certifications			X
Just in Time/Additional Information	X		X
Submit JIT/Additional Information			X
Award Acceptance			
Receive the Notice of Grant Award			X
Review the Notice of Grant Award			X
Interpret sponsored project terms and conditions			X
Compliance Check			X
RCR			X
COI/FCOI			X
Human Subjects			X
Cash Match Approvals			X
PI Implementation Meeting			X
Work with Business Services to review and approve contract language		X	X
Manage incoming Sub Award Agreements			X
Determine Reassign time needs (watermark system)	X		
Issue outgoing Sub Award Agreements			X
ALL Communication with program officer/sponsoring agency			X
Communicate new Award to SPAC & Request Work Tags			X
Implementing Grant After Award			

Interpret sponsored projects terms and conditions with respect to reporting		X	
Set up Grant/subaward/cash match in Workday and establish worktags		X	
Schedule Grant Kick off meeting		X	
Update HR on personnel changes	X		
Time and effort guidance		X	
Managing Award			
Initiate Procurement (solicitations, purchase orders, etc.)	X		
Certify time and effort for all personnel	X	X	
Allocate expenses between grant and match	X	X	
Train departments on how to run Workday reports		X	
Run and review budget to actual reports to ensure accurate expenses	X		
Initiate timely correction requests for misapplied charges	X		
Review and approve expenses on award	X	X	
Year end financial reviews (fiscal year and grant year end) for timely close processes	X		
Prepare and send Monthly University wide grant status report		X	
Communicate with program officer/sponsoring agency (post-award)		X	X
Prepare external financial reports		X	
Process/receipt of Non-competing continuation NOAs			X
Review & Submit Programatic Reports (RPPR)	X		
Review Financial Reports	X	X	
Submit Financial Reports		X	
Prepare, Review and Submit request for reimbursement from awarding agency		X	
Manage Performance	X		
Subaward Amendments			X
Subrecipient monitoring	X	X	
Vendor contract monitoring	X		
Carryover Approval	X	X	X
Submit No Cost Extentions to Sponsor			X
Manage Change of PI		X	X
Manage Reduction of Effort (25%)	X		X
Request budget reallocation	X		
Budget Reallocation (per sponsor guidelines)		X	X
Manage transfer of funds budgeted into or out of participant support costs to other categories of expense		X	X
Request change of key personnel	X		
Manage change of Key Personnel			X
Request change in SOW	X		
Manage Change in SOW			X
Notify of needed transfer of awards/termination	X		
Transfer of Awards/Termination		X	X
Change in the approved cost-sharing or matching provided by the non-Federal entity		X	X
Support close out of grant	X		
Close out Grant		X	

SPONSORED PROJECT LIFECYCLE

This graphic reflects the typical progression of a project. The lifecycle of sponsored projects involves several key phases, each playing a crucial role in the successful completion of the project.

Phase 1: Getting Started

Encompasses the many things that happen before one even begins writing a proposal. The Getting Started phase prepares PIs for the proposal development process.

Phase 2: Pre-Award

Entails the steps that must happen leading up to submission of a proposal. The Pre-Award phase positions PIs to develop competitive, timely projects that lead to funding.

Phase 3: Post-Award

Involves the actual implementation and management of the funded project. The Post-Award phase allows PIs to put their projects into motion and consist of all the things that occur after an award has been accepted through completion and closeout.

PHASE 1: GETTING STARTED

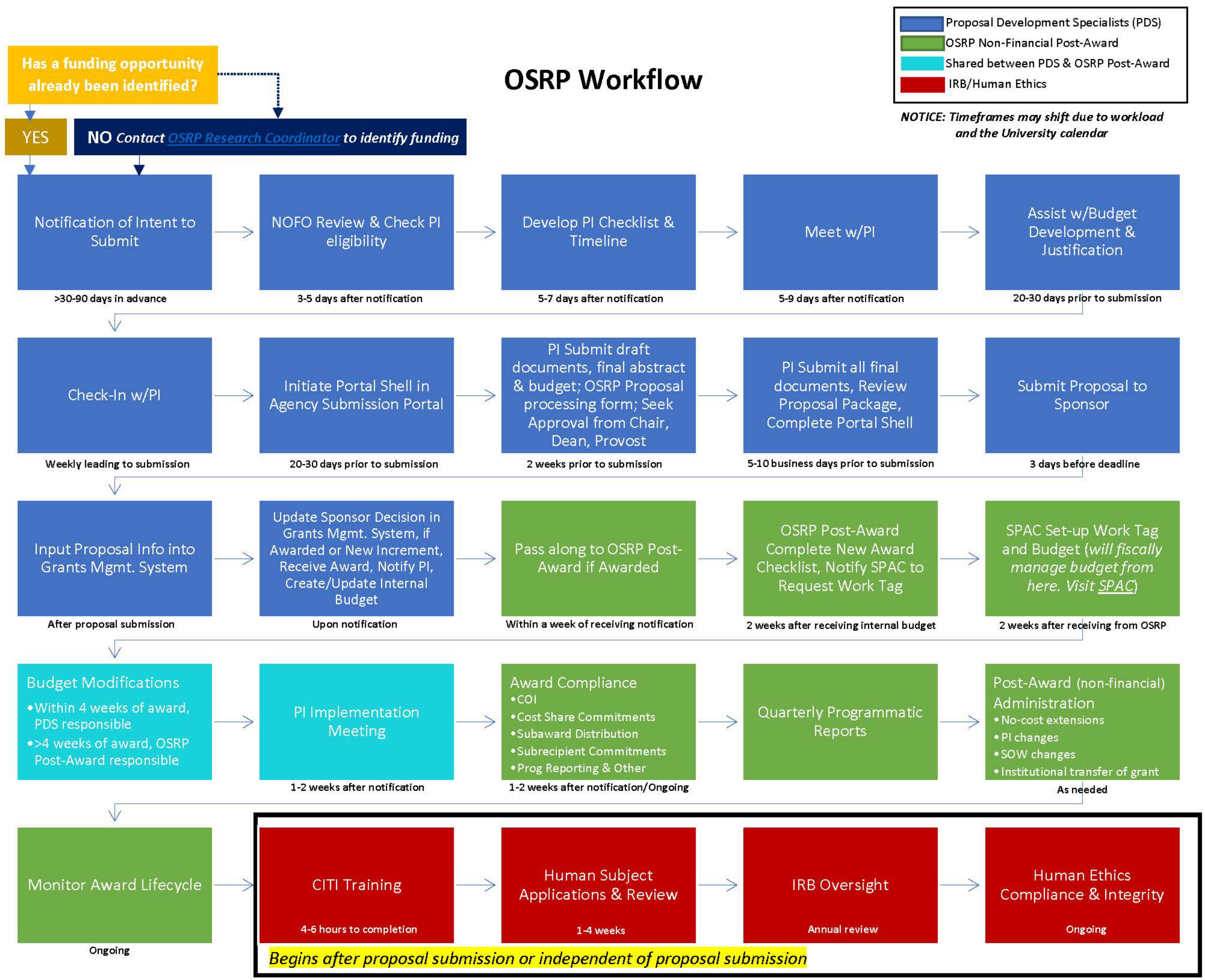
Idea Conception	PI or project teams conceive an idea that may lead to a fundable proposal.
Research Development	Research Development encompasses a set of strategic, proactive, catalytic, and capacity-building activities designed to facilitate individual faculty members, teams of researchers, and central research administration in attracting extramural research funding, creating relationships, and developing and implementing strategies that increase institutional competitiveness. Research development covers all the groundwork leading up to the initiation of a proposal from programming and tools to access and support.
Find Funding/Grant Seeking	Identifying and/or searching for appropriate funding opportunities.

PHASE 2: PRE-AWARD

Proposal Development	Proposal solicitation review; proposal compliance; continuous and final proposal review and feedback; budget development.
Budget Development	Developing a budget that aligns with the project's scope of work and aligns with the project activities to accomplish the project goals and meet deliverables.
Proposal Submission	Electronic or hard copy submission to sponsor. Review of budget; University/departmental cost- sharing/matching; effort commitment; course- release/buyout; authorized signatures on proposal routing form and proposal.
Award Acceptance	Negotiation of terms and conditions of pending grant or contract award; acceptance of award on behalf of the University by Authorized Official.

PHASE 3: POST-AWARD

Project Set-up	Processing of award set-up; gaining necessary institutional approvals prior to project commencement.
Project Management & Monitoring	Day-to-day project/program management; institutional compliance with sponsor requirements; time & effort reporting; institutional prior approval; contract continuations, modifications, and amendments.
Project Closeout	Closing out of award; patent/invention, final reports (technical, financial, property reporting).


OSRP Workflow
Proposal Development Specialists (PDS)
OSRP Non-Financial Post-Award
Shared between PDS & OSRP Post-Award
IRB/Human Ethics
NOTICE: Timeframes may shift due to workload and the University calendar
Has a funding opportunity already been identified?
YES
NO Contact OSRP Research Coordinator to identify funding
Notification of Intent to Submit
>30-90 days in advance
NOFO Review & Check PI eligibility
3-5 days after notification
Develop PI Checklist & Timeline
5-7 days after notification
Meet w/PI
5-9 days after notification
Assist w/Budget Development & Justification
20-30 days prior to submission
Check-In w/PI
Weekly leading to submission
Initiate Portal Shell in Agency Submission Portal
20-30 days prior to submission
PI Submit draft documents, final abstract & budget; OSRP Proposal processing form; Seek Approval from Chair, Dean, Provost
2 weeks prior to submission
PI Submit all final documents, Review Proposal Package, Complete Portal Shell
5-10 business days prior to submission
Submit Proposal to Sponsor
3 days before deadline
Input Proposal Info into Grants Mgmt. System
After proposal submission
Update Sponsor Decision in Grants Mgmt. System, if Awarded or New Increment, Receive Award, Notify PI, Create/Update Internal Budget
Upon notification
Pass along to OSRP Post-Award if Awarded
Within a week of receiving notification
OSRP Post-Award Complete New Award Checklist, Notify SPAC to Request Work Tag
2 weeks after receiving internal budget
SPAC Set-up Work Tag and Budget (will fiscally manage budget from here. Visit SPAC)
2 weeks after receiving from OSRP
Budget Modifications
• Within 4 weeks of award, PDS responsible
• >4 weeks of award, OSRP Post-Award responsible
PI Implementation Meeting
1-2 weeks after notification
Award Compliance
• COI
• Cost Share Commitments
• Subaward Distribution
• Subrecipient Commitments
• Prog Reporting & Other
1-2 weeks after notification/Ongoing
Quarterly Programmatic Reports
Post-Award (non-financial) Administration
• No-cost extensions
• PI changes
• SOW changes
• Institutional transfer of grant
As needed
Monitor Award Lifecycle
Ongoing
CITI Training
4-6 hours to completion
Human Subject Applications & Review
1-4 weeks
IRB Oversight
Annual review
Human Ethics Compliance & Integrity
Ongoing
Begins after proposal submission or independent of proposal submission

TYPES OF FUNDING MECHANISMS

Grants

A legal instrument of financial assistance between an external agency and a recipient or between a pass-through entity and a subrecipient. Its purpose is to advance knowledge by the transfer of money, property, services or anything of value to accomplish a public purpose.

Contracts

A legal instrument by which a recipient or subrecipient conducts procurement transactions under an award such as purchasing a supply or service. Generally based upon submission of milestones or deliverables. Contracts may be issued by other universities, companies, organizations, or agencies.

Cooperative Agreements

A legal instrument of financial assistance between a federal agency and a recipient or between a pass-through entity and subrecipient. Is used to enter into a relationship, the principal purpose of which is to transfer anything of value to carry out a public purpose authorized by a law of the United States; and not to acquire property or services for the federal government or pass-through entity's direct benefit or use; and is distinguished from a grant in that it provides for substantial involvement of the federal agency or pass-through entity in carrying out the activity contemplated by the federal award. Agency involvement may include: participating in protocol design, data collection, and data analysis and interpretation; approving a stage of the project before the next stage starts; or coordinating or providing training to grantee staff.

Gifts

Funds provided by an individual donor, foundation, or corporation that may be designated for a specific purpose. Gifts are recorded by the MSU Denver Foundation as a gift or pledge.

Subawards

An award provided by a pass-through entity to a subrecipient for the subrecipient to contribute to the goals and objectives of the project by carrying out part of an award received by the pass-through entity. It does not include payments to a contractor, beneficiary, or participant. A subaward may be provided through any form of legal agreement consistent with criteria in with § 200.331, including an agreement the pass-through entity considers a contract. Prime recipient of a sponsored award issues a subaward to a 3rd party that assists in the performance of substantial work under the grant or contract.

Every sponsored project agreement must be evidenced by a formal document that outlines the project objectives and administrative requirements of the project. Informal (oral) agreements are the personal responsibility of the individual faculty member making such arrangements and may not be binding on the University.

MSU Denver

Sponsored Research & Programs,
Sponsored Projects Accounting & Compliance

Procedures & Practices

ADMINISTRATIVE SALARIES

Purpose: The salaries of administrative and clerical personnel are normally treated as an indirect cost. Administrative and clerical salaries should not be a normal occurrence on sponsored projects as these are factored into the University's negotiated indirect cost rate.

As stipulated in the Cost Accounting Standards and the Uniform Guidance, 2 CFR 200, direct charging of administrative salaries is allowable only when all the following conditions are met:

- Administrative or clerical services are integral to a project or activity;
- Individuals involved can be specifically identified with the project or activity;
- Such expenses are explicitly included in the budget or have the prior written approval of the federal awarding agency; **and**
- The costs are not also recovered as indirect costs.

If administrative and/or clerical salaries are to be charged to an award, the budget justification must include ***a detailed explanation of the role of the administrator as it relates specifically to the aims of the project and may not include general administrative support***. However, there will need to be a reduction in indirect costs for your project to meet the conditions outlined in the Uniform Guidance.

PROCEDURE

1. When working with your OSRP Proposal Development Specialist (PDS) please be sure to disclose if administrative personnel (i.e. general administration, general clerical, accounting/finance, those holding administrative titles) will be included in your project budget.

2. The PI will be required to submit a detailed explanation as to why the administrative personnel is necessary for the project.

3. The PDS will check to ensure that the request aligns with 2 CFR 200 guidance. If so, the PDS will seek approval from the dean/supervisor/executive of the area.

ALLOWABILITY OF COSTS

Purpose: The allowability of costs for sponsored projects is determined by several factors (allowability, allocability, and reasonableness). Allowability refers to whether the cost is authorized for payment under the terms of the award. All expenses charged to sponsored projects must be allowable to be charged to the project work tag.

§ 200.402 Composition of costs.
The total cost of an award is the sum of the allowable direct and allocable indirect costs minus any applicable credits.

§ 200.403 Factors affecting allowability of costs.
Except where otherwise authorized by statute, costs must meet the following criteria to be allowable on sponsored program awards:

- Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.

- Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.

- Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the recipient or subrecipient.

- Be accorded consistent treatment. For example, a cost must not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.

- Be determined in accordance with generally accepted accounting principles (GAAP), except, for State and local governments and Indian Tribes only, as otherwise provided for in this part.

- Not be included as a cost or used to meet cost sharing requirements of any other federally-financed program in either the current or a prior period. See § 200.306(b).

- Be adequately documented. See §§ 200.300 through 200.309.

- Administrative closeout costs may be incurred until the due date of the final report(s). If incurred, these costs must be liquidated prior to the due date of the final report(s) and charged to the final budget period of the award unless otherwise specified by the Federal agency. All other costs must be incurred during the approved budget period. At its discretion, the Federal agency is authorized to waive prior written approvals to carry forward unobligated balances to subsequent budget periods. See § 200.308(g)(3).

§ 200.408 Limitation on allowance of costs.
Statutory requirements may limit the allowability of costs. Any costs that exceed the maximum amount allowed by statute may not be charged to the Federal award. Only the amount allowable by statute may be charged to the Federal award.

§ 200.410 Collection of unallowable costs.
Payments made for costs determined to be unallowable by either the awarding Federal agency, cognizant agency for indirect costs, or pass-through entity must be refunded with interest to the Federal Government. Unless directed by Federal statute or regulation, repayments must be made in accordance with the instructions provided by the Federal agency or pass-through entity that made the allowability determination. See §§ 200.300 through 200.309, and § 200.346.

The concepts of allowability, allocability, and reasonableness address directly the question of whether a cost may be charged as a direct or indirect cost against a specific sponsored research award.

It is a shared responsibility of the PI, originating unit, and Sponsored Projects Accounting & Compliance (SPAC) to ensure that all costs charged to the sponsored projects are allowable, allocable and reasonable. A determination of allowability, allocability and reasonableness for a given cost is based on the specific guidelines of the sponsoring agency, University policy, CO state and federal law, and federal cost principles.

Costs must be given consistent treatment through application of those generally accepted accounting principles appropriate to the circumstances, and in compliance with the University's Cost Accounting Standards Board (CASB) Disclosure Statement; and must conform to any limitations or exclusions set forth in 2 CFR 200, the award document, or the agency's guidelines.

NOTE: Any allowable costs allocated to a sponsored project under these standards may not be shifted to other sponsored projects in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored project, or for other reasons of convenience. In addition, any allowable costs allocated to activities sponsored by industry, foreign governments, or other sponsors may not be shifted to federally funded sponsored projects.

PROCEDURE

1. Please work with your OSRP Proposal Development Specialist (PDS) to develop your proposal budget.

2. If project expenses change after the award is received, please contact SPAC. SPAC will make a determination on allowability.

AWARD ACCEPTANCE

This procedure outlines the process that the Office of Sponsored Research & Programs (OSRP) follows to negotiate and accept a grant award. Typically, grants do not require negotiation, other than budget revisions because most federal awards incorporate standard terms and conditions that are not negotiable. Most negotiations conducted by OSRP involve awards from non-federal sponsors.

Purpose: This procedure outlines the process for accepting grant awards and negotiating contract agreement terms for MSU Denver faculty- and staff-led sponsored projects. The recipient of the contract or grant shall be Metropolitan State University of Denver and not an individual, department, or other constituent unit. As such, *grants, contracts, and subaward agreements may only be executed by the Executive Director of OSRP or their designee*.

PROCEDURE

1. If an award is received and has received prior approval, skip to the next step. If an award is received without prior approval of the proposal, the proposal is subject to the Pre-Award Review and Approval Process prior to acceptance of the award at the discretion of the OSRP Executive Director. OSRP has the right to reject any award if:
   a. the proposal did not follow the internal process of OSRP review, vetting, approval, and submission prior to proposal submission;
   b. the sponsoring agency cannot agree to our red lines or requests;
   c. MSU Denver cannot agree to or accept the terms and conditions;
   d. the project goes against MSU Denver mission and values; or
   e. the project cannot be run efficiently/deliverables cannot be met.
   (There may be other circumstances that warrant the denial of an award/contract)

   Note: Unacceptable requirements are those that would cause an extreme burden on MSU Denver, or MSU Denver administration, or are programmatic requirements that MSU Denver could not fulfill. (Examples include but are not limited to: Monthly invoicing with special requirements such as invoicing by task; Deliverable(s) requiring an infusion of resources greater than those provided by the award; Technical Reports due every two weeks; Final invoice or final financial report due less than 90 days after the project's end date, etc.)

2. OSRP Executive Director or ORSP Associate Director and PI review the award notification/documentation, if all is acceptable, they will sign the award notification (if required) to accept the award, terms, and conditions. If there is an issue, the PI should notify OSRP. OSRP representative will reach out to the sponsor to ask questions and ensure the award is in acceptable terms before executing. **ONLY the OSRP authorized representative can sign/execute grant awards and agreements.**

The OSRP Executive Director or ORSP Associate Director reviews the terms and conditions of the award/subaward or contract/subcontract, with particular attention to:

a. The Payment Schedule
b. General Terms and Conditions
c. Special Provisions
d. Scope of Work
e. Budgets and payment
f. Method of Invoicing and timeframe
g. Reporting requirements

If there is any mention of Intellectual Property in the award, OSRP will forward to the MSU Denver contracts manager, if necessary.

3. The assigned OSRP Proposal Development Specialist (PDS) shares the award notice with the PI and the dean of that area, then uploads the award notice into Cayuse (grants management system).

4. The PDS confirms the project budget with the PI, updates as necessary, and ensures the final budget is on the internal budget template, then uploads the final budget into Cayuse. After the award document and internal budget are uploaded into the grants management system, the PDS will notify the OSRP Post-Award Specialist.

5. OSRP Post-Award Specialist completes the award checklist and gathers documents, grants v. contracts form (if applicable), and other internal forms (if applicable), and forwards a copy of the award/contract and backup documents to Sponsored Projects Accounting & Compliance (SPAC) to request a work tag. Work tags can only be requested by OSRP Post-Award Specialist to ensure a streamlined process and prevent delay.

6. OSRP Post-Award Specialist schedules meeting with PI to discuss project deliverables, sponsor requirements, and other project details. If any of the requirements concerning the project or deliverables are considered unacceptable, the PI/PD should discuss with the OSRP Post-Award Specialist so that it can be negotiated with the sponsor.

7. SPAC creates work tags, notifies PI, and schedules onboarding meeting.

Note: If the new award includes subawards that will be issued by OSRP. OSRP will coordinate with the PI/PD to setup those agreements.

Note: MOUs (memorandum of understanding) and MOAs (memorandum of agreement) that are in place or sought with K-12 districts or other community partners should be reviewed by MSU Denver contracts manager in addition to OSRP. Such agreements may be referenced in the grant, contract, or sub-agreement. Contact OSRP for assistance.

BUDGET DEVELOPMENT

Preparation of the budget is an important part of the proposal preparation process. Sponsors and peer reviewers are responsible for comparing the level of funding requested to the work proposed. Therefore, the budget section of the proposal should reflect, as accurately as possible, the funding needed to carry out the project.

Purpose: A grant budget is the "fiscal expression" of your sponsored project. Your plan for the funds requested should be reasonable, allowable, and allocable. If you over-estimate the cost of the proposed activities, reviewers may find your proposal not competitive against other applications that plan to do more with less. If you underestimate your expenses, reviewers may find your proposal unrealistic.

PROCEDURE

1. Contact your OSRP Proposal Development Specialist (PDS) to begin the budget development process.

2. Your OSRP PDS will schedule an introductory meeting to discuss budget needs and develop a preliminary list of budget lines and budget amounts.

3. Your OSRP PDS will begin the budget development for your project utilizing a standard OSRP budget template and provide it to the Principal Investigator. All budgets must comply with sponsor guidelines, university policies, federal regulations, and state procurement policies, as well as be allowable, allocable, and reasonable.

4. Principal Investigators (PIs) will review the budget for accuracy. PIs must use the template format provided by the OSRP PDS.

5. The PI and the OSRP PDS will work together to gather feedback and revise the budget as necessary.

6. Once the budget is developed and final, the PI will need to develop the budget justification.

7. The PI will submit the budget justification to OSRP for review.

8. The OSRP PDS will perform a final review then route the proposal and budget to the department chair/director and dean/AVP for approval before submitting to the sponsor.

9. Final budgets must be delivered to the OSRP PDS for final review 2 weeks to seven business days in advance of the target proposal submission date.

NOTE: A cost-of-living adjustment or allowance can be budgeted in order to cover expected cost increases ranging from raises for salaries and generic inflationary forces for other direct costs. A standard 3% increase can be used for budget categories when appropriate.

BUDGET MODIFICATIONS

During a sponsored project, unexpected circumstances may arise resulting in the need for the Principal Investigator (PI) to request changes to their project.

Purpose: Occasionally, a project's financial resources need to be reallocated due to the nature and progress of the research. For example, a piece of equipment may become unnecessary, while another expense becomes necessary, or the scope of the project might change due to unforeseen circumstances. In these cases, a re-budget or budget modification may be necessary.

A budget modification is shifting an expense from one budget category to another, which may result in adjustment to the F&A cost collection.

Modifying the budget is allowable only to the extent of the terms within the award or contract. Therefore, before any attempt to modify the budget, the PI must work with the Office of Sponsored Research & Programs (OSRP) to review the terms of the specific award and to officially modify the budget. The PI should also assess the potential impacts of the proposed budget modification in conjunction with OSRP Post-Award. Depending on the terms of the agreement, budget modifications may require sponsor approval.

During the performance of the project, a PI may discover that he/she needs to allocate funds approved for one purpose to another purpose. In some cases, this can be done without sponsor approval. However, in all cases, the PI must work with OSRP to officially make this determination and modify the project budget, even if only needing an internal budget modification, not requiring sponsor approval.

Each agency has specific requirements for obtaining prior approval. All prior approval requests will be made to the funder via OSRP Post-Award. If sponsor prior approval is required, the PI will provide OSRP Post-Award staff with a written explanation and rationale for the request. OSRP is responsible for reviewing the request, editing as appropriate, and officially submitting it to the sponsor.

Where federally sponsored projects are concerned, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards sets forth standards for obtaining consistency and uniformity among federal agencies in the administration of grants to, and agreements with, institutions of higher education. Under "expanded authorities," many federal agencies have transferred the authority to unilaterally approve a number of post-award actions.

Where non-federal awards are concerned, sponsors will typically provide prior approval language in the agreement, contract, memorandum of understanding, or another binding document.

PROCEDURE

1. PI and/or SPAC determine if a budget modification is needed.

2. PI contact OSRP.

3. OSRP review award terms to determine the approval process for budget modifications.

4. PI should work with OSRP, SPAC, and the departmental fiscal manager to determine what exactly needs to be modified.

5. PI provide the internal budget template with the updated budget to OSRP.

6. OSRP will provide a final review, approve, and process the budget modification request.

7. If sponsor approval is required, OSRP will submit the official request for approval.

CHANGE IN PRINCIPAL INVESTIGATOR (PI)

Purpose: During the course of a sponsored project, unexpected circumstances may arise that may not have been previously anticipated. As a result, the Principal Investigator or project director may need to be changed. The sponsor's approval is required for this change.

PROCEDURE

1. **Contact the OSRP Post-Award staff.** After an award is executed, the OSRP's post-award staff are responsible for central oversight. Contact them to discuss the proposed change in Principal Investigator/Project Director.

2. **Submit a formal request.** A formal request must be submitted to OSRP for prior approval. The PI/PD of record will remain the PI/PD until an official change has been approved by the sponsor.

3. **OSRP internal review.** Once the formal request is received, OSRP will conduct an internal review to ensure the request is compliant with both the funding agency's terms and conditions and MSU Denver policies. This may include submitting a biosketch/vitae, current & pending support form, collaborations and other affiliations form, and other common forms for the new PI/PD.

4. **Agency submission and approval.** OSRP's Authorized Organization Representatives (AORs) are the only staff who can submit a formal request on behalf of MSU Denver. OSRP will submit the change request to the funding agency via email or specified online portal.

5. **Implementation.** Only after receiving formal approval from both OSRP and the funding agency can the requested change be implemented. OSRP will communicate the change to the dean, the new PI and SPAC. SPAC will update the PI in WorkDay.

CHANGE IN SCOPE OF WORK

Purpose: During the course of a funded research project, it may be necessary to clarify or alter the scope of work for the project. If such adjustments do not involve a corresponding change to the budget for the project, this change can often be made via a simple amendment to the contract/award agreement.

At MSU Denver, a "change in scope" for an externally funded research project is managed by OSRP. The process involves the Principal Investigator (PI) requesting a modification, which is then reviewed by OSRP to ensure compliance with the sponsor's rules and university policy.

When to request a change in scope:
You may need to request a change in scope for several reasons during a project:

- **Shifting research focus:** Changes to the original programmatic goals or activities.
- **Changes in personnel:** Replacing a Principal Investigator or a subrecipient PI.
- **Budgetary changes:** Re-budgeting or other significant changes to the project's finances.
- **Extensions:** Requesting more time to complete the project (a "no-cost extension").
- **Sub-awards:** Modifying an existing sub-award or issuing a new one if a subrecipient is changing institutions.

When prior approval is required:
Prior approval is typically required for changes that alter the fundamental aspects of the funded research, including but not limited to:

- **Significant re-budgeting:** Altering the project budget to move significant funds between categories.
- **Change in PI:** A change in the lead Principal Investigator.
- **Subrecipient change:** Adding a new sub-award or changing the subrecipient PI or institution.
- **Performance site change:** Changing the primary location where the grant work is performed.
- **Deviation from original aims:** Altering the direction or purpose of the approved research.

PROCEDURE

1. **Contact the OSRP Post-Award staff.** After an award is executed, the OSRP's post-award staff are responsible for central oversight. Contact them to discuss the proposed change in scope.

2. **Submit a formal request.** The PI must submit a formal request to OSRP for prior approval. OSRP handles requests for "post-award items" like changes in PI, no-cost extensions, or re-budgeting.

3. **OSRP internal review.** Once the formal request is received, OSRP will conduct an internal review to ensure the request is compliant with both the funding agency's terms and conditions and MSU Denver policies.

4. **Agency submission and approval.** OSRP's Authorized Organization Representatives (AORs) are the only staff who can submit proposals and formal requests on behalf of MSU Denver. OSRP will submit the change request to the funding agency via email or specified online portal.

5. **Implementation.** Only after receiving formal approval from both OSRP and the funding agency can the requested change be implemented. OSRP will communicate the change to the PI and SPAC.

COMPLIANCE & RISK CHECK (PRE-AWARD)

In reviewing award agreements, OSRP works to ensure that the terms and conditions of the award documentation align with federal law, state law, MSU Denver policies, OSRP Policies, and the needs of the PIs at MSU Denver. Other departments on campus may also need to engage in this process if the terms require unusual circumstances, data security or use of MSU Denver's name or logo, for example.

As part of this process, we are looking to ensure that the terms of the proposal or agreement match the requirements of the laws and policies applicable to MSU Denver. Specifically, we want to make sure that academic freedom is preserved, protecting rights in areas such as intellectual property, publication and data ownership, as well as ensuring that state restrictions are not exceeded in areas such as insurance and indemnification.

The OSRP Executive Director or ORSP Associate Director reviews the terms and conditions of the agreement/award notice, with particular attention to:

a. The payment schedule
b. General terms and conditions
c. Special provisions
d. Scope of work
e. Budgets and payment
f. Method of invoicing and timeframe
g. Reporting requirements
h. Effective dates

Different approaches may be taken depending on how the terms come in. The overall goal is to ensure that MSU Denver can perform the project in compliance with minimal risks.

These include:

- For projects that have not yet been awarded but require pre-proposal review, OSRP, and sometimes Business Services, reviews the pre-proposal terms and conditions to identify terms and conditions provided by the sponsor that need negotiation and may then draft an exception letter requesting changes and/or negotiation in the event the proposal is funded.
- For review of awarded projects, OSRP will directly negotiate changes with the sponsor. This is done through red-line exchanges, emails, phone calls, etc.

Other things to consider include:

- Financial Risks: Pre-award expenditures are subject to financial risk, especially if the award is delayed or not received. It is crucial to ensure that the PI's department has sufficient funds to cover any costs incurred before the award is finalized.
- Liabilities: There are legal liabilities associated with pre-award spending, particularly regarding intellectual property rights and indemnification. PIs must carefully assess these risks before requesting authorization.

- Documentation: Proper documentation of sponsor approval for pre-award expenses is essential. This includes maintaining records of the sponsor's approval and ensuring that all expenditures are allowed under the terms of the anticipated award.
- Compliance: Institutions must comply with government regulations and adhere to the terms of the anticipated award. This includes understanding the limitations and restrictions associated with pre-award spending.

COMPLIANCE AUDITS

MSU Denver undergoes various internal and external audits. Internal audits may be performed as regular monthly reviews with the PI and the Sponsored Projects Accounting & Compliance (SPAC) assignee, whereas external audits are conducted by entities outside of MSU Denver.

As per the federal government's mandate, any institution that spends more than $750,000 in federal funds during its fiscal year must complete a "Single Audit." The requirements for a Single Audit are explained in Uniform Guidance-Subpart F. Because MSU Denver exceeds the federal expenditure threshold and is a state agency, the university is included in the State of Colorado's consolidated Single Audit. This audit is conducted as part of the state's overall financial and compliance review process.

Purpose: Compliance audits for sponsored projects ensure that funds are used according to the terms of the award and applicable regulations. They help verify accurate financial reporting, proper documentation, and adherence to institutional policies. These audits promote accountability and protect future funding opportunities.

Sponsored Projects Accounting and Compliance (SPAC) conducts the following Audit Activities:

- **Subrecipient Monitoring**: SPAC conducts risk assessments and monthly desk reviews of subrecipient invoices to ensure proper documentation and adherence to subaward terms. High risk subrecipients may be audited by samples of expenditures, review of sponsor's procurement policies or site visits.

- **Effort Certification**: SPAC monitors and manages the institution's effort reporting systems, working closely with departments to ensure timely and accurate certification of personnel effort on sponsored projects.

- **Compliance Monitoring**: SPAC implements risk-based monitoring strategies and provides education to the grant community on best practices to maintain compliance with sponsor and institutional requirements. These monitoring activities include the review and approval of all expenditures, including payroll, after the PI's approval.

Grant Administrators may receive requests for additional detailed justifications or further action is required.

- **Audit Coordination**: SPAC manages external audit engagements and supports the institution's participation in the annual Single Audit for federally funded activities.

Programmatic audits are handled through OSRP and the PI. If you receive an email from a sponsor requesting documentation or announcing a desk review or audit, please contact the Executive Director of OSRP immediately.

CONFLICT OF INTEREST

Purpose: To comply with federal regulations and MSU Denver policy, all Principal Investigators (PIs) and sponsored projects personnel involved in sponsored research must disclose significant financial interests (SFI) that may present an actual, potential, or perceived conflict of interest related to their institutional responsibilities. This procedure serves to mitigate financial conflicts of interest for employees and students conducting federally funded research at the University.

Note: Please use this procedure with the University's Conflict of Interest and Commitment policy and Uniform Guidance 2 CFR 200.

Training Requirement: Investigators are required to complete conflict of interest training before engaging in grant-related work, and again every four years during any grant-funded award. The required training is available online through the Collaborative Institutional Training Initiative (CITI).

PROCEDURE

1. Whether there is a conflict or potential conflict, all PIs, employees, and students being funded from a sponsored project are required to complete the Financial Conflict of Interest (FCOI) Disclosure Form for Sponsored Research.

2. This form is required before any proposals are submitted.

3. This form must be completed annually if you receive sponsored program funds.

4. OSRP will refer any potential financial conflicts (positive disclosures) to the Provost, CFO, Director of SPAC, and general counsel to make an initial determination whether an Investigator's (or sponsored project personnel) significant financial interest (SFI) is related to the sponsors' funded research, i.e. reasonably determines that the SFI could directly and significantly affect the design, conduct, or reporting of the sponsor funded research.

5. If there is a determination that the SFI is related to the sponsored research, the dean/executive of the area will be notified.

6. Where a FCOI has been found to exist, a management plan will be established to address the SFI. OSRP executive director, SPAC director, the employee, and the employee's supervisor, will collaboratively develop a management plan to manage, reduce, or eliminate any actual or potential FCOI.

7. The sponsor will be notified as required.

Definitions

A. **Investigator** means the Project Director or Principal Investigator AND any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research, who may include, for example, non-faculty employees, collaborators or consultants.

B. **Investigator's Institutional Responsibilities** means an Investigator's professional responsibilities on behalf of MSU Denver, which may include for example: activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.

C. **Significant Financial Interest (SFI)** means:
   1. A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse or dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities
   2. 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 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. 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;
      A. 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 months preceding the disclosure, when aggregated, exceeds $5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
      B. Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
   3. Investigators also must disclose any reimbursed travel or travel paid on behalf of the Investigator (i.e., not reimbursed to the Investigator), related to their MSU Denver responsibilities.
      A. 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 as defined at 20 USC 1001(a); an academic teaching hospital; a medical center; or a research institute affiliated with an institution of higher education.

B. At a minimum, the Investigator must disclose: the sponsor/organizer of the trip, the purpose of the trip, the monetary value of the trip, the destination, and the duration.

4. The following are excluded from the definition of SFI:
   A. Salary, royalties, or other remuneration paid by MSU Denver to the Investigator if the Investigator is currently employed or otherwise appointed by MSU Denver;
   B. Intellectual Property Rights assigned to MSU Denver and agreements to share in royalties related to such rights;
   C. 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;
   D. Income from seminars, lectures, or teaching engagements sponsored by a federal, state or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or
   E. Income from service on advisory committees or review panels for a federal, state or local government agency, institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.
   F. Exclusions for NSF only:
      A. An equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, meets both of the following tests:
         i. does not exceed $10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and does not represent more than a 5% ownership interest in any single entity;
         ii. or Salary, royalties or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children, are not expected to exceed $10,000 during the twelve-month period.
5. **Financial Conflict of Interest (FCOI)** means an SFI that could directly and significantly affect the design, conduct, or reporting of the Sponsors' funded research.
6. **Research** means a systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge. This definition:
   A. Encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug).
   B. Includes any such activity for which research funding is available from the Sponsors through a grant or cooperative agreement, however authorized,

such as a research grant, career development award, center grant, individual fellowship award, infrastructure award, institutional training grant, program project, or research resources award.

