

# SPONSORED RESEARCH HANDBOOK

An overview of policies and procedures governing sponsored research at the University of Maryland

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Division of Research

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# Introduction

This handbook contains most of the policies and procedures that relate to sponsored research, service, and training at The University of Maryland, College Park campus. It covers the development of proposals, review of proposals, submission of proposals soliciting external support, and the establishment and administration of sponsored project accounts.

The purpose of this handbook is to guide the user through the necessary steps and to provide the rules and regulations that apply when submitting a proposal or administering a grant, and is intended primarily for the faculty and administrators of the College Park campus.

A few words are in order to clarify the term "sponsored project" (or "sponsored program"), and to distinguish this from a "gift" or "grant" provided by a donor. The term "sponsored project" relates only to a research, service, or instruction project that is conducted with support provided by some entity outside the campus (the sponsor). A sponsored project grant or contract is based on a commitment from the University to carry out one of those programs in keeping with terms agreed upon by both parties. The sponsored project will always require some use of university resources and the sponsor will receive some benefit (which could range from a single technical and financial report through substantial material benefits). By contrast, a gift or grant from a donor may carry a stipulation as to its use, but there can be no expectation of benefit back to the donor including the technical and financial reports common to sponsored project grants and contracts; it is donative in its purpose.

The differences are based on the purpose of the funds provided and are completely independent of the source of funding. The distinction is important because project directors, departments, and the campus are required to administer the agreements and account for the funds in different ways.

Readers of this manual are reminded of four relevant University policies approved by the Board of Regents:

- [Policy on Classified and Proprietary Work](#)
- [Policy on Conflict of Interest and Conflict of Commitment](#)
- [Policy on Misconduct in Scholarly Work](#)
- [Policy on Intellectual Property](#)

Refer to ORA's [website](#) for other research-related policies.

Other important research-related information can be found with the links below:

- [DRIF \(Designated Research Initiative Fund – A Faculty Incentive Program\)](#)
- [Cost Sharing](#)

As campus needs change, these policies and procedures will be updated. This manual has been designed so that occasional revisions to particular sections may be issued and inserted as occasion demands.

The Office of Research Administration and the Office of Contract & Grant Accounting sponsor the [Certificate Program](#), which provides training to UMCP staff and faculty on many of the sponsored research topics presented in this handbook.

# Types of Agreements

The classification of an agreement as either a gift or sponsored agreement has important accounting and tax related implications. Revenue recognition and net asset classifications are substantially different depending upon its classification in the University accounting system. The classification affects the University research base, which impacts the allocation of facilities and administrative (F&A) costs to government and non-government agreements and the distribution of F&A (DRIF) recoveries. The effort and resources consumed in the solicitation of private gifts must be recorded and reported as fundraising expenses.

**Sponsored agreements** are contracts, grants and cooperative agreements that represent an exchange transaction, where the sponsor receives some form of consideration in return for the funding. In contracts, the University is required to provide goods or services in exchange for payment. Grants or cooperative agreements require the University to provide technical and/or financial reporting to the sponsor on the results of research or other sponsored activity.

In **contracts**, one party is buying a service or product from the other in exchange for payment. Contracts assume the production and delivery of a specific product that can be an instrument, device, or technical report. Consequently, contract requirements are more specific and less flexible than grants and agency personnel tend to maintain stricter oversight. Federal contracts are governed by the Federal Acquisition Regulations, as well as specific terms and conditions in each contract document.

A **cooperative agreement** is an arrangement where both parties are involved in carrying out a portion of the research. Cooperative agreements generally stipulate the responsibilities of both parties. Federal cooperative agreements are governed by the same regulations as Federal grants.

