Pre-Award Information

NSHE Sponsored Programs Proposal Process (Internal Awards)

Introduction

The System Sponsored Programs and EPSCoR Office (NSHE SSPO) is a unit within the Nevada System of Higher Education (NSHE), Academic and Student Affairs. NSHE SSPO provides preaward and post-award services for grants and contracts. NSHE SSPO pre- and post-award administrators assist institutions, faculty and staff members to develop and submit proposals and provide financial and administrative support. NSHE SSPO is accountable for pre- and post-award responsibilities that include identifying funding sources; reviewing solicitations; proposal preparation, review and submission; contract negotiations; financial administration; producing financial reports and invoices; effort reporting; cost sharing documentation; audit coordination; System- and State-wide programming to include proposal development, drafting solicitations, coordinating reviews, program administration, outreach, education and reporting; and award closeout.

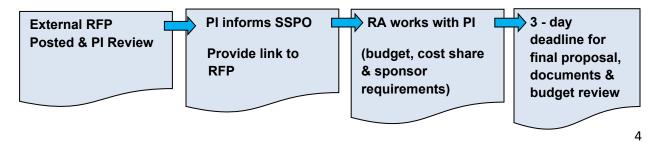
NSHE SSPO is charged with administrative and financial regulations and compliance requirements that govern grants and contracts. The procedures on NSHE Sponsored Programs - Requirement to Submit Proposal and Receive Awards for Grants and Contracts are available at <u>https://epscorspo.nevada.edu/spo-forms/</u>.

Proposal Development and Submission

Applicable to: System Administration and its units, including System Computing Services.

When responding to requests by a sponsoring agency for proposals that require financial support, such responses must be routed through NSHE SSPO for review. NSHE SSPO should be contacted within one calendar week of the decision to submit a proposal.

A Research Administrator (RA) will be designated to work with the Principal Investigator to review the Request for Proposal (RFP) for any NSHE requirements and to answer any questions that the PI may have during the proposal process. A copy of the RFP or the website link should be referenced for guiding the proposal development.



Full proposals, supplemental documents, current and pending support forms, bio sketches, etc. must be received by NSHE SSPO not less than 3 business days prior to the sponsor due date for proposals. Proposals received less than 3 business days prior to the sponsor due date may not be reviewed or guaranteed for submission.

Routing Form

Every proposal for review must be submitted to NSHE SSPO with a completed routing form. Proposals must comply with the requirements set forth for review and submission to be guaranteed for submission to the sponsoring agency. See <u>https://epscorspo.nevada.edu/spo-forms/</u> for an electronic version of the Routing Form. NSHE SSPO staff completing a proposal routing form must complete the form through the Proposal Database located on the commons drive. All routing forms submitted outside of NSHE SSPO would need to be uploaded in the Proposal Database by the RA for processing.

Budget Development

The RA's role is to advise and guide the PI in preparing and completing their proposal budget. The RA may help facilitate the budget development process by discussing the project with the PI and ascertaining which costs should be included and sharing knowledge regarding allowable costs and indirect cost calculations. The budget should be developed in accordance with the sponsor's requirements, NSHE standards and OMB Uniform Guidance directives and follow the standard budget categories.

Personnel – Should be expressed in terms of a percentage and will be required to report through effort certification reporting. When projecting salaries for the entire project period, it is important to understand that everyone may not be involved during the entire project. When preparing the budget, be sure that the NSHE 3% inflationary factor is included in subsequent year salaries.

Personnel that are employed under NSHE at any of the institutions cannot be budgeted under Personnel as Independent Contractors. If salary is required for a faculty or staff member at a campus to perform a scope of work, a subaward to the campus must be issued.

Fringe Benefits – Fringe benefits are NSHE's contribution to group insurance plans and retirement programs, etc. These contributions are expressed in terms of percentage of salary. They are re-calculated annually to assure accuracy. Fringe rates for proposals are estimates only; the actual fringe rate will be charged to the project accounts when

salaries/wages are incurred. RAs will apply the correct fringe rates based on staff categories.

Consultants – Refer to the policy guidelines of the sponsoring agency to determine when project funds may be used for consultant fees.

Equipment – Equipment, as defined by <u>BCN policy</u>, as inventoried equipment is defined as all merchandise meeting the following criteria:

- 1. Has a unit cost of \$5,000 or more
- 2. Is complete in itself (per unit)
- 3. Does not lose its identity even though it may become a component part of another item when placed in use
- 4. Is of a non-expendable, non-repairable, durable nature with a life expectancy of one year or more

Items which do not meet these criteria should be classified as "supplies."