FAQs

Am I required to disclose a conflict?

Individuals subject to this policy are required to disclose financial interests related to federally funded proposals and to meet institutional and Sponsor requirements for COI training. An Investigator will not be eligible to submit an application in response to a Sponsor's funding announcement until she/he has met these requirements.

Am I required to take COI Training?

Yes. MSU Denver provides online COI training through the Collaborative Institutional Training Initiative (CITI). The training is administered by the Center for Faculty Excellence and is available to all faculty, staff.

Each investigator must complete COI training

- Prior to submitting, or being listed as an investigator on, an application in response to a Sponsor's funding announcement;
- At least every four years afterward;
- Immediately under the following circumstances:
- For new Investigators, before beginning work on a currently-funded project to which this COI policy applies; and for current investigators who have not completed the training or have a COI completion certificate on file; and
- MSU Denver COI policies change in a manner that affects Investigator requirements.

Am I required to complete the FCOI form?

Completed Financial Conflict of Interest (FCOI) Disclosure Form is required to be submitted by each Investigator, including sub-recipient Investigators, if applicable, planning to participate in the Sponsors' funded research at the time of application for federal funding; at least annually, during the period of the award, beginning with the anniversary date of the award; and within thirty days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new significant financial interest.

Completed disclosure forms should be emailed to the Executive Director of the Office of Sponsored Research and Programs.

What determines non-compliance?

Not completing the COI training, not completing the required FCOI form, not disclosing a conflict, not completing or updating the form in a timely manner, or a combination of all of these. Additionally, if MSU Denver identifies an Investigator noncompliant with a previously instituted management plan.

Who should I notify once COI training is complete?
Investigators must complete the required COI training and forward proof of completion to the Executive Director of the Office of Sponsored Research and Programs.

What should be included in the Management Plan if a SFI is determined to exist?
All management plans must include, at a minimum, the following elements:

A. Sponsor Project Number;
B. Project Title;
C. PD/Pl or contact PD/Pl if a multiple PD/Pl model is used;
D. Name of Investigator with the Financial Conflict of Interest (FCOI);
E. Name of the entity with which the Investigator has a FCOI;
F. Nature of the FCOI;
G. Value of the FCOI (dollar ranges are permissible: $0-$4,999; $5,000-$9,999; $10,000-$19,999; amounts between $20,000-$100,000 by increments of $20,000; amounts above $100,000 by increments of $50,000), 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;
H. A description of how the financial interest relates to the Sponsor funded research and the basis for the Institution's determination that the financial interest conflicts with such research;
I. Detailed methodology of the review process to include composition of the review panel, and documents reviewed;
J. Findings of review; and
K. A description of the key elements of the Institution's management plan, including:
    i. Role and principal duties of the conflicted Investigator in the research project;
    ii. Conditions of the management plan;
    iii. How the management plan is designed to safeguard objectivity in the research project;
    iv. Confirmation of the Investigator's agreement to the management plan;
    v. How the management plan will be monitored to ensure Investigator compliance; and
    vi. Other information as needed.

What are possible approaches to manage, reduce, or eliminate a SFI?

A. Public disclosure of financial conflicts of interest (e.g., when presenting or publishing the research). If the Sponsors' determine that a Sponsor-funded project to evaluate a drug, medical device or treatment was conducted by an Investigator with a conflict that was not disclosed or managed, the lnvestigator(s) is required to disclose the conflict in each public presentation of the results of the research;
B. For research projects involving human subjects research, disclosure of financial conflicts of interest directly to participants;
    i. COI determinations and management plans must be included in the submission of human subjects research to the Institutional Review Board

(IRB) for review. The IRB may require modifications to the research or to the management plan for the protection of subjects, per HSPP/IRB policies.

C. Appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the financial conflict of interest;
D. Modification of the research plan;
E. Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research;
F. Reduction or elimination of the financial interest (e.g., sale of an equity interest); or
G. Severance of relationship(s) that create financial conflicts.

What happens if MSU Denver identifies an SFI that was not disclosed in a timely manner by an Investigator?
OSRP, SPAC, the employee, and their dean/executive leader must implement, on at least an interim basis, a management plan that specifies the actions that have been, and will be, taken to manage such financial conflict of interest going forward.

Within 120 days of the determination of noncompliance, complete a retrospective review of the Investigator's activities to determine whether any research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of such research. If necessary, MSU Denver will 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, MSU Denver is required to notify the Sponsors promptly and submit a mitigation report to the appropriate Sponsor point-of-contact. MSU Denver may determine that additional interim measures are necessary.

How often are FCOI forms reviewed?
Once per year. All FCOI forms must be completed at least annually unless a potential conflict has been identified prior to that time. Refer to the COI policy.

How often are management plans reviewed?
No less than once a year, OSRP will monitor Investigator compliance with management plans for the duration of the project period, including extensions with or without funds.

How are FCOI disputes resolved?
Any dispute, controversy, sanction or appeal in relation to disclosure, management or elimination of financial conflicts of interest shall be resolved by the Provost, CFO, and general counsel. The decision shall be considered final subject to review, modification, and approval by the President or the president’s designee.

How is a FCOI reported to the sponsor?
Prior to the University's expenditure of any funds under the Sponsors' research project, the University is required to provide to the sponsors a financial conflict of interest (FCOI) report regarding any Investigator's FCOI and ensure that MSU Denver has implemented a

management plan in accordance with this policy. If MSU Denver identifies a FCOI and eliminates it prior to the expenditure of the sponsors' awarded funds, the University is not required to submit an FCOI report.

Once a FCOI has been reported, MSU Denver must submit an annual FCOI report to the Sponsor for the duration of the project period, including extensions with or without funds. The report must specifically state whether the FCOI is still being managed, why it no longer exists, and/or detail any changes in the management plan.

For any significant financial interest (SFI) that MSU Denver identifies as conflicting subsequent to its initial FCOI report during an ongoing Sponsor funded research project (e.g., upon the participation of an Investigator who is new to the research project), within 60 days MSU Denver must provide to the appropriate sponsor point-of-contact an FCOI report regarding the financial conflict of interest and ensure that MSU Denver has implemented an FCOI management plan.

If the FCOI report involves an SFI that was not disclosed in a timely manner by an Investigator or, for whatever reason, was not previously reviewed or managed by the University, MSU Denver must complete a retrospective review to determine whether any sponsor-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 reporting of such research. If bias is found, MSU Denver is required to notify the sponsor promptly and submit a mitigation report to the appropriate sponsor point-of-contact.

What if my project has a subaward?

When MSU Denver carries out any Sponsor-funded research with the involvement of a sub-recipient or contractor, the University will take reasonable steps to ensure that any sub-recipient Investigator complies with the Sponsor's FCOI mandates by:

A. Incorporating terms as part of a written agreement with the sub-recipient that establish whether MSU Denver's COI policy or the sub-recipient's policy will apply to the sub-recipient's Investigators.
B. If the sub-recipient's Investigators are to comply with the sub-recipient's FCOI policy, the sub-recipient must certify that its policy complies with the sponsor's regulations and the agreement will specify the time period(s) for the sub-recipient to report all identified FCOIs to MSU Denver. If the sub-recipient cannot provide such certification, its Investigators must comply with MSU Denver's COI policy.
C. If the sub-recipient's Investigators are to comply with MSU Denver's COI policy, the agreement will specify the time period(s) for the sub-recipient to submit all Investigator disclosures of significant financial interests to MSU Denver.

Is Public Disclosure Permissible?

Promoting Objectivity in Research (42 CFR Part 50 Subpart F), as well as NSF's Conflict of Interest Policy, prior to the expenditure of any funds under Sponsor-funded research project, MSU Denver will ensure public accessibility, via a publicly accessible website or written response to any requestor within five (5) business days of a request, of information concerning any significant financial interest (SFI) disclosed to the University that meets the following three criteria:

A. The SFI was disclosed and is still held by the Investigator;
B. MSU Denver determines that the SFI is related to the Sponsor-funded research; and
C. MSU Denver determines that the SFI is a FCOI.

How long will FCOI disclosures be kept?

Records of all FCOI disclosures, review notes, and actions taken will be maintained for at least three years from the date of submission of the final expenditures report.

CONSULTANT (EXTERNAL)

Purpose: Costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill and who are not officers or employees of the recipient or subrecipient institution are allowable, subject to paragraphs (b) and (c) of section 2 CFR 200.459.

An individual or business whose expertise is required to perform the project. Services are temporary and special or highly technical.

- An individual or business outside the project who confers with the PI regarding research objectives.
- Does not develop the objectives of the project.
- Is not responsible for the overall outcome of the project.
- Is not responsible in designing or developing the research.
- Is not responsible for conducting the research.
- Is not responsible for reporting the research.
- Is not essential toward the shape, direction, and completion of the project.
- Receives a fee for their services not a salary.
- Provides similar services to other organizations.
- Does not serve as senior personnel – e.g., Co-Investigator, Principal Investigator, etc.
- Will not use university resources. Provides its own work area, tools, materials, and supplies.
- MSU Denver defines the scope of work.
- Consultant determines how to accomplish the work.
- Is not considered an employee of the University and therefore is not eligible for workers compensation, liability coverage, or unemployment.
- Payment is based upon completion of specific work, rather than time worked.

PROCEDURE

1. If the statements above best describe your proposed agreement, notify your OSRP proposal development specialist.

2. OSRP will confirm consultancy and request a Consultant Letter of Commitment for the project.

Consultant Letter of Commitment

CONTRACTS

Purpose: This document is intended to clearly define the difference between restricted contracts and regular receivable contracts.

Overview: Both restricted and regular contracts are external funding to the University in exchange for work performed by the university classified as auxiliary funded activities. However, there are important differences between these types of activities.

Types of Contracts

Sponsored Project Contract (Restricted): A sponsored project contract is not a grant or an award. It includes scholarly activities integral to MSU's teaching, research, and service mission and can be in the form of a contract or a collaborative agreement. Sponsored projects usually require the intellectual contribution of at least one MSU employee, and they usually (but not always) allow for the University to own resulting intellectual property and for the publication of results without significant restrictions. Sponsored projects must be processed through OSRP.

Sponsored projects typically have some or all the following characteristics:

- The activity requires an intellectual or scholarly contribution from MSU personnel, including research.
- An administrative service recharge (ASR) is required.
- A formal proposal or award document exists, often requiring the endorsement of an authorized official of MSU.
- The proposal or agreement includes an itemized budget.
- Cost-sharing may be involved or required to receive the funding.
- A specific commitment is made regarding the level of personnel effort.
- A fiscal report, activity report, and/or external audit are required during the course of the work or at the end of the project period.
- Unexpended funds may be returned to the sponsor at the end of the activity.
- The activity includes compliance terms and conditions.

NOTE*: This is not an exhaustive list.*

Regular Receivable Contract: A regular receivable contract is a fee for service activity. This includes providing specific services or products in exchange for a fee. This is routine work that involves standardized procedures or procedures supplied entirely by the outside party funding the work. The outcome of the work is not likely to result in the development of new knowledge or publishable information, and any data collected is to be provided without significant interpretive analysis. Fee-for-service activities do not include any research activities. These contracts should be vetted through Contracts & Business Services.

Fee for service activities typically have some or all the following characteristics:

- The scope of work describes routine or repetitive services.
- The work will require little or no intellectual or scholarly contribution on the part of MSU Denver employees.

- No new intellectual property is expected to be developed in performing the work.
- There is no scientific uncertainty regarding the University's ability to perform the work and provide the stated deliverables.
- MSU employees will not engage in significant interpretive analysis of resulting data or provide conclusions. There is no expectation of publishing on the work or the data.
- An administrative service recharge (ASR) is required.

CONTRACT NEGOTIATION & EXECUTION

This procedure outlines the process that the Office of Sponsored Research & Programs (OSRP) follows to negotiate and execute a sponsored contract. Most negotiations conducted by OSRP involve awards from non-federal sponsors, contracts, and sub-agreements from other institutions. ***PLEASE NOTE that all contracts must start with Business Services.***

SCOPE

This procedure outlines the process for negotiating sponsored contract terms for MSU Denver faculty- and staff-led sponsored projects. The recipient of the contract shall be Metropolitan State University of Denver and not an individual, department, or other constituent unit. As such, *grants, restricted contracts, and subaward agreements may only be executed by the Executive Director of OSRP or their designee*.

Contracts are binding agreements between two or more parties that create rights and obligations that may be enforced by a court of law.

The process of reviewing and negotiating contracts can span weeks if there are extraordinary or unique requirements or if there are missing documents.

Many times, when OSRP receives a contract, OSRP will partner with other departments to review the terms and conditions of the contract to ensure that the language is acceptable and does not present risks to the University. This review process could take an extended amount of time.

There are terms and conditions that cannot be accepted on behalf of the University due to a number of reasons. Some of the first questions asked are:

- What kind of service is it? What kind of document is being used?
- Has the contractor provided their own terms? If so, have they provided a copy for review?
- Does the contract follow procurement and/or fiscal rules?
- Who needs to review and approve the contractual language? (Routing)
- Do negotiations need to happen with the contractor?
- OSRP will keep a copy of the final versions in the files AND send a copy to SPAC.

As with awards, the OSRP Executive Director or ORSP Associate Director reviews the terms and conditions of the contract/subcontract, with particular attention to:

a. The Payment Schedule
b. General Terms and Conditions
c. Special Provisions
d. Scope of Work, Budgets, and Payment
e. Method of Invoicing and Timeframe
f. Reporting requirements

PROCEDURE FOR CONTRACT NEGOTIATION

1. If a contract is received and has received prior approval, skip to the next step. If a contract is received without prior approval, the contract/agreement is subject to the Pre-Award Review and Approval Process prior to acceptance of the terms, at the discretion of the OSRP executive director. OSRP has the right to reject any contract if:
   a. the agreement did not follow the internal process of OSRP review, vetting, approval, and submission;
   b. the sponsor cannot agree to our redlines or requests;
   c. MSU Denver cannot agree to or accept the terms and conditions;
   d. the project/service goes against MSU Denver mission and values; or
   e. the service cannot be provided efficiently/deliverables cannot be met.

   (There may be other circumstances that warrant the denial of a contract)

   Note: Unacceptable requirements are those that would cause an extreme burden on MSU Denver or MSU Denver administration, are programmatic requirements that MSU Denver could not fulfill, or pose extreme risks to MSU Denver or risks that cannot be mitigated.

2. OSRP Executive Director reviews the contract language, terms, and conditions. If there is any mention of: Intellectual Property, indemnification, arbitration, choice of law, or liability in the contract, OSRP will collaborate with MSU Denver Contracts & Business Services office for review.

3. If necessary, the OSRP Executive Director will collaborate with the university's contracts team to redline the contract language. The goal is to protect the institution and ensure the contract language is in acceptable terms before executing.

4. OSRP Executive Director will route the contract language to other divisions that may need to review specific sections or language, such as IT services, facilities, SPAC, etc.

5. If all is acceptable, the OSRP Executive Director will execute the contract to accept the terms and conditions. If there is an issue/are issues, the OSRP Executive Director will consult with the Manager of Contracts and Business Services.

6. Once issues are resolved, the OSRP Executive Director will execute the contract. **ONLY the OSRP authorized representative can sign/execute sponsored contracts and agreements**.

7. If there are further issues, the OSRP Executive Director will reach out to the sponsor to ask questions, get clarification, and, potentially, negotiate terms.

8. Once all redlines are accepted and the contract has been executed, the university should receive the completely signed contract back from the sponsor, it is considered fully executed and work tags can then be requested by OSRP.

COST SHARE

Purpose: This document is intended to clearly define terms and processes related to cost share to provide Principal Investigators (PI) and Fiscal Managers helpful information during the proposal and post award phases.

Overview: Understanding the benefits and fiscal management requirements of cost-sharing is essential for effective financial planning of a sponsored project. Cost-sharing can reduce expenses by distributing costs among multiple parties, but it requires careful oversight to maximize benefits and maintain financial integrity.

Cost Share means sharing the total project costs of a sponsored project. Typically, the institution takes on the responsibility of sharing the costs either by cash match, in-kind, or third-party share.

Modes of Cost Share

Cash Match (CMATCH) is an in-house term. It refers to institutional funds allocated to support sponsored projects. Each year, the University maintains a budget for cash match dollars, which are managed by the Office of Sponsored Research& Programs (OSRP) to further support the mission of various sponsored awards. In addition, other departments may provide cash match. An example of cash match may be a request for funds to provide scholarships, purchases of material and supplies, and purchase of equipment. These dollars may or may not be included in the proposal budget or the narrative. Principal Investigators (PIs) are invited to apply for these funds semi-annually.

In-Kind refers to support provided without the exchange of money. In-kind contributions may be in the form of providing services, space, effort or supplies directly benefiting and specifically designated for the University's project or program. If the value can be quantified, an in-kind work tag can be added for documentation purposes.

Third-Party Support refers to support provided by an external source. The third-party support can be in the form of cash or in-kind.

Types of Cost Share

Mandatory Cost Share: Cost share that is required by the sponsor and is listed/described in the notice of funding opportunity (i.e. RFP, program announcement, funding opportunity announcement). Projects with a cost share requirement will receive priority for cash match funds.

Voluntary Committed Cost Share: Cost share that is not required by the sponsor, but the PI lists the commitment in the proposal and proposal budget. This type of cost share is highly discouraged. It becomes part of a binding agreement and must be reported as part of the project deliverables.

Voluntary Uncommitted Cost Share: Cost share that is not required by the sponsor and not included in the proposal or the proposal budget. This is strictly internal and may be used to further support the project. Projects with a voluntary cost share may apply for cash match and will be determined on a case-by-case basis.

Cost Sharing	Committed	Not Committed (Not Required)
Sponsor Requires	Mandatory commitment*	N/A
Sponsor Does Not Require	Voluntary Commitment*	Voluntary Uncommitted

**Once cost sharing is committed by your proposal, it must be tracked and reported. The PI works with SPAC in this process.*

Cost Share Process

PROPOSAL PHASE

When a proposal is being developed before submission, the PI needs to inform the OSRP Proposal Development Specialist (PDS) if the project depends on any cost-share of any type to fulfill the deliverables on the proposal. If any of these forms of cost-share are promised explicitly, or if the project absolutely cannot be completed without that cost-share, then these elements need to be described to the OSRP PDS by the PI. This is so that the Specialist may accurately summarize cost-share requirements in the approval process before approvers support submission of the proposal.

The specialist will work with the PI to mutually determine where and if the cost-share needs should be described in the proposal (the narrative, the facilities section as NSF requires, or either of the budget documents), or if it merely needs to be documented internally.

All cost-share to be mentioned in the proposal or related documents must be made clear to OSRP, the chair, the dean and any other relevant approvers before the proposal is circulated for approvals.

AWARD PHASE

OSRP extends an invitation to apply for OSRP CMATCH semi-annually via an application process. Announcements are emailed, by OSRP, to Deans and Department Chairs regarding application periods and deadlines. The link to the application will be included in this email and will also be available on the OSRP website. PIs need to submit the CMATCH application and email it to OSRP for consideration. For questions about the CMATCH application, please contact OSRP.

As noted on the application, OSRP CMATCH funds are limited. Priority will be given to those with mandatory CMATCH requirements. CMATCH funds expire at the end of the fiscal year. A determination letter is sent to the applicant at the end of the application review period. If approved, the letter/acknowledgement must be signed by the PI and returned for OSRP recordkeeping. OSRP then forwards the approval notice to SPAC for work tag setup in Workday. OSRP monitors CMATCH spending throughout the award year to ensure that funds are being spent. If funds are awarded and not used, the chance of being awarded funds in a subsequent year is unlikely. Personnel costs are prohibited on OSRP CMATCH.

POST AWARD PHASE

Once a grant application is awarded, the Office of Sponsored Research Programs (OSRP) notifies the Sponsored Projects Accounting and Compliance (SPAC) office and the Principal Investigator (PI). Grants with cost-share receive an additional grant work tag. All purchasing rules apply to cost-share work tags. Cost share funded by CMATCH does not carry over to the next fiscal year and the work tags are closed. A new application through OSRP is required for subsequent years. Cost share remaining by external sources will roll over.

SPAC oversees the compliance for both mandatory and voluntary committed cost share. SPAC will review and approve each transaction submitted for compliance to ensure the funds are being spent in accordance with the cash match acceptance letter. The PI is responsible to document, record and report the commitment to the sponsor in cooperation with SPAC. Failure to meet cost-sharing commitments or provide proper documentation can jeopardize the award. Regular financial reviews will be conducted by SPAC and the PI for oversight.

Cash Match expenditures of voluntary uncommitted cost share must still be reviewed and approved by SPAC according to the cash match approved application. Regular financial reviews are optional and may be conducted by SPAC and the PI. As a reminder, awards that are overspent will be funded by the PI or their Dean's ICR Fund.

PROCEDURE

1. PI to work with OSRP to determine if cost share is required or needed.
2. PI will work with OSRP to determine the type of cost share required.
3. OSRP will determine how much cost share is required/needed for the project.
4. PI will seek means to fulfill cost share (i.e. cash, in-kind, third party).
5. PI may apply for OSRP CMATCH funds via application process.
6. If proposal is awarded, OSRP will work with SPAC to establish cost share.
7. SPAC will establish cost share work tag.
8. SPAC oversees cost share compliance.
9. PI will work with SPAC on cost share reporting.

COST SHARE: CASH MATCH

Purpose: Cash matching includes cash spent on sponsored project-related costs. The allowable cash match must include costs that are necessary, reasonable, and allowable for the sponsored program.

Please refer to the Cost Share Guidance Document

Cash Match (CMATCH) is an in-house term. It refers to institutional funds allocated to support sponsored projects. Each year, the University maintains a budget for cash match dollars, which is managed by the Office of Sponsored Research& Programs (OSRP) to further support the mission of various sponsored awards. In addition, other departments may provide cash match. An example of cash match may be a request for funds to provide scholarships, purchases of material and supplies, and purchase of equipment. These dollars may or may not be included in the proposal budget or the narrative. Principal Investigators (PIs) are invited to apply for these funds semi-annually.

PROCEDURE

1. OSRP extends an invitation to apply for OSRP CMATCH semi-annually via an application process. Announcements are emailed, by OSRP, to Deans and Department Chairs regarding application periods and deadlines.

2. When a proposal is being developed well in advance of submission, the PI needs to inform the OSRP Proposal Development Specialist if the project depends on any cost-share of any type to fulfill the deliverables on the proposal. This may occur outside of the CMATCH application window.

3. OSRP will determine the type of cost share required. All cost share may not be cash match.

4. A determination letter is sent to the applicant at the end of the application review period. If approved, the letter/acknowledgement must be signed by the PI and returned for OSRP recordkeeping.

5. OSRP then forwards the approval notice to SPAC for work tag setup in Workday.

OSRP monitors CMATCH spending throughout the award year to ensure that funds are being spent. If funds are awarded and not used, the chance of being awarded funds in a subsequent year is unlikely. **NOTE**: *Personnel costs are prohibited on OSRP CMATCH*.

OSRP CMATCH funds are limited. Priority will be given to those with mandatory CMATCH requirements. CMATCH funds expire at the end of the fiscal year.

COURSE BUY-OUT/RELEASE TIME

Purpose: This procedure serves as a guide for determining appropriate course buy-out costs for faculty and release time for staff to be written into sponsored project budgets and for establishing approval protocol for this time.

A "buy-out" means that a course release is being allowed so the faculty member can dedicate a portion of effort to an externally funded sponsored project. The corresponding percentage of the person's appointment is charged directly to the award account during the term of the buy-out. In effect, the sponsored project "buys" the faculty member's released time by paying for that portion of the faculty member's salary so that the equivalent amount of effort can be spent working on the sponsored project. Funds collected from the sponsored project for course buy-out salary and fringe shall be allocated to affiliate faculty/replacement faculty salary line to fund replacement costs.

It is not unusual in a federal or state project to find that the proportion of faculty time supported by a sponsor is limited. In proposing a project with sponsored project funds, the Principal Investigator must select a workable and fundable methodology, including the amount of time that is available to work on a project. If the Principal Investigator is a faculty member, check with the respective Chair and Dean to ensure that the proposed workload is feasible. **NOTE**: All course buyouts are calculated using the Institutional Base Salary Rate.

Faculty on academic year contracts will calculate their summer sponsored project funded time based on 9-month appointments (usually 1/9 units up to 33.3% for all summer activities). For work during the academic year, Principal Investigators/project staff may be able to request course buy-out or release time, usually at 10% of their institutional base salary per year, if allowed by the sponsor and approved by the Department Chair/Supervisor. For non-administrative staff, there may be potential for release time for work on sponsored projects. The immediate supervisor must provide approval in advance for the time that a staff member is being released from their normal job duties.

These guidelines do not address other types of differentiated workload. Primary responsibility for establishing procedures regarding workload allocation for course offloads, research offloads or otherwise, rests with the Schools, Colleges, and Library.

Salary savings resulting from the difference in allocated external funding for the buy-out/ release and the actual teaching replacement costs are distributed to the college.

PROCEDURE

1. Contact OSRP to initiate the proposal budget development process.

2. PIs should have a conversation with their department chair and/or dean regarding any necessary course buy-outs.

3. OSRP will seek approval from the department chair/supervisor and dean via the proposal processing form prior to proposal submission for course buy-outs proposed in sponsored programs applications, contracts, or other external sources.

4. If proposal is selected for award, OSRP will work with the PI to confirm project personnel and appropriate salaries.

5. OSRP will submit the proposal budget and award documents to SPAC to request work tags.

6. SPAC will upload the project budget into WorkDay.

7. The PI should notify their department chair and college/school fiscal to update any costing allocations to align with the project budget.

8. Faculty must certify time and effort reporting to confirm that time charged is an accurate and a reasonable estimation of time devoted to the sponsored project.

DIRECT COSTS vs. INDIRECT COSTS

Purpose: The purpose of this procedure is to establish definitions for direct costs and indirect costs.

Definitions:
Direct costs *are expenses that can be specifically identified with a particular sponsored aw ard or project, such as supplies and personnel costs directly related to the award.*

Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a sponsored award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as direct or indirect costs.

All direct costs must be allocable, allowable, reasonable, and consistently applied.

Indirect costs (formerly known as facilities & administrative costs-F&A) *are expenses that cannot be directly attributed to a specific project or activity but are necessary for the overall operation of an organization*.

Indirect (F&A) costs are those that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity.

For major Institutions of Higher Education (IHE) and major nonprofit organizations, indirect costs must be classified within two broad categories: “Facilities” and “Administration.” “Facilities” is defined as depreciation on buildings, equipment and capital improvements, interest on debt associated with certain buildings, equipment and capital improvements, and operations and maintenance expenses. “Administration” is defined as general administration and general expenses such as the director's office, accounting, personnel, and all other types of expenditures not listed specifically under one of the subcategories of “Facilities” (including cross allocations from other pools, where applicable).

Refer to 2 CFR 200.413 and 2 CFR 200.414 in addition to 2 CFR 200 Appendix III

PROCEDURE

1. Contact your OSRP proposal development specialist to develop your proposal budget to ensure accuracy and compliance.

2. If a needed expense arise post-award, that did not receive prior approval from the sponsor, please reach out to OSRP post-award team to see if prior approval is needed from the sponsor before making any purchasing or charges to the sponsored project.

Examples of Traditional Allowable & Unallowable Costs Table

2 CFR 200	Type of Cost	Allowable as a Direct Cost	Unallowable as a Direct Cost
421	**Advertising & Public Relations**	Allowable only if related to and necessary for performance of the sponsored project (i.e., recruitment of personnel, procurement of goods and services etc.)	Unallowable for advertising related to the general image of the university or events related to instruction, other institutional activities, or demonstrations. Unallowable for promotional items and memorabilia, including models, gifts and souvenirs
423	**Alcoholic Beverages**	**Unallowable**	**Unallowable**
471	**Communication Costs**	Allowable ONLY for costs directly attributable to a **specific** project (ex. long distance calls)	Unallowable for recurring line charges, network/local telephone costs, other general communication expenses
430 & Appendix III, B5-7	**Compensation for Personal Services**	Salaries, wages and fringe benefits of personnel who directly contribute to the project's technical purpose (i.e. Faculty, other technical & research staff)	Unallowable for salaries & wages of administrative & clerical staff. See code for exceptions. *The cost of institution-furnished automobiles that relate to personal use by employees is unallowable
434	**Contributions & Donations**	**Unallowable**	**Unallowable**
438	**Entertainment Costs**	**Unallowable**	**Unallowable** - includes amusement, diversion, and social activities and any costs directly associated with such costs
439	**Equipment & other Capital Expenditures**	Allowable only for *special purpose equipment* - used exclusively for research, medical, scientific, or other technical activities. Prior approval from awarding agency required for items with a unit cost of $5,000 or more, per indirect cost agreement	Unallowable for *General Purpose Equipment*– not used exclusively for research (i.e., office equipment and furnishings, modular offices, telephone networks, Information Technology equipment & systems, AC equipment, reproduction and printing equipment, and motor vehicles)
441	**Fines & Penalties**	**Unallowable** except when incurred as a result of compliance with specific federal award provisions	**Unallowable** except when incurred as a result of compliance with specific federal award provisions
445	**Goods or Services for Personal Use**	**Unallowable**	**Unallowable**
445	**Housing & Personal Living Expenses**	**Unallowable**	**Unallowable**

447	**Insurance & Indemnification**	Allowable if related to and necessary for the performance of the sponsored project (Note: malpractice insurance is an allowable cost of research programs only to the extent that the research involves human subjects)	Refer to the code for allowability of other types of insurance maintained by the institution in connection with the general conduct of its activities
450	**Lobbying Costs**	**Unallowable**	**Unallowable**
451	**Losses on Other Sponsored Agreements or Contracts**	**Unallowable**	**Unallowable**
452	**Maintenance & Repair Costs**	Allowable as a direct cost as necessary to carry out the technical and scientific aspects of and actually used for the performance of a sponsored project	Unallowable for costs incurred for necessary maintenance, repair, or upkeep of buildings and equipment which neither add to the permanent value of the property nor appreciably prolong its intended life but keep it in an efficient operating condition (Generally F&A). *Costs incurred for improvements which add to the permanent value of buildings and equipment or appreciably prolong their intended life shall be treated as capital expenditures
453	**Material, Supplies Costs & Computing devices**	Allowable as a direct cost when necessary, and actually used, for the performance of a sponsored project	Generally Unallowable for routine office supplies & postage
432	**Conferences**	Allowable when the primary purpose is the dissemination of technical information directly related to the project. This includes costs of meals, transportation, rental of facilities, speakers' fees, and other items incidental to such meetings or conferences	"Entertainment costs" are unallowable (see above)
454	**Memberships, Subscriptions & Professional Activity Costs**	Costs of membership in business, technical, professional, community, or civic organizations are allowable Subscriptions to business, professional, and technical periodicals are allowable	Costs of membership in any country club or social or dining club or organization are unallowable Costs of membership in organizations whose primary purpose is lobbying are unallowable
448	**Patent Costs (Intellectual Property)**	Allowable if required by the sponsored agreement	Unallowable for foreign patents

459	**Professional Service Costs**	Allowable when in accordance with 200.435 and in compliance with university policy	Unallowable for officers or employees of the institution
460	**Proposal Costs**	**Unallowable**	**Unallowable**
461	**Publication & Printing Costs**	Allowable if the costs can be identified with a research project. If the cost is for page charges, the charges are allowable for professional journals if the work is supported by the Federal Government and the charges are levied impartially on all research papers published, not just those funded by federally sponsored authors	Generally unallowable for routine copying and postage (considered F&A)
462	**Rearrangement & Reconversion Costs**	Costs incurred for ordinary and normal rearrangement and alteration of facilities are allowable as indirect costs. Special arrangements and alterations are allowable as a direct cost if the costs are incurred specifically for a federal award and with the prior approval of the Federal agency or pass-through entity. Costs incurred in restoring or rehabilitating the recipient's or subrecipient's facilities to approximately the same condition existing immediately before the commencement of a federal award(s), less costs related to normal wear and tear, are allowable	**N/A**
465	**Rental Costs of Buildings and Equipment**	Allowable for reasonable costs (when incurred specifically for the sponsored project.)	The rental of any property owned by any individuals or entities affiliated with the recipient or subrecipient, including commercial or residential real estate, for purposes such as the home office is unallowable
463	**Recruiting Costs**	Allowable when related to and necessary for the project and if reasonable	Advertising which includes color, material for other than recruitment purposes, or which is excessive in size is unallowable
448	**Royalties and Other Costs for Use of Patents (Intellectual property)**	Allowable when necessary for the performance of the sponsored project	Unallowable when the Federal Government has a license or the right to free use of the patent or copyright; or when the patent or copyright has been adjudicated to

			be invalid, has been administratively determined to be invalid, is considered to be unenforceable, or has expired
466	**Scholarships, Student Aid Costs, & Tuition Remission**	Allowable only when the purpose of the sponsored agreement is to provide training to selected participants and the charge is approved by the sponsoring agency. The rental of any property owned by any individuals or entities affiliated with the recipient or subrecipient, including commercial or residential real estate, for purposes such as the home office is unallowable. Stipulations apply	Student health insurance is unallowable
469	**Student Activity Costs**	**Unallowable**	Costs incurred for intramural activities, student publications, student clubs, and other student activities are unallowable unless expressly authorized in the Federal award
472	**Termination Costs Applicable to Sponsored Agreements**	Allowable for costs which would not have arisen had the sponsored agreement not been terminated, provided they meet the requirements of 2 CFR 200.472	Unallowable for any costs continuing after termination due to the negligent or willful failure of the institution to discontinue such costs
473	**Training & Education Costs**	Allowable for training provided for employee development for a specific sponsored project	**N/A**
474	**Transportation (Freight) Costs**	Allowable for costs for freight, express, cartage, postage and other transportation services when related to goods purchased, in process, or delivered (must be project- specific)	Unallowable for routine/ general postage
475	**Travel Costs**	Allowable for transportation, lodging, subsistence and related items for employees who are in travel status on project-specific business, subject to University policy	Unreasonable travel costs (including airfare costs in excess of the lowest available commercial discount airfare except where justified & documented) are unallowable. Non-employee travel unallowable unless related to 2 CFR 200 or specifically required to fulfill the requirements of the solicitation

EARLY TERMINATION OF AWARD

Purpose: When sponsored project awards are terminated early, Metropolitan State University of Denver must act swiftly, cautiously, and in a manner of compliance to ensure the least amount of negative impact for the institution.

Official notices of termination may be received by the Principal Investigator (PI) or Office of Sponsored Research & Programs (OSRP). When a notice (email, letter, other) is received by the Principal Investigator, OSRP should be contacted immediately. The PI should not respond to the email or notice. OSRP is the delegated organizational representative with authority to communicate with sponsors on such matters.

PROCEDURES

The procedural response should follow the process below.

Office of Sponsored Research & Programs (OSRP)

1. If PI receives notification from the sponsor, PI forwards notification to OSRP executive director
2. If OSRP receives notification, OSRP notifies the Provost, General Counsel, VP of Governmental Affairs, PI, Department Chair, Dean, and SPAC immediately
3. OSRP files notice in grants management system
4. OSRP executive director communicates with VP of Governmental Affairs & General Counsel to determine response and potential repercussions
5. OSRP executive director communicates with sponsor, if necessary
6. OSRP will communicate the information with subawardees/subrecipients and request final reports via a subaward amendment
7. OSRP will process subaward amendments to change the expiration date, funding amount, and reporting requirements
8. OSRP will work with SPAC to assist the PI, as necessary, to close out the project

Sponsored Projects Accounting & Compliance (SPAC)

1. SPAC is notified by OSRP that project has been terminated
2. SPAC will add notice to the supporting documentation in Workday
3. SPAC will follow the notification to comply with final billing & reporting requirements
4. SPAC will review expenses to capture all expenditures through the termination date, including indirect costs
5. SPAC will collect final reports and invoices from subawardees/subrecipients in a timely manner (15 days or less, depending on termination language)
6. SPAC will submit final invoice to the sponsor
7. SPAC will notify the PI once the final invoice has been submitted
8. SPAC will work to close out the project with the sponsor and in Workday

Principal Investigator (PI)

1. PI will notify their project team of project termination
2. PI will work with SPAC on closeout documents and any reporting requirements
3. PI will notify their departmental/college fiscal of all payroll changes and final expenses

College/Departmental Fiscal

1. The college (or departmental) fiscal manager will work with the PI, department chair, dean, HR, and SPAC to determine changes in payroll before the next payroll is run
2. If payroll changes are needed, the college fiscal will process the proper documentation to either terminate personnel or move them to another funding source before the next payroll is run
3. The college (or departmental) fiscal manager will also work with the university's Contracts and Business Services team when procurement contracts are impacted

Please note that the university is not responsible for covering grant personnel costs once the grant has terminated.