**Grants** are financial assistance instruments that provide the researcher with significant flexibility to determine spending categories and research direction. Grants are usually made in support of basic research, training, or workshop support, requiring technical and financial reports rather than specifying definite services or product deliverables. They typically come from a corporation, foundation or other organization, not an individual, and are awarded in response to a proposal submitted by the University. Unlike cooperative agreements, grants do not require substantial programmatic involvement between the parties. Federal grants are governed by the Office of Management and Budget (OMB) Cost and Accounting Circulars and by each individual agency's grants policy document.

**Gifts** represent non-reciprocal, unconditional and irrevocable transfers of property or money and have no donor-imposed restrictions, conditions or control. Gifts are not considered sponsored agreements.

In general, a sponsored agreement can be distinguished from a private gift by any one of the following criteria. The sponsor has:

- Control or approval of work scope;
- A requirement for a defined deliverable in terms of a report on results of research, or financial accounting for the expenditure of funds;
- Pre publishing review rights; or
- Licensing rights of products resulting from the research

**Agreements classified as sponsored must be reviewed, negotiated, and accepted by ORA.**

# Prepare to Apply

## **FIND FUNDING OPPORTUNITY**

Register for [SPIN Plus](#) to receive funding alerts. SPINPlus is the funding search database available to UM faculty, staff and students. This search system provides a modern full-text search that is run against the entire funding record. Results are returned to the user in relevancy ranked format, and can be further sorted, grouped, or filtered by the results grid column headers. An individual funding profile can be setup to receive regular funding alerts.

Links to SPIN Plus and other resources are provided in the proposal development section of the Division of Research's website.

## **LIMITED SUBMISSIONS**

Limited Submissions are grant programs which accept only a fixed number of applications or nominations from a given institution. Many funding agencies have programs that place limits on the number of applications they will accept. Please review UMCP's established guidelines for coordinating limited submissions which can be found on the Division of Research's [website](#).

## **GATHER AND UPDATE INFORMATION**

Sponsors requiring electronic submission of proposals often require specific software or registration in electronic systems. Before beginning the proposal process, ensure that you have the necessary software to complete electronic application forms, including PDF generators or viewers. If necessary, create or update profiles in electronic systems such as NSF FastLane, NIH eRA Commons, NASA NSPIRES, etc.

ORA provides training to faculty and staff on proposal submission in grants.gov. More information about training provided by ORA may be found in the training section of [ORA's website](#).

# Preparing the Proposal

## **INFORMAL INQUIRY**

Principal Investigators are urged to communicate with agency technical representatives at the very earliest stages of proposal preparation. The information that may be gained via an early dialogue with potential sponsors may prove useful in structuring the final proposal. The Office of Research Administration (ORA) can provide names, addresses and telephone numbers of agency representatives in most cases.

A well prepared short prospectus can present the important points of a proposed project. Submitting an informal proposal to an agency can serve as a starting point for expressions of interest or further comment. A personal visit preceded by a telephone call can be even more useful, since it may result in some guidance by agency personnel in structuring the final proposal so that the project meets agency priorities without significant deviation of the Principal Investigator's original ideas.

Informal proposals should have overall cost estimates rather than detailed budgets. An informal proposal does not require campus endorsement; therefore, it does not have to proceed through the formal review and approval procedure. It is suggested however, that budgetary matters be discussed with department or division administrators or with ORA in order to avoid confusion or misunderstanding at a later date. A lack of correlation between the technical proposal and the budget may lead to rejection of the proposal. A copy of the informal proposal will be helpful. Departmental concurrence even at this early stage is important.

Informal proposals are not accepted by Federal agencies when the submission is in response to a "Request for Proposals" since that is a competitive contract award process with strict guidelines and deadlines.

## **PRE-PROPOSAL PROCESS**

Numerous funding agencies are increasingly asking for pre-proposals and/or letters of intent to screen potential grant applicants. In some instances, these types of proposals require electronic submission or signature by an Authorized Institutional Official, and therefore require the involvement of ORA. A completed [Internal Routing Form](#) needs to accompany a pre-proposal to ORA for review and signature. Normally, pre-proposals take the form of a summary of the project, and overall budget for the entire project period. For pre-proposals, only the Principal Investigator's signature is required on the Internal Routing Form.