Supplies – Supplies may include program materials, outreach items, miscellaneous disposable items (under \$5,000), etc. and must be itemized by category.

Travel – Funding agencies require full justification for travel requests. Describe the purpose of the travel, destination(s), names or titles of individuals for whom funds are requested, and frequency of trips. All international travel requires Sponsored Programs Office approval since most agencies require prior approval; this applies to subrecipient too.

Other – "Other" expenses may include publication costs, software subscriptions, license fees, rental and leases, and participant costs. These items must be itemized and justified in the budget justification.

Subawards – If a portion of the scope of work is provided outside of NSHE System Administration, or competitions for proposals will be initiated under the prime award, a breakdown of the subrecipient budget must be provided. Approval from the Sponsored Programs Office of the subrecipient is required. A letter of commitment and scope of work may also be required by the sponsoring agency.

The budget justification must clearly identify the subaward's budget in the sponsoring agency format but placed under "Other". System Administration or its units, if applicable, will calculate indirect costs only on the first \$25,000 of each subaward. The sub-recipient is expected to be able to charge their full F & A if they have a negotiated rate. Any sponsor F & A restrictions will apply to the sub-recipient.

Facilities and Administration (F&A) Costs

Proposals that are submitted for NSHE SSPO to administer are to apply the full applicable F&A (Indirect Cost) rate to all sponsored projects. The current rate is 15% (effective 7/1/18). Under the following circumstances, a reduction of indirect costs is applicable:

• The sponsoring agency's institutional policies restrict or prohibit payment of full indirect costs.

Indirect costs are not calculated on the following direct cost items if the approved indirect cost rate is applied:

- Equipment, as defined above;
- Subawards (amount in excess of \$25,000 for each subaward);
- Participant Support;
- Tuition; and
- Space Rental.

F&A is not allowed on NSHE State Special Project Match (SPM) funds issued through the State of Nevada but may be utilized as matching funds to a federal award.

Unrecovered or Waived F&A

If the full F&A is not requested and it is applicable to the sponsoring agency, this results in an amount that may be considered cost sharing/matching. If state funds are utilized at NSHE SSPO as cost sharing/match funds, consideration of unrecovered F&A may be requested as part of the budget documentation.

Cost Sharing/Matching

Cost sharing occurs when a cost specifically benefits a sponsored project but is not charged to that project. Matching is synonymous with cost sharing and occurs when a sponsor agrees to fund a portion of direct costs predicated on NSHE making a pre-determined contribution.

If the sponsoring agency requires cost share/matching per the solicitation, then it must be budgeted and explained in the budget justification. Examples of these are a 1:1 cost share requirement.

Sponsored projects may not be cost shared/matched on a voluntary basis. Voluntary cost sharing occurs when a PI includes cost sharing in a proposal when the sponsor does not require it. Voluntary cost sharing, including proposed faculty effort and other types of direct costs, is prohibited. Cost share/match should only be committed as required by the sponsoring agency.

Once a cost sharing/match has been proposed and an award is made, all cost sharing commitments are considered to be mandatory and as such represent binding obligations of NSHE.

If sub-recipients are contributing cost share/matching funds through their institution, their Sponsored Programs office must sign off on the contribution prior to submission to the sponsoring agency. Federal funds from other projects cannot be used as cost share/match.

The complete cost sharing policy can be found at <u>https://epscorspo.nevada.edu/spo-forms/</u>.

Proposal Review

The budget must be reviewed and approved by an authorized representative designated by the Director of the Sponsored Programs Office to make sure that all appropriate charges are included, calculations are correct, and costs are in accordance with NSHE policy, OMB Uniform Guidance, and sponsor regulations.

Authorized Organizational Representative

The NSHE SSPO Director has been delegated the authority to sign and obligate NSHE for all standard form federal grant and contract matters.

Submission

All Research Administrators are authorized to submit the final proposal to the sponsoring agency upon approval of the NSHE SSPO.

Post Proposal Follow-Up

A complete copy of the proposal packet and confirmation of receipt, if applicable, will be provided to the PI via email.

Receipt of Award

When a proposal is approved by a sponsor for support, NSHE SSPO will receive notice that an award has been made or a contract is being prepared. If the PI receives such a notice, he/she must contact NSHE SSPO immediately to insure that NSHE SSPO has also received the notice. NSHE SSPO cannot administratively initiate the project without the formal sponsor notification. **Principal Investigators are not authorized to sign award documents on behalf of NSHE**.