EMPLOYEE HIRING ON SPONSORED PROJECTS

Hiring employees for sponsored projects must follow university employment policies and comply with the terms and conditions of the grant or contract. All positions funded by sponsored awards must be directly related to the scope of work outlined in the agreement and must be necessary for the successful completion of the project. Departments are responsible for ensuring that hiring practices are equitable, that salary rates are consistent with institutional standards, and that all appointments are properly documented and approved. Additionally, time and effort reporting must accurately reflect the work performed on the sponsored project to ensure compliance with federal and sponsor regulations.

Purpose: The purpose of hiring for sponsored projects is to ensure that personnel funded by external awards are recruited and appointed in a manner that aligns with the project's objectives, sponsor requirements, and university policies. This process supports the effective execution of the sponsored work by securing qualified individuals whose roles are essential to the scope of the project, while maintaining compliance with applicable employment laws, budgetary constraints, and reporting obligations.

PROCEDURE

1. Hiring an employee whose salary will be charged to a grant requires careful coordination and strict adherence to both university policies and sponsor requirements. The process begins with identifying the need for a position that directly supports the scope of work outlined in the sponsored project. The Principal Investigator (PI), and the Grant Administrator, must ensure that the position is budgeted appropriately in the grant proposal and that the duties align with the objectives of the award.

2. Once the grant is awarded, the hiring process must follow the university's standard employment procedures, including job posting, recruitment, and selection, unless the sponsor has approved a named individual or specific hiring exception. ***All employment offers must clearly state that the position is contingent upon continued external funding.*** Before the employee begins work, proper documentation must be completed, including employment eligibility verification and assignment of the correct payroll work tags. All salaries are subject to fringe and other applicable costs (i.e. unemployment, vacation payout, etc.) and it is the responsibility of the PI and their support staff to ensure those costs are within the approved budget. All salary increases awarded at the University level (i.e. across the board increases, one-time payments, etc.) will be charged to the award.

3. Compliance is critical throughout the employment period. During regular monthly grant expenditure reviews by the PI and their support staff, corrections to payroll charges in the financial system must be made timely. Time and effort reporting must accurately reflect the work performed on the sponsored project to ensure they are allowable, allocable, and reasonable under the terms of the award. Any changes in funding, scope, or employment status must be communicated to Sponsored Projects Accounting and Compliance (SPAC) to maintain financial and regulatory integrity.

EQUIPMENT AND CAPITAL PURCHASING

This guide is intended to be read with the purchasing manual and highlights notable items.

Step 1 – What are you buying?

- Is there an existing Price Agreement or Award for it?

There are two sets of price agreements/awards: Campus awards and State awards.

Campus awards are considered mandatory. The list is available on the AP and Travel website.

- **Office supplies** – Office Depot
- **Furniture** – list and contacts are on the website
- **Copiers and networked printers** – Ricoh
- **Promotional items** – list and contacts available on the website

State awards are considered permissive – you don't have to use them, but it makes your life a lot easier. The list is available at the state's website: https://www.bidscolorado.com/co/portal.nsf/xpPriceAgreementsByCategory.xsp

If you use a state price agreement award, you do not have to bid, regardless of purchase amount. PLEASE NOTE: It is not enough that a vendor has any state award, the vendor must have an award for what you want to buy.

- Services – anything that is done by a person that is integral to the purchase. Primarily, this means hiring people to do something, like programming or janitorial services, but it can also include less obvious purchases, such as catering and leasing equipment. Services procurements require HR review when they are over $10,000.
- Goods – anything that is an object that we will own, such as purchased equipment or office supplies. While services might be involved, if they are incidental to the purchase, such as shipping or loading a predetermined set of software on a computer, this would not be considered a "services" purchase.
- IT/computer-related purchases, including all hardware and software, must be purchased through the ITS department unless ITS says otherwise.
- Capital Purchases- any purchase of an item with a useful life greater than one year and a unit cost equal to or greater than $5K purchased with grant dollars must have written directions from the sponsor noting who owns the asset at the end of the award and if the item must be returned to the sponsor. This written documentation must accompany the supplier invoice and/or the purchase requisition.

Step 2 – Solicitation Thresholds-Uniform Grant Guidance 200.320(b)

- $10,000 through $24,999 – purchases of goods that will be paid for by a Federal Grant or Federal pass-through (FPT) require a minimum of two quotes from a Vendor which may include, but are not limited to an email, price list from a website, or online search engines prior to purchase.

- $10,000 through $49,999 – purchases of services that will be paid for by a Federal Grant or Federal pass-through (FPT) require a minimum of two quotes from a Vendor which may include, but are not limited to an email, price list from a website, or online search engines prior to purchase.
- For marketplace entities such as Amazon, eBay and Etsy, documentation would need to be supplied that consideration was given to a minimum of two internet sources for the product.

Step 3 – How much does it cost?

- Under $10,000 – “Small dollar purchase”
- Must use an SPO, ICPS, Check Request, Corporate Card, etc., according to the type of purchase. Please see the Purchasing Manual for details or contact Terri McLaggan.

  IMPORTANT – Purchases to any one vendor totaling more than $10,000 over the fiscal year must use a purchase order. Purchase orders must be in place before the purchase. AHEC will not issue a purchase order after the fact, and after-the-fact purchases are considered illegal purchases.

- Over $10,000 – Must have a Purchase Order or Contract, unless you are using an awarded vendor and paying them with a Corporate Card. IN ADDITION:
- Goods: If a purchase of goods will be more than $25,000 over the fiscal year the purchase must be bid out, unless you are using an awarded vendor.
- ▪ Under $25,000 is discretionary – you can purchase from anyone you want.
- ▪ DQ is recommended, but you can use an IFB or RFP, if preferred. See below for descriptions. If the total dollar amount will be over $150,000, and IFB is required.
- ▪ Goods can be purchased with a PO, regardless of the dollar amount.
- Services: If a purchase of services will be more than $50,000 over the fiscal year, the purchase must be bid out, unless you are using an awarded vendor.
- ▪ Under $50,000 is discretionary.
- ▪ DQ is recommended, but you can use an RFP if preferred. If the purchase will be more than $150,000 and RFP is required.
- ▪ If the services total more than $100,000 over the term of the purchase, it must go on a formal contract, rather than a PO.

AHEC BID Methods:

IMPORTANT – Once a bid process has begun, you can NOT talk to any of the potential vendors. All questions must go through AHEC Purchasing; otherwise, there could be grounds for a protest and the procurement could be stopped.

- Documented Quote (DQ) – Generally used for one-time need, cannot be multi-year. Always awarded to the lowest qualified bidder, chosen by AHEC Purchasing. There should be very clear specifications. DQ’s are posted on the CORE system a minimum of 3 days, but AHEC Purchasing has authority to require it to be posted longer. If protested, the vendor might be entitled to cost of bid prep.

- Invitation for Bid (IFB) – Just like a DQ, but used for multi-year awards and purchases over $150K. Always awarded to the lowest qualified bidder, chosen by AHEC. You should provide very specific specifications. IFB's are posted on the CORE system a minimum of 14 calendar days, but AHEC Purchasing has authority to require it to be posted longer. If protested, the vendor might be entitled to cost of bid prep.
- Request for Proposal (RFP) – Used when a) the specifications are not clearly known, b) selection criteria are variable, and/or c) the department wants to judge the respondents and select the vendor. A committee must be established, and the process must be approved by the Director of Purchasing. RFP's are posted on the CORE system a minimum of 30 days, but AHEC Purchasing has authority to require it to be posted longer. If protested, the process must stop until the protest is resolved. A protest can potentially go to court.

Examples:

- ***Documented Quote***: You need to buy a 2008 Chevy Silverado 1500 4x4, in red, with automatic transmission and crew cab. Cruise control and upgraded stereo are preferable. Vendors will respond with their best price and AHEC will select the lowest bidder that meets all the requirements.

- ***Invitation for Bid***: You need to buy a fleet of pickup trucks, none more than 3 years old, all with automatic transmission. MPG should be at least 14 city, 17 highway. Reliability and safety ratings will be taken into consideration. Vendors will respond with their best bid proposal and AHEC will select the lowest bidder that meets the requirements, with assistance from the MSU Denver purchaser.

- ***Request for Proposal***: You need some means of transporting people and things for moderate to long distances. You want to know what options are available. Price is only one consideration among many. The MSU Denver purchaser will select a committee to determine the best vendor proposal to fulfill their needs

EQUIPMENT TRANSFER

This procedure provides guidance for determining and processing equipment transfers purchased with external (sponsored) funds when faculty or staff relocate to another institution, campus, or department within the university. It outlines the procedures and criteria for requesting such transfers to ensure compliance with funding and institutional requirements.

Purpose: Title to property purchased from sponsored funds vests in the University upon acquisition unless otherwise specified by the grant/contract terms. The University has an obligation to ensure that the equipment is used for the stated purpose of the project as long as the grant is active at this Institution. When a project terminates, the University must use the equipment properly to support the University at large, or other research projects or dispose of it according to specified procedures. This procedure incorporates the following regulations, policies and processes, with the same force and effect as if they were given in full text.

PROCEDURE

When a faculty member is transferring from one institution to another or from one department to another within the University, and wishes to transfer equipment, the following rules govern the transfer of equipment.

Equipment purchased from ongoing grants/contracts is usually moved along with the transfer of the grant(s)/contract(s) to the new institution, or new department within the University, if the equipment is needed for continuation of the project. If the equipment is to be transferred the Office of the Controller, specifically Accounting Services, and Sponsored Projects Accounting and Fiscal Compliance (SPAC) must be notified so University books and records can be updated.

Equipment which was purchased from a grant/contract that has terminated or will terminate by the time the investigator transfers must remain with MSU Denver. Any exception to this may only be granted by the Dean of the Department and the Provost, assuming the equipment does not need to be returned to the sponsor.

ESTABLISHING A PROJECT-NEW AWARD/SUBAWARD/MATCH

Purpose: The purpose of this procedure is to give a brief outline of how new projects, subawards, and match accounts are established.

PROCEDURE

1. After an award has been accepted for the University, OSRP completes the New Award Checklist and submits it along with backup documents to SPAC.

2. SPAC has a project establishment process.

3. A project work tag is created by a SPAC analyst.

4. The PI is notified when an account has been established.

ESTABLISHING A SUBAWARD

Purpose: Sometimes MSU Denver is awarded a sponsored project or contract that involves partners from other institutions/agencies called subrecipients. Many times, this results in a subaward. Subawards are established to distribute a portion of the funds and project responsibilities to the subrecipient.

PROCEDURE

1. Upon notice of award, OSRP will begin the process to issue appropriate agreements to any external collaborating entities.

2. OSRP will collaborate with SPAC to request work tags for both the prime award to MSU Denver and the subawards to external collaborators.

3. The OSRP Post-Award staff will prepare the subaward agreement based on information obtained from the notice of award (NOA); subrecipient commitment form; and subrecipient scope of work, budget, and justification.

NOTE: Subawards must receive prior approval from the sponsor (usually at proposal stage).

4. Sub-awards usually comply with all terms and conditions of the prime award. The subaward agreement will note reporting requirements.

5. Once the subaward agreement is prepared, OSRP will send the agreement to the subrecipient institution's contact for review, approval, and execution. The subaward agreement is not valid until it has been fully executed.

6. After the subaward agreement has been fully executed, OSRP will notify SPAC. SPAC will then work to establish the subaward in the system. This may require steps beyond the agreement such as requesting a Supplier Packet from the subrecipient to add them to the payment system so the subrecipient institution can be reimbursed when they send invoices.

NOTE: For projects requiring IRB, no project expenses may be incurred until IRB has been approved.

After the subaward agreement is fully executed and work has started, it is the PI's responsibility to:

- Review and approve all invoices from the subrecipient to ensure funds are spent appropriately and within the approved budget and scope.
- Review and approve budget revision requests from the subrecipient (OSRP must also approve any revisions).
- Monitor the progress of the subaward and obtain all required deliverables.

When the subrecipient submits an invoice for reimbursement, the invoice must be signed by an authorized official of the subrecipient institution. Final invoices should be received from the subrecipient institution in accordance with dates and terms listed in the subaward agreement.

To meet the Uniform Guidance mandates, OSRP will conduct a risk assessment prior to proposal submission, and SPAC will perform subrecipient monitoring post-award, based on the level of risk, to ensure that the subrecipient and MSU Denver are compliant with Uniform Guidance. Ultimately, however, it is the responsibility of the MSU Denver PI to monitor the performance of the subrecipient/subcontractor and to ensure that work on the project is proceeding as planned and proposed in the original application.

When MSU Denver is the Subrecipient (an external entity is the lead institution)

When a MSU Denver PI receives notice from their collaborators that an award is forthcoming, the PI should contact OSRP as soon as possible so that OSRP can make contact with the external organization's Sponsored Programs Office. As with any award, it is important not to incur any expenses or start work on the project **until after** the subaward/subcontract agreement has been fully executed by all parties.

In some cases, a PI may request authorization to incur pre-award expenses up to 90 days in advance of the anticipated start date (this request must have Prior Approval from the sponsor). Similar to a subaward/subcontract issued from MSU Denver to another organization, a subaward/subcontract received by MSU Denver from another organization may be issued annually, or multi-year. MSU Denver may need to satisfy any pending IRB or training approvals prior to the award's issuance, and the lead organization or institution may request additional information or proof of approval/certification.

EXPANDED AUTHORITY & PRIOR APPROVALS

All award activities and expenditures require prior agency approval. **Prior approval** may be granted in the Notice of Award (NOA) when a proposal is funded such as including equipment purchases in the proposal budget and justification, unless otherwise noted in the award terms and conditions.

Purpose: There are still times when changes to project activities and expenditures need to occur during the life of the funded project. Though not an all-inclusive list, some items that require prior approval from sponsors are change in senior key personnel or PI; change in scope of work; disengagement of the PI for an extended period (>/= 3 months); changes in cost share amount; adding sub-recipients; change in participant support funding; etc. Always contact OSRP for approval when you want to make changes to your project. Other times expanded authorities may apply.

Expanded authorities are the operating authorities provided to grantees under certain research grant mechanisms that waive the normally required sponsor prior approval for specific actions.

There are a limited number of post-award actions that typically require prior sponsor approval for which approval authorities have been ‘expanded’ to the grantee.

Many federal agencies have waived approval of certain post-award changes under expanded authorities granted to the local institution. These expanded authorities do not apply to contracts. However, grantees must still ensure proper stewardship over these funds and that all costs are allowable, allocable, and reasonable.

Always contact OSRP and/or SPAC to determine if your project’s agency is listed and what may be allowable. If the sponsoring agency is not listed, OSRP will need to request approval from the sponsor. If the action that you are requesting is not listed, OSRP will need to request approval from the sponsor.

Agencies included in the Expanded Authorities Matrix are National Science Foundation (NSF), U.S. Department of Energy, National Institutes of Health (NIH), U.S. Department of Commerce (DOC), U.S. Department of Agriculture (USDA)/NIFA, National Aeronautics and Space Administration (NASA), and U.S. Department of Homeland Security’s (DHS) GFAD and FEMA programs. The U.S. Department of Education’s also has an Expanded Authorities list.

Remember that the specific terms and conditions of an award will always supersede the Prior Approval Matrix. Updates to the Uniform Guidance may also supersede the Matrix.

EXPENDITURE REVIEW

Regularly reviewing expenses on a grant is crucial for a Principal Investigator (PI) to ensure compliance with federal regulations and maintain financial integrity. According to the Uniform Guidance (2 CFR Part 200), PIs must adhere to strict cost principles, ensuring that all expenditures are allowable, allocable, and reasonable. Regular reviews help identify any discrepancies early, preventing misuse of funds and potential penalties. Additionally, consistent monitoring supports accurate financial reporting, which is essential for transparency and accountability. This practice not only safeguards the grant's objectives but also fosters trust with funding agencies, enhancing the likelihood of future funding opportunities.

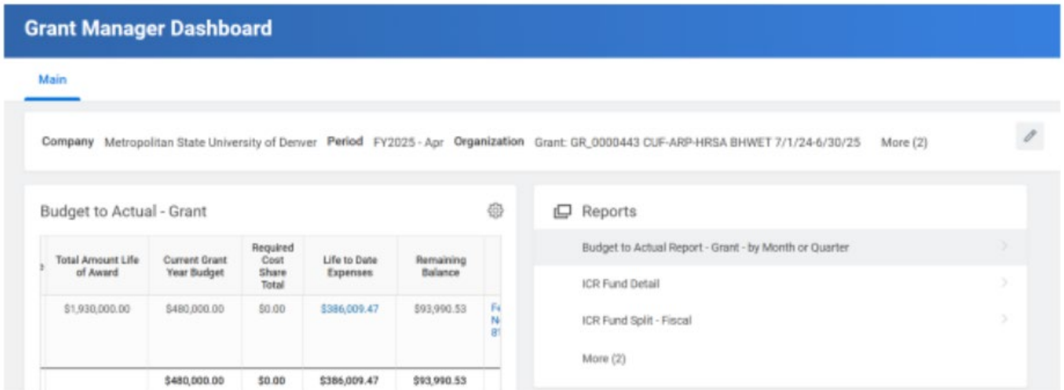
Purpose: The outlined instructions detail the procedure for reviewing and analyzing expenditures, a responsibility the University takes very seriously. Consequently, the Grant Dashboard serves as a valuable tool, ensuring adherence to strict cost principles mandated by the federal government.

Expense reviews should be conducted regularly, at least once a month, especially when a cost transfer is necessary. Timeliness of cost transfers is a critical aspect outlined in the Uniform Guidance (2 CFR Part 200). According to these regulations, cost transfers must be executed promptly to ensure compliance with federal requirements. Specifically, transfers should be made within 90 days of the original expense posting. This timely action helps maintain the integrity of financial records and supports the principles of allowability, allocability, and reasonableness. Delayed transfers can raise audit concerns and potentially jeopardize the project's funding. Therefore, adhering to these guidelines is essential for accurate financial management and accountability in federally sponsored projects.

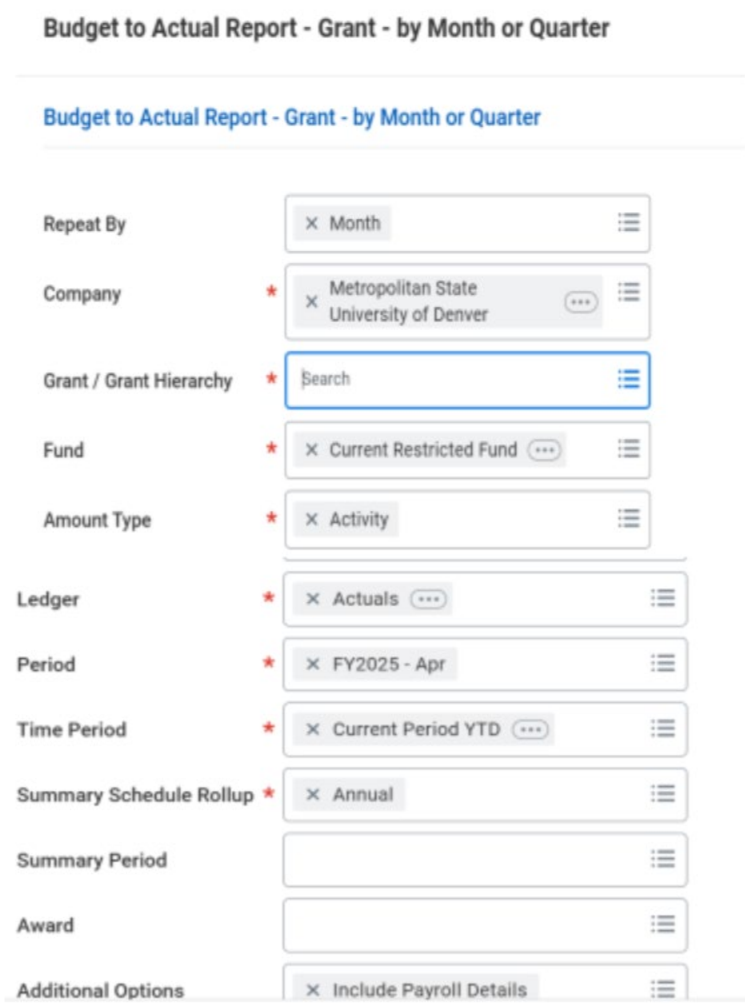
PROCEDURE

1. In Workday (WD) launch the Grant Manager Dashboard. If assistance is needed to get started, refer to the Grant Manager Dashboard Job Aid: https://msudenver.sharepoint.com/sites/OTC/Grant%20Job%20Aids/Forms/AllItems.aspx?as=json

2. Once the dashboard has run navigate to the Report section on the right side of the dashboard, select the first report Budget to Actual Report - Grant - by Month or Quarter.



The following screen will appear, use the following parameters with your grant and time of choice and run the report.



This report will pull the grant expenses by month for the fiscal year. Select a month for expense validation. Click on the dollar hyperlink to view transaction level detail of that month's total activity.

Expense

ov ar e))	FY2025-Dec (Fiscal Year (July - June))	FY2025-Jan (Fiscal Year (July - June))	FY2025-Feb (Fiscal Year (July - June))	FY2025-Mar (Fiscal Year (July - June))
9	$35,223.23	$46,915.83	$36,091.17	$37,890.98
9	$35,223.23	$46,915.83	$36,091.17	$37,890.98

You can download the detailed activity by selecting the excel option in the upper right-hand side.

413 items

Accounting Date	Fund	Cost Center	Grant	Ledger Account	Spend Category as Wo
03/01/2025	Current Restricted Fund	Social Work	GR_0000443 CUF-ARP-HRSA BHWET 7/1/24-6/30/25	610000:Employee Benefits	Admin fringe benefits
03/01/2025	Current Restricted Fund	Social Work	GR_0000443 CUF-ARP-HRSA BHWET 7/1/24-6/30/25	610000:Employee Benefits	Admin fringe benefits

Items per page 30 « ‹ 1 2 3 4 5 › »

SIDE NOTE*: You can format the excel file that was downloaded from WD with the steps below but doing so is not required.*

- *Change the row height to 15.*
- *Reduce columns to eliminate extra space.*
- *Sort by Ledger Account.*

Accounting Date	Fund	Cost Center	Grant	Ledger Account	Spend Category as Worktag	Line Memo	Employee Name	Supplier as Worktag	Ledger/Budget Debit minus	Facilities And Administra
3/1/2025	Current Restricted Fund	Social Work	GR_0000443	600000:Salarie	ES-Full Time		Mr. Jones		(1,570.71)	(125.66)
3/1/2025	Current Restricted Fund	Social Work	GR_0000443	600000:Salarie	ES-Full Time		Mr. Jones		(159.74)	(12.78)
3/1/2025	Current Restricted Fund	Social Work	GR_0000443	600000:Salarie	ES-Full Time		Mr. Jones		977.33	78.19

The report will list details for each transaction including the employees' names for payroll. In addition, the last column provides the indirect cost charged to the grant for the expense. This is calculated using the grant's ICR rate agreement specified in the terms and agreements.

To maintain compliance and ensure proper use of grant funds, validate that each expense follows the cost principles of allowable, allocable, and reasonable, please follow these steps:

Allowable: Verify that the expense is permitted under the terms of your grant and federal regulations.

Allocable: Ensure the expense directly benefits the project. Confirm that the cost can be assigned to the grant in proportion to the benefit received. This means the expense should be necessary for the project and not for other unrelated activities.

Reasonable: Assess whether the cost is reasonable, meaning it reflects what a prudent person would pay under similar circumstances. This can involve whether the expense is consistent with market rates and necessary for the project's objectives.

In the event, an expense needs to be transferred off or onto the grant.

Please submit an expense transfer request at: https://msudenver.qualtrics.com/jfe/form/SV_bKET0WVLybs8Dqe

If it's salary or benefits that need to be adjusted please submit a payroll accounting adjustment at: https://msudenver.sharepoint.com/sites/OTC/Job%20Aids%20General/Forms/AllItems.aspx?id=%2Fsites%2FOTC%2FJob%20Aids%20General%2FHow%20to%20find%20and%20Correct%20Payroll%20Job%20Aid%2Epdf&parent=%2Fsites%2FOTC%2FJob%20Aids%20General

Repeat the above steps if additional months are needed for review.

EXPENSE TRANSFER

Refer to the Job Aid for Expense Transfer.

Purpose: This procedure will assist work tag managers with Expense Transfers, also known as cost transfers, when they need to reclass funds or costs to a different set of work tags with Expense, Revenue and Cash transfers. If you find items in your trial balance that are not yours, and you need to reclassify them to the correct area, you may use this process. *You must be an authorized signer to request an expense transfer*. **You must have written approval from the work tag manager that will be accepting these expenses**.

WORKDAY MODULE/APP: Expense transfer requests are completed outside of Workday. Please use the link to the Qualtrics Survey in the Job Aid documentation.

Qualtrics Survey link https://msudenver.qualtrics.com/jfe/form/SV_bKET0WVLybs8Dqe

Always refer to the job aid for the most updated version.

PROCEDURE

1. Open the Workday Departmental Transfer Request form on the OTC Website. This is a Qualtrics Survey that you must complete for a successful transfer. Link provided above.

2. Please refer to and follow the instructions and requests highlighted on the opening page. After reading through and confirming the information provided, click on the Next Arrow button to progress through the form.

   Note: For ALL screens, when you have completed the information fields and are ready to proceed to the next screen, always click on the Next Arrow to move onto the next page. If you need to go back to a previous page, use the Back Arrow.

3. The following screen will require you to provide the following information related to you and your department:
   a. Department Name
   b. Your First and Last Name
   c. Your MSU Email Address
   d. Your Phone Number

4. You must fill out all fields on each screen to move forward. If you miss a field, you will be required to complete it before moving forward.

5. If you need to backtrack through the form to re-enter or correct information provided on an earlier page, click the Back Arrow button to return to the previous page of the form.

6. Confirm that you are either the Authorized Signer for the work tags included in the Expense Transfer, or that you have written permission from the Authorized Signer to use them.

7. If you are not the Authorized Signer, you will need to provide their written permission by uploading it when prompted.

8. Confirm whether your request involves the use of a grant or an ICR.

9. If a grant or ICR is involved, you will need to provide documentation regarding the affected grant fund(s), along with an explanation for why the original or incorrect work tags were previously used. Finally, explain how the expense will benefit the grant now being charged.

10. The next form is a longer section, and requires the following information to be provided:
    a. If further documentation is available to upload for the request. (An upload section is included.)
    b. An explanation for why the original / incorrect Work tags were used.
    c. For a Grant, provide a thorough explanation on how this expense benefits the grant.
    d. Is this transfer being requested more than 90-days after the calendar month of the original expense? (Requires a Yes or No answer provided.)
    e. Provide details on the procedure updates that have been made in your department to prevent this transfer request from recurring.
    f. Identify whether or not this transaction is for a Corp Card Transaction, and Expense Report, or a Supplier Invoice. If yes, then answer the next set of questions.
    g. If you selected "Yes" above, please explain why this transaction did not have the correct work tags assigned.
    h. Provide the Workday Document ID for this transaction.

11. On the next page, please provide the following:
    a. A more detailed explanation for what this transfer is and why it's taking place altogether.
    b. Please upload your documentation to the page; if you are providing a spreadsheet of transactions that need to be reclassified, please upload them here. This field only allows for one upload. (Another screen that follows will allow for additional document uploads.)
    c. Confirm whether you already have documentation for this transfer available.

12. Provide the full set of work tags for this expense. Provide the entire work tag string for the existing expense in Workday and provide all work tags for where this expense should be moved.

13. You may be asked to once again enter the Work tag combinations for where the Expense is moving to and from. Provide this as previously instructed.

14. **NOTE**: THIS IS THE VERY LAST SCREEN IN THE PROCESS. Once you click the Next Arrow on this screen, you will officially confirm & submit your Transfer Request. Be sure that all of your information provided is accurate before proceeding to the next screen.

15. Once all fields have been filled out, you will be greeted with the following confirmation screen. At this point, your Expense Transfer request has been submitted; check your email for additional communication & instructions from the Accounting Services.

16. Following your submission, the transfer request will post to the accounting ledgers within ten business days after receiving all required information. The Office of the Controller will reach out only if there are any questions with your request; otherwise, you can confirm that the transfer has been completed after ten business days in Workday.

EXPORT CONTROLS

Purpose: When traveling internationally, it is important to follow university policies as well as U.S. and international laws regarding devices, data, and online access. Traveling with technology introduces risks to both you and the institution, but by preparing in advance and following the guidance below, you can protect personal information, research data, and University systems.

In accordance with federal regulations, the PI must ensure that the University is in compliance with the applicable laws relative to the research project, contract or grant.

Additionally, Export Administration Regulations (EAR, enforced by the Department of Commerce) and International Traffic in Arms Regulations (ITAR, enforced by the Department of State) are Federal regulations which, for reasons of national security or protection of trade, prohibit the “export” (defined very broadly as any oral, written, electronic, or visual disclosure, shipment, transfer, or transmission of a commodity, technology, or software/code) of certain technologies without a license, unless an exception applies. If research at MSU Denver involves such technologies, these regulations may require MSU Denver to obtain prior approval from the State or U.S. Department of Commerce before:

- involving international students or faculty in the research;
- working with international companies; and
- sharing research results with persons who are not U.S. citizens or permanent residents.

These requirements may undermine publication rights, dissemination of research results, and international collaboration. Violations of the regulations may result in severe penalties.

Proposals and awards containing such terms and conditions, or involving research implicated by export control laws, should be identified as early as possible.

PROCEDURE

1. PIs should notify OSRP if their research involves international students or faculty, if they are working with international companies, and/or if they are sharing research results with persons who are not U.S, citizens or permanent residents.

2. PIs should also notify OSRP and ITS if they are planning to travel abroad with a university-issued laptop/computing device.

GUIDANCE FROM MSU DENVER ITS

TAKE ONLY WHAT YOU NEED

- Limit the number of devices and amount of data you bring.
- Request a loaner laptop or phone from your IT department if you are traveling for University-related purposes.

- Consider obtaining a temporary or local-use mobile phone when traveling to high-risk regions.

BE PREPARED FOR BORDER SECURITY

Entering and traveling abroad

- Border officials in many countries can search or confiscate devices. Privacy protections vary widely.
- Some countries may require you to disclose passwords or unlock devices.
- Report any search or seizure of University devices immediately to IT Services.

Re-entering the U.S.

- U.S. Customs and Border Protection (CBP) can search or seize devices of both citizens and non-citizens.
- For University-owned devices, do not unlock or consent to searches. If a device is taken, report immediately to IT Services.
- Non-U.S. citizens should be aware: Refusing access may lead to denial of entry into the U.S.

PROTECT DEVICES AND DATA

Before you leave

- Remove sensitive research, institutional, or personal data from your devices.
- Disable lock-screen notifications and biometric authentication; use a strong passcode instead.
- Log out of cloud services (Google, MS365, OneDrive, etc.).
- Clear browser histories, cached files, and downloads.

While abroad

- Avoid public WiFi which is not encrypted or password protected.
- Power off devices before passing through border security.
- Always keep devices with you; do not leave them in hotel rooms or safes.
- Be discreet; avoid using obvious laptop bags that may draw attention.
- Report suspected compromise, theft, or loss immediately to IT Services.

ACCESSING UNIVERSITY RESOURCES WHILE ABROAD

Some cloud services and academic platforms may be restricted or blocked depending on your location.

- **Canvas** – Restricted in certain sanctioned countries.
- **Duo MFA** – Access blocked from some regions due to U.S. trade laws.
- **Google** & **Microsoft Services** – Limited or unavailable in certain countries.
- **Zoom** – Inaccessible in restricted regions.

Check restrictions before traveling and use the university VPN when possible.

Connect securely

- Disable auto-join WiFi to avoid unsafe connections.

- Turn off Bluetooth, location enabling, and wireless connections when not in use.
- Use VPN or cellular networks instead of public WiFi.
- Avoid free charging stations; bring your own charger.

Avoid common security risks

- Never enter sensitive passwords or data on public/shared computers.
- Do not accept USB drives, downloads, or media from unknown sources.
- Avoid posting detailed travel information or locations on social media.
- Do not use personal accounts to store or transmit University data.

IF YOUR DEVICE IS LOST OR STOLEN

- Report the loss immediately to IT Services.
- Change your University and personal passwords.
- Notify local authorities.
- Monitor financial and personal accounts for unusual activity.

FDP GRANTS V. CONTRACTS CHECKLIST

Purpose: OSRP determines if specific projects should be treated as a grant or contract. OSRP uses the Federal Demonstration Partnership's Checklist to Determine Subrecipient or Contractor Classification form to make this determination.

Generally, the determination of the relationship with an entity is verified through the institutional review of the proposal narrative, budget justification, and other related proposal documents, as well as through discussions with key personnel prior to proposal submission. When the relationship remains unclear, the determination checklist form may provide assistance in making an accurate determination.

PROCEDURE

OSRP typically manages the proposal process and the sponsored/restricted contracts, thus there is no confusion about the funding instrument. However, there are situations that arise where maybe OSRP was not involved, OSRP receives an award that did not go through the proper university process, or OSRP receives an unsolicited agreement. This is highly not recommended as it can cause major issues for all parties involved, such as budget shortage due to the exclusion of indirect costs or fringe benefits.

If OSRP receives an undefined funding instrument, the Checklist to Determine Subrecipient or Contractor Classification form will be used to make a determination.

Section 1 of the Checklist identifies if the funding instrument is a grant award or subaward. This is determined if the following is true:

A grant award is a legal instrument of financial assistance between an agency and a recipient or between a pass-through entity and a subrecipient.

A subaward is for the purpose of carrying out a portion of an award and creates a funding assistance relationship with the subrecipient.

Characteristics which support the classification of the entity as a recipient/subrecipient include when the recipient:

- Determines who is eligible to receive what funding assistance;
- Has its performance measured in relation to whether objectives of a funding program were met;
- Has responsibility for programmatic decision making;
- In accordance with its agreement, uses the sponsored funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

Section 2 of the Checklist identifies if the funding instrument is a contract.

A contract is for the purpose of obtaining goods and services for the entity's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the entity and a contractor are when the entity receiving the sponsored funds:

- Provides the goods and services within normal business operations;
- Provides similar goods or services to many different purchasers;
- Normally operates in a competitive environment;
- Provides goods or services that are ancillary to the operation of the sponsored program.

Section 3 is the use of judgment. In determining whether an agreement between a pass-through entity and another entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a grant award/subaward or a procurement contract.

If the determination is not clear, OSRP should include a summary regarding their determination in the summary box provided.

OSRP will then need to work with the PI to complete the internal pre-award process to ensure a complete New Award Checklist can be sent to SPAC to request work tags.

FINANCIAL REPORTING

Purpose: Responsibilities for submitting documents to meet award terms and conditions are shared by the Principal Investigator (PI) and Sponsored Projects and Accounting Compliance (SPAC).

Actual reporting requirements vary by award, but most awards typically require both periodic progress and financial reports to be submitted to the sponsor. Details of the reporting requirements to the sponsor are normally outlined in the sponsor's notice of award.

The Principal Investigator is responsible for the progress reports on the deliverables associated with the award. SPAC is responsible for completing financial reports.

PROCEDURES

Financial and Management reports are generally prepared by SPAC. SPAC will invoice sponsors and prepare any official financial reports required by the sponsor. The PI has the responsibility to review the project expenditures, on at least a monthly basis, to assure that all the expenditures are reported correctly.

The PI and SPAC will coordinate on other types of Administrative/Management Reports. Although deadlines may vary, many of these types of reports are submitted annually or at close-out of the award. Such reports may include Final Invention statements; Equipment Inventory reports; Subcontractor Reports; Small Business Reports, etc. SPAC will inform you of reporting responsibilities during grant kickoff.

FIXED PRICE AGREEMENTS

A fixed price agreement is a type of sponsored award in which the sponsor agrees to pay a predetermined amount for the completion of a specific scope of work, regardless of the actual costs incurred. Under this arrangement, the university is responsible for managing the project within the agreed budget and timeline. Any cost overruns are absorbed by the university, while any unspent funds at the end of the project may be retained, subject to sponsor terms. It is essential that the scope, deliverables, and payment schedule are clearly defined in the agreement to ensure compliance and proper financial management.

Purpose: The purpose of a fixed price agreement is to establish a clear and predictable financial arrangement between the university and the sponsor for the delivery of specific project outcomes. This agreement ensures that the university receives a set amount of funding for completing the defined scope of work, regardless of the actual costs incurred. It supports efficient project planning, encourages cost control, and simplifies financial reporting, while ensuring compliance with sponsor terms and institutional policies.

Managing a fixed price agreement involves coordinated responsibilities across several university roles to ensure compliance and successful project execution. The Principal Investigator (PI) is responsible for defining a clear scope of work and deliverables during the proposal phase and for ensuring the project is completed within the agreed budget and timeline. The PI must also monitor progress and communicate any changes in scope or schedule to Sponsored Projects Accounting and Fiscal Compliance (SPAC).

PROCEDURE

1. Office of Sponsored Research and Programs (OSRP) receives the fixed price agreement.

2. OSRP then coordinates the review and approval of agreement terms.

3. OSRP will follow the internal process to prepare the agreement for SPACs review.

4. After the fully executed agreement has been received, SPAC reviews the agreement and sets up the award in the financial system.

5. SPAC manages, among other things, invoicing according to the payment schedule.

6. SPAC provides guidance on allowable costs and the handling of residual funds. In addition, they ensure accurate financial tracking, revenue recognition, and reporting.

7. SPAC also manages closeout procedures and support audits by maintaining complete and accurate documentation.

GRANT EMPLOYEE HIRING

Purpose: The purpose of hiring for sponsored projects is to ensure that personnel funded by external awards are recruited and appointed in a manner that aligns with the project's objectives, sponsor requirements, and university policies.

This procedure supports the effective execution of the sponsored work by securing qualified individuals whose roles are essential to the scope of the project, while maintaining compliance with applicable employment laws, budgetary constraints, and reporting obligations.

Hiring employees for sponsored projects must follow university employment policies and comply with the terms and conditions of the sponsored award or contract. All positions funded by sponsored awards must be directly related to the scope of work outlined in the agreement and must be necessary for the successful completion of the project.

Departments are responsible for ensuring that hiring practices are equitable, that salary rates are consistent with institutional standards, and that all appointments are properly documented and approved. Additionally, time and effort reporting must accurately reflect the work performed on the sponsored project to ensure compliance with federal and sponsor regulations.

PROCEDURE

Hiring an employee whose salary will be charged to a sponsored project requires careful coordination and strict adherence to both university policies and sponsor requirements.

1. The process begins with identifying the need for a position that directly supports the scope of work outlined in the sponsored project. The Principal Investigator (PI) and the Grant Administrator must ensure that the position is budgeted appropriately in the proposal and that the duties align with the objectives of the award.

2. Once the project is awarded, the hiring process must follow the university's standard employment procedures, including job posting, recruitment, and selection, unless the sponsor has approved a named individual or specific hiring exception. All employment offers must clearly state that the position is contingent upon continued external funding.

3. Before the employee begins work, proper documentation must be completed, including employment eligibility verification and assignment of the correct payroll work tags. All salaries are subject to fringe and other applicable costs, i.e. unemployment, vacation payout, etc. and it is the responsibility of the PI and their support staff to ensure those costs are within the approved budget. All salary increases awarded at the University level, *i.e. across the board increases, one-time payments etc. will be charged to the award and should be built into the approved budget*.

4. Compliance is critical throughout the employment period. During regular monthly project expenditure reviews by the PI and their support staff, corrections to payroll charges in the financial system must be made timely. Time and effort reporting must accurately reflect the work performed on the sponsored project to ensure they are allowable, allocable, and reasonable under the terms of the award.

5. Any changes in funding, scope, or employment status must be communicated to Sponsored Projects Accounting and Compliance (SPAC) to maintain financial and regulatory integrity.

GRANT MANAGER DASHBOARD

Purpose: This procedure provides an overview of the Grant Manager Dashboard and the various reports associated with it

The Grant Manager Dashboard in Workday is your central hub for overseeing the financial aspects of your grant or contract. This dashboard provides real-time insights and data visualization that will enhance your decision-making processes and improve overall efficiency.

Please use this procedure in concert with the Job Aid – GRANT MANAGER DASHBOARD

PROCEDURE

Generating Dashboard Reports

Whenever you open the Dashboard, the following popup window appears for you to enter the grant parameters to search for:

1. The Company and Period will automatically populate; the default Period is set to the current date. If you need to select a different Period, then click the selection icon to select the Period from the dropdown list. (The selection icon will also be used to change the selection for all the other fields, as well.

2. In the required Organization Tab, to view a grant, contract or cash match, type in the Grant Number. This will be GR_0000XXX.

3. The optional Award field is only used when specifically looking up Award details (see Viewing Awards section on the next page).

4. For the required Fund field, type in one of the following: Current Restricted Fund for grants, Auxiliary Fund for contracts, and General Fund for cash match.

Award Field Selection (Optional)

Viewing awards provides the full scope of the total remaining balance and all award grant work tags on the Budget to Actual report. In addition, viewing Award documents is available by this field. (This option will not provide access to all reports.) To view details on an award, enter the following into the filter criteria popup:

- Company: Metropolitan State University of Denver
- Period: [Current Fiscal Year & Month]
- Organization: Current Restricted Fund
- Award: [Type the Name or Reference ID of your Award, hit Enter, and confirm the selection.]
- Fund: Current Restricted Fund for grants, Auxiliary Fund for contract and/or General Fund for cash match

Dashboard Report Selection

The Grant Manager Dashboard page has four primary reports: 1) Budget to Actual Report – Grant, 2) Budget vs. Actual by Object Class with a Visualization Chart 3) Budget vs. Actuals by Ledger Account, and 4) Grant Expenses (LTD). In addition, you'll see the following Grant related reports, on the right-hand side under "Reports":

- Budget to Actual Report – Grant – by Month or Quarter
- ICR Fund Detail
- ICR Fund Split
- ICR Balance Report
- VPO Liability – By Worker

As you move in and out of the reports, you will be prompted to reenter your initial dashboard parameters.

Further details on what each of these reports entail can be found in the "Grant Reports – General Overview" section, starting on the next page.

Time Period Selection

When filling out the Time Period for report parameters, you have two distinct options:

1. Award Time Period, which will pull transactions from the inception of the grant work tag, and
2. Fiscal Time Period will pull transactions for the fiscal year.

Grant Dashboard - Primary Reports

Budget to Actual Report – Grant

This main report gives you a real-time snapshot of your award, showcasing the award and connected grant(s), your SPAC contact, the life of your award, current budget, life-to-date expenses, and ICR rate. In addition, you can dive deeper into expense details with drill-down menus. For a complete view of the remaining balance, use the optional award field. (Note that Blue Text can be selected to open up further drill-down information in all of these reports.)

NOTE: The remaining balance is the Current Budget minus Life to Date Expenses. To see the full scope of the remaining balance, return to the pencil icon and pull the grant by the award number, and refer to the Award Field Selection (Optional) section of the job aid.

Budget vs. Actuals by Object Class

This is a report that is to align with your budget on a line-by-line basis with your expenses. As a result, a remaining balance per budget line will be displayed showing any over or under spending. Functionally, this report operates very similarly to the Budget vs Actuals, but it includes a graph chart in addition to the line-by-line details.

MSU - Budget vs. Actuals by Ledger Account
This report breaks down the selected grant across all of the Ledger Accounts by Expenses that are involved in its activity, such as Scholarships & Fellows, and All Travel Accounts.

Grant Expenses (LTD)
This report showcases all the individual transactions linked to your selected grant. You'll see the ledger account, transaction amount, transaction date, detailed payroll information, line memo, and more. This report covers every transaction for the entire life of the grant, and by default uses the Award Time report parameters.

Budget to Actual Report – Grant – by Month or Quarter
This report highlights the Award(s) connected to your selected Grant, offering detailed information on a per-month or per quarter basis. Explore the expenses with drilldown menus, including detailed payroll information. Plus, discover the Facilities and Administration (F&A) column to see the ICR charged on each transaction. (**Note** that Blue Text can be selected to open up further drill-down information in all of these reports.)

ICR Fund Detail
This report reveals all the financial information related to your ICR Fund, broken down by Ledger Accounts, Object Class, Employees, and more.

ICR Fund Detail
This report reveals all the financial information related to your ICR Fund, broken down by Ledger Accounts, Object Class, Employees, and more.

ICR Balance Report
This report gives you the real-time balance in your ICR Fund by simply entering the financing source code. The total ending balance is the amount in your ICR Fund.

VPO Liability – By Worker
This report details the annual leave hours currently held by your grant employees. It's crucial to monitor this liability to ensure sufficient grant funds are available for payouts. The best business practice is for employees to regularly take their annual leave.

GRANT SEEKING

Purpose: This procedure outlines how to begin the grant seeking journey and how to access available funding databases.

Prospective Principal Investigators (PIs) can work with the Office of Sponsored Research and Programs (OSRP) Research Coordinator to conduct funding opportunities research using government databases (grants.gov) or OSRP subscription databases. OSRP subscribes to the ExLibris Pivot-RP funding database and the American Association of State Colleges and Universities (AASCU) Grants Resource Center (GRC) database.

PROCEDURE

Many MSU Denver employees desire to engage with the sponsored programs process. This process typically begins with an idea or concept followed by seeking funding. OSRP staff are available to meet to discuss specific interests and assist in implementing search strategies and identifying potential sponsors. To begin your grant-seeking journey, follow the steps below.

1. On the OSRP website, click the drop down on the left-hand side and click Locate Funding Opportunities.

2. Select a funding database and follow the instructions.

3. If you desire personal assistance with grant seeking, complete the Research Request form and submit it to the OSRP Research Coordinator. The form can be found here Request Funding Research - MSU Denver

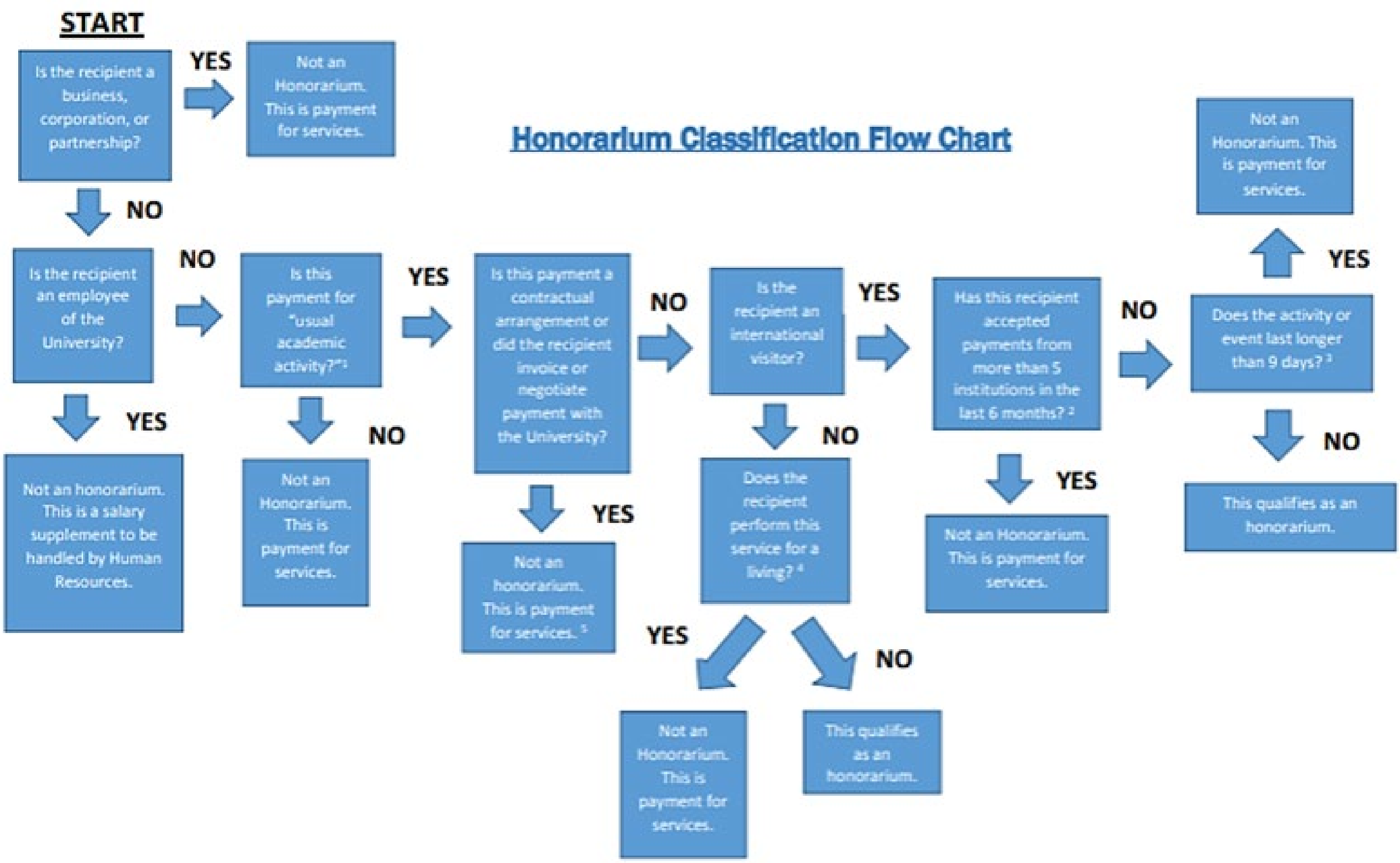
4. Once the form is submitted, the OSRP Research Coordinator will schedule a meeting to discuss the PI's interests and needs.

HONORARIUMS

Purpose: The purpose of this document is to clearly identify how to determine if a payment is an honorarium or a different type of payment.

PROCEDURE

1. PIs should work with the Office of Sponsored Research and Programs (OSRP) and Sponsored Projects and Accounting Compliance (SPAC) to determine the type of payment that needs to be budgeted in their proposal/sponsored project budget.



Quick Notes:

A. "Usual Academic Activity" means activity conducted for the benefit of the honorarium-paying institution and includes lecturing, teaching, consulting, conducting research, attending meetings, symposia or seminars, or otherwise sharing knowledge. Readings and performances are included academic activities, so long as the activity is open without charge to the public and/or student.

B. "If such payment is offered by an institution or organization described in subsection (p)(1) and is made for services conducted for the benefit of that institution or entity and if the alien has not accepted such payment or expenses from more than 5 institutions or organizations in the previous 6-month period." Immigration and Nationality Act (INA) Section 212(q).

a. Any alien admitted under section 101(a)(15)(B) may accept an honorarium payment and associated incidental expenses for a usual academic activity or activities (lasting not longer than 9 days at any single institution), as defined by the Attorney General in consultation with the Secretary of Education. INA §212(q).
b. Honorariums may not be used in lieu of a salary.
c. This stems from IRS Revenue Ruling 77-356. The Frequency of a Congress man's speech making (10 occurrences) indicated "a degree of recurrence, continuity, and availability for speech making," and thus was considered self-employment.

NOTE 1: Honorariums are taxable income under IRC (61)(a)(1).
NOTE 2: Honorariums are not PERA includable salary under Colorado Revised Statute 24-51-101(42)(a)(2).
NOTE 3: Honorariums do not require review by human resources

HUMAN SUBJECTS & IRB SUBMISSION

What are Human Subjects?

Human subject means a living individual about whom an investigator (whether professional or student) conducting research (46.102(e)):

1. *Obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or*
2. *Obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens*

MSU Denver has a duty to ensure and enforce protections for all human subjects.

Human subjects protection is about respecting the rights and welfare of people who volunteer to help researchers by participating in their studies.

When humans are used in research, whether through data collection identifiable as private information or interaction with the individual (as a recipient of the test article or a control), this is considered human subjects and must be approved by the MSU Denver Institutional Review Board (IRB).

What is the IRB?

The Institutional Review Board (IRB) is an independent committee that protects the rights and well-being of research subjects. As part of the protocol and informed consent process, the IRB reviews all aspects of compensation and reimbursement made to a human subject including amount, proposed distribution method, timing, and if a human subject is either a MSU Denver student or employee.

The IRB reviews and makes determinations on proposed human subjects research that is conducted by or in collaboration with MSU Denver faculty, staff, and/or students. The IRB follows regulatory requirements and the ethical principles of **Respect for Persons**, **Beneficence**, and **Justice** in reviewing research that involves participants and/or identifiable private information.

Any research, whether funded or non-funded, that involves human subjects MUST submit an IRB application via Cayuse, the institution platform for IRB submissions. If you are unsure if your research/study has human subjects, please contact the Human Subjects Protection Program Manager at hspp@msudenver.edu. They will help you make the determination.

No research activities involving participants or identifiable data, including recruitment, may begin until final IRB approval or an exempt determination is granted.

Status Categories

Exempt: A determination of "exempt" means that the research protocol is exempt from regulatory requirements of the Common Rule (45 CFR 46), the federal regulations that govern the conduct of human subjects research. However, these studies must still meet institutional standards. At MSU Denver all human subjects research must be reviewed by the IRB and is held to same standard of ethical conduct.

Expedited: The term "expedited" refers to the process, not a timeline. Proposed research that poses no more than minimal risk to participants (i.e. no more than the risks that participants would encounter is their daily lives) can be reviewed by two IRB members and generally does not have to go to the full board for review. When proposed research is determined to qualify for expedited review, the HSPP staff will assign one or more IRB reviewers to read and evaluate the submission materials. Each reviewer determines whether the research protocol requires minor or major modifications and subsequent review or if the protocol can be approved as is.

Full Review: Research protocols requiring review by the full board are those that involve greater than minimal risk to human participants. Common examples of research requiring full board review are studies involving prisoners, persons with undocumented status, research on illegal activities, incarcerated youth, among others. Whether a proposed research protocol will require full board review depends on the nature and context of the particular study. The level of review is determined by the HSPP/IRB, not by the investigators.

Please be advised that the quality and clarity of the submission materials greatly impact the IRB reviewer's ability to assess risks to participants and to make a determination in a timely manner. Poorly crafted research protocols and supporting materials will delay the process regardless of whether the study is reviewed by one or all IRB members.

How to Make an IRB Submission

PROCEDURE:

1. **Plan ahead for the IRB review**

The IRB review process takes time and research protocols are reviewed on a first-come, first-serve basis. The IRB's ability to conduct a timely review of your research is very dependent on the quality and clarity of your submission. Please plan accordingly and develop a clear and detailed research plan.

You will complete everything in Cayuse, but the following documents are also required for review:

–Consent form(s)
-Survey/Questionnaire and/or Qualtrics link
-Recruitment Materials (email, flyers, etc.)
-CITI certificate(s)

2. **Complete CITI Training**

The Principal Investigator and members of the research team are required to complete the CITI Program training.

If the CITI training requirement is not complete for all research personnel involved with human subjects in your study, your application is deemed incomplete and cannot be processed for IRB review.

This includes any researcher who:
- obtains information about living individuals by intervening or interacting with them for research purposes
- obtains identifiable private information about living individuals for research purposes
- obtains the voluntary informed consent of individuals to be subjects in research; and/or
- is studying, interpreting, or analyzing identifiable private information or data for research purposes.

3. **Access Cayuse**

To submit materials for IRB review, the Principal Investigator must complete a submission via Cayuse. At MSU Denver, the Principal Investigator must be a member of the faculty or staff.

4. **Letters of Support**

If you will be conducting research at a school, public or private agency, or collaborating with an organization a letter of cooperation, authorization, or support to conduct research may be required. In some cases, the IRB requires documentation that the researchers have permission to conduct the study in a specific setting. Some organizations or institutions may also require their own ethics or IRB review process in addition to MSU Denver's IRB review and approval. Multiple review processes can occur concurrently in many cases.

If you are proposing to recruit students from MSU Denver classrooms or student organizations, classes or student groups that are targeted for recruitment must be directly relevant to the proposed research and not simply a matter of convenience for the investigators. In some studies, the IRB may request documentation of permission from the course instructor or faculty or staff advisor that he/she is aware of the study and what is being asked of the students. As there are specific considerations of potential coercion or undue influence with recruiting students into a study, researchers are advised to clearly outline the measures they are taking to minimize this risk in their submission materials.

5. **Use of Listservs**

The Institutional Review Board (IRB) is seeing an increase in the request to use specific listservs for recruitment of participants into a research study. The IRB is trained and responsible for assessing the risk to human subjects of all research proposals including research design, recruitment and consent processes, data management and confidentiality according to the three principles contained in the Belmont Report and the Code of Federal Regulations (45 CFR 46). https://www.hhs.gov/ohrp/. Upon review and approval of a research proposal that intends to use any internal or external listservs for recruitment, the IRB requests that the Principal Investigator (PI) obtains permission from the owner of the listerv, to encourage responsible use. This step ensures that the IRB carries out its charge and responsibilities to protect human subjects, and also decreases administrative burden on offices who are not trained in assessing the risk to human subjects of research per federal regulations. PIs will be instructed that it is their responsibility to request permission to use a listserv prior to recruitment. The decision to approve this request is up to the individual unit, office, department, etc. that controls the listserv. Approval to use a listserv to distribute recruitment information does not change the PI's responsibility to the protection of the rights and welfare of subjects in human research, including obtaining informed consent of individual subjects.

6. **Ask questions**

Many researcher questions will be answered in the Investigator Manual, by completing the required CITI training, and by reviewing the information on the Cayuse training webpage. If you are unsure what information to include in your protocol, how to create a good consent form for your study, or need guidance on the submission process, please ask. The HSPP staff welcomes your questions and can provide assistance before and throughout the IRB review process.

Researchers (faculty, staff, and students) can make an appointment with HSPP staff to consult on their IRB application prior to submission or during the IRB review process. Please email the HSPP with questions or for a consultation (hspp@msudenver.edu).

7. **All requests for IRB review should be submitted through Cayuse**.
    - Submissions will NOT be accepted through the HSPP email or any other method other than via Cayuse.
    - Submission materials should be complete and documents should be clearly titled.
    - Instructions for submitting materials for IRB review can be found in the Investigator Manual.
    - Please also upload a Word Doc or PDF of all consent forms and surveys.

For proposed studies that may require Full Board review, the researcher must contact the HSPP as soon as possible to begin the review process. Full Board reviews can often take several months before approval.

Investigators should note that the IRB does not convene during the summer months.

IRB meetings are not open to the public and adhere to confidentiality measures outlined in the federal regulations and guidance. For additional information, visit the IRB website.

INDIRECT COSTS

What are indirect costs (IDC)?

Indirect costs, formerly referred to as facilities & administration costs (F&A), are costs that are indirectly related to sponsored projects. These costs are not specifically attributed to an individual project. The IDC rate is approved by our federal cognizant agency, the U.S. Department of Health and Human Services (DHHS), and aligns with federal guidance.

Indirect charges are defined as costs that are incurred for common or joint objectives. Indirect costs reimburse the university for services to the sponsored project such as Administration to include general administration, sponsored projects administration, and personnel in support of research and sponsored programs; and Facilities to include building depreciation, equipment depreciation, operations and maintenance, library, construction and maintenance of laboratories; high-tech equipment and facilities; office supplies; postage; utilities; photocopying; compliance; safety, security, and government-mandated expenses. IDC is charged to all grants, as allowed by the sponsor.

MSU Denver's NICRA

This is the federally negotiated indirect cost rate agreement (NICRA). MSU Denver's NICRA is approved by the U.S. Department of Health and Human Services, the university's federal cognizant agency. The NICRA is a legal document between the federal government and the applicant that formalizes the indirect cost rate the applicant can use on sponsored award budgets. NICRAs are designed to streamline the sponsored projects process. Once MSU Denver and DHHS negotiate an indirect cost rate covering indirect costs and fringe benefits, that rate will apply in all subsequent years until it is renewed.

The rates approved in the agreement are for use on sponsored projects, contracts, and other agreements with the federal government. However, this rate needs to be consistently applied, where allowed, across all funding agencies.

What is MTDC?

MTDC means modified total direct costs. The university's NICRA is based on the utilization of the MTDC formula when calculating indirect costs. Because of this formula, OSRP cannot just calculate the indirect cost rate on the full amount of requested direct costs in a proposal budget.

MTDC consists of all direct costs less certain categories of exclusions as defined by the principles in the "Uniform Guidance," or more formally the Office of Budget and Management (OMB) Code of Federal Regulations Title 2 Part 200, more commonly called 2 CFR 200. The exclusions are not included in the calculation of the indirect cost rate and therefore, these direct expenses are not subject to the application of the indirect cost rate.

- MTDC includes direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first $25,000 of each subaward.
- MTDC excludes equipment (single, tangible items over $5,000 with a useful life over one year), capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of $25,000.

What is Indirect Cost Recovery (ICR)?
Indirect Cost Recovery (ICR) are the costs recovered via the indirect cost rate. ICR is a mechanism intended to reimburse the University for costs that are incurred to support sponsored projects.

There are many examples where the University covers the costs that go towards supporting a sponsored project. ICR is intended to reimburse the University for those costs.

The difference between IDC & ICR
Applying the appropriate IDC rate reimburses the institution for costs incurred to construct and maintain buildings, provide equipment, utilities, and general and administrative support for sponsored activities. These rates are negotiated with the cognizant federal agency (U.S. Department of Health and Human Services, Division of Cost Allocation) in accordance with Uniform Guidance 2 CFR 200.419.

Indirect Costs (IDC) is a rate charged to a sponsored project. When Sponsored Projects and Accounting Compliance (SPAC) invoices a sponsor, the university is reimbursed for the indirect cost rate of operations and administration.

Indirect Cost Recovery (ICR) are the costs recovered via the indirect cost rate. ICR is earned each time an eligible grant has an expense so ICR balances may change monthly. The ICR is split multiple ways to support the activities and research infrastructure of the university. In addition to supporting university investment in research and sponsored projects, IDC creates a small/partial buffer of resources for managing potential grant miscalculations by the PI.

So, the university recoups IDC from the sponsor, and the university turns that into ICR to be utilized internally.

When is MSU Denver allowed to charge the full indirect rate?
MSU Denver is allowed to charge the full indirect cost rate when sponsors do not stipulate or cap the amount of indirect costs that an applicant can request.

When is MSU Denver not allowed to charge the full indirect rate?
MSU Denver is always allowed to charge the full indirect cost rate unless the sponsor does not allow for indirects to be charged or when sponsors denote a cap on the indirect cost amount or rate in the notice of funding opportunity. Any deviation from the full

indirect cost rate should be in writing via the notice of funding opportunity (NOFO)/RFP or sponsor guidelines. When the full indirect cost rate is not allowed, OSRP and the Provost must review and approve the rate proposed.

What is Administrative Service Recharge?

Administrative Service Recharge (ASR) is 10% of all revenue, charged by the university, in an Auxiliary Fund. This rate was determined at the University and is not approved by an external party. ASR is currently charged for all sponsor-related contracts. If a proposed contract is deemed to be other than a grant, an administrative charge is applied. No indirects are charged to contracts currently. The full 10% recharge is funneled to the CFO. No portions return to the PI or departments.

Notes about Indirect Costs

- Indirect cost rate is not a tax
- Indirect cost rate does not fully recover all institutional costs
- Indirect cost rate issued by U.S. DHHS is lower than the break-even rate
- Indirect cost rate does not negatively impact proposal outcome

INDIRECT COST RECOVERY

What is Indirect Cost Recovery (ICR)?

ICR is a mechanism intended to reimburse the University for costs that are incurred to support sponsored projects.

For example, those that work on grants use University facilities and utilities, and the operation of grants often requires the support of Human Resources to help with personnel needs, Payroll to pay those working on the grant, Business Services and Accounts Payable to contract with and to pay related vendors or reimburse travel costs. Grant operations also require support from the Office of Sponsored Research and Projects (OSRP) and the Sponsored Projects Accounting and Fiscal Compliance (SPAC) team.

There are many other examples where the University is covering the costs that go towards supporting an award and ICR is intended to reimburse the University for those costs.

How much ICR can we charge?

The amount of ICR that the University can charge to a grant is limited to a predetermined rate that is negotiated by the Office of the Controller and approved by the University's cognizant agency, the Department of Health and Human Services. Currently those rates are 33% for on-campus awards and 21% for off-campus awards. However, those rates may be limited by the awarding agency if they will not agree to pay MSU Denver's full negotiated rate. The University may accept a grant that will not pay the full ICR rate, with the appropriate approvals from the Director of OSRP and the Provost, but it must be done with the understanding that the University must fund the support above with other sources of money.

INTELLECTUAL PROPERTY

Refer to MSU Denver Intellectual Property Policy

MSU Denver is dedicated to supporting and encouraging our faculty, staff, and students to engage in and learn from the expansive range of scholarly, technical, and artistic opportunities we offer. Intellectual property ("IP") plays an important role in our efforts. Intellectual property law secures for individual authors and inventors certain exclusive rights and benefits and thereby encourages them to create and innovate. The results of their efforts then benefit the larger community. Ownership of IP rights, therefore, should be properly balanced between MSU Denver (also referred to herein as the University) and University Personnel. Furthermore, adequate recognition of and incentive to potential inventors through the sharing of the financial benefits resulting from the transfer and development of patentable inventions, and other marketable forms of IP, encourages the creation of such IP. At the same time, MSU Denver's share in the financial benefits provides funds for ongoing operations or further research at MSU Denver.

For Sponsored Programs, § 200.448 Intellectual property.
Patent and copyright costs.

1. The following costs related to securing patents and copyrights are allowable:
   A. Costs of preparing disclosures, reports, and other documents required by the award and of searching the art to the extent necessary to make such disclosures;
   B. Costs of preparing documents and any other patent costs in connection with the filing and prosecution of a United States patent application where the Federal Government requires that a title or a royalty-free license be conveyed to the Federal Government; and
   C. General counseling services relating to patent and copyright matters, such as advice on patent and copyright laws, regulations, clauses, and employee intellectual property agreements (See § 200.459).
2. The following costs related to securing patents and copyrights are unallowable:
   A. Costs of preparing disclosures, reports, and other documents and of searching the art to make disclosures not required by the award;
   B. Costs in connection with filing and prosecuting any foreign patent application, or any United States patent application, where the award does not require conveying title or a royalty-free license to the Federal Government.

Royalties and other costs for the use of patents and copyrights.

1. Royalties on a patent or copyright or amortization of the cost of acquiring by purchase a copyright, patent, or rights thereto, necessary for the proper performance of the award are allowable unless:
   A. The Federal Government already has a license or the right to free use of the patent or copyright.
   B. The patent or copyright has been adjudicated to be invalid or administratively determined to be invalid.

   C. The patent or copyright is considered to be unenforceable.
   D. The patent or copyright is expired.
2. Special care should be exercised in determining reasonableness when the royalties may have been obtained as a result of less-than-arm's-length bargaining, such as:
   A. Royalties paid to persons, including corporations, affiliated with the recipient or subrecipient.
   B. Royalties paid to unaffiliated parties, including corporations, under an agreement entered into in contemplation that an award would be made.
   C. Royalties paid under an agreement entered into after an award is made to a recipient or subrecipient.
   D. In any case involving a patent or copyright formerly owned by the recipient or subrecipient, the amount of royalty allowed must not exceed the cost which would have been allowed had the recipient or subrecipient retained ownership.

PROCEDURE

1. PI should reach out to OSRP and legal counsel if any type of intellectual property is part of their project or if intellectual property will result from their research/project.

2. If OSRP identifies intellectual property language in the terms and conditions for an award, OSRP will alert general counsel to bring them into the loop.

INTENT TO SUBMIT

Purpose: The purpose of the Intent to Submit form is to communicate intentions to apply for a funding opportunity with OSRP.

Communication is vital to ensuring the proposal is processed according to University policy and agency guidelines. The PI must send an Intent to Submit form to OSRP as soon as the decision is made to apply to a funding opportunity, so the proposal deadline can be added to the task calendar and assigned to the proper proposal development specialist to begin work. Refer to the OSRP Workflow timeline.

Interdisciplinary Proposal Information

Funding agencies encourage interdisciplinary and collaborative proposals that are ambitious in nature and foster a broad impact on the university, community, and academia. These projects are more likely to have successful outcomes and be replicated and presented as a model of a best practice in higher education. For interdisciplinary and collaborative proposals, it is mandatory for OSRP to be informed of the endeavor in the very early stages to ensure the coordinated effort required such as:

- Developing reasonable timelines and gathering internal and external approvals
- Reviewing sponsor guidelines and identifying any unique requirements for the proposal
- Developing and preparing the budget
- Coordinating subrecipient commitment forms, if applicable
- Following-up with subrecipient partners to obtain institutionally approved statements of work and budgets
- Assisting with securing approvals for cost-sharing commitments
- Accessing and preparing the portal shell

Completing the Intent to Submit form allows OSRP to get a head start on learning about the funding opportunity and funding agency prior to the initial OSRP meeting. The information obtained from the Intent to Submit form also helps OSRP to develop internal timelines and prepare a checklist for the PI to help develop the best proposal package possible.

PROCEDURE

1. PIs should complete the Intent to Submit form, found on the OSRP website.

2. Submit the completed Intent to Submit form to OSRP as soon as you consider applying for a funding opportunity.

3. An OSRP proposal development specialist will contact you to schedule an initial meeting.

INTERNATIONAL COLLABORATORS/COLLABORATION

Purpose: The purpose of this procedure is to bring awareness to the potential risks associated with international collaborations and who to contact to mitigate the potential risks.

PROCEDURE

There are some countries that the US will not allow collaboration with.

If PIs would like to partner with international collaborators, whether the research is domestic or abroad, please notify OSRP immediately.

For partners at international institutions, research laboratories, and hospitals, OSRP will need to complete a risk assessment prior to a proposal submission.

For international collaborators serving as consultants, the Procurement office requires a W8BEN form and must run the data through Visual Compliance as a form of risk assessment.

Additionally, federal agencies may have other requirements related to international collaborations. Always check with OSRP before including international collaborators in funding proposals.

National Institutes of Health (NIH)

NIH defines a foreign component as the performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended.

For grants requesting NIH funding for one or more foreign components, NIH will require that competing applications submit applications to a Notice of Funding Opportunity (NOFO) that supports the new PF5 Activity Code for grants, new UF5 Activity Code for cooperative agreements, or another complex mechanism activity code that supports the International Project component type.

NIH continues to support international collaborations. Of note, foreign components other than those previously supported by subawards or consortia agreements (e.g., foreign consultants, international travel) may continue to be supported through other activity codes unless otherwise indicated in the NOFO.

National Science Foundation (NSF)

NSF rarely provides direct funding support to foreign organizations. NSF will consider proposals for cooperative projects involving U.S. and foreign organizations, provided support is requested only for the U.S. portion of the collaborative effort.

In cases however, where the proposer considers the foreign organization or foreign individual's involvement to be essential to the project and proposes to provide funding through the NSF budget (via a subaward or consultant arrangement), the proposer must justify the benefit to U.S. research and education. The justification must include, at minimum:

- why support from the foreign counterpart's in-country resources is not feasible;
- why the foreign organization or foreign individual can carry out the activity more effectively than a U.S. organization or U.S. individual
- what unique expertise, organizational capability, facilities, data resources, and/or access to a geographic location not generally available to U.S. investigators the foreign organization or foreign individual brings to the project; and
- what significant science and engineering education, training, or research opportunities the foreign organization or foreign individual offers to the U.S.

Such information must be included in any proposal to NSF, including new and renewal proposals. The information must be included in the project description section of the proposal. The box for "Funding of a Foreign Organization or Foreign Individual" must be checked on the Cover Sheet if the proposal includes funding for a foreign organization or foreign individual.

a. International Research/Education/Training Activities. For each proposal that describes an international activity, PIs should list the primary countries involved on the Cover Sheet.
b. An international activity is defined as research, training, and/or education carried out in cooperation with foreign counterparts either overseas or in the U.S. using virtual technologies.
c. International Conferences. Proposers also should enter on the Cover Sheet the country/countries with which project participants will engage and/or travel to attend international conferences. If the specific location of the international conference is not known at the time of the proposal submission, proposers should enter "Worldwide" on the Cover Sheet.
d. Work in foreign countries. Some governments require nonresidents to obtain official approval to carry out investigations within their borders and coastal waters under their jurisdiction. PIs are responsible for obtaining the required authorizations. Advance coordination should minimize disruption of the research.