When an award document is received that requires an authorized signature, it is the responsibility of NSHE SSPO to return signed copies to the sponsor. Upon receipt of the fully executed documents, NSHE SSPO will process the award.

Anticipated Awards (Memo Account)

There may be a legitimate need to start a project prior to the receipt of formal notifications of an award from a sponsor. In this situation, a Memo Account may be requested by the PI prior to the formal notification by completing a <u>Memo Account Request form</u>. The PI must list the guarantee account that will cover any unpaid expenses by the sponsor. When the formal award is received the account will be updated with current information per the sponsored agreement. If for any reason an award is not received, or if the sponsor's conditions preclude pre-award-date expenses, the SA unit is responsible for any unreimbursed expenditures. The amount requested should be no more than 25% of the total budget and limited to expenses that would be incurred within the 90 pre-award period. The full amount of the anticipated award will not be authorized to set up a Memo Account.

"Kick Off" Meeting

Upon receipt of award, and review of terms and conditions, a "Kick Off" meeting will be conducted with the PI and the NSHE SSPO Director or their designee to review the roles and responsibilities of those involved in the program implementation and grants management. This will include the review of Scope of Work (SOW), budget, cost share, sponsor terms and conditions and compliance.

Subawards

Since the development of the SPO in 1986, system- or statewide sponsored project funds have been distributed through a competitive Request for Proposals (RFP) solicitation or as specifically described in the narrative of the funded proposal.

Standard Templates for Subawards

All sponsored program funds sub-awarded to NSHE institutions will be distributed through the Basic Agreement for Inter-Institutional Cooperation in Sponsored Programs, as per the *Procedures and Guidelines Manual*, Chapter 6, Section 12.

NSHE is a member of the Federal Demonstration Partnership (FDP) and is permitted to use the standard FDP subaward templates.

Proposal Selection Process

All proposals received through an RFP will be competitive, electronically submitted via pdf, and sent through a review process. The review panels can be made up of external or internal reviewers depending on the request for proposal and guidelines.

If an RFP is specific to a new EPSCoR system-wide project under NSF, NASA or DOE, the proposal will always be sent out for external review. Upon compilation of the reviewers' comments, the Research Affairs Council (RAC) and the Project Director will meet and then

provide a consensus on which of the selected pre-proposals will move forward for full proposal development. The internal NSHE Request for Proposals for EPSCoR process is specifically written to meet the needs of the sponsoring agency and the complete cycle from RFP to selection of pre-proposals is approximately 12-18 months.

Roles of Administration

While the process of managing sponsored program awards is a shared responsibility between the Principal Investigator and the staff of NSHE SSPO, both have unique areas of primary responsibility.

The purpose of this section is to outline those specific responsibilities, present an overview of project management with special emphasis on the Principal Investigator's role in sponsored programs management and the pre- and post-award administration. The program is administered by a Principal Investigator (PI) and a Research Administrator (RA).

The role of the PI is to interact with the RA as necessary regarding grant compliance clarification or needs. The RA is the main point of contact with the sponsor. Any requests made to the federal, state, county, foundation, etc. shall be sent from the NSHE SSPO designated RA. This ensures that documentation and a single point of contact is facilitated.

The Scope of Work (SOW) approved by the sponsor is administered through a team approach. Most awards are sub-awarded out to the institutions to fulfill the SOW along with an approved budget. Because there are NSHE non-subaward administered programs, the program SOW and budget will be set up as a sub-budget to the prime award. The prime grantee (NSHE SSPO) will maintain the budget of any associated costs of salary/fringe, operations, all subawards and F&A.

Project Director/Principal Investigator (PI)

The PI is responsible 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 program award rests with the PI. The fundamental responsibilities of the PI during the post-award phase of a sponsored award include:

- Executing the project as outlined in the funded proposal, using sound management techniques;
- Carrying out the project's financial plan as presented in the funded proposal, or make changes to the plan while working with the RA;
- Reporting project progress to the sponsor as outlined in the terms of the award;
- Maintaining an accurate record of project related expenses;
- Complying with NSHE policy and procedures related to project management and personnel practices;

- Complying with all applicable sponsor rules, regulations, and/or terms and conditions of the award and follow OMB Uniform guidelines; and
- Coordinating efforts with the RA.