Projects in Foreign Countries

a. For awards that include activities requiring permits from appropriate Federal, State, or local government authorities, the recipient should obtain any required permits prior to undertaking the proposed activities.
b. The recipient must comply with the laws and regulations of any foreign country in which research is to be conducted. Areas of potential concern include: (1) requirements for advance approval to conduct research or surveys; (2) special arrangements for the participation of foreign scientists and engineers; and (3) special

visas for persons engaged in research or studies. NSF does not assume responsibility for recipient compliance with the laws and regulations of the country in which the work is to be conducted.

c. The recipient also should assure that activities carried on outside the U.S. are coordinated as necessary with appropriate U.S. and foreign government authorities and that necessary licenses, permits or approvals are obtained prior to undertaking the proposed activities.

IRB OPERATIONS

What is the IRB?

The IRB is the Institutional Review Board, in compliance with **45 CFR 46,** Subpart A—Basic HHS Policy for Protection of Human Research Subjects.

What are Human Subjects?

Human subject means a living individual about whom an investigator (whether professional or student) conducting research (46.102(e)):

1. *Obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or*
2. *Obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens*

IRB Function

The IRB reviews and makes determinations on proposed human subjects research that is conducted by or in collaboration with MSU Denver faculty, staff, and/or students. The IRB follows regulatory requirements and the ethical principles of Respect for Persons, Beneficence, and Justice in reviewing research that involves participants and/or identifiable private information.

The MSU Denver Institutional Review Board (IRB) is composed of members of the MSU Denver faculty and staff and the community at-large. Members of the IRB are tasked with protecting the rights and welfare of participants in research studies.

IRB Composition

The MSU Denver IRB currently has 11 members consisting of a Chair, Assistant Chair, human subjects protection program (HSPP) manager, and one community member. The board also meets the federal requirements of a mixture of scientists and non-scientists.

IRB Meeting schedule

The board meets monthly during the Spring and Fall semester. The board does not meet, nor review Expedited and Full Board projects during the summer months. The Human Subject Protection Program (HSPP) does function year-round and is able to review Exempt projects during the summer months. The HSPP also works with faculty/students during the summer months to prep Expedited and Full Board projects for review during the Fall semester.

How to become an IRB Member

The MSU Denver IRB is always willing to accept new members. In addition to accepting applications, the HSPP also works to identify faculty, students, and community members that would maintain and improve the quality of reviews and diversity of our board. All applications should be made through the Human Subject Protection Program. After accepting the position of IRB member, this person must complete a semester's worth of training. Training includes, but is not limited to, completion of CITI trainings, review of practice protocols, and 1-on-1 trainings with the HSPP Manager.

How to apply for IRB review

To make a submission to the MSU Denver IRB, researchers must submit their application via Cayuse, MSU Denver's online submission platform. Items to prepare before submission include appropriate CITI certification for all research personnel, recruitment materials, consent documents, letters of support and protocol. All resources and templates needed for IRB submissions can be found the MSU Denver IRB website. After the project has been submitted, the HSPP will conduct the initial review to determine the appropriate level of review. Once the level of review has been determined, either the HSPP or the IRB will conduct the review and provide feedback, leading to approval. All feedback, modifications requested, and approval letters can be accessed via Cayuse through the specific project file. All projects will receive an annual administrative check-in, which is a reminder to make any appropriate updates, maintain CITI certifications and to close the project once data collection has been completed. For any questions regarding IRB applications, please contact the HSPP office. ***See the Human Subjects Procedure for application instructions.*

How to use Cayuse

Please Note: You will be able to log-in to Cayuse, using your MSU Denver credentials.

If you are unable to log-in, please send an email to hspp@msudenver.edu with your name, email, department and 900#.

MSU Denver's IRB requires that the Principal Investigator on any human research study be a full-time faculty or department Director. A student may make the submission, but the advisor must be listed as the Principal Investigator.

Begin your Cayuse experience here. During your first log-in, you will be prompted to take a tour of the system, we strongly encourage you to do so, as this will provide your initial Cayuse training. Afterwards, you may utilize the help buttons located on every page.

At the top of the first page, you will see "Products", click there and select "Human Ethics," this will lead you to the project dashboard.

After completing a submission, the PI must also **'Certify'** the project to finally submit it to the HSPP.

When making revisions to an "Initial Submission:"

- When responding to reviewers' comments, researchers must state how they addressed that comment in the comment thread.

- When attaching new documents, remove old documents and leave only the revised document.

- In protocol text boxes, only include information that is currently relevant for the study; delete parts that are no longer relevant.

- Researchers must address the comments in both the textboxes and comments (state how the reviewer's comment was addressed)

When making modifications to an already approved study:

- All changes, even minor, must receive IRB approval before the researcher implements them.

- Considerable changes to the study's research plan (e.g., research questions, procedure, study design, intervention, subject population) require the submission of a new study.

- When the changes do not considerably change the study's research plan, the following are guidelines for making modifications to already approved protocols.

    - To create a modification, you must access the project's 'Study Details' page and select 'New Submission' (blue button). This will lead you to create a modification for the project.

    - The researcher must write the following heading in textboxes after what was already written in that textbox for areas they are modifying the protocol: *Modification (date) and followed by the proposed changes*.

    - No parts of the original content in the textboxes should be deleted.

    - Any new attachments should be labeled to reflect that they are modified and the date. For example, "consent.modified.4.18.24"

    - All prior approved documents should remain in Cayuse.

Templates

Templates are tools that may be used to develop materials for your study. There is no requirement to use these exact formats for your submission. However, all researchers are encouraged to review the templates for content and language that may be relevant to your research and may be considered during IRB review.

HRP-503a TEMPLATE PROTOCOL: Social-Behavioral. This template can help you build a research protocol that includes information considered by the IRB during the review process. Your research protocol is the key document in your submission package that should be supported by all supplemental materials.

UNIVERSAL CONSENT TEMPLATE: This template should be utilized by most research studies performed at MSU. This can be used for anonymous surveys, as well as when collecting identifiable data. This template can be adapted to best fit your research and subject population.

HRP-502c TEMPLATE CONSENT DOCUMENT: Release Form for Images and Recordings For some studies, a separate release form may be appropriate to gain specific permissions for data collection through photography, video recording, and/or audio-recording. This template may be edited to fit your research. In other studies, the researchers may integrate language and permissions for this type of data collection into their consent form.

HRP-502d TEMPLATE CONSENT DOCUMENT: Assent Templates. This template provides guidance on drafting verbal scripts and/or written assent forms for gaining permission from child participants.

HRP-502e TEMPLATE CONSENT DOCUMENT: Parental Consent. For studies that involve child participants, this template can be used to develop a consent document for parents.

HRP-502f TEMPLATE CONSENT DOCUMENT: Adult Unable to Consent. For studies that involve adult participants who are unable to consent, this template may be used to develop a consent document for legally authorized representatives (LAR).

JUST IN TIME (JIT)

Purpose: Sponsors, including National Institutes of Health (NIH), may request additional information or changes after a proposal has been submitted if it is being considered for funding. "Just-In-Time" (JIT) is a procedure used to postpone the collection of certain information normally required for all competitive proposals. *JIT notification is not a Notice of Award, nor should it be construed as a guarantee of funding*.

The PI should contact OSRP as soon as they receive such requests. PIs are not to respond to the request. OSRP will respond once all requested information has been collected. The timeframe for submitting this information is often quite short. The sponsor will typically specify the procedures for transmitting the information. OSRP will guide and assist the PI during this process.

PROCEDURE

As part of NIH's peer review process, PIs may be contacted by the NIH requesting additional information about their project and the institution. This may happen at other agencies as well. A JIT request will include:

1. Other Project Support information: the NIH will request that you list any active and pending support (including the proposal under consideration) and address any technical, scientific, and/or budgetary overlap between the proposal being considered and any active/pending support.

2. IRB approval letter (if human subjects are involved).

3. IACUC approval (if animals are involved).

4. Other Information Requested: may include budget revisions, changes to the human subjects section, etc. If requested, these changes must be submitted as an "Other Upload" file in the eRA Commons Just-In-Time module. OSRP will submit the requested information.

Please note: only OSRP has authority to submit any JIT changes and additional submissions to the sponsor. Also, other agencies, besides NIH, may request additional information upon proposal review. Please forward those requests to OSRP, and OSRP will guide and assist the PI with gathering requested information as well as submit this information to the sponsor.

LIMITED SUBMISSION COMPETITIONS

Purpose: Programs with limited nominations or proposal submissions must be coordinated through OSRP.

In cases of limited submission solicitations, where the sponsor limits the number of proposals per institution, OSRP will have an internal competition to select the most competitive candidate(s) and project ideas to submit a proposal. If you plan to submit a proposal for consideration, your proposal submission MUST be coordinated with the Office of Sponsored Research & Programs. *This process is critical as extra submissions can result in all submissions being denied*.

PROCEDURE

The process for selecting researchers to submit on behalf of MSU Denver varies depending on the level of interest shown for individual competitions. Typically, the process consists of the following steps:

Interested researchers submit an email of intent (1st internal deadline). Emails of intent should include names of participating researchers and a brief description of the proposed work.

Researchers must submit a much more detailed pre-proposal of their intended work (2nd internal deadline).

Unless otherwise stated in the announcements and communications, all internal applications should include:

- **Title/Cover page**: Project title, list of investigators/key personnel & their affiliations, and a short abstract of approximately 200 words.
- **Project Narrative**: Up to 4 pages, minimum 11 pt. font, single-spaced, and 1-inch margins all around (including figures & tables, excluding references), describing the proposed project and addressing the evaluation criteria set by the sponsor in their funding opportunity announcement/solicitation.
- **References:** 1-page maximum.
- **Budget**: 1-page maximum with brief justifications capturing the budget categories, the amount received by each participating institution.

Materials should be prepared as a single PDF document and submitted using the Limited Submission Pre-Proposal form. Please send any questions to the executive director of OSRP.

In preparing your submission, please use the font type and size required or suggested by the funding agency, if different from above, for the associated internal competition. If none listed, font type should be standard/easy to read such as Aptos, Calibri, Times New Roman, Arial and font size of no smaller than 11pt.

If OSRP has yet to notify the campus community of a limited submission that you are interested in applying to or if you believe a funding opportunity that you are interested in is limited, please reach out to OSRP with the funding opportunity. The executive director of OSRP will then launch the limited submission competition. We must follow the limited submission process as extra submissions can result in the sponsor's rejection of all submissions from MSU Denver.

The Office of Sponsored Research & Programs (OSRP) conducts a selection process to determine which of the submitted pre-proposals will be invited to move forward in the general competition.

The Limited Submission Selection Committee should consist of the executive director of OSRP or their designee, AVP of faculty affairs or their designee, at least 1 dean, and at least 2 faculty representatives.

Selected nominees are notified by the OSRP. All researchers who submit a pre-proposal will receive feedback regarding their application.

If there is limited interest in a specific opportunity, the competition may remain open past the deadlines stated. In such cases, applications will be processed in order of receipt until the maximum number of proposals have been accepted for submission.

MALIGN FOREIGN TALENT

Purpose: The purpose of this procedure is to bring awareness to Malign Foreign Talent Recruitment Programs (MFTRP) and describe how to report someone's involvement.

Malign Foreign Talent Recruitment Program Prohibition
Individuals who are a current party to a Malign Foreign Talent Recruitment Program (MFTRP) are not eligible to serve as a senior/key person on an NSF proposal or on any NSF award made after May 20, 2024. Other federal agencies may apply the same rule.

Malign Foreign Talent Recruitment Programs (MFTRPs) are initiatives organized by foreign governments to recruit researchers, often involving unethical practices that conflict with U.S. research standards.

PROCEDURE

Principal Investigators (PIs) must disclose to OSRP if any project personnel are part of a Malign Foreign Talent Recruitment Program or suspected of being part of a Malign Foreign Talent Recruitment Program.

Malign Foreign Talent Recruitment Program (MFTRP) Certification
NSF requires MFTRP certifications from proposers and individuals identified as senior/key personnel.

a. ***Pre-Award Certifications:***
   - In accordance with Section 10632 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19232), the AOR must certify that all individuals identified as senior/key personnel have been made aware of and have complied with their responsibility under that section to certify that the individual is not a party to a malign foreign talent recruitment program.

   - In accordance with Section 10632 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19232), each individual identified as a senior/key person must certify that they are not a party to a malign foreign talent recruitment program on pre-award disclosures.

b. ***Post-award Certification:***
   - Individuals serving as a Principal Investigator (PI) or co-PI on an active NSF award made on or after May 20, 2024, must certify annually via Research.gov to their participation or non-participation in an MFTRP.[2] Additional information regarding the annual certification process can be found at nsf.gov/research-security.

   - Requires all senior/key personnel to certify on post-award disclosures that they are not party to a Malign Foreign Talent Recruitment Program.

NO-COST EXTENSION

Purpose: Uniform Guidance (2 CFR 200.308) gives guidance for ***one-time extensions.*** This procedure outlines how to initiate a one-time no-cost extension through OSRP.

Prior approval is not required if a recipient is authorized in the terms and conditions of the federal award to initiate a one-time extension, unless one or more of the conditions outlined in paragraphs (g)(2)(i) through (iii) of section 308 apply. **However, the recipient must notify the Federal agency in writing with the supporting justification and a revised period of performance at least 10 calendar days before the conclusion of the period of performance.** A one-time extension may not be exercised for the sole purpose of using unobligated balances. This paragraph does not preclude the Federal agency from approving further no-cost extensions to the Federal award.

One-time extensions require prior approval from the Federal agency when:
(i) The terms and conditions of the Federal award prohibit the extension;
(ii) The extension requires additional Federal funds; or
(iii) The extension involves any change in the approved scope of the project.

OSRP must seek approval from the sponsor for all non-federal awards/projects.

ONE-YEAR NO-COST EXTENSION (NCE) REQUEST

All federal (and state) agencies, however, expect institutions to verify that the scope of work is unchanged and the extension is not being requested merely for the purpose of using unliquidated balances for these first one-year no-cost extensions. The approval of a first one-year no-cost extension therefore requires the submission of a justification to OSRP. The justification should identify the completion of the remaining project objectives and include an explanation of how the remaining funds will be spent. *These first one-year no-cost extension requests should be submitted to the sponsor by OSRP and require a response from the sponsor before the extension of the award can be processed.*

SUBSEQUENT EXTENSION REQUESTS

Subsequent extension requests and all other non-federal one-year no-cost extension requests require sponsor approval and should be submitted through OSRP. The request should be in writing, provide a justification related to the completion of the remaining project objectives, and include an explanation of how the remaining funds will be spent. The justification should not indicate a change to the scope of work and the extension should not be requested merely for the purpose of using unliquidated balances for a no-cost extension.

Additional information may be requested for subsequent federal award or other non-federal award no-cost extension requests, based on the specific award. All no-cost extension requests should be submitted to OSRP at least 30 days prior to the expiration date of the award, although some sponsors may request an earlier submission.

PROCEDURE

1. Notify OSRP within 30-60 days that you would like to request a no-cost extension.

2. Provide OSRP with a justification for completing the project and an explanation of how remaining funds will be spent.

3. OSRP will review and ask follow-up questions, if necessary.

4. If a budget modification is needed, OSRP will meet with SPAC and the PI to discuss the budget modification. Refer to the budget modification procedure.

5. OSRP will submit the official no-cost extension request to sponsor.

PAYING SUBAWARDEES/SUBRECIPIENTS AND SUBCONTRACTORS SELECTION

Purpose: This document is intended to outline the procedure for setting up and paying sub-awardees and sub-contractors on sponsored projects.

PROCEDURE

Procure To Pay for Sponsored Projects - after award and work tags are created

Step 1: Determine whether the expense is for a Subrecipient, a Subcontractor, or a general procurement.

- OSRP will give an overview of contracts vs subawards in the pre-award phase. Below are some reference documents that outline the difference.
    1. Subaward Guide: A basic introductory page: https://www.msudenver.edu/sponsored-research-programs/sub-award-guide/
    2. Types of subawards: https://www.msudenver.edu/sponsored-research-programs/sub-award-guide/types-of-sub-awards/
    3. Sub-award or Sub-contract Creation: https://www.msudenver.edu/sponsored-research-programs/sub-award-guide/create-a-sub-award-proposal/
    4. Sub-award Budgeting: https://www.msudenver.edu/sponsored-research-programs/sub-award-guide/sub-award-budgeting/
    5. Sub-award Frequently Asked Questions (FAQ): https://www.msudenver.edu/sponsored-research-programs/sub-award-guide/sub-award-frequently-asked-questions-faq/
    6. eCFR: 2 CFR 200.331 – Subrecipient and contractor determinations
    7. OSRP uses a tool (FDP Subrecipient v. Contractor Determination) for determining whether something is a contract or a sponsored project.
- Any general procurement or subcontractor that is not named in the sponsored award must follow regular procurement rules and processes.
    1. Steps on general procurement: https://msudenver.sharepoint.com/sites/OTC/SitePages/Pathway-to-Payment-Landing-Page.aspx
    2. Subrecipients and Subcontractors that have been specified in the sponsored award do not need to have a solicitation, regardless of dollar amount, but do need to follow other procurement processes.

Step 2: Set up the Award in Workday

- OSRP will draft and finalize the subaward agreement and send it to the subrecipient for signatures. It takes approximately 2 weeks to send out the subaward agreement. Once the subaward agreement is returned to OSRP from the subrecipient, it takes approximately 1 week to get the final signatures on our end to finalize the sub-award.
- OSRP then sends the subaward to SPAC to create the subrecipient work tag in WorkDay. This process takes approximately 1 week.

- **Note**: Subrecipients have individual work tags that are under the umbrella of the associated grant work tag.

Step 3: Set up the supplier

- Subrecipients, Subcontractors, and all other contractors or vendors being paid through Accounts Payable must be set up as suppliers in Workday.
- Job Aid available: Create Supplier Request
- The department needs to send the supplier the New Vendor Packet and instruct them to fill out the forms and upload them to the Secure Dropbox
- The supplier request will route to Business Services to complete
- We must have the New Vendor Packet before it can be completed
- Business Services will TIN match the supplier
- Workday will run Visual Compliance for sanctioned/debarred compliance
- Once Business Services receives the Supplier Create Request *and* the New Vendor Packet for the supplier, it generally takes 1-2 days to complete the setup, unless there are errors/omissions, or the supplier returns a red response from Visual Compliance.
- If the supplier does return a red response from Visual Compliance, SPAC will reach out to the PI to discuss what to do.

Step 4: Procurement

- References:
  - OTC Page: Pathway to Procurement or Payment Landing Page
  - OTC Pathway to Procurement Excel flowchart: Purchasing Pathway
  - OTC Business Services Page: Contracts and Business Services
  - OTC SPAC Page: Sponsored Project Accounting and Compliance
  - Referenced from the Pathway to Procurement page
    - Job Aid: Create a Purchase Requisition
  - Regardless of the type of procurement/supplier, the department needs to submit a requisition in Workday. A requisition becomes a Purchase Order (PO).
    - If the supplier is a subrecipient or project-specified contractor, no quotes are required, which means the subrecipient or project-specified contractor was pre-approved by the funding agency, and you do not need to attach pricing justification or sole source justification to the requisition that would otherwise be required or issue a solicitation. However, such project-specified contracts must follow any selection requirements of the grant.
  - Named contractors are supposed to follow some kind of procurement selection process during the proposal/pre-award phase, but it wasn't clear that that was happening. This could potentially follow the federal uniform guidance limits for providing quotes under the Simplified Acquisition Threshold, which is up to $250,000.
    - If the supplier is not specified in the proposal budget or for any other kind of purchase:

    - Currently, if the dollar amount is between $10,000 and $49,999, the department must provide at least two quotes from different suppliers or contractors and a short justification for the one chosen. Effective October 2024, this will be updated to make $50,000 the micro-purchase threshold, so the following bullets will be the only requirements.
    - If the dollar amount is over $50,000 and there is not an existing competitive award (mandatory or permissive, see the definitions section for descriptions) for the supplier, a solicitation will be required. AHEC manages all solicitations. See the Definitions section for descriptions of the types of solicitations and timelines.
    - If there is a mandatory award already in place for the purchase, no solicitation or competitive quotes are required to use that supplier.
    - If a permissive award is already in place, and there are multiple suppliers covered by the award, either the department should get two quotes from those suppliers and justify choosing one, or if none of them are suitable, and the amount is over $50,000, a solicitation will be required.
- Sub-Award Agreements and Subcontracts may require separate contract forms but still require a requisition/PO in Workday for the amounts to be encumbered and for AP to generate payments.
    - Submit a requisition in Workday.
    - Such agreements/contracts will be signed by the Executive Director of OSRP or their delegate.
- Any service on a sponsored project is a subcontract; all subcontracts go through regular procurement processes, i.e., solicitation, if necessary, and purchase orders or contracts.
    - Regular purchases/contracts will be issued on PO forms.
- If the supplier has their own documents, they are not to be signed. They should be attached to the requisition in Workday, and Business Services will review and negotiate terms, as necessary.
    - Spend Categories
        - For Sub-awards/sub-recipients, use "Grants – Subrecipient Services", e.g. suppliers receiving money from the sponsored project to achieve the goals of the sponsored project.
        - For Subcontracts, use "Services – Consultants" or "Services – Miscellaneous, Non-IT". These are required for reporting purposes.
        - For all other purchases, use the regular spend categories, as appropriate.
- Solicitation Process – AHEC Procurement manages the solicitation process in cooperation with the purchaser (in this case, the MSU Denver department that received the sponsored award). See the Definitions section for descriptions of the types of solicitations and timelines. Solicitations are required for any purchase over $50,000 that does not already have a mandatory or permissive award.
    - Once the Purchase Requisition is submitted, it will route to the project PI, SPAC, other approvers as necessary, Business Services, and finally AHEC Procurement to create the PO/encumbrance.

- Sub-Award Agreements will also be in Workday as PO's, so they will have a PO number.
- AHEC endeavors to process all REQs received within three (3) business days (during normal operations), assuming we have all required prior approvals, documents, insurance, etc. If they need additional documentation or information, they will work with the department and/or supplier to gather the required items.

Step 5: Payments

- Create Workday receipts for services completed or goods received
  - OTC Job Aid: [Create and Edit Receipt]
  - Create a Supplier Invoice Request to initiate the payment
    - OTC Job Aid: [Create Supplier Invoice Request]
  - Accounts Payable will complete the supplier invoice and payment process
  - Tracking Payments:
    - Individual Payments can be tracked in Workday either by invoice number, supplier name, or on the PO.

DEFINITIONS:

Documented Quote (DQ) – A Documented Quote (DQ) is conducted for solicitations over $50,000 and up to $250,000. The Procurement Director may allow a DQ to be conducted up to $500,000 in special circumstances. If a Documented quote is to be conducted; the assigned Purchasing Agent will partner with the customer and will work as a team through the process. A Documented Quote must be publicized for at least three (3) business days, though it will be posted for a reasonable number of days for potential vendors to adequately respond.

Invitation for Bid (IFB) – An Invitation for Bid (IFB) may be conducted for purchases totaling more than $250,000. Invitation for Bids is a method that results in an award to the lowest responsive bid from a responsible bidder based on the specifications set forth in the solicitation. The minimum posting time for an IFB is fourteen (14) calendar days. IFBs are typically utilized when the specific services and or goods are known and can be easily defined. The assigned Purchasing Agent will work with the customer to identify the specific requirements, specifications and process of the IFB.

Mandatory Supplier Award – A supplier for goods or services that the University has completed a solicitation for and determined will cover the entire University, e.g. copiers, furniture, etc. Mandatory price agreements must be used by all University departments if and when the need arises for the supplies or services available through a mandatory agreement. If a department seeks to purchase supplies or services of a similar nature from a source other than a mandatory price agreement, they may request a waiver from the University's Controller. The department should work with Business Services to submit the waiver request to the Controller, who will make the determination whether to grant the waiver. If the waiver is granted, and the purchase totals $50,000 or more, the standard solicitation requirements will apply.

Pass-through entity (PTE) – A non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program. In most cases, MSU Denver is the Pass-through entity.

Permissive Supplier Award – A supplier or group of suppliers that the University has completed a solicitation for and will cover the entire University. Though the use of permissive awards is not required under procurement code or rule, permissive awards should still be the first source that departments look to. The most common permissive awards are issued by the State and provide a wide variety of goods and services with aggressive pricing and negotiated terms and conditions and help save time. However, if none of the awarded suppliers are determined acceptable to the department, waiver from the Controller to use a different supplier is not required. However, if the purchase totals $50,000 or more, the standard solicitation requirements will apply. "Cooperative Agreements" are considered permissive awards, unless determined to be mandatory by the Controller. One example of this is the Omnia agreement for furniture.

Recipient - An entity, usually but not limited to non-Federal entities that receive an award directly from an awarding agency. The term recipient does not include subrecipients or individuals that are beneficiaries of the award. In most cases MSU Denver is also the Recipient of the sponsored award.

Request for Proposal (RFP) – A Request for Proposal (RFP) may be conducted for needs over $250,000 when factors in addition to cost are important. They are also used when vendors are needed to determine the best method for achieving a specific goal or solving a particular problem. Requirements for an RFP include an evaluation committee (of at least three members), and an evaluation rubric (scoring mechanism). An RFP is required to be posted for a minimum of thirty (30) calendar days. The assigned Purchasing Agent will work with the customer to develop the RFP requirements, evaluation criteria, evaluation rubric, and process the RFP.

Solicitation – A method of selecting a vendor/supplier/contractor by posting a description of the requirements to a public notice board, allowing any entity that believes it can fulfill the requirements to submit a response. Solicitations are required for any purchase of goods or services exceeding $50,000 that does not already have an awarded supplier or a waiver specified in the University's Fiscal Rules or Procurement Rules. Depending on what is being sought and the dollar amount, a solicitation may be performed as a Documented Quote (DQ), an Invitation for Bids (IFB), or a Request for Proposal (RFP), each having its own requirements.

Sub-award – what a subrecipient gets, aka notice of award (NOA); Cannot be used for the procurement of routine goods and services.

Subcontract- The entity or individual is providing specified goods and services in support of the sponsored project. Provides goods or services that are ancillary to the operation of the federal program.

Subrecipient – A non-federal entity that receives a sub-award from a pass-through entity to carry out part of a federal program but does not include an individual that is a beneficiary of such program. Substantive, programmatic work or an important or significant portion of the sponsored project is being undertaken by the entity. Terms and conditions from a prime award are typically imposed on the subrecipient to the same degree that they are imposed on MSU Denver as the prime recipient.

PAYROLL CORRECTIONS

Purpose: This procedure explains how to view payroll expenses beginning in fiscal year 2024 and what to do if corrections are needed to the work tags. *Refer to the Job Aid How to Find and Correct Payroll.*

WORKDAY MODULE/APP: This is a job aid that will lead you to reports for Payroll that you can find by using the Search Bar.

Always refer to the actual job aid when correcting payroll.

PROCEDURE

1. From the Search Bar enter "Payroll Distribution Detail – For Company"

2. A box will populate "MSU – Payroll Distribution Detail – For Company." Please reference the job aid "Manager_Reports_Payroll Distribution Detail-for Company.pdf" for pulling the Payroll Distribution Detail report in the Financial Reporting job aid folder.

3. Once the report is pulled, verify the department's payroll information:
   a. If the information is correct, simply use the information for normal reporting purposes.

4. If something in the report is incorrect (i.e. someone is being paid from the incorrect Work tags) or a Work tag is missing, request a correction by following the steps below.
   a. Export the report into Excel including the header records (see job aid noted above for step by steps export instructions).
   b. Highlight the lines on the report that are incorrect and next to each line that is incorrect list the correct work tags that should be used. Please also indicate if this salary correction is a one-time adjustment or if the new work tags are to be charged on future payroll expenses for this employee. DO NOT OVERWRITE any information on the report.
   c. Email the created Excel report to the Payroll office at Payroll@msudenver.edu. Please put "**payroll expense corrections**" in the subject line of the message.
   d. Payroll will reply with an update on how and when the request was processed.

PI CERTIFICATION PROGRAM

Purpose: All existing and new Principal Investigators (PIs) are required to complete the Roadrunner PI Certification Program to be able to serve as PI on sponsored projects.

The purpose of the Roadrunner PI Certification Program is to educate Principal Investigators (and aspiring PIs) on the various phases, processes, procedures, and roles and responsibilities of being a PI to ensure accountability, responsibility, and compliance throughout the sponsored project lifecycle.

When Metropolitan State University of Denver submits proposals and accepts awards for extramurally funded sponsored projects, the university assumes significant financial and legal obligations. The PI of a project bears primary responsibility for the ethical conduct of research, fiscal stewardship of sponsor funds, and for compliance with federal regulations, applicable state and local law and university policies under the general oversight and authority of the university.

This PI Certification Training is a comprehensive program that prepares faculty, staff, and administrators to become thriving PIs who are aware of the changing funding landscape, compliance policies, and internal processes. This program is mandatory for those who serve as PIs or will serve as PIs. Consisting of three phases—Getting Started, Pre-Award, and Post-Award—this training program identifies the responsibilities that come with being a PI, explains internal processes, and breaks down what happens after a proposal has been awarded or contract has been executed via post-award management. The completion of each phase culminates with an internal micro-credential—the PI Ready badge.

PROCEDURE

1. Log in to Canvas.

2. Select PI Certification from the list of courses.

3. Complete the three required modules (Getting started, Pre-Award, Post-Award) and take the quiz at the end of each module.

4. Notify the OSRP executive director when you have completed the course.

5. Earn your micro-badge.

PRINCIPAL INVESTIGATOR (PI) ELIGIBILITY

Purpose: The Principal Investigator (PI) has primary responsibility for achieving the technical success of the project, while also complying with the financial and administrative policies and regulations associated with the award. Although PIs may have administrative staff to assist them with the management of project funds, the ultimate responsibility for the management of the sponsored project award rests with the PI.

To serve as PI, one must be a full-time employee of MSU Denver. Several employment titles automatically confer PI/co-PI status due to the roles and responsibilities that come with that title. Titles of Professor, Associate Professor, and Assistant Professor and to library faculty holding the titles of Senior Librarian, Librarian, and Associate Librarian. Other administrative titles are also eligible for automatic PI status provided the individual is a full-time employee: Vice President, Associate Vice President, Assistant Vice President, Dean, Associate Dean, Assistant Dean, and Director. However, Emeritus faculty do not automatically confer PI status but may serve as co-Investigator or senior key personnel.

The PI must have an active appointment with MSU Denver and is responsible for executing and financially managing the project. Since a proposal and subsequent award are a commitment for MSU Denver in many ways, it is important to establish the qualifications and ability of PIs and Co-PIs to carry out the work on externally funded projects.

**All PIs must have completed the CITI trainings (effective 10/01/25) and the Roadrunner PI Certification Training before submitting proposals (effective 02/01/2026).

Alternative way of becoming PI:
Understanding that there may be times where those not automatically conferred PI status needs to be the Principal on the project, OSRP has developed an alternate approval process to allow those employees to be PI. *Refer to the PI Eligibility application*.

PROCEDURE

1. Complete the PI Eligibility application, available on the OSRP website or by contacting an OSRP proposal development specialist.
2. Attach the applicant's current curriculum vitae (for all proposals), sciENcv biosketch, sciENcv current & pending support document, synergistic activities form, and collaborators and other affiliations document (for NSF and NIH projects).
3. Include a brief summary of the justification for the request to be PI and a summary of qualifications.
4. Receive approval and signature from the unit head and the dean.
5. Submit the PI Eligibility application to an OSRP proposal development specialist.
6. OSRP will review the application and make a determination.
7. If approved, OSRP will collect the Provost's (or a designee) approval and signature.
8. Once all approvals are received, the applicant will need to complete the Roadrunner PI Certification Program and can then serve as PI for that particular sponsored project.

REQUESTING PI ELIGIBILITY

Purpose: For individuals not in an employment position whose role and responsibility does not include serving as PI/Co-PI, PI eligibility will need to be requested.

Individuals must complete the application and submit the required documentation to be considered. The application will then be routed to the replacement faculty member and appropriate approver before routing to the Provost and Executive Director of OSRP for review and approval.

PROCEDURE

1. Complete the PI Eligibility application, attach the applicant's current curriculum vitae, sciENcv biosketch, sciENcv current & pending support document, and collaborators and other affiliations document (for NSF and NIH projects). Include a brief summary of the requestor's justification for the request to be PI and a summary of their qualifications.

2. Include a backup PI or Co-PI. A replacement faculty member (who is a qualified PI or Co-PI, as defined) who will commit to assuming the PI responsibilities should the original requestor leave MSU Denver or otherwise are unable to remain as PI or Co-PI on the project.

3. Include the requestor's unit head for approval (for example, within an academic department, the Department Chair). The unit head must confirm via their approval that the person requesting PI eligibility status will, pending award, have assignable workload available for the specified scope of project activities (e.g., lecturer teaching load will be modified for assignable sponsored project workload).

4. Once the application is complete, complete the Roadrunner PI Certification Program (or show proof that the requested PI has already completed the PI Certification Program), and then proceed to submit for internal routing and approval by the individuals listed above (i.e. department chair or director, dean or area AVP, OSRP executive director, provost).

Such a request must be made for each proposal submission and will be approved or denied by the Provost, OSRP executive director, or their designee. **Approval must be obtained before submitting a proposal to OSRP.**

The rationale for this request is to:
1. Inform the individuals supervisor and/or departmental chair of the grant application;
2. Communicate the individual's qualifications to conduct research/carry out the program; and
3. Ensure that the employee's workload will be adjusted accordingly in the event of an award.

4. The backup PI should be someone both capable and committed to carrying on the work of the grant or sponsored project should the PI or Co-PI leave MSU Denver. The backup PI should also be someone who automatically confers the title PI.*

*Persons qualified to certify this request include (a) (if the requestor is in an academic unit) a regular faculty member in the requestor's unit who is otherwise qualified (as defined here) to be a PI and is qualified to manage the project and continue its work, and (b) (if the requestor is in an administrative/non-academic unit) a MSU Denver administrator at the level of director or above who is qualified to manage the project.

All applications and all supporting documentation should be emailed to OSRP for consideration.

PI TERMINATION

Purpose: The purpose of this procedure is to establish clear and consistent steps for managing the termination of a Principal Investigator (PI) on a sponsored project. It ensures that any transition in leadership is handled in a manner that maintains compliance with sponsor requirements, protects the integrity of the research, and supports uninterrupted project administration. This document provides guidance for departments and administrative offices to coordinate timely communication, documentation, and approval of changes to PI assignments, thereby safeguarding the university's fiduciary and regulatory responsibilities.

The termination of a Principal Investigator (PI) on a sponsored project must be managed in accordance with university policies and sponsor requirements to ensure continuity, compliance, and proper stewardship of the award. If a PI resigns, retires, or is otherwise unable to fulfill their responsibilities, the department must promptly notify the Office of Sponsored Research & Programs (OSRP) and Sponsored Projects Accounting and Compliance (SPAC). A formal request to change the PI must be submitted to the sponsor, including justification and the proposed replacement, subject to sponsor approval. During the transition, the university must ensure that project activities, financial oversight, and reporting obligations continue without disruption. All changes must be documented and communicated to relevant stakeholders to maintain the integrity of the sponsored project.

PROCEDURE

If a Principal Investigator (PI) is unable to continue leading a sponsored project due to resignation, retirement, or other circumstances, the following steps must be followed:

1. <u>Notification</u>: The department must inform OSRP and SPAC immediately upon learning of the PI's departure or inability to continue.
2. <u>Sponsor Approval</u>: OSRP submits a request to change the PI to the sponsor, including justification and the proposed replacement.

3. Interim Oversight: If needed, an interim PI may be appointed to maintain project continuity until sponsor approval is received.
4. Documentation: All communications, approvals, and changes must be documented and retained.
5. Transition Planning: The outgoing PI, department, and SPAC should coordinate to ensure a smooth transition of responsibilities, including financial oversight and reporting.

If a PI is transferring to another institution and desires to move sponsored award(s)/contracts(s) to the new institution, they should contact their department head and dean to initiate this discussion. Since the award is issued to MSU Denver, whether a transfer will be allowed is determined by the institution and in conjunction with the sponsoring agency. *Please refer to the Transfer of Awards procedure*.

If the grant/contract is to remain at MSU Denver, a new PI must be identified, and the sponsoring agency must approve this person. Typically, this is accomplished with a letter requesting the change and a copy of the new PI's bio-sketch or vitae (and common forms depending on the agency). A signature from the authorized organizational representative for MSU Denver may be required, depending on the sponsoring agency requirements.

OSRP will notify SPAC, the dean, and department chair once the change in PI is complete.

Final Reports and Deliverables

It is the PI's responsibility to ensure that the final technical report and any other deliverables as required under the contract documents are delivered to the sponsor within the allowable time frame and prior to your departure from MSU Denver.

PROGRAM INCOME

Effective management of program income is critical to fulfilling the university's fiduciary responsibilities. All program income must be utilized appropriately, accurately tracked, and reported in full compliance with the specific terms of each sponsored agreement, as well as all relevant governmental regulations.

Purpose: The University may generate income from sponsored projects or federal appropriations, with appropriate sponsor approvals. MSU Denver is responsible for ensuring that this program income is properly utilized, accurately accounted for, and appropriately reported.

PROCEDURE

To ensure program income is accurately accounted for in a sponsored project, it is essential to identify all potential sources of income during the on-boarding phase on the award. This includes income from registration fees, service charges, or sales directly related to the project. Clear documentation of anticipated income helps establish appropriate tracking mechanisms and ensures alignment with sponsor expectations. If program income is determined after the initial onboarding of the new award, SPAC must be notified to ensure proper setup and compliance.

Once the project is underway, program income must be recorded differently from other project funds. Departments should use designated work tags to track income and expenditure, ensuring transparency and facilitating accurate reporting. Regular reconciliation of these work tags is necessary to maintain financial integrity and to support internal and external audits.

Compliance also requires that program income be used according to the sponsor's approved method. Program income may be added to the project budget, used for cost sharing, or deducted from the total allowable costs. Principal Investigators and SPAC must work together to ensure that all income is reported timely and in accordance with institutional policies, applicable taxes and Uniform Guidance (2 CFR 200.307).

PROJECT CLOSEOUT

Purpose: The University has an obligation to meet all programmatic and financial deliverables in accordance with the terms and conditions of the award agreement. Efficient closeout of sponsored grants and contracts ensures that the University meets these requirements while also maintaining proper internal controls related to record retention and financial accountability. The Closeout Procedure ensures that all sponsored funds are fully closed out within 120 days of the end date stated in the Grant Agreement or Contract.

PROCEDURE

Programmatic/Technical

Project closeout typically requires administrative tasks to be finalized. Once it has been determined that all administrative actions and required work of the award have been completed, closeout can begin.

When the recipient or subrecipient fails to complete the necessary administrative actions or the required work for an award, MSU Denver must proceed with closeout based on the information available.

According to 2 CFR 200.344, a recipient must submit all reports (financial, performance, and other reports required by the award) no later than 120 calendar days after the conclusion of the period of performance. A subrecipient must submit all reports (financial, performance, and other reports required by a subaward) to the pass-through entity no later than 90 calendar days after the conclusion of the period of performance of the subaward (or an earlier date as agreed upon by the pass-through entity and subrecipient). The timeframe may differ for non-federal sponsors. MSU Denver will comply with the award terms and conditions.

The PI is responsible for collecting final programmatic reports from the subrecipients as well as completing and submitting the final programmatic/performance report to the sponsor in a timely manner and according to the reporting requirements outlined in the award documents or pre-award documents.

The PI should notify OSRP when the final programmatic/performance report has been submitted.

FOR FEDERAL AWARDS: If MSU Denver does not comply with the requirements, including submitting all final reports, the federal agency must report the recipient's material failure to comply with the terms and conditions of the federal award in *SAM.gov*. A Federal agency must use the Contractor Performance Assessment Reporting System (CPARS) to enter or amend information in *SAM.gov*. Federal agencies may also pursue other enforcement actions as appropriate.

Financial

Review Period – 90 Days Prior to End Date:

During the final 90 days of an award period, Sponsored Projects Accounting and Fiscal Compliance (SPAC) will send out two notifications to the PI/Department advising of actions that need to be taken to ensure a smooth transition at the end of an award period. In addition to these messages the grant accountant will set up close-out meetings with the PI and their support staff.

The purpose of these emails/meetings will be to alert the PI/Department to the approaching end date of the award/contract and to outline responsibilities and next steps to be taken by both the PI/Department and SPAC. The Review Period emails should be sent out via the grants@msudenver.edu mailbox.

Adjustment Period – 1 to 60* Days After End Date:

If no time extension is requested by the PI/Department, SPAC will work with the PI/Department during the first 60 days following the end date of the award to reconcile final expenditures and prepare the award for final financial reporting (if required) and final invoicing to be submitted to the sponsor.

Actions during this period include, but are not limited to:

- Reconcile expenditures to verify appropriate allowability and allocability to the correct funding and account codes.
- Verify all cost-share requirements are met (if needed).
- Review expenses to ensure all subcontract invoices have been paid.
- Contact subcontractor(s) for final invoice(s) if not already received.
- Reconcile ICR and make any necessary adjustments.
- Validate program income with PI/Department, if necessary.
- Confirm carryover amount to be requested (if needed).
- Confirm all payroll on award has been reallocated.

**The Adjustment Period is equal in length to the interval of time required by the sponsor for the submission of the financial report or final invoice, less 30 days. The exception to this general rule is when the final financial report or final invoice is due within 45 days after the End Date. In this case, the Adjustment Period is equal to 15 days prior to the required due date.*

Reporting Period – 61 to 90 Days After End Date:

During the Reporting Period, SPAC will draft and send out final invoices and financial reporting, as required by the sponsor. *Any additional expenses during this period to be included in final invoice/reports must be submitted with supporting documentation immediately upon receipt and review of final invoice/reports by the PI/Department*.

Actions during this period include, but are not limited to:

- SPAC will prepare final invoice/financial report and send to PI/Department for review

and approval. Written approval from PI/Department, via email, is required prior to submission of final invoice/financial report to sponsor.
- SPAC will submit final invoice/financial report once approval has been received.
- SPAC will provide the PI/Department a final signed copy of any financial reports upon submission to the sponsor.

Once the final invoice and/or financial report has been delivered to the sponsor, no additional expenses will be allowed to be charged to the grant/contract without written approval from SPAC and the sponsor to ensure reimbursement. All late expenses without proper justification and approval are considered unallowable and will need to be transferred to a non-sponsored source of funding.

Closeout Period – 91 to 120 Days After End Date:
During the Closeout Period, SPAC will move forward with the closeout of the award in the MSU Denver financial system (Workday). Generally, assistance from the PI/Department is not necessary during this period except to resolve deficits or cash residuals. At that point, SPAC will reach out to the necessary personnel to determine the correct resolutions.

All funds associated with the grant/contract should be fully closed out within 120 days of the End Date of the grant/contract award period or as outlined in the terms and conditions of the award.

Actions during this period include, but are not limited to:
- A Closeout Report will be drafted and sent to the PI/Department to alert of final closeout of the fund and, if necessary, advice regarding deficits or residuals.
- The SPAC accountant assigned to the closeout of the award will complete all steps outlined in the Grant Closeout Checklist.
- Once the Closeout Checklist has been completed, it will be submitted to the Director of SPAC for final review and approval.
- After the Closeout Checklist is verified and approved, the award fund(s) will be inactivated in Workday and the file will be archived in the Office of the Controller.

Unexpended/Over-expended Funding
If the grant is non-federal and/or there is no contractual terms deeming that the remaining funding must be returned the funding will be allocated as follows:
- For all cost reimbursable grants any positive cash will be returned to the sponsor regardless of amount.
- If the award is overbudget the department must use PI's Indirect Cost Recovery funds or their departmental funds.

PROJECT REPORTING

Purpose: Certain sponsor-prescribed actions are required to ensure timely reporting of an award. This procedure outlines these reporting requirements.

PROCEDURE

While requirements vary by sponsor, the following reporting types are needed for most projects:

Progress Reporting (interim and final)—Most awards require submission of interim (usually quarterly) and final progress reports covering the technical aspects of the award. Such reports can vary from a brief summary and list of publications to a complete compilation of project results. The specific reporting requirements are stipulated in the award agreement.

The PI is responsible for preparing and submitting progress reports in the correct form (manual or electronic) and by the prescribed deadline. The Office of Sponsored Research & Programs (OSRP) requests that a copy of the report be forwarded to their office for placement in the award file.

Financial Reporting—Sponsored Projects Accounting & Compliance (SPAC) has primary responsibility for preparing and submitting all interim and final financial reports; however, timely reporting usually requires assistance from the PI through their input prior to the reporting deadline.

The PI is responsible for ensuring that all expenses charged are accurate and allowable under the terms of the award. For final reports, the PI plays a vital role in assuring that the report (and final invoice) is accurate and submitted by the deadline. Any trailing charges not included in the final invoice will become the responsibility of the PI and/or the PI's department.

Always read the award documents to become familiar with reporting requirements.

PROPOSAL DEVELOPMENT

Purpose: This procedure gives a detailed outline of the proposal development process at MSU Denver.

MSU Denver's proposal development for external funding process begins with contacting OSRP as soon as a funding opportunity is identified, followed by developing a detailed project plan and budget with an OSRP Proposal Development Specialist (PDS).

Key Roles and Responsibilities

- Principal Investigator (PI): Responsible for generating the proposal content, ensuring all internal and external requirements are met, ensuring subject matter expertise is evident, and managing the project team.
- Office of Sponsored Research & Programs (OSRP): Provides centralized support including assistance with budgeting, editing documents, reviewing for compliance, and submitting the proposal on behalf of the university as the Authorized Organization Representative (AOR).

PROCEDURE

1. Initial Contact & Planning

- Complete the Intent to Submit form: Complete the Intent to Submit form on the OSRP website and submit it to OSRP as soon as there is a decision to pursue external funding to discuss ideas and get initial support.
- Introductory Meeting: An OSRP specialist will schedule a meeting to discuss the project, budget needs, and potential funding sources.
- Review Funding Announcement: Carefully read the funding opportunity guidelines to understand the requirements and ensure they are a good fit.
- Complete all internal training requirements: PIs are required to complete certain training modules before submitting a proposal. *See Training procedure*.

2. Proposal Content & Development

- Develop a Timeline: The OSRP proposal development specialist (PDS) will create a timeline that outlines all tasks, forms, and approvals needed to meet deadlines.
- Generate Core Content: The PI is the primary author, responsible for generating the project's core narrative, methodology, and outcomes, ensuring it makes a strong case for funding.
- Develop the Budget: Work with the PDS to create a detailed budget, using the internal budget template provided by OSRP. The final budget must be submitted to OSRP at least seven (7) business days before the proposal deadline.
- Include partners/sub-awards: If the proposal includes sub-awards or sub-contracts, the PI must work with OSRP to gather the necessary documents from collaborating institutions. These include a subrecipient commitment form, letters of commitment, a detailed budget, and a scope of work.

3. Internal & External Requirements

- Secure Internal Approvals: Obtain written approval from the department chair, dean, and other appropriate supervisors before submitting.
- Complete Institutional Forms: **Gather all required institutional documents, such as the Proposal Processing Form, Conflict of Interest (COI) form, and any required Cost Share Commitment forms.**
- Address Compliance: **If the research involves human subjects, the PI must get approval from the Institutional Review Board (IRB) before submitting the proposal.**
- Comply with Policies: OSRP will ensure that all federal, state, and institutional policies and guidelines are followed throughout the process.

4. Submission & Follow-up

- Final Internal Review: Submit the final proposal to the OSRP specialist at least five (5) business days in advance of the submission deadline for review and to obtain final submission approvals.
- OSRP Submission: OSRP staff will submit the proposal to the funding agency as the Authorized Organization Representative (AOR) through the appropriate portals.

PROPOSAL REVIEW & SUBMISSION DEADLINES

Purpose: OSRP is the office responsible for reviewing and submitting proposals on behalf of MSU Denver. Because constant multiple competing deadlines, OSRP has instituted internal deadlines for proposal review and submission.

Timelines are integral to ensure timely review, approval, and submission of grant proposals.

OSRP Timelines help anticipate the different phases of a project. The key concerns are:

1. Approvals: Timing the budget documents so that the Chair and Dean get sufficient time to review and approve the proposal for submission
2. OSRP Support: Often the details of the proposal, the application directions or the budget, generate questions OSRP may need to research to support you adequately
3. Some applications or proposals require information from other internal offices or the program officer
4. Some applications will require submission to an unfamiliar portal where OSRP will need to establish an account and be granted access to submit

These dynamics mean that proposal information is often needed by OSRP well ahead of finishing the proposal package. The OSRP PDS will help anticipate all these needs.

Timelines

- Proposal and Budget Planning Meetings
  - >/= 6 weeks prior to announcement closing
- Budget Documents & Abstract/Summary Finalized
  - PDS circulates for approval
  - 2 weeks to 7 business days before submission
- All Documents Complete and Final
  - 5 business days ahead of the submission date
- Submission Date
  - 1-3 days ahead of closing date

Any proposal received later than this date may not be approved for submission. Further, if OSRP does not review the proposal prior to submission, there is a chance that the proposal may have to be withdrawn from the competition or, if selected for award, OSRP may not be able to accept the award if any components of the proposal do not comply with university policy.

PROCEDURE

1. All final proposal documents must be received by the OSRP proposal development specialist **5 business days** ahead of the submission date. It is important that PIs work with OSRP to meet both the internal and submission deadlines.

   NOTE: The proposal development specialist may have more than one proposal with the same or similar closing date, and most funders with online platforms strongly recommend submitting at least 3 days early.

2. The OSRP PDS will give a final review and assemble the proposal package as outlined in the sponsor guidelines.

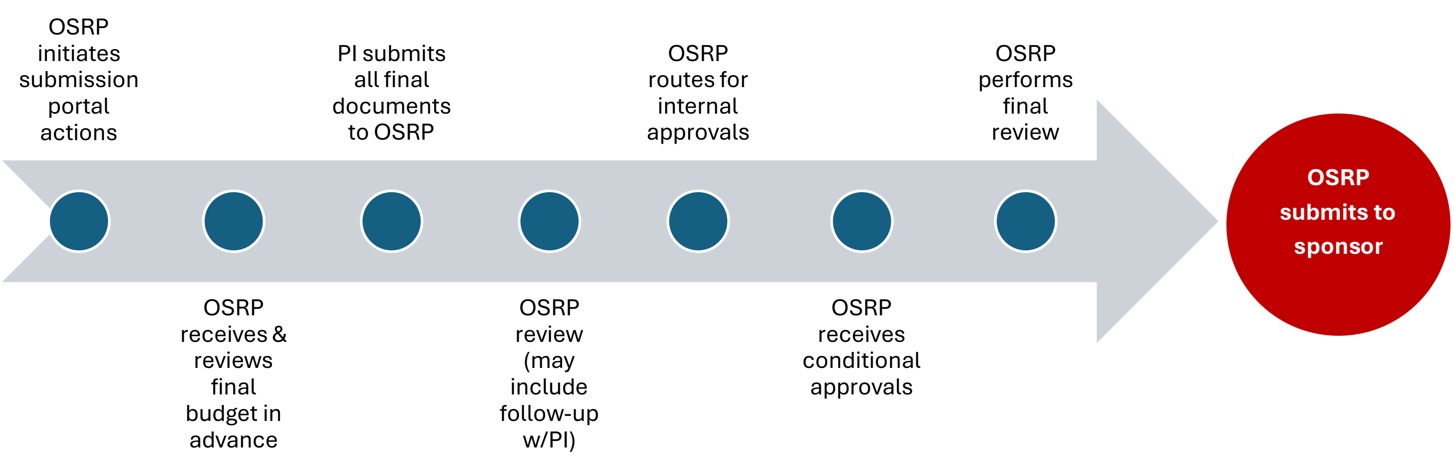
3. Once the PDS has received all internal approvals and performed a final review, the OSRP PDS will submit the proposal.

4. The end point of the internal timeline will be the submission date, typically 1-3 days ahead of your closing date.

PROCESS

Proposals that meet the internal deadline will be given priority review over proposals that do not and the level of additional assistance (copy edits, uploading support, formatting, etc.) depends on the amount of time provided to OSRP. Any proposal received past the internal deadline will be reviewed accordingly and ability to obtain institutional approvals required for submission may be affected.

The below outlines the required OSRP review, institutional approvals, and document deadlines to meet the sponsor's proposal deadline:



PROPOSAL SUBMISSION

Purpose: To submit a proposal through OSRP, contact OSRP to initiate the process via Intent to Submit form, then work with an assigned Proposal Development Specialist (PDS) who will guide the process (developing the proposal, budget, and necessary forms) ensuring compliance with agency and institutional guidelines before the proposal is submitted.

Proposals may only be submitted by an OSRP authorized organizational representative (AOR). Various federal portals such as Grants.gov, Research.gov, ASSIST, and NSPIRES only allow for approval and submission by the AOR. Some portals will allow PIs to upload information but will not allow them to submit. The PI should always work with OSRP to get proposals submitted in a timely manner. OSRP also submits to private funders when the project has a research focus. No matter the submission guidelines, PIs are not allowed to submit proposals on behalf of MSU Denver.

PROCEDURE

1. Create Portal Shell: The PDS will initiate a portal shell in the agency's submission portal.

2. Review and Submit: The PDS will review the entire proposal package to ensure it aligns with the sponsor's guidelines and institutional requirements. The PDS will also seek internal approvals.

3. Final Submission: The PDS, who is also an AOR, will then submit the complete proposal through the sponsor's portal, ensuring all necessary documents are uploaded and any errors are resolved. The PDS will notify the PI and dean that the proposal was successfully submitted and accepted.

4. Post-Submission Input: Information about the proposal is then entered into MSU Denver's internal Grants Management System, and the sponsor's decision is updated in this system once received.

5. Decision notification: The PDS will receive notification from the funder when a decision is made and will inform the PI in a timely manner. Some sponsors will send the notification to the PI, if so, please forward to OSRP.

PURCHASING: PURCHASE REQUISITIONS & PURCHASE ORDERS

This guide is intended to be read with the Purchasing Manual and highlights notable items.

PROCEDURE

Step 1 – What being purchased?

• Is there an existing Price Agreement or Award for it? There are two sets of price agreements/awards: Campus awards and State awards. Campus awards are considered mandatory. The list is available on the AP and Travel website.

- Office supplies – Office Depot
- Furniture – list and contacts are on the website
- Copiers and networked printers – Ricoh
- Promotional items – list and contacts available on the website.

State awards are considered permissive – Do not have to use them, but it makes life a lot easier. The list is available at the state's website: https://www.bidscolorado.com/co/portal.nsf/xpPriceAgreementsByCategory.xsp

If a state price agreement award is used, do not have to bid, regardless of purchase amount.

PLEASE NOTE: It is not enough that a vendor have any state award, the vendor must have an award for what needs to be purchased.

- Services – anything that is done by a person that is integral to the purchase. Primarily, this means hiring people to do something, like programming or janitorial services, but it can also include less obvious purchases, such as catering and leasing equipment. Services procurements require HR review when they are over $10,000.

- Goods – anything that is an object that we will own, such as purchased equipment or office supplies. While services might be involved, if they are incidental to the purchase, such as shipping or loading a predetermined set of software on a computer, this would not be considered a "services" purchase.

- IT/Computer-related purchases, including all hardware and software, must be purchased through the ITS department unless ITS says otherwise.

- Capital Purchases- any purchase of an item with a useful life greater than one year and a unit cost equal to or greater than $5K purchased with grant dollars must have written directions from the sponsor noting who owns the asset at the end of the award and if the item must be returned to the sponsor. This written documentation must accompany the supplier invoice and/or the purchase requisition.

Step 2 – Solicitation Thresholds-Uniform Grant Guidance 200.320(b)

- $10,000 through $24,999 – purchases of goods that will be paid for by a Federal Grant or

Federal pass-through (FPT) require a minimum of two quotes from a Vendor which may include, but are not limited to an email, price list from a website, or online search engines prior to purchase.

- $10,000 through $49,999 – purchases of services that will be paid for by a Federal Grant or Federal pass-through (FPT) require a minimum of two quotes from a Vendor which may include, but are not limited to an email, price list from a website, or online search engines prior to purchase.

- For marketplace entities such as Amazon, eBay and Etsy, documentation would need to be supplied that consideration was given to a minimum of two internet sources for the product.

Step 3 – How much does it cost?

- Under $10,000 – "Small dollar purchase"
    - Must use an SPO, ICPS, Check Request, Corporate Card, etc., according to the type of purchase. Please see the Purchasing Manual for details or contact Terri McLaggan.

- **IMPORTANT** – Purchases to any one vendor totaling more than $10,000 over the fiscal year must use a purchase order. Purchase orders must be in place before the purchase. AHEC will not issue a purchase order after the fact, and **after-the-fact purchases are considered illegal purchases.**

- Over $10,000 – Must have a Purchase Order or Contract, unless an awarded vendor is used and paid with a Corporate Card. IN ADDITION:

    - Goods: If a purchase of goods will be more than $25,000 over the fiscal year the purchase must be bid out, unless using an awarded vendor.
        - Under $25,000 is discretionary –can purchase from anyone desired.
        - DQ is recommended, but can use an IFB or RFP, if preferred. See below for descriptions. If the total dollar amount will be over $150,000, and IFB is required.
        - Goods can be purchased with a PO, regardless of the dollar amount.

    - Services: If a purchase of services will be more than $50,000 over the fiscal year, the purchase must be bid out, unless using an awarded vendor.
        - Under $50,000 is discretionary.
        - DQ is recommended, but can use an RFP if preferred. If the purchase will be more than $150,000 and RFP is required.
        - If the services total more than $100,000 over the term of the purchase, it must go on a formal contract, rather than a PO.

AHEC BID Methods:

- **IMPORTANT** – Once a bid process has begun, there is to be **no communication** with any of the potential vendors. All questions must go through AHEC Purchasing; otherwise, there could be grounds for a protest and the procurement could be stopped.

- Documented Quote (DQ) – Generally used for one-time need, cannot be multi-year. Always awarded to the lowest qualified bidder, chosen by AHEC Purchasing. There should be very clear specifications. DQ's are posted on the CORE system a minimum of 3 days, but AHEC Purchasing has authority to require it to be posted longer. If protested, the vendor might be entitled to cost of bid prep.

- Invitation for Bid (IFB) – Just like a DQ, but used for multi-year awards and purchases over $150K. Always awarded to the lowest qualified bidder, chosen by AHEC. Very specific specifications should be provided. IFB's are posted on the CORE system a minimum of 14 calendar days, but AHEC Purchasing has authority to require it to be posted longer. If protested, the vendor might be entitled to cost of bid prep.

- Request for Proposal (RFP) – Used when a) the specifications are not clearly known, b) selection criteria are variable, and/or c) the department wants to judge the respondents and select the vendor. A committee must be established, and the process must be approved by the Director of Purchasing. RFP's are posted on the CORE system a minimum of 30 days, but AHEC Purchasing has authority to require it to be posted longer. If protested, the process must stop until the protest is resolved. A protest can potentially go to court.

REDUCTION OF EFFORT

Purpose: The purpose of this procedure is to define the steps PIs must take to reduce effort for senior key personnel.

During the course of a sponsored project, unexpected circumstances may arise that may not have been previously anticipated. As a result, the level of effort for key personnel may need to be changed. Sponsor's approval may be required for this change. PIs will need to work with OSRP to reduce effort on sponsored projects.

PROCEDURE

1. **Contact the OSRP Post-Award staff.** After an award is executed, OSRP's post-award staff are responsible for central programmatic oversight. Contact them to discuss the proposed change in level of effort.
2. OSRP may need to have a meeting with the PI, college fiscal, and SPAC to ensure that everyone has the same information.
3. Submit a formal request. The PI will need to submit a formal request via email to OSRP for prior approval.
4. OSRP internal review. Once the formal request is received, OSRP will conduct an internal review to ensure the request is compliant with both the funding agency's terms and conditions and MSU Denver policies. Unless outlined in expanded authorities, no official changes shall be made until approved by the sponsor.
5. Agency submission and approval. OSRP's Authorized Organization Representatives (AORs) are the only staff who can submit a formal request on behalf of MSU Denver. If necessary, OSRP will submit the change of effort request to the funding agency via email or specified online portal.
6. OSRP will communicate the approval/change to the PI, college fiscal, and SPAC. The college fiscal, or designated fiscal, will need to submit an updated costing allocation.

RESPONSIBLE CONDUCT OF RESEARCH

Purpose: Responsible Conduct of Research training is required for all personnel and students conducting federally funded research.

MSU Denver promotes the responsible conduct of research among MSU Denver faculty, students, and staff. Federal legislation and agency policies (e.g., NIH, NSF, USDA) require that awardees of specific federally funded research and training grants provide appropriate Responsible Conduct of Research (RCR) training to all sponsored project personnel performing research. *For additional information refer to the MSU Denver Research Misconduct Policy*.

Responsible Conduct of Research training is required for all personnel and students conducting federally funded research. For National Science Foundation (NSF) grants the training is specifically mandated by the agency for all PIs and Co-PIs. Training is required before beginning a research project and is valid for students until graduation.

MSU Denver uses the CITI program for online training. Please visit the **MSU Institutional Review Board Researcher** web page and scroll down to "Collaborative Institutional Training Initiative – CITI Certification" for instructions on how to set up an account. Please make sure to affiliate your account with Metropolitan State University of Denver.

PROCEDURES

Inquiry Procedures

1. Allegations of research misconduct may be submitted via phone, email, or in-person.

2. So as not to deter individuals from reporting concerns about the conduct of research, the University will accept allegations anonymously.
    a. In the case of anonymous allegations, the University becomes the Complainant by proxy. However, individuals should be informed, when possible, that reports made anonymously could seriously limit the ability of the University to verify the allegation, investigate the details of the occurrence, make a determination of misconduct, and/or recommend and enforce corrective actions.

3. Upon notification of an allegation of research misconduct, the Research Integrity Officer will promptly assess the allegation to determine if there is a preponderance of evidence of research misconduct that would merit a formal inquiry. If the Provost determines that the allegation merits further examination, the inquiry process will immediately commence.
    a. To the extent the University has not already done so at the allegation stage, the Provost shall, on or before the date on which the Respondent is notified or the inquiry begins, whichever is earlier, promptly take all reasonable and practical steps to obtain custody of all the research records and evidence needed to conduct the research misconduct proceeding, inventory the records and

evidence, and sequester them in a secure manner, except that where the research records or evidence encompass scientific instruments shared by a number of users, custody may be limited to copies of the data or evidence on such instruments, so long as those copies are substantially equivalent to the evidentiary value of the instruments.

   b. General Counsel may aid in determining what records or other evidence are appropriate for this purpose. Any documents or records obtained in pursuit of this investigation shall be inventoried and secured in the custody of the Provost.
   c. At the time of or before beginning an inquiry, the Provost will make a good faith effort to notify the presumed Respondent that an inquiry into the allegation is to be conducted. If the inquiry subsequently identifies additional respondents, the Provost will notify them. Such notification shall include a statement of the allegation, reference to this research integrity policy, and communication of the Respondent's right to representation by legal counsel.

4. Within fifteen (15) business days of the notification of the Respondent of the allegation, the Provost, in consultation with appropriate University officials, shall appoint an inquiry committee of no less than three members with the appropriate expertise to evaluate the allegation.
   a. At least two of the members of the inquiry committee shall be tenured faculty members of Metropolitan State University of Denver. To the extent possible, one member should represent the academic field or cognate discipline from which the Respondent was conducting the research subjected to this inquiry.

5. Within five (5) business days of the selection of this inquiry committee, the Respondent shall be notified of the membership of this committee.
   a. The University shall take precautions to ensure that individuals selected to serve on the investigation committee do not have unresolved personal, professional, or financial conflicts of interest with the complainant, respondent, or witnesses.
   b. The Respondent shall have the right to strike no more than one member of the inquiry for any reason, unless evidence exists of a conflict of interest or potential conflict of interest between the Respondent and the committee member.
   c. Any other objections to the inquiry committee composition by the Respondent must be accompanied with a written explanation of potential bias or conflict of interest in an inquiry committee member for evaluation by the Provost and appropriate University officials.
   d. Any changes to the inquiry committee shall occur only with agreement of a majority of the officials appointing the inquiry committee. If the appointing officials cannot agree on a replacement, the Provost shall have the authority to implement a change to the inquiry committee.

6. The inquiry shall minimally consist of interviews of the Complainant, the Respondent, and any witnesses identified by either party or through examination of relevant research records.

   a. Any interviews shall be recorded and transcribed. The transcripts of interviews shall be provided to the interviewees for comment or revision and included as a part of the inquiry record.
   b. The Respondent and Complainant shall have the right to at least five (5) business days advance notice of the interview to prepare for the interview. In addition, the Respondent shall have the right to representation by legal counsel as a part of any interview undertaken as a part of the inquiry.

7. The inquiry committee shall also review all research records and materials obtained by the Provost.

8. The inquiry committee shall evaluate the evidence and testimony obtained during the inquiry and consult with the Provost and General Counsel to arrive at a decision as to the preponderance of evidence of possible research misconduct meriting further investigation. The inquiry shall not include a decision as to the actual occurrence of misconduct but instead deliver a recommendation for further investigation.

9. The inquiry shall be completed as quickly as possible within sixty (60) calendar days after its initiation. Should the inquiry require additional time beyond the 60 days specified herein, the Respondent, Complainant, Provost, DO, and appropriate University officials shall be notified of the need for additional time along with documentation of the reasons for such additional time.

10. The results of the inquiry shall be documented in a written report that includes the following items:
    a. The name and position of individuals against which allegations of misconduct were asserted;
    b. A full description of the alleged research misconduct;
    c. A summary of the inquiry process used and of the evidence reviewed;
    d. A summary of interviews undertaken as a part of the inquiry; Any rebuttal offered by the Respondent; and
    e. The committee's determination as to the basis for concluding that an investigation is or is not warranted. If no investigation is recommended the report should describe any other actions recommended to address the alleged activity.

11. The inquiry committee will submit a draft inquiry report for comment by the Provost, the Complainant, and the Respondent.
    a. Within ten (10) business days of receipt of the draft inquiry report, all individuals reviewing the draft must provide any comments that will be added to the final inquiry report.

12. The final inquiry report, inclusive of any additional comments, shall be completed within five (5) business days and submitted to the Deciding Official. The DO shall seek the advice of General Counsel as needed to render a decision on the inquiry within fifteen

(15) business days of receipt of the final inquiry report. Once the decision is made, the DO shall immediately notify the Provost.

13. The Provost will notify the Complainant, Respondent, and appropriate University officials of the DO's decision to proceed with an investigation or close the inquiry. The Provost will also be responsible for any other notification of individuals deemed appropriate after review with General Counsel.

Investigation Procedures

1. In the event that the Deciding Official elects to proceed with an investigation, the following procedure shall be applied. An investigation is warranted if there is:
    a. A reasonable basis for concluding that the allegation falls within the definition of research misconduct under this part and involves PHS supported biomedical or behavioral research, research training or activities related to that research or research training, as provided in [42 CFR 93.102]; and b. Preliminary information-gathering and preliminary fact-finding from the inquiry indicates that the allegation may have substance.

2. As applicable, within thirty (30) days of finding that an investigation is warranted, the Provost must provide the written finding and a copy of the inquiry report to funding agencies or other relevant entities, as required, including but not limited to the Research Integrity Officer.
    a. The report must include:
        i. The name and position of the respondent;
        ii. A description of the allegations of research misconduct;
        iii. All support, including, for example, grant numbers, grant applications, contracts, and publications listing support;
        iv. The basis for recommending that the alleged actions warrant an investigation; and
        v. Any comments on the report by the respondent or the complainant. b. The Provost must provide the following information, on request:
            1. The institutional policies and procedures under which the inquiry was conducted;
            2. The research records and evidence reviewed, transcripts or recordings of any interviews, and copies of all relevant documents; and iii. The charges for the investigation to consider.

3. To the extent the University has not already done so at the allegation or inquiry stages, the Research Integrity Officer shall take all reasonable and practical steps to obtain custody of all the research records and evidence needed to conduct the research misconduct proceeding, inventory the records and evidence, and sequester them in a secure manner, except that where the research records or evidence encompass scientific instruments shared by a number of users, custody may be limited to copies of

the data or evidence on such instruments, so long as those copies are substantially equivalent to the evidentiary value of the instruments. The Provost shall take custody of additional records whenever additional items become known or relevant to the investigation.

4. The Research Integrity Officer shall notify the respondent in writing of the allegations within a reasonable amount of time after determining that an investigation is warranted, but before the investigation begins. The Provost shall give the respondent written notice of any new allegations of research misconduct within a reasonable amount of time of deciding to pursue allegations not addressed during the inquiry or in the initial notice of investigation.

5. The Research Integrity Officer, in consultation with appropriate University officials, shall appoint an investigation committee of no less than five members with the appropriate expertise to evaluate the allegation as specified earlier in this policy.
    a. The University shall take precautions to ensure that individuals selected to serve on the investigation committee do not have unresolved personal, professional, or financial conflicts of interest with the complainant, respondent, or witnesses.
    b. At least three of the members of the investigation committee shall be tenured faculty members of Metropolitan State University of Denver. To the extent possible, one member should represent the academic field or cognate discipline from which the Respondent was conducting the research subjected to this investigation.
    c. Individuals appointed to the investigation committee should not have been involved with the inquiry proceedings, either as appointed committee members or as witnesses.

6. Within five (5) business days of the selection of this investigation committee, the Respondent shall be notified of the membership of this committee.
    a. The Respondent shall have the right to strike no more than one member of the investigation committee for any reason, unless evidence exists of a conflict of interest or potential conflict of interest between the Respondent and the committee member.
    b. Any other objections to the investigation committee composition by the Respondent must be accompanied with a written explanation of potential bias or conflict of interest in a committee member for evaluation by the Provost and appropriate University officials.
    c. Any changes to the investigation committee shall occur only with agreement of a majority of the officials appointing the committee members. If the appointing parties cannot agree on a replacement, the Research Integrity Officer shall have the authority to implement a change to the investigation committee.

7. Once convened, the investigation shall commence within twenty (20) business days. The investigation committee shall review evidence gathered by the Provost, interviews conducted as a part of the inquiry and other records used in that process and determine if additional records are required.
    a. The Provost will then notify the Respondent if additional records are required, will obtain such records, and will add them to the inventory of evidence to be reviewed concerning the allegation.
    b. The investigation committee shall then review any additional evidence gathered and if possible, conduct additional interviews of the Complainant, Respondent, and any other individuals who may have information pertinent to the alleged misconduct.
    c. Such interviews shall be tape recorded and transcribed. The transcripts of interviews shall be provided to the interviewees for comment or revision and included as a part of the investigation record.
    d. The Respondent and Complainant shall have the right to at least five (5) business days advance notice of the interview in order to prepare for the interview. In addition, the Respondent shall have the right to representation by legal counsel as a part of any interview undertaken as a part of the investigation.

8. Should additional expertise be required to fairly evaluate evidence presented in connection with the alleged research misconduct, the investigation committee shall be empowered to retain outside expertise to assist the investigation.
    a. Any such external reviewer shall be obligated to maintain the confidentiality of the investigation and review only evidence gathered by the investigation committee for evaluation of the alleged misconduct.
    b. The Respondent shall be notified of any such use of external resources but shall not have the right to object thereto.

9. The investigation committee shall consider all evidence gathered and presented with respect to the alleged research misconduct and make a determination that research misconduct has occurred. A minimum of a majority vote of the members of the investigation committee shall be required for the determination reported by the committee.

10. Upon arrival at such determination, the committee shall prepare a draft report of the investigation that includes at a minimum, the following elements:
    a. The name and position of individuals against which allegations of misconduct were asserted;
    b. A full description of the alleged research misconduct;
    c. A detailed description of the investigation process used and of the evidence reviewed;
    d. A detailed description of interviews undertaken as a part of the investigation;

e. A detailed description of other evidence reviewed, results of that review, and conclusions arrived from review of that evidence;
f. Any rebuttal offered by the Respondent; and
g. The committee's determination as to the basis for concluding that research misconduct occurred or not. If no finding of misconduct is noted, the report should describe any other actions recommended to address the allegation.

11. If a finding of misconduct is made, the following elements must be described:
    a. Describe the action as a falsification, fabrication or plagiarism and to the extent possible identify if it was intentional, knowing, or in reckless disregard;
    b. Address the merits of any explanation, evidence, or rebuttal provided by the Respondent;
    c. Identify any publications arising from the misconduct that require correction or retraction;
    d. Specify the person or persons responsible for the misconduct; and
    e. Specify any external parties or funding sources impacted by the finding.

12. The investigation shall be completed within one hundred twenty (120) calendar days inclusive of conduct of the investigation, preparation of report findings, submission of draft investigation report, and incorporation of any subsequent comments. If the investigation committee requires additional time, the reasons for delay should be documented as a part of the final report.

13. The investigation committee will submit a draft investigation report for comment by the Provost, the Complainant, the Respondent, and General Counsel.
    a. Within ten (10) business days of receipt of the draft investigation report, all individuals reviewing the draft must provide any comments that will be added to the draft investigation report.

14. The University shall give the respondent a copy of the draft investigation report and, concurrently, a copy of, or supervised access to, the evidence on which the report is based.