Pre and Post Award Administration

NSHE SSPO is the administrative unit responsible for communicating sponsor requirements to NSHE System Administration and establishing the controls necessary to assure the requirements are met. NSHE SSPO is responsible for grants and contracts and the financial controls of awards received.

Research Administrator (RA) (Pre-Award)

The RA provides service to the PI with regard to external funding while protecting NSHE and its employees and maintaining an environment of compliance. Responsibilities of a RA include:

- Supporting PIs in the development of proposals and related financial narratives and budgets;
- Overseeing proposal submission, award activation & financial administration;
- Electronically submitting proposals;
- Maintaining database of proposals and awarded grants and contracts;
- Providing general assistance and advice in the management of awards;
- Preparing subawards from NSHE to other institutions or organizations;
- Managing grant and contract accounts throughout the life of the project;
- Reviewing and approving invoices;
- Understanding unallowable, direct, and facilities and administrative (F&A) costs;
- Understanding and following Cost Accounting Standards (CAS) and OMB Uniform Guidance;
- Showing consistency in charging sponsored award costs;
- Monitoring compliance with grant and contract financial rules and regulations;
- Ensuring monthly review of project costs;
- Ensuring compliance with sub-recipient monitoring procedures and cost-share requirements;
- Acting as the primary liaison with sponsors on all contractual and administrative issues
- Approving and coordinating all expenditures; and
- Coordinating efforts with the PI.

Post Award Department (Post Award Manager and Grants Administrator)

The Post Award Department is made up of the Post Award Manager and the Grants Administrator. They provide customer service to the PIs and RAs with regard to external funding and financial compliance. The Post Award Department's responsibilities include, but are not limited to the following:

- 1. Establishing and managing the financial compliance of grants and contracts, as detailed in the Workday Procedures section of the Grants Manual Policy and Procedures throughout the lifecycle of the award;
- Invoicing and drawing down funds based on each sponsor's specific requirements and/or method (i.e. Payment Management System (PMS), ePage, Research.gov, etc.) for requesting funds;
- 3. Managing financial reporting requirements as required by each sponsor;
- 4. Managing subaward documents, receipt of invoices and tracking cost share information via the *AwardIt* database;
- 5. Managing the effort certification process on a monthly basis (refer to Effort Reporting Policy and Procedures section);
- 6. Coordinating external and internal sponsored program audits;
- 7. Ensuring compliance with sub-recipient monitoring procedures and cost share/matching requirements;
- 8. Coordinating close out of award; and
- 9. Maintaining grants and contracts records and destroying upon expiration.

Proposal Development - Requirement to Submit Proposals and Receive Awards for Grants and Contracts Policy

Nevada System of Higher Education (NSHE) Policy on the Requirement to Submit Proposals and Receive Awards for Grants and Contracts includes the NSHE branches listed: System Computing Services (SCS) and System Administration. This policy transmits the requirement to submit proposals and to receive awards for grants and contracts through the NSHE System Sponsored Programs Office (NSHE SSPO).

This policy states that all employees who receive any part of their salary through NSHE SA or SCS branches or whose activities use any NSHE resources or facilities must submit their proposals for extramural support through NSHE SSPO.

This requirement is necessary to ensure that all research and other extramurally funded projects conducted by NSHE employees, or with the use of NSHE resources or facilities, are approved by the appropriate Authorized Official Representative (AOR) at NSHE SSPO and comply with relevant NSHE policies and guidelines as well as sponsor guidelines including the federal Uniform Guidance, including but not limited to those governing:

- integrity in research;
- appropriateness of the activity to NSHE;
- protection of human and animal subjects and the environment;
- use of NSHE facilities;
- adherence to personnel policies;
- compensation plans;
- intellectual property;
- conflicts of interest;

- recovery of direct and indirect costs;
- liability insurance and indemnification; and
- medical malpractice coverage.

In the case of projects to be conducted by NSHE in collaboration with other organizations, NSHE can be either the prime contractor or a subcontractor. In all cases, all resources required to conduct the portion of the work which will be directed by NSHE employees must be included in the award to NSHE.

Monthly Reconciliation – On a monthly basis, an effort report will be generated for all required employees whose compensation was charged in whole or in part to a sponsored project during the respective effort period. Effective July 2020, the effort certification process transitioned from a hard copy version for all professional employees to an effort certification process in Workday. Effective March 2022, student workers transitioned to an effort certification process in Workday. As of July 2022, hourly employees, Letters of Appointment (LOAs), and stipends continue to be