15. The University may provide the Complainant a copy of the draft investigation report or relevant portions of that report.

16. The final investigation report shall include:
    a. A description of the nature of the allegations of research misconduct;
    b. A description and documentation of all support, including federal support, for example, any grant numbers, grant applications, contracts, and publications listing the support;
    c. Description of the specific allegations of research misconduct for consideration in the investigation;

d. The University policies and procedures under which the investigation was conducted;
e. Identification and summary of the research records and evidence reviewed, and any evidence taken into custody but not reviewed;
f. A Statement of Findings for each separate allegation of research misconduct identified during the investigation, including a finding as to whether research misconduct did or did not occur, and if so:
    i. Identification of the research misconduct as a falsification, fabrication or plagiarism, and if it was intentional, knowing, or reckless disregard;
    ii. A summary of the facts and the analysis which support the conclusion and consider the merits of any reasonable explanation by the Respondent;
    iii. Identification of specific federal support;
    iv. Identification of any publications need correction or retraction;
    v. Identification of person(s) responsible for the misconduct; and
    vi. A list of any current support or known applications or proposals for support that the Respondent has pending with federal agencies.
g. Any comments on the draft report made by the Respondent and Complainant.

17. The final investigation report, inclusive of any additional comments, will be submitted to the Deciding Official. The DO, in consultation with University officials, will render a decision on research misconduct within fifteen (15) business days of receipt of the final investigation report.

18. A finding of research misconduct requires that:
    a. There be a significant departure from accepted practices of the relevant research community;
    b. The misconduct be committed intentionally, knowingly, or recklessly; and
    c. The allegation be proven by a preponderance of evidence.

19. The University shall keep sufficiently detailed documentation of inquiries to permit a later assessment by federal Office of Research Integrity of the reasons why the institution decided not to conduct an investigation. Consistent with [42 CFR 93.317], the University shall keep these records in a secure manner for at least seven years after the termination of the inquiry, and upon request, provide them to the Office of Research Integrity or other federally authorized personnel.

***Refer to the Research Misconduct Policy for further details.*

REVISIONS REQUIRING PRIOR APPROVALS

Purpose: A recipient or subrecipient must request prior written approval from the sponsor or pass-through entity for program and budget-related reasons.

2 CFR 200.308 Revisions Requiring Prior Approval. A recipient or subrecipient must request prior written approval from the sponsor agency or pass-through entity for the following program and budget-related reasons (*this is not an exhaustive list*):

1. Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval).

2. Change in key personnel (including employees and contractors) that are identified by name or position in the award.

3. The disengagement from a project for more than three months, or a 25 percent reduction in time and effort devoted to the award over the course of the period of performance, by the approved project director or Principal Investigator.

4. The inclusion, unless waived by the sponsor agency, of costs that require prior approval in accordance with subpart E as applicable.

5. The transfer of funds budgeted for participant support costs to other budget categories.

6. Subaward activities not proposed in the application and approved in the award. A change of subrecipient only requires prior approval if the sponsor agency or pass-through entity includes the requirement in the terms and conditions of the award. In general, a sponsor agency or pass-through entity should not require prior approval of a change of subrecipient unless the inclusion was a determining factor in the merit review or eligibility process. This requirement does not apply to procurement transactions for goods and services.

7. Changes in the total approved cost-sharing amount.

8. The need arises for additional funds to complete the project. Before providing approval, the sponsor agency must ensure that adequate funds are available to avoid a violation of the Anti-deficiency Act.

9. Transferring funds between the construction and non-construction work under an award.

10. A no-cost extension of the period of performance, other than any one-time extension authorized by the sponsor agency. All requests for no-cost extensions should be submitted at least 10 calendar days before the conclusion of the period of performance. The sponsor agency may approve multiple no-cost extensions under an award if not

prohibited by federal statute or regulation.

PROCEDURE

1. Contact OSRP to request any revisions for any sponsored project. Each agency has specific requirements for obtaining prior approval.

2. All prior approval requests will be made to the sponsor via OSRP Post-Award.

3. If sponsor prior approval is required, the PI shall provide OSRP Post-Award staff with a written explanation and rationale for the request.

4. OSRP is responsible for reviewing the request, editing as appropriate, and officially submitting to the sponsor.

SAFE AND HARASSMENT-FREE FIELDWORK (SAHF)

Purpose: The U.S. National Science Foundation's policy is to foster safe and harassment-free environments wherever science is conducted.

For each proposal to NSF that proposes to conduct research off-campus or off-site, the submitting organization's authorized organizational representative (AOR) must complete a certification that the organization has a plan in place **for the proposal** regarding safe and inclusive working environments. See Chapter II.E.9 of the Proposal and Award Policies and Procedures Guide (PAPPG) for more information. The Plan describes how the following types of behavior will be addressed:

a) Abuse of any person, including, but not limited to, harassment, stalking, bullying, or hazing of any kind, whether the behavior is carried out verbally, physically, electronically, or in written form; or
b) Conduct that is unwelcome, offensive, indecent, obscene, or disorderly.

This plan should also identify steps the proposing organization will take to nurture an inclusive off-campus or off-site working environment, (e.g., trainings); processes to establish shared team definitions of roles, responsibilities, and culture, (e.g., codes of conduct); and field support, such as mentor/mentee support mechanisms, regular check-ins, and/or developmental events.

Communications within team and to the organization should be considered in the plan, minimizing singular points within the communications pathway (e.g., a single person overseeing access to a single satellite phone), and any special circumstances such as the involvement of multiple organizations or the presence of third parties in the working environment should be considered. The process or method for making incident reports as well as how any reports received will be resolved should also be accounted for.

The organization's plan for the proposal must be disseminated to individuals participating in the off-campus or off-site research prior to departure. Proposers should not submit the plan to NSF for review.

c) Simultaneously submitted collaborative proposals and proposals that include subawards are a single unified project and, as such, only one combined plan for the project should be developed, regardless of the number of non-lead collaborative proposals or subawards included. The lead organization is responsible for checking the *"Off-Campus or Off-Site Research"* box on the Cover Sheet, if applicable.

Some programs managed by the NSF directorates for Biological Sciences (BIO) and Geosciences (GEO) may instead require a Safe and Harassment-free Fieldwork Plan to be submitted with a proposal. This requirement will be detailed in the participating programs' solicitations.

What is a Safe and Harassment-free Fieldwork (SAHF) Plan?
A SAHF plan is a project-specific two-page supplementary document that will be reviewed under NSF's Broader Impacts merit review criterion. Only certain NSF BIO or NSF GEO solicitations require a SAHF plan, and this requirement applies only to proposals with off-campus or off-site research.

The four components of the SAHF plan are specified in each solicitation (please read them in their entirety) and include:

1. A description of the field setting and unique challenges for the team.
2. Steps that will be taken to nurture an inclusive off-campus or off-site working environment.
3. Communication processes.
4. Organizational mechanisms for reporting, responding to, and resolving issues of harassment, should they arise.

Which solicitations require a SAHF plan to be included in a proposal?
Several solicitations issued by BIO and GEO require the inclusion of the two-page SAHF plan as a supplementary document. Proposers are only required to submit a SAHF plan if they are proposing off-campus or off-site research. Additional solicitations may require a SAHF plan in the future, so before you submit a proposal, please carefully read the solicitation to determine whether a SAHF Plan is required.

See Chapter VII.B.6 of the PAPPG for information on requirements for plans for award recipients who re-budget funds to support off-campus or off-site research and for supplemental requests that include off-campus or off-site.

PROCEDURE
Contact your OSRP proposal development specialist to determine if your project requires a SAHF plan.

SIGNATURE AUTHORITY: GRANTS & SPONSORED CONTRACTS

Purpose: All applications must receive University approval prior to submission to an external sponsor.

University policy requires the signatures of authorized officials to ensure compliance with sponsor and government regulations; acceptance of responsibility for the administration of the sponsored project, including the provision of adequate facilities and services; and compliance with University policy. Authorization also indicates acceptance of terms and conditions of an award.

All grant proposals, grant awards, and sponsored contracts should be signed by the Executive Director of the Office of Sponsored Research and Programs or their sub-delegate. Any proposal submitted and/or award/contract signed by other parties is subject to withdrawal.

The President of the University has identified individuals who are authorized to sign University contracts, as defined in the Signature Authority policy. The purpose is to minimize risks to the University and to minimize risk to employees of personal liability for unauthorized actions.

In reference to the Signature Authority policy, the MSU Denver President authorizes the MSU Denver vice presidents to sign any contract, as defined in the “Definitions” section, that pertains to the vice president’s operational area, with the exception of (3.c.) Grants and contracts for sponsored research and programs. (6.) The Director of the Office of Sponsored Programs and Research is authorized to sign all grant contracts, amendments, and continuations, regardless of dollar amount. No other person(s) should sign any sponsored proposals or contracts.

PROCEDURE FOR OBTAINING SIGNATURE

1. **For proposals**: All proposals must be reviewed, approved, and submitted by OSRP. Any employee of the university wanting to submit a proposal or engage in a sponsored contract, must first notify OSRP via the Intent to Submit form. OSRP will follow the internal processes for preparing a proposal package for submission. Once the process is complete and the budget has been vetted, the proposal development specialist in OSRP will route the proposal and budget for internal signatures (must be approved by the chair/director, dean/AVP, etc.) before performing the final check and signing to submit.
2. **For sponsored contracts**: Please email the Executive Director and Associate Director of OSRP to notify them of a pending contract. Connect OSRP with the contractor. OSRP will work with the contractor to process the contract following internal procedures for review and approval before executing.
3. **For electronic submissions**: Proposals that must be transmitted electronically must be reviewed and approved prior to submission to the sponsor. **The PDS in OSRP will review proposals for compliance with University and sponsor requirements.**

SPONSOR COMMUNICATIONS

Purpose: This procedure serves to establish sponsor communication permissions.

PROCEDURE

Pre-Award Communication

Building a relationship with a sponsor is one of the best ways to submit competitive proposals, and to stay on top of funding trends at sponsor agencies. Program officers are in the best position to tell you if a particular research/program idea is a "good fit" for their program. They may, in turn, suggest other programs and/or agencies that might be better suited for a particular project.

1. PIs may consider sending a short e-mail to a potential sponsor. The e-mail should be very clearly written, and succinct—a paragraph or two summarizing the proposed research/project and requesting feedback.

2. Meeting in person is ideal, but not always feasible. Ask if the program officer is willing to schedule a phone or virtual meeting to discuss your project in greater detail.

3. Prepare for the phone call, with details on your project, facilities at MSU Denver, and any other questions about the funding opportunity you may have for the sponsor. PIs may invite their OSRP PDS to this meeting. The PDS may be able to provide some necessary institutional information.

Post-Award Communication

1. Once an award is received, **all communications** with the sponsor **must come from OSRP/SPAC.**

Many federal agencies, including the National Institutes of Health (NIH), require communications and requests to be endorsed by an Authorized Organization Representative (AOR). **At MSU Denver, this requirement is met by routing requests and questions through the Office of Sponsored Research & Programs (OSRP).** After review, OSRP (or SPAC) will clarify any questions with the PI then will provide the official University endorsement and submit your communication/request to the sponsor.

Upon notice of award, OSRP and/or SPAC will be the exclusive communicator with all program officers/sponsor agencies.

PIs and other project team members are not permitted to communicate with anyone at the sponsor agency once the University has received an award.

SPONSORED PROGRAMS TRAINING

Purpose: This procedure outlines the identified trainings required by PIs and sponsored project teams.

CITI courses are intended to provide researchers (faculty, staff, and students) with an overview of human subjects research and protections, proper conduct of research, and conflicts of interest.

The CITI training is the minimum requirement for researchers who are submitting materials for IRB review. In addition, several federal funding agencies have adopted a requirement for research security training. Further, all PIs are required to complete the MSU Denver Roadrunner PI Certification Program.

Types of CITI Training Required at MSU Denver

Conflict of Interest (COI): The COI Basic course discusses the PHS regulations on financial conflicts of interest and an investigator's responsibilities relating to the disclosure of "Significant Financial Interests." It is designed to help learners satisfy training requirements associated with the PHS regulations on financial conflicts of interest.

Responsible Conduct of Research (RCR): RCR is increasingly viewed as an essential component of training, regardless of a researcher's source of funding. This course provides an in-depth review of the core RCR topics including authorship, collaborative research, conflicts of interest, human subjects, and research misconduct. Case studies and video examples are used to supplement key concepts.

Social & Behavioral Research – Comprehensive: SBE-focused comprehensive course provides an expanded training covering not only major topical areas but also many concepts that are specific to types of research, roles in the protection of human subjects, and advanced modules on informed consent topics, vulnerable populations, big data research, mobile apps research, and disaster and conflict research. It offers historic and current information on regulatory and ethical issues important to the conduct of research involving human subjects. Case studies are used within the modules to present key concepts. This course has been updated to reflect the 2018 Requirements of the Common Rule.

Other

Research Security Training: This training provides recipients of federal research funding with information on risks and threats to the global research ecosystem — and the knowledge and tools necessary to protect against these risks. Several federal funding agencies require research security training certifications from proposers and individuals identified as senior/key personnel by the proposer. In accordance with Section 10634 of the CHIPS and Science Act of 2022 (42 U.S.C. § 19234), each individual identified as a senior/key person must certify that they have completed the requisite research security training that meets the requirements specified in *Item 2 of Important Notice No. 149* within 12 months prior to proposal submission.

Researchers:

All research personnel listed on any MSU Denver IRB submission, must complete the appropriate CITI certifications or its equivalent. MSU Denver requires research personnel to complete the "Social & Behavioral Research – Basic/Refresher" (3-year expiration date), "Conflicts of Interest - COI" (4-year expiration date) CITI certifications, and "Responsible Conduct of Research – RCR" (no expiration date) course. If a researcher's certificate has expired, the researcher must stop participating in research activities until the certificate has been renewed. Additionally, PIs and Senior Key Personnel submitting proposals to federal agencies must also complete the new Research Security training available on the NSF website.

TRAININGS REQUIRED

	CITI Conflict of Interest	CITI Responsible Conduct of Research	CITI Social Behavioral all human subjects research	Research Security	Roadrunner PI Certification
All PIs	x				x
All PIs performing research w/human subjects	x	x	x	x	x
Project Teams performing research w/human subjects	x	x	x		
All PIs & Senior Key Personnel w/federal grants	x	x		x	x
All PIs performing research	x	x			x
IRB Member	x	x	x		

If the Principal Investigator's certificate(s) is expired, the entire project must pause until the certificate(s) has been renewed.

IRB Members:

All active MSU Denver IRB members must complete the "IRB Members," "Social & Behavioral Research – Basic/Refresher" and "Conflict of Interest - COI" courses, it is also recommended to complete the "Responsible Conduct of Research – RCR" course. IRB members must keep all certifications up to date.

Who needs to complete the required trainings?
The Principal Investigator and ALL research personnel involved with human subjects in the study. This includes any researcher who:

- obtains information about living individuals by intervening or interacting with them for research purposes;
- obtains identifiable private information about living individuals for research purposes;
- obtains the voluntary informed consent of individuals to be subjects in research; and/or
- is studying, interpreting, or analyzing identifiable private information or data for research purposes.

For research teams that involve external investigators (from other institutions or community members), the PI may provide alternate, comparable training for HSPP consideration.

PROCEDURES

How to access CITI Trainings:
To access and complete CITI trainings, go to the website, www.citiprogram.org. Create an account and affiliate yourself with MSU Denver. After creating the account, to complete a particular course, select the option to "add a course" and answer the following questions to indicate the specific course to be completed. After the training is completed, download the certificate for your records and the certificates will automatically upload to Cayuse, as long as you used your MSU Denver email.

Registering for CITI Training:

1. Go to the CITI website (www.citiprogram.org) and register as a new user.

2. To complete CITI training, you must be affiliated with a participating institution. Please select "Metropolitan State University of Denver" from the participating institutions dropdown list.

3. Create a username and password. Keep track of this information as it will allow you to log in and out of the program and complete the training modules at your own pace. It is best to use your MSU Denver email to create the CITI account, as it communicates with Cayuse.

4. The program will ask if you will be requesting CME/CEU credits for the course(s) you are about to complete. Choose "No" for this question, so the training is free.

5. Complete the required fields, including your institutional email address (xxxxx@msudenver.edu).

6. When you select the curriculum, in Question 1 for Human Subjects Research learner groups (see below), most researchers at MSU Denver are conducting social and

behavioral research and should select that learner group. The course that you will complete is the "Social & Behavioral Research – Basic/Refresher", unless you are conducting biomedical research.

If you have any questions on the type of research you may be conducting and what CITI training modules would best apply to your studies, please contact the Human Subjects Protection Program manager at hspp@msudenver.edu.

7. For ALL other questions under the curriculum choices (Questions 2- 6), select "Not at this time" or simply leave the choices unchecked when "Not at this time" is not an option.

   Please Note: Researchers are welcome to add and complete other courses and training in the CITI program. Once you register for the CITI program, you can always change learner groups or additional modules later. This is helpful for researchers who may need to complete additional training in CITI for other MSU Denver offices or programs.

8. The program will ask if you want to register with another institution (besides Metropolitan State University of Denver), please select "No."

9. The Basic Course should appear under your course list in the Main Menu. Follow the link to access the individual modules. The Main Menu will show you the status of the training and allow you to access a completion report when the training is complete. You may log out of the training at any time and the program will keep track of the modules already completed. The optional modules are optional and do not count towards your completion report.

10. Once all the required modules in the training (including quizzes) are completed, you will be granted a completion report. The CITI basic course training is valid for 3 years.

As a courtesy, the CITI program will alert you to expiring training via email and provide access to a refresher course as you near the expiration date.

It is your responsibility to ensure that the required training is complete and current when submitting to the IRB and conducting human subjects research.

Accessibility: According to the CITI Program website, the course modules are compatible to screen readers. In addition to English, many of the courses are available in the following languages: Chinese, French, Korean, Japanese, Portuguese, Russian, Spanish, and Thai.

******CITI certificates will automatically attach to the researcher's Cayuse profile if you used your MSU Denver email and associated yourself with MSU Denver when creating an account. There is no need to upload CITI certificates to Cayuse, unless a different email address is used in the CITI system***.

If you have any questions regarding CITI training, please reach out to the Human Subjects Protection Manager at hspp@msudenver.edu.

How to access Research Security Training:
PIs and Senior Key Personnel may access the Research Security Training modules at Research Security Training | NSF - National Science Foundation. You **MUST** download and print your completion certificate as a form of record as the system will not save your completion data.

If you have any questions regarding Research Security training, please reach out to the OSRP Executive Director at lamusalini@msudenver.edu.

How to access Roadrunner PI Certification Program:
Once on the MSU Denver network, login to Canvas. All full-time faculty and staff should see the PI Certification course readily available. If you are a full-time faculty or staff member and do not see the course, please contact OSRP.

MODIFICATIONS OF SUBAWARDS AND SUBCONTRACTS

Purpose: This procedure outlines the process for requesting modifications for subawards/subcontracts.

A subaward/subcontract to another organization or institution may need to be modified during the period of performance. For example, modifications or amendments may be needed to extend the period of performance, increase or reduce the amount to the subrecipient, revise the scope of work, change the PI, or modify other terms and conditions.

PROCEDURE

To begin the process of modifying an existing subaward/subcontract, the PI will first need to:

1. Contact the OSRP post-award assistant director via email.

2. Submit, to OSRP, relevant documentation, such as a revised scope of work or revised budget from the external subrecipient, as well as the reason for the change.

3. OSRP will prepare the subaward amendment and obtain the appropriate signatures and approvals from both the prime awarding institution and the subrecipient authorized official.

4. OSRP will also seek sponsor approval, if necessary.

SUBRECIPIENT INVOICE APPROVALS

Purpose: This procedure outlines the PI's responsibility for approving subrecipient invoices.

PROCEDURE

PIs are responsible for monitoring the progress of subrecipient's scope of work, using a variety of means to make this determination. Such reviews should generally take place at least quarterly. The PI might receive informal progress reports via phone conversations, e-mail communications, or face-to-face discussions, or more formal technical reports or other deliverables might be required and due on specific dates. Formal technical reports are filed in the PI's department and retained for 3 years after the closeout of the award.

Technical progress reviews by the PI are documented by the PI's approval on invoices received from the subrecipient.

Subrecipient invoices submitted within Workday must contain a minimum level of information including but not limited to:

- name of subrecipient;
- date of invoice;
- invoice number;
- period of performance covered by invoice;
- description of services;
- current period costs;
- subrecipient contact person with respect to the invoice;
- certification on each invoice as to the truth and accuracy of the invoice.

The PI must review and approve the subrecipient invoice for accuracy and timeliness prior to submission in Workday. The PI has oversight to ensure that the subrecipient is fulfilling their contractual obligations. The PI then must submit invoices within Workday for payment within 30 days of the invoice date.

SUBRECIPIENT MONITORING

Purpose: This procedure outlines the steps for monitoring a subrecipient.

The University has the responsibility, on an ongoing basis throughout the life of an award, to monitor the activities of subrecipients in accordance with the governing agreement. This is to ensure that awarded funds are used for authorized purposes in compliance with the provisions of the agreement, and to ensure that performance goals are achieved.

PROCEDURE

Set-up of Award

1. OSRP receives the Subrecipient Commitment Form during the pre-proposal phase. That

form is used during the risk assessment process. Upon award, OSRP will provide a completed Subaward Agreement to each subrecipient.

2. OSRP will perform the initial risk assessment for all subrecipients using the FDP Risk Assessment Questionnaire.

3. OSRP will notify SPAC of new awards during the work tag request process. OSRP will submit the risk assessment to the SPAC Grant Compliance Officer (GCO).

4. SPAC GCO will take ownership of continuous risk monitoring.

How to Assess Risk of a Subrecipient

Prior to the establishment of a new subaward grant work tag, the (GCO) will gather additional information and documentation on the subrecipient's organization, financial stability, and financial processes and controls. The GCO will submit a Subrecipient Audit Certification and Financial Status Questionnaire to the subrecipient for them to complete. Once returned to SPAC the GCO will then establish a basis for the risk level of the subrecipient.

The GCO will evaluate and document the financial risk of the subrecipient. Each subrecipient will be rated as either low, medium, or high risk. If the risk assessment reveals a high potential for financial risk, the GCO will document the approach to be taken to mitigate the concern. The GCO will notify the Director of SPAC of the completion of the risk assessment. The Subrecipient will notify the PI and OSRP of any high risk subrecipients.

Some examples to mitigate risk may be:
- Request detailed invoicing of payroll and other expenses.
- Receive updates from PI to ensure technical or progress reports are performed timely.
- Monitor the timeliness of invoices.
- Quarterly financial review monitoring procedures.

Progress Monitoring, Technical Reports, and Deliverables

PIs are responsible for monitoring the progress of subrecipient’s scope of work, using a variety of means to make this determination. Such reviews should generally take place at least quarterly. The PI might receive informal progress reports via phone conversations, e-mail communications, or face-to-face discussions, or more formal technical reports or other deliverables might be required and due on specific dates. Formal technical reports are filed in the PI’s department and retained for 3 years after the closeout of the award.

Technical progress reviews by the PI are documented by the PI’s approval on invoices received from the subrecipient.

Subrecipient invoices submitted within Workday must contain a minimum level of information including but not limited to:
- name of subrecipient;

- date of invoice;
- invoice number;
- period of performance covered by invoice;
- description of services;
- current period costs;
- subrecipient contact person with respect to the invoice;
- certification on each invoice as to the truth and accuracy of the invoice.

The PI must review and approve the subrecipient invoice for accuracy and timeliness prior to submission in Workday. The PI has oversight to ensure that the subrecipient is fulfilling their contractual obligations. The PI then must submit invoices within Workday for payment within 30 days of the invoice date.

Resolving Invoice Issues

If, after reviewing the invoice, a concern with subrecipient performance is identified, the PI should request clarification from the subrecipient. If the PI identifies any unusual, miscellaneous, apparently excessive, or potentially unallowable charges invoiced by a subrecipient, and if the explanations from the subrecipient are insufficient to render a prudent judgment on the allowability of the cost, the PI shall refer the matter to SPAC and OSRP for resolution with the subrecipient's institutional authorities. Once satisfied, the PI may proceed with approval for payment. Invoices should not be approved for payment until all issues or concerns have been resolved.

SPAC Monitoring of Ongoing Activities

The Restricted Fund Accountant and GCO will provide a review of all subrecipient invoices submitted for payment. The review will, at a minimum, include:

- appropriate invoice format and level of detail;
- approval of the PI;
- certification or signature by authorized subrecipient representatives.

The Restricted Fund Accountant or GCO may disallow invoice charges determined to be unreasonable, un-allocable, or unallowable. The Restricted Fund Accountant and/or GCO will work with the PI or PI admin to document the reason for the disallowance and contact the subrecipient organization to request a revised invoice.

Subrecipient Audit Requirements

Annual financial statements or completed Audit Certification and Financial Status Questionnaires will be requested and reviewed by SPAC.

The GCO will send and monitor the MSU Denver Financial Questionnaire to sub-grantees. If no response is received after two reminder email attempts (at a two-week cadence per email), SPAC will work with the PI for assistance. After two weeks of working with the PI and no result, the grantee will be changed to High Risk.

Should any subrecipient during this monitoring period change from low to high risk, the Grant Compliance Officer and Director of SPAC will document the approach to be taken to mitigate the concern. The GCO will notify the PI and OSRP of the determination.

Some examples to mitigate risk may be:
- The subaward agreement will contain additional terms and conditions.
- Request detailed invoicing of payroll and other expenses.
- Receive updates from the PI to ensure technical or progress reports are performed timely.
- Monitor the timeliness of invoices.
- Quarterly financial review monitoring procedures.
- Audit a subrecipient

How to Audit a High Risk Subrecipient

High-risk subrecipients may be audited by any of the following approaches:
- Desk audits of a sample of expenditures;
- Requests for procurement policies and procedures;
- Site visits to review processes, systems, and controls;
- Other procedures deemed appropriate.

If after performing an audit, the risk level remains high, the GCO and Director of SPAC will communicate with the PI, OSRP and the Controller. Other solutions may be presented to mitigate the risk.

Closeout of Subrecipient Awards

SPAC, in collaboration with the PI or PI admin, will begin subaward closeout actions immediately following conclusion of the subaward period of performance. Where possible, subrecipient awards should be processed for close-out within 60 days after the performance period. A subrecipient award may not be formally closed until all of the applicable closeout requirements have been accomplished. Subrecipient award closeout requirements must include:
- Receipt of final invoice;
- Collection of all required deliverables (e.g., technical/progress reports, patent/ invention documentation, equipment reports, etc.) to be provided by the subrecipient and final verification of technical completion by the PI, indicated by the PI's signature and date on the final invoice;
- Completion of any necessary final review of costs charged to the University by the subrecipient and final closeout of all commitments, accrued costs, or payables;
- SPAC will inactivate the subaward grant work tag in Workday.

All subrecipient information will be maintained in the award attachments within Workday.

SUBRECIPIENT RISK ASSESSMENT

Purpose: MSU Denver is required to perform a risk assessment on all subrecipients, according to 2 CFR 200.332. As the pass-through entity, MSU Denver must verify that the subrecipient is not excluded or disqualified in accordance with § 180.300. Verification methods are provided in § 180.300, which include confirming in *SAM.gov* that a potential subrecipient is not suspended, debarred, or otherwise excluded from receiving Federal funds.

Additionally, MSU Denver must evaluate each subrecipient's fraud risk and risk of noncompliance with a subaward to determine the appropriate subrecipient monitoring described in paragraph (f) of this section. When evaluating a subrecipient's risk, a pass-through entity should consider the following:

a) The subrecipient's prior experience with the same or similar subawards;
b) The results of previous audits. This includes considering whether or not the subrecipient receives a Single Audit in accordance with subpart F and the extent to which the same or similar subawards have been audited as a major program;
c) Whether the subrecipient has new personnel or new or substantially changed systems; and
d) The extent and results of any federal agency monitoring (for example, if the subrecipient also receives federal awards directly from the federal agency).

MSU Denver uses the FDP Risk Assessment Questionnaire (RAQ). The RAQ focuses on federal and federal flow-through funds but could be used to assess risk of subrecipients regardless of funding source. It is a tool to assist a pass-through entity (PTE) with determining the risk of a subrecipient and should not be recycled as a questionnaire to send to a subrecipient to complete. Use of the RAQ does not guarantee a clean audit.

PROCEDURE

1. PIs should notify OSRP that they plan to have subrecipients on their project.

2. OSRP will connect with the research administrator and PI at the subrecipient institution to complete the Subrecipient Commitment Form.
3. Once the Subrecipient Commitment Form is received back by OSRP, OSRP will perform a risk assessment utilizing the RAQ.

4. OSRP will make a determination of partnership based on the risk level before the proposal is submitted.

5. If the proposal is awarded, OSRP will share the RAQ with SPAC to allow SPAC to establish subrecipient monitoring.

SUBRECIPIENTS, SUBCONTRACTORS, AND VENDORS

Purpose: Sponsored projects often involve external collaborators, and it is essential to distinguish between subrecipients, subcontractors, and vendors. Each has different responsibilities, funding agreements, and compliance requirements.

KEY DIFFERENCES BETWEEN SUBRECIPIENTS, SUBCONTRACTORS, AND VENDORS

Category	Definition	Key Responsibilities
Subrecipient	Carries out a portion of the sponsored project's research and has intellectual contribution to the project.	• Responsible for project scope & reporting • Subject to federal compliance regulations • Provides programmatic deliverables
Subcontractor	Provides specialized goods or services to assist in project execution but does not contribute to the intellectual work.	• Delivers defined tasks or materials • Paid for services rendered • Not responsible for research outcomes
Vendor	Provides standard goods or services through a procurement relationship, not directly engaged in project research.	• Sells commercial goods/services • No programmatic decision-making • Follows standard procurement procedures

PROCEDURE FOR ENGAGING A SUBRECIPIENT

Subrecipient

- Works collaboratively with the MSU Denver PI as a co-investigator at another entity to which funds are being passed.
- Has authority to make administrative and programmatic decisions and to control the method and results of work.
- Has responsibility to meet all applicable sponsor requirements.
- Has performance measured against meeting the program objectives.
- Are usually designated senior/key personnel in the proposal-may be a Co-PI.
- Uses sponsor funds to carry out a program rather than provide a good or a service.
- Has responsibility for the end results of the research effort.
- May need IRB approval for its independent portion of the work.
- Services are complex and require a scope of work, budget, budget justification, billing requirements, and a deliverable schedule.
- The entity's statement of work may represent an intellectually significant portion of the programmatic decision making.

- The entity's work results may involve intellectual property and/or may lead to publications.

Working with a subrecipient requires careful planning and compliance. The instrument used to identify a subrecipient is a subaward. The following steps outline the required process.

1. Identify the Subrecipient Early: Collaborate with OSRP to determine if the entity qualifies as a subrecipient.

2. Subrecipient Commitment Form: This form collects essential details such as budget, scope of work, and compliance certifications. Reviewed by the external PI's department and signed by authorized officials. Form is provided by OSRP to collaborator's AOR.

3. Perform Risk Assessment: OSRP conducts a risk review of the subrecipient to ensure they meet sponsor compliance standards.

4. Draft Subaward Agreement: If awarded by sponsor, OSRP negotiates contract terms, reporting requirements, and financial oversight then issues subaward.

5. Monitor Performance & Compliance: The PI is responsible for tracking deliverables, approving invoices, and ensuring financial compliance.

PROCEDURE FOR ENGAGING A CONTRACTOR/SUBCONTRACTOR

Contractor/Subcontractor

- Contractor/Subcontractor services are uniquely designed in response to each project and not provided commercially.
- Contractor/Subcontractor technical lead is usually a scientific collaborator, or even a co-PI on the MSU Denver project.
- Contractor/Subcontractor retains rights to intellectual property.
- Contractor/Subcontractor participates in development and execution of statement of work.

Working with a contractor or subcontractor also requires careful planning and compliance to ensure that they are budgeted accurately in MSU Denver's proposal budget for sponsor approval.

Subrecipients, Subcontractors, and all other contractors or vendors being paid through Accounts Payable must be set up as suppliers in Workday.

Once the award has been set up in WorkDay. The following steps outline the required process. ***If the contractor/ subcontractor is named in the sponsored award***:

1. Refer to Job Aid: Job Aid available at Create Supplier Request.

2. New Vendor Packet: The department needs to send the supplier the New Vendor Packet and instruct them to fill out the forms and upload them to the Secure Dropbox.
3. Routing: The supplier request will route to Business Services to complete.
4. Set up: The contractor/subcontractor will then be set up in the WorkDay system.

If the contractor/subcontractor ***is not named in the sponsored award***:

- Any general procurement or subcontractor that is not named in the grant award must follow regular procurement rules and processes.
- Steps on general procurement: https://msudenver.sharepoint.com/sites/OTC/SitePages/Pathway-to-Payment-Landing-Page.aspx

PROCEDURE FOR ENGAGING A VENDOR

Vendors

- Vendor provides the goods or services within normal business operations
- Vendor provides similar goods and services to many different purchasers and in a competitive environment
- Vendor retains no rights to intellectual property.
- Vendor provides the goods or services ancillary to the operation of the federal program.
- Does not make program decisions or take actions that impact a program's overall success or failure.
- Is not responsible for research/programmatic results.
- The goods and services are secondary to the central purpose of the project.
- No potential for patentable or copyrightable technology to be created through project from activities of the entity.
- Vendor is not subject to compliance requirements of the federal program Vendor Agreement

Vendors are different as they are typically not written into the proposal or considered during the pre-award phase unless the PI received quotes during the proposal phase. However, given that quotes have time limits and the time that it takes to receive a funding decision from the sponsor, it is difficult to utilize a pre-award quote.

Vendors follow general procurement rules and processes.

1. Steps on general procurement: https://msudenver.sharepoint.com/sites/OTC/SitePages/Pathway-to-Payment-Landing-Page.aspx

SUMMER PAY FOR SPONSORED PROJECTS

Purpose: The following guidance is provided for faculty who, in addition to their academic year base salary, choose to devote additional effort and receive compensation during the summer months.

Key Definitions:

Academic Year: The fall and spring semesters.

Externally Sponsored Agreement/Project: External funds provided to MSU Denver as a result of a funded proposal or contract.

Institutional Base Salary (IBS): The annual salary of the employee as it appears in the employment contract.

Principal Investigator (PI): An individual who has primary responsibility for the design, execution, and management of the research, training, or public service project and who will be involved in the project in a significant manner.

Summer Salary: Compensation paid during the months faculty are not on contract. The summer period is defined to be the period outside the base salary period of the academic year appointment. Faculty members may receive summer salary for the months during the summer period (up to 3 months for 9-month faculty contracts).

Description: The University is obligated to comply with all federal policies related to the fiscal management of grants and contracts under guidelines established by the Code of Federal Regulations (CFR), Title 2, Part 200-Cost Principles for Educational Institutions.

Requirements: The principles are as follows:

- Charges for work performed by faculty during the summer months will be determined for each faculty member at their Institutional Base Salary (IBS) rate divided by the period to which the base salary applies. The externally funded summer salary will be calculated by one of the following:
    - A percentage of salary based on IBS. For example, a 9-month faculty member is eligible to receive up to 33.3% (11.11% or 1/9 per month) of salary during the summer months.
    - Calculated on a daily basis using the faculty member's daily rate, based on IBS.
- 9-month faculty may charge salary for up to 3 full summer months (10-month may charge up to 2 summer months), unless sponsor restricted. MSU Denver does not provide compensation for faculty when they are on vacation. Therefore, faculty members who take vacation may not be paid for 100% effort during that month.
- Faculty may fund effort expended over the summer by charging salary to sponsored projects.
- All effort and corresponding salary charged to any sponsored project(s) must be in

compliance with sponsor and University policies. Further, the effort committed during the period should be devoted exclusively to the activities supported by that project or projects, with the salary charges to each aligning on a monthly basis with the effort provided.

- It is understood that, as part of their normal work, faculty may participate in "other academic, administrative or research activities" during the summer. These activities include but are not limited to advising students (outside the scope of the sponsored research charged), unsponsored research, administrative committees, preparing new or renewal proposals, teaching, curriculum development, peer reviews, refereeing and/or writing other scholarly publications. Effort associated with these activities during the summer months may never be charged to any sponsored project.

PROCEDURE

Please work with the assigned OSRP proposal development specialist (PDS) to develop your proposal budget. The PDS will be able to properly calculate the summer salary.

Reference Materials:

Code of Federal Regulations (2 CFR 200.430)

Additional Reference Materials:

NSF Salary Limitations

(a) Senior Personnel Salaries & Wages Policy

NSF regards research as one of the normal functions of faculty members at institutions of higher education. Compensation for time normally spent on research within the term of appointment is deemed to be included within the faculty member's regular organizational salary.

As a general policy, NSF limits the salary compensation requested in the proposal budget for senior personnel to no more than two months of their regular salary in any one year. (See Exhibit II-14 for the definitions of Senior Personnel.) It is the organization's responsibility to define and consistently apply the term "year," and to specify this definition in the budget justification. This limit includes salary compensation received from all NSF-funded grants. This effort must be documented in accordance with 2 CFR § 200, Subpart E, including 2 CFR § 200.430(i). If anticipated, any compensation for such personnel in excess of two months must be disclosed in the proposal budget, justified in the budget narrative, and must be specifically approved by NSF in the award notice budget.

NIH Salary Cap

Since 1990, Congress has legislatively mandated a limitation on direct salary for individuals under NIH awards. The mandate appears in the Consolidated Appropriations Act, which provides authority for NIH to incur obligations for each Fiscal Year. The Consolidated Appropriations Act restricts the amount of direct salary to Executive Level II of the Federal Executive pay scale.

TIME & EFFORT CERTIFICATION

Purpose: As a recipient of federal grant funding, PIs are required to comply with regulations outlined in the Uniform Guidance Subpart E §200.430, by confirming effort expended on sponsored programs. Individual effort is expressed as a percentage of the total amount of time spent on work-related activities (instruction, research, administration, clerical, etc.) for which compensation was provided. Effort reporting is the method used to certify that work was actually performed.

NOTE: Please use this procedure along with the Effort Certification Job Aid

PROCEDURE

Navigate to your Workday inbox in the upper-right corner of the Workday page; from the inbox, you can find, edit, and submit each Effort Certification task.

***IMPORTANT**: Before editing/verifying the information, please be sure to review the important legal language under the Details section regarding the federal accuracy requirements for Effort Certifications.*

Verify that the effort certifications – in terms of work tags, hour amount, and allocation percentage – are up to date and accurate. If all the information is correct, then click on **Submit**. However, if you identify needed changes, then proceed on to the following steps.

For Changes in Effort

After clicking on the **Change Effort** button, select the change reason from the column.

1. Select the change reason code from the column in the table.
2. After choosing the reclassification reason, update the certified percentage.
3. **Attachments** can be useful to explain any changes that are made but are not required documents.

Changes in effort certifications can only be made between shared categories, meaning you cannot shift overall percentages between different types of pay. (i.e. you cannot shift the total balance of regular pay and holiday pay, though you can change the specific percentages in each to adjust for changes between different departments and/or work tags for that specific pay type.)

For Changes in Costing Allocations

After clicking on the **Change Effort** button, add a row by choosing a row to copy.

1. Update all work tags for the allocation (Cost Center, Function, Fund, Grant, Auxiliary Location, etc.).
2. Select the change reason code from the column in the table.
3. After choosing the reclassification reason, update the certified percent.

To remove an allocation row, click the subtraction sign from the row.

For Adding a Missing Work Tag to a Costing Allocation Line

1. Select and copy the line that is a missing grant work tag by clicking on **Add Row.**
   a. Select the change reason code from the column in the table.
   b. After choosing the reclassification reason, you will then reduce the initial line that is missing a work tag to zero.
   c. In the new line, in the change reason column, choose reclassification reason and add the missing work tag under the costing column.

Change Effort Q&A

In addition to change reasons, all change efforts require an answer to be selected from the question that will follow.

After making all the changes, verify the information in the **Details** tab to ensure accuracy: If the information all appears correct, click **Submit**.

If your effort certification task is sent back by your manager, go to the Process History tab, and review the send back reason. Once you have made the necessary corrections, click **Submit**.

TRANSFER OF AWARDS

Purpose: The purpose of this procedure is to establish clear and consistent steps for managing the transfer of a sponsored project when a Principal Investigator (PI) leaves the institution.

PROCEDURE

1. If a PI is transferring to another institution and desires to move sponsored award(s)/ contracts(s) to the new institution, please contact the department head and dean to initiate this discussion. Since the award is issued to MSU Denver, whether a transfer will be allowed is determined by the institution and in conjunction with the sponsoring agency.

2. After the transfer has been approved by the department head and dean, contact OSRP and SPAC to identify the specific transfer requirements for the project's sponsor.

3. Most frequently on federal awards, a final financial report should be submitted that reflects the unexpended balance that could be moved to your new institution. Please work with the SPAC accountant assigned to the award to finalize this balance. SPAC will also request a final drawdown for funds due to MSU Denver.

4. Some agencies require a performance report and electronic transition. If this is true for the sponsored project that the PI wishes to transfer, the PI will be required to submit the performance report to OSRP unless otherwise instructed. OSRP will initiate the transfer in the sponsor's system once final financial information is received from SPAC.

5. All agencies require an official transfer request. This request will be initiated by OSRP to the sponsor.

6. OSRP will communicate with the authorized organization representative at the institution that the PI is transferring to.

If the department head/dean has decided that the grant/contract is to remain at MSU Denver, a new PI must be identified, and the sponsoring agency must approve this person. Typically, this is accomplished with a letter (or portal initiation) requesting the change and a copy of the new PI's bio-sketch or vitae (and common forms depending on the agency). A signature from the authorized organizational representative for MSU Denver may be required, depending on the sponsoring agency requirements. Please work with OSRP to accomplish this task.

OSRP will notify SPAC, the dean, and department chair once the transfer is complete.

Equipment

If transferring to a new institution, the PI may want to request transfer of any equipment purchased with grant funding during their employment at MSU Denver.

1. To initiate this process, the PI must prepare an equipment list and description to be presented to the department head and dean for approval. Any release of equipment will be at the discretion of the department head and dean and must be approved by the Provost/VPAA.

2. A copy of the approved list will need to be supplied to the MSU Denver Controller, SPAC, and Procurement Team so that accurate inventory records can be maintained, and the MSU Denver property control tags get removed.

3. For government owned equipment, the underlying grant/contract document will provide the disposition instructions to follow. SPAC will offer guidance.

Final Reports and Deliverables

It is the PI's responsibility to ensure that the final technical report and any other deliverables as required under the contract documents are delivered to the sponsor within the allowable time frame and prior to their departure from MSU Denver.

TRANSITIONING AWARD TO SPAC

Purpose: The purpose of this document is to clearly define the transition of new awards from OSRP to SPAC.

PROCEDURE

Once the pre-award phase is complete and an award is issued and accepted, OSRP will work to gather backup documents, confirm the budget, and transition the now sponsored project award to Sponsored Projects Accounting & Compliance (SPAC).

After review and acceptance of the award, the OSRP post-award assistant director will perform a compliance check, check for cost sharing commitments, create and execute subaward agreements, communicate with the program officer if there are any questions or changes needed, and communicate with SPAC about the new award.

Gather backup documents

The New Award Checklist is an internal document with various check points to ensure that the award file is complete for SPAC review and establish new award set-up.

The OSRP post-award assistant director must gather all backup documents and complete the New Award Checklist before submitting a request for work tags to SPAC.

Confirm the project budget

Sometimes to complete the New Award Checklist, OSRP may need to request additional or updated information such as an updated budget if the amount of award differs from the proposal budget or request names of internal personnel working on the project.

The proposal development specialist (PDS) will reach out to the PI to confirm the project budget. If any changes need to be made to the budget, that happens at this stage.

Once the budget is confirmed, the PDS will complete the internal budget template and submit to the OSRP post-award assistant director as part of the New Award Checklist support documents.

Request work tags

There is a process to request work tags for new and continuing awards.

All work tag requests must come from the OSRP post-award assistant director.

If a PI receives a new grant or contract, please forward it to OSRP immediately.

If the internal process was properly followed, OSRP will already have a file for the proposal documents, including the proposal budget, that accompanies the new award.

If the internal process was not followed properly, which is not recommended, the PI will have to start from the beginning before work tags can be established.

Working with OSRP from the beginning is the best and most efficient way to ensure compliance and to speed up the internal process for getting a work tag to spend sponsored funds.

Now that the New Award Checklist is complete and work tags have been requested, the award will transition to SPAC. SPAC will fiscally manage the award through closeout.

Once work tags have been established and the award has been set-up, SPAC will schedule and onboarding meeting with the PI.

TRAVEL ON SPONSORED PROJECTS

Purpose: The purpose of this procedure is to ensure that all travel occurring on sponsored projects follow MSU Denver policy and procedures in addition to 2 CFR 200 and the terms and conditions outlined in the award notice.

Travel costs include the transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the recipient or subrecipient. These costs may be charged on an actual cost basis, on a per diem or mileage basis, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the trip. The method used must be consistent with those normally allowed in similar circumstances in the recipient's or subrecipient's other activities and in accordance with the recipient's or subrecipient's established written policies. Notwithstanding the provisions of § 200.444, travel costs of officials covered by that section are allowable with the prior written approval of the federal agency or pass-through entity when they are specifically related to the federal award (§ 200.475).

PROCEDURES

Reimbursement for travel expenses is subject to MSU Denver policies and sponsor regulations.

Uniform Guidance requires that institutions apply their policies and procedures consistently to both federally funded and other activities of the university. As a result, travel requests and reimbursements for sponsored projects are processed in accordance with University travel procedures.

While federal and most non-federal sponsors require that travel be in accordance with the MSU Denver travel policies, it is important that the PI review the specific terms and conditions of the award and the corresponding sponsor guidelines to ensure compliance. Certain awards may be more restrictive and may require specific sponsor prior approval, even when included in the proposal budget.

When determining whether or not travel charges are allowable, MSU Denver considers the following factors:

- The travel is necessary to fulfill the programmatic objective of the project and directly benefits the program being charged, and the cost of the travel is reasonable and allocable to the award.

- There is a clearly defined relationship between the traveler and their involvement in scope of work being performed. That relationship should be documented in the travel documentation.

NOTE: See the Travel Documentation Process Flowchart for a visual and follow the MSU Denver Travel Guide for all travel procedures.

FOREIGN TRAVEL ON SPONSORED PROJECTS

Purpose: The purpose of this procedure is to ensure that foreign travel occurring on sponsored projects follow MSU Denver policy and procedures in addition to 2 CFR 200 and the terms and conditions outlined in the award notice.

PROCEDURE

1. **Approval for Foreign Travel**: Foreign Travel is generally not permitted unless specifically approved by the awarding agency. This includes ensuring that travel costs are necessary and directly benefit the project.

2. On federally funded projects, all foreign travel, including those that are cost shared, should utilize US flag air-carriers whenever possible and regardless of cost or convenience. These costs need to be fully justified in the budget and any exceptions to the "Fly America Act" requirements or under the "Open Skies Act" may only occur under exceptional circumstances and as/if approved by the sponsor.

3. If a PI or project staff is planning to travel abroad, please contact the Office of Sponsored Research and Programs (OSRP) and Sponsored Projects and Accounting Compliance (SPAC) well in advance to seek required approvals.

NOTE: Please follow MSU Denver travel policy and procedures in addition to this document.

Travel Documentation Process

Check your departmental deadlines!

REV 03.03.25

1 BEFORE YOU TRAVEL

Spend Authorization (AUTH-000xxxx)

START — **Start planning your travel**

Create Spend Authorization

The Spend Authorization is required for all travel that includes airfare, an overnight stay, or a rental car. If you need a travel cash advance, you must request it on your Spend Authorization.

Step 1: Submit Spend Authorization (in Workday) - Estimate all costs

Do NOT purchase any travel items yet.

In Workday Attach:

- Conference Schedule
- Proposed Itinerary
- Any documentation required by your department

APPROVAL ROUTING

After Spend Authorization is APPROVED

Student Travel: If students are traveling, make sure you selected a student travel type on the Spend Authorization and you attached a Student Roster for the Dean of Students approval for International Travel.

With travel now approved, you may purchase your flight, hotel, registration, and any other travel needs.

- *When purchasing travel items on a University Travel Card, you must already have an APPROVED Spend Authorization in Workday.*
- *If you use a personal credit card, you will not be reimbursed until after the travel is ended.*
- *By accepting a Travel Advance, the traveler agrees to and accepts the terms of the Travel Advance Agreement. Information may be found in the Travel Guide.*

2 Requesting a Travel Advance Request (Optional. Minimum $200)

NOTE — A Travel Advance may be requested by checking the Cash Advance Requested box on the per diem expense line.

Cash Advance Requested ☑

**For travel to cash societies or for Study Abroad, where exceptions might be needed, please reach out to the Campus Liaison Training Team on how to request additional per diem.*

Travel Advance
Request a travel advance on your Spend Authorization - up to 90% of your total estimated per diem*.

APPROVAL ROUTING

Spend Authorization is APPROVED. The Advance will deposit to your bank account 5-10 business days prior to travel.

$500.00 (Loan)

TRAVEL STATUS

Time to Travel!

While traveling, you may use the Workday Mobile App to capture images of your receipts. When you use this App, the receipts will automatically be attached to your Expense Report in Workday. (Available for free at Apple Store or Google Play Store) You may also email receipts to your own MSU Denver email account to prevent loss of receipts. DO NOT charge meals to your travel card. You are entitled to 90% of your estimated per diem as a travel cash advance to purchase meals.

4 AFTER TRAVEL - FINALIZE EXPENSES

Final Expense Report (EXP-000XXXX)

Create Expense Report

Your final travel expense report (EXP) is due on or before 30 days after your return.

FINAL

In Workday Link:

- Link to your Spend Authorization
- Link all Travel Card transactions not already submitted for this trip.

TRAVEL EXPENSE REPORT
After returning, submit an Expense Report (EXP) in Workday, linking your Spend Authorization.

In Workday Attach:

- All itemized receipts from trip
- Final Hotel Folio - showing zero balance
- Flight itinerary, Conference or Program itinerary

APPROVAL ROUTING

After approval in Workday, payment will process as an *ACH payment.

Payment Elections

*Employees are to be paid electronically via ACH. Make sure you set your Payment Elections in Workday.

$ PAYMENT is equal to
Total travel expense amount
LESS any advance received
LESS any items paid by the University

Reimbursement (116.96) USD

***If you did NOT use your entire advance amount, you will show a negative reimbursement amount at the top of your EXP Report and you must return the money.*

5 Travel Advance Return

**If you did not use your entire advance and you owe money back to the University:
You must return any unused funds to the University, using the eMarket link: https://commerce.cashnet.com/cashnetg/static/storefront/MSUDenverEM_AS/catalog
To return funds for an unused Travel Advance, select Travel Advance Return of Funds.
To return funds for an accidental personal purchase on a Travel Card, please select Travel Card Return of Funds.

For assistance or training please reach out to us.
Email: CorporateCard@msudenver.edu
Phone: 303-605-0039

VACATION PAYOUT ON SPONSORED PROJECTS

Purpose: Employees fully funded on sponsored projects incur vacation time. It is important for PIs (or project directors) to understand how this can impact their sponsored project budget.

PROCEDURE

Vacation hours accumulate monthly based on an employee's full-time equivalent (FTE) status. When not used, these hours can significantly increase.

1. Encouraging employees to utilize their vacation time is a wise fiscal strategy. Unused vacation liability is charged to the department upon an employee's termination. **For sponsored projects, this liability is charged to the sponsored project budget**.

2. Monitor the vacation payout (VPO) balance and earmark funds accordingly to protect the project budget from unexpected shortfalls. This is especially critical when a sponsored project has full-time employees.

3. To aid in your review of VPO balances the grant dashboard has a VPO Liability report, please visit the Office of the Controller's SharePoint site for instructions on how to run that report.

Sick time is another benefit provided by the University. Unused sick time is only paid out after 10 years of service and is capped at 10 days. It is important to monitor this balance and allocate funds if any project-funded employees meet this eligibility.

Finally, the University may implement an across-the-board pay increase. For grant-funded employees, this increase is charged to the grant. If not anticipated, this can cause financial strain on the project budget. Therefore, it is crucial to plan for regular compensation increases during the proposal phase.

Please note that most proposal budgets are developed with an anticipated 3% increase in salary per project year and a 1% increase in fringe per project year.

MSU Denver Foundation

Corporate and Foundation Relations (CFR)

Policies & Procedures

Sponsored Research & Programs Handbook

This section outlines the current policies and procedures for working with the MSU Denver Foundation, University Advancement, and its Corporate and Foundation Relations (CFR) team. These guidelines are designed to support faculty and staff in navigating philanthropic grant opportunities, managing awarded funds, and ensuring compliance with institutional and donor expectations. ***Please note:*** The CFR team is currently in a period of transition, and these policies are subject to change. Please consult for the most up-to-date guidance.

UNDERSTANDING FOUNDATION GRANTS

- Foundation grants are philanthropic contributions from private foundations, corporations, or individual donors.
- These differ from government-sponsored research grants and are managed by the MSU Denver Foundation, a 501(c)(3) nonprofit organization.
- Purpose: Support scholarships, programs, and initiatives aligned with donor intent and university priorities.
- Management: Administered by the Foundation and facilitated by CFR team, not OSRP.

ROLES AND RESPONSIBILITIES

- Principal Investigator (PI): Must be a full-time MSU Denver employee. Responsible for technical success, financial oversight, and compliance.
- CFR Team: Supports concept development, proposal writing, funder alignment, and post-award management.
- Foundation Principal Analyst: Assists with financial setup and reporting.

DETERMINING FUNDER FIT

- Assess alignment with the funder's mission, geographic focus, giving history, and reporting requirements.
- The CFR team can assist with prospect research and funder vetting.

ADMINISTRATIVE FEES

- Non-Endowed Gifts: 6% one-time fee on the receipt amount.
- Endowments: 2% annual fee assessed quarterly.
- Fee Waivers: Must be approved by the Foundation Executive Director and CFO. Requests must be documented and justified.

SPENDING AND REPORTING

- Most expenses are processed through MSU Denver's ERP system (Workday) and reimbursed by the Foundation.
- Monthly financial reports are distributed to departments. Delays may occur due to university processing timelines.

SCHOLARSHIPS VS. STIPENDS

- Scholarships: Processed through the university's scholarship system and applied to student accounts.
- Stipends: Paid directly to students and may bypass tuition payments. Requires advance discussion with relevant offices.

PROPOSAL DEVELOPMENT AND SUBMISSION

- Start Early: Notify CFR as soon as a grant opportunity is identified.
- Collaborate: CFR assists with writing, budgeting, and aligning proposals with funder expectations.
- Submission: CFR submits proposals on behalf of the university and manages funder communications.

POST-AWARD MANAGEMENT

- Post-Award Summary: Created by CFR to outline key tasks and deadlines.
- Quarterly Check-ins: CFR monitors progress, compliance, and financial health.
- Reporting: PI is responsible for completing reports with CFR support. Reports must include budget breakdowns and impact metrics.

INTERNAL SYSTEMS AND WORKDAY

- Accounting Strings: Include Fund, Cost Center, Spend Category, Function, Grant ID, and Program Work Tag.
- Program Work Tag: Links university and foundation systems; begins with "FDN".

RESOURCES

- Grants Toolkit: Includes templates, budgeting tools, and proposal guidance.
- Centrally Managed List: Some funders require CFR coordination due to institutional relationships.
- Funding Databases: CFR uses Foundation Directory Online, GrantStation, Pivot-RP, and others.

KEY DISTINCTIONS

- CFR (Foundation): Works with donors, manages gifts, focuses on scholarships and programs, submits philanthropic proposals.
- OSRP (Academic Affairs): Works with sponsors, manages grants/contracts, focuses on research and academic projects, submits research proposals.

CONTACT AND SUPPORT

- For questions, proposal support, or post-award guidance, contact the Corporate and Foundation Relations Team at MSU Denver University Advancement.

DEFINITIONS

Budget— The financial plan for the sponsored award that the sponsoring agency or pass-through entity approves during the award process or in subsequent amendments to the award.

Budget modification—A revision to the originally approved award budget.

CITI—The Collaborative Institutional Training Initiative (CITI Program) is the trusted standard in research, ethics, compliance, and safety training. CITI provide rigorously peer-reviewed courses developed by experts in their fields.

Compliance—Adhering to regulations and requirements that govern a specific area.

Contract—A form of sponsored project. Contracts are a mechanism for procurement of a product or service with specific obligations for both sponsor and recipient. Typically, the sponsor specifies a research topic or a service and the methods for conducting the research/service in detail.

Course buyout—For work during the academic year, key personnel on sponsored projects, who are faculty, may be able to request course reassigned time if allowed by the grant agency and approved by the Department Chair and Dean. This reassigned time is sometimes referred to as a “course buy-out” as someone is essentially buying out the cost to cover the course. Calculated using the Institutional Base Salary (IBS) rate.

Direct Costs—Costs that are easily attributable to individual grants. These costs can be identified with a particular sponsored project or can be assigned directly to such activities relatively easily with a high degree of accuracy.

Fixed Price Award/Agreement—A type of grant, contract, or cooperative agreement pursuant to which the sponsoring agency or pass-through entity provides a specific amount of funding without regard to actual costs incurred under the award. This type of award reduces some of the administrative burden and record-keeping requirements for both the recipient or subrecipient and the sponsoring agency or pass-through entity. Accountability is based primarily on performance and results.

Gift— Funds provided by an individual donor, foundation, or corporation that may be designated for a specific purpose. Gifts are recorded by the MSU Denver Foundation as a gift or pledge.

Grant (Award)—A form of sponsored project. It is a type of financial assistance awarded to the University, on behalf of an individual, for the conduct of research or other programs as specified in an approved proposal.

Grant Seeking—The process of identifying funding from various sources that support specific research or project ideas.

Human Ethics—Ethical and regulatory issues surrounding human subjects research.

Human Subjects—A living individual from whom a research obtains data through intervention, interaction, or identifiable private information.

Indirect Costs (IDC)—Those costs incurred for a common or joint purpose benefitting more than one cost objective and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.

Indirect Cost Recovery (ICR)—A mechanism intended to reimburse the University for costs that are incurred to support sponsored projects.

Invoicing—The process of generating an invoice/bill and submitting it to a sponsor to request reimbursement of project expenses.

Limited Submissions—Opportunities in which the sponsoring agency limits the number of proposals a single institution (e.g., one application from MSU Denver) or units within an institution can submit.

Notice of Funding Opportunity (NOFO)—A formal announcement of the availability of funding through a financial assistance program from a sponsoring agency. The notice of funding opportunity provides information on the award, such as who is eligible to apply, the evaluation criteria for selecting a recipient or subrecipient, the required components of an application, and how to submit the application. The notice of funding opportunity is any paper or electronic issuance that an agency uses to announce a funding opportunity, whether it is called a "program announcement," "notice of funding availability," "broad agency announcement," "research announcement," "solicitation," "request for proposal," "funding opportunity announcement," or some other term.

Post-Award—All of the things that occur after a proposal has been awarded and the award has been accepted.

Pre-Award—All of the things that occur prior to a proposal being awarded/funded.

Program Officer—Program office personnel, at the sponsoring agency, responsible for developing program regulations, application notices, and application packages; overseeing the review and ranking of applications submitted under their programs; providing detailed funding recommendations to the Grants Division for applications; participating in negotiations, as necessary; providing technical assistance to applicants and recipients; monitoring funded projects; and making recommendations to the Grants Division about recipients' requests for revisions to project activities and budgets.

Proposal— A set of documents (or an application packet) containing a technical narrative of an idea and a budget and budget narrative to be submitted to a sponsor agency for funding support.

Reassign time—Time that faculty are allowed to focus on research, instruction, and other scholarly activities by reducing their usual institutional responsibilities (i.e. course buyout).

Release time—Time buy-outs are for staff members. Instead of a course buy-out, which is unique to faculty, a time buy-out is a release for a portion of time.

Research—A systematic study directed toward fuller scientific knowledge or understanding of the subject studied.

Research (Grants) Administration—is managing the administrative and financial aspects of sponsored projects, ensuring compliance with regulations, and supporting researchers throughout the project lifecycle. Research administration encompasses all activities that support faculty and staff involved in external sponsored projects across the University, regardless of funding source.

Sponsor Agency—Sponsor agencies are institutions that are either part of the federal, state, or local government, or a non-profit, corporation, or other institutes that provide funding for a research project.

Sponsored Project—An activity sponsored, or funded, by an external organization, such as a federal, state, local or private organization or agency that is in the form of a grant, contract or other arrangement formalizing the transfer of money or property from a sponsor to the University with the intent to either carry out a public purpose or provide a direct benefit to the sponsor. Sponsored projects bind the University to a set of specific terms and conditions and involve a related reciprocal transfer of something of value to the sponsor.

- Characteristics include:
    - Specific scope of work or set of specific aims
    - Financial accountability and/or reporting; the funds must be separately budgeted and accounted for
    - Specific period of performance
    - Deliverables, including a final technical report
    - Disposition of property

Statement of Work (SOW)—Is the detailed description of the work that will be performed under the award/contract.

Subaward—An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of an award received by the pass-through entity.

Summer pay—Compensation paid during the months faculty are not under contract. The summer period is defined to be the period outside the base salary period of the academic year appointment. Summer salary is paid from external funded programs and thus originates from a different source than that generated by their regular appointment.

Supplemental pay—Any payment above the employee's institutional base salary for additional employment. Calculated using the Institutional Base Salary (IBS) rate.

Uniform Guidance (2 CFR 200)—Issued by the Office of Management and Budget, the Uniform Guidance is a set of federal regulations that streamlines administrative requirements, cost principles, and audit requirements for federal awards to non-federal entities.

MSU Denver

Sponsored Research & Programs

OSRP FORMS

CONSULTANT LETTERHEAD

Click here to enter date

Metropolitan State University of Denver
Office of Sponsored Research and Programs
PO Box 173362, Campus Box 4
Dever, CO 80217

Subject: Insert Consultant Name, Insert PI last Name

This letter confirms the participation of ___________, as consultant, in a proposal entitled, "Insert Project Title" led by Metropolitan State University of Denver to Insert Prime Sponsor Name and Solicitation Number.

Insert Consultant Name confirms participation as identified below and in the proposal:

Fully burdened rate per hour:
Total number of hours:
Total consultant's cost:

Period of performance:

Brief description of service:

Insert Name of Consultant is pleased to be part of this exciting project and is prepared to enter into the necessary agreement(s) consistent with the prime award should this proposal be funded. Consultant Name's Federal Employer Identification Number is Insert Number. Any award resulting from this proposal should reflect the recipient as "Insert Consultant's Legal Name."

For questions, please contact me at Insert Consultant's Email Address and/or Insert PI Phone Number.

Kind regards,

Insert Official Name

COST SHARING PROCEDURE SUMMARY

Cost Share means sharing the total project costs of a sponsored project. Typically, the institution takes on the responsibility of sharing the costs either by cash match, in-kind, or third-party share.

Understanding the benefits and fiscal management requirements of cost-sharing is essential for effective financial planning of a sponsored project. Cost-sharing can reduce expenses by distributing costs among multiple parties, but it requires careful oversight to maximize benefits and maintain financial integrity.

Modes of Cost Share:

Cash Match (CMATCH) is an in-house term. It refers to institutional funds allocated to support sponsored projects. University cash match dollars are managed by the Office of Sponsored Research& Programs (OSRP) to further support the mission of various sponsored awards.

In-Kind refers to support provided without the exchange of money. In-kind contributions may be in the form of providing services, space, effort or supplies directly benefiting and specifically designated for the University's project or program.

Third-Party Support refers to support provided by an external source.

FORM INSTRUCTIONS

The completed Cost Share Agreement Form is considered an **internal document** and is not to be submitted to the sponsoring agency; however, it should be included with the proposal package during formal review/approval routing.

Please complete the cost share form and submit it to your OSRP proposal development specialist 10 days prior to the proposal submission deadline.

DEPARTMENT/COLLEGE/SCHOOL/CENTER NOTES

Non-Personnel Expenses (travel, supplies, equipment purchases, etc.). If these items are included as cost share, please attach a list or describe these items and list the cumulative $ amount.

% Time: Reflects the amounts to be provided by designated unit for cost-shared salaries.

Authorized Signature: To be signed by the individual responsible (as determined by applicable signature policy) for allocation of those funds, e.g. Faculty salary funds are approved by the department chair. Faculty course buyout funds are approved by the dean.

OTHER

List third-party support in the Other section. Internal cost share commitments that do not go under department/college/school/center/OSRP should also be placed under other.

MSU DENVER COST SHARE AGREEMENT FORM

PROPOSAL # ______

(Assigned by OSRP)

This form is required for all cost sharing and must be submitted to OSRP Executive Director ten (10) days in advance of the proposal submission.

PRINCIPAL INVESTIGATOR		DEPT.	
SPONSOR NAME			
PROJECT TITLE			

	Employee Name/Other (If cost share time proposed)	Dept	% Time	Non-Personnel Expenses	Faculty/Staff Time & Fringe ($)	**Authorized Signature/Date** (Authorized Signature defined by Academic Unit)
DEPARTMENT						
	Sub-Total: Department Investment					
COL/SCHL						
	Sub-Total: College/School Investment					
CENTER						
	Sub-Total: Center/Institute Investment					

	OSRP CMATCH	Description	OSRP Approval/Signature
OSRP			

OTHER

Provide description of other sources (internal or external). Attach associated supporting documents. Add'l pages may be used.

Unrecovered Indirects	***Indirects on C/S***	***In-Kind***	***Other***

Internal $ ______

External $ ______

CALCULATIONS for Unrecovered Indirects and Indirects on Cost Share

Total-Department/College/Center ($) ______

Total-OSRP CMATCH ($) ______

Total-Other ($) ______

GRAND TOTAL - COST SHARING INVESTMENT ______

OSRP Executive Director Final Approval ______

Metropolitan State University of Denver

Financial Conflict of Interest (FCOI) Disclosure Form for Sponsored Research

Purpose
To comply with federal regulations and MSU Denver policy, all Investigators involved in sponsored research must disclose significant financial interests (SFI) that may present an actual, potential, or perceived conflict of interest related to their institutional responsibilities. OSRP must have disclosures prior to submitting your proposal for external funding. The completed and signed disclosure form should be included with the sponsored proposal/application routing packet. It is the responsibility of the Investigator to file a revised disclosure form with the Office of Sponsored Research & Programs (OSRP) annually or within thirty days of discovering or acquiring a material change in the significant financial interests or obligations previously disclosed.

Training Requirement: Investigators are required to complete conflict of interest training before engaging in grant-related work, and again every four years during any grant-funded award. The required training is available on-line through the Collaborative Institutional Training Initiative (CITI). You will need to affiliate your training with MSU Denver so that we receive notification from CITI when you have completed the training. To access CITI, go to the CITI website, complete the "Conflicts of Interest" module.

DISCLOSURE EXCEPTIONS – DO NOT INCLUDE the following when disclosing financial interests:

- Salary, royalties, or other remuneration paid by MSU Denver to you, to your spouse and/or to dependent children (as applicable) if you are currently employed by MSU Denver;
- Income related to intellectual property rights assigned to MSU Denver or to agreements to share in royalties related to such rights;
- Income from investment vehicles such as mutual funds and retirement accounts for which you, your spouse and dependent children do not directly control the investment decisions made in such vehicles
- Income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education
- 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

You need to report only those Significant Financial Interests that are directly related to your responsibilities as an employee of Metropolitan State University of Denver.

Information:

- **Name:** ____
- **Title/Position:** ____
- **Department/College:** ____
- **Sponsor/Funding Agency:** _______________________________________
- **Project Title:** ____
- **Grant/Contract Number (if available):** ____________________________
- **Email:** ____

If this project is a subaward to MSU Denver, the funding originates from:
___NSF ___ PHS ___Other

Check one: ☐ Initial disclosure ☐ Update disclosing new significant financial interests ☐ Required annual update

Disclosure of Significant Financial Interests (SFI)

For purposes of this form, an SFI includes financial interests (including those of your spouse or dependent children) that reasonably appear related to your institutional responsibilities and meet one or more of the thresholds below.

Please answer the following questions:

1. **Equity Interests**
   - Do you, your spouse, or dependent children hold any equity interest (e.g., stock, stock options, ownership) that exceeds 5% ownership or is valued at **more than $5,000** in a publicly traded entity that is related to your institutional responsibilities?
     ☐ Yes ☐ No
     If yes, describe: _____________________________________
   - Do you hold **any equity interest** in a non-publicly traded entity that is related to your institutional responsibilities?
     ☐ Yes ☐ No
     If yes, describe: _____________________________________
2. **Compensation**
   - Have you, your spouse, or dependent children received (or do you expect to receive) **compensation exceeding $5,000** in the past 12 months from any

entity related to your institutional responsibilities (Exclude payments from MSU, or for teaching engagements and governmental advisory committee.)?
☐ Yes ☐ No
If yes, describe: ____

3. **Intellectual Property**
   - Do you receive income related to intellectual property rights (patents, copyrights, licensing fees, royalties) that are related to your institutional responsibilities?
     ☐ Yes ☐ No
     If yes, describe: ____
4. **Travel** (PHS-funded projects only)
   - Have you received **sponsored or reimbursed travel** related to your institutional responsibilities from an entity other than MSU Denver, a U.S. federal/state/local government agency, a U.S. university, or an academic medical center?
     ☐ Yes ☐ No
     If yes, provide sponsor, purpose, destination, and duration: ______________________________
5. **Other Relationships/Commitments**
   - Are there any other financial relationships or outside commitments that could reasonably be perceived to affect, or appear to affect, the design, conduct, or reporting of sponsored research?
     ☐ Yes ☐ No
     If yes, describe: ____

Certification and Acknowledgement

I certify that:

- The information provided above is true and complete to the best of my knowledge.
- I will update this disclosure annually and within **30 days** of acquiring a new Significant Financial Interest.
- I understand that failure to disclose may result in sanctions under MSU Denver policy and federal regulations.

I understand that significant financial interests disclosed here do not necessarily constitute a financial conflict of interest, and I may be asked to provide additional information if it is needed to determine whether a financial conflict of interest does exist.

Signature: __________________________ Date: _________

Review and Determination (For Administrative Use Only)

☐ No FCOI identified

☐ FCOI identified – management plan required (attached)

☐ Additional review required by the Designated Official

Reviewer Name/Title: ___________________________

Reviewer Signature: ____________________________ Date: __________

LIMITED SUBMISSION PRE-PROPOSAL FORM

This form is used for submitting internal applications for limited submission opportunities. Unless otherwise stated in the campus announcements and communications, all internal applications should include:

- Title/Cover page: Project title, list of investigators/key personnel & their affiliations, and a short abstract of ~200 words.
- Project Narrative: Up to 4 pages, minimum 11 pt. font, single-spaced, and 1-inch margins all around (including figures & tables, excluding references), describing the proposed project and addressing the evaluation criteria set by the sponsor in their funding opportunity announcement/solicitation.
- References 1-page maximum
- Budget: 1 page maximum with brief justifications capturing the major categories of expenses, the amount received by each participating institution

Materials should be prepared **as a single PDF** document and attached to an email to the executive director of OSRP along with this pre-proposal form.

Please send any questions to the executive director of OSRP.

Investigator Information

Enter information for the primary point of contact for the pre-proposal application and administration.

Last Name:

First Name:

Home Department & College/School:

Email/Phone Number:

Pre-Proposal Information

Program Announcement#:

Sponsor:

Project Title:

PI Eligibility Application

Complete the PI Eligibility application, attach the potential PIs current curriculum vitae, sciENcv biosketch, sciENcv current & pending support document, collaborators and other affiliations document (for NSF and NIH projects), and synergistic activities 1-pager (NSF projects only). Include a brief summary of the justification for the request to be PI and a summary of their qualifications.

Section 1.

Requestor:		**Email:**	
Name of Person Seeking PI Status:		**Dept.:**	
Position Title:		**College:**	
C.V. Attached?		**Current & Pending Support Attached?**	
sciENcv Bio Attached?		**COA Attached? (for NSF & NIH project)**	
PI Certification Prog. Completed?		**Synergistic Activities Attached?**	

Justification for Request:

Summary of Qualifications:

Section 2.

Include a Backup PI or Co-PI. A replacement faculty member (who is a qualified PI, as defined) who will commit to assuming the PI responsibilities should the original requestor leave MSU Denver or otherwise are unable to remain as PI on the project. *Signature confirms commitment.*

Name of Backup PI:			
Dept. & College:			
PI Certification Prog. Completed?		**Email:**	
Signature of Backup PI:			

Section 3.

Include the requestor's unit head. The unit head is confirming via their approval that the person requesting PI eligibility status will have assignable workload available for the specified scope of project activities, pending award.

Unit Head:		**Approval Date:**	
Dean/VP:		**Approval Date:**	
OSRP:		**Approval Date:**	
Provost:		**Approval Date:**	