When the sponsor requires cost sharing commitments, or when voluntary cost sharing commitments are made as part of a pre-proposal, the completed Internal Routing Form must include the signatures of the administering department chair, and dean, and in addition supporting documentation from others who have committed resources towards the project.

# **THE FORMAL PROPOSAL**

## ***General Considerations***

The format and content of any proposal or application will necessarily vary with the requirements of the potential sponsor. An unsolicited grant proposal will differ somewhat from a proposal submitted in response to a competitive contract bidding situation, while new, renewal, or continuation proposals will differ from each other. ORA is available for assistance in these matters.

Most sponsoring agencies provide instructions for proposals, others require the use of specific electronic submission systems and some have few prescribed rules. Applications or proposals submitted to some sponsors must meet certain deadlines, other sponsors will accept proposals at any time. Unsolicited grant proposals may be submitted concurrently to several agencies; a statement of concurrent submission should be included in such cases citing the other agencies to which the proposal was submitted.

## ***Proposal Content***

A proposal requesting support from any sponsor will most often consist of the following:

- ◆ Title Page—For those sponsors that do not provide application forms or have other specific requirements, the Principal Investigator must construct some form of title page. Generally the title page will contain
  - the title of the proposed project,
  - the College and Department or Institute,
  - name and title of the Principal Investigator(s),
  - time period and inclusive dates of the proposed project,
  - total support requested, name and address of the sponsoring agency, and
  - a signature line for the UM Authorized Official's signature (will be signed by a representative in ORA).
  
- ◆ Table of Contents—with page numbers.
  
- ◆ Abstract—A brief description covering the purpose, important features, and significance of the project.
  
- ◆ Description of the Project—The detailed description of the project may contain many or all of the following:
  - Project Rationale
    - Introduction
    - A Statement of the Needs and Problems
    - Goals and Objectives of the Project
    - Relation of the Project to the State of Knowledge in the Field
    - Significance of the Project
  - Procedures
    - Statement of Approach
    - The Means by Which Objectives Will be Met
    - Problems that are Anticipated
  - Evaluation

- Management
  - Organization of the Project
  - Project Staff and Their Roles
  - Project Schedule

- ◆ Facilities—Available facilities and special equipment that will be important to the project should be described. Any additional facilities and equipment to be acquired under the sponsored project, funded either by the University or the sponsor, should be described in detail. The importance of these facilities or equipment in relation to the success of the project should be made clear.
- ◆ Personnel—Generally, biographical sketches including pertinent publications of the Principal Investigator(s) and senior faculty and professional collaborators should be included.
- ◆ Budget—The budget serves to identify the cost of the project to the sponsor. The budget also serves as a further measure of the Principal Investigator's capabilities since there must be a reasonable correlation between the project as described and the Principal Investigator's assessment of the various cost elements. Sponsors usually require a budget and a budget justification. A sample budget summary and budget justification can be found in the supplementary materials of [Class 9 of the Certificate Program](#).

The budget will always contain a listing of the Direct Costs and the Facilities and Administrative ("Indirect") Costs. Direct costs are those that can be distinctly identified as benefiting the project such as salaries and fringe benefits, equipment, supplies, travel and computer time among others. Federal agencies require that all direct costs adhere to the regulations set forth by the relevant guidelines. Facilities and Administrative (F&A) Costs are those expenses that are incurred by the Campus through the cost of facilities and services for common or joint objectives such as general administration, physical plant maintenance and operation, and research administration expenses.

- ◆ Direct costs—Some, or all of the following, are included in direct costs:

*Salaries* include all personnel, titles, the percentage of time each will devote to the project, the rate of pay, and amount requested from the sponsor to support each person per year (or for the budget period). Time should be expressed as percent of effort or the number of person months intended to be spent on the project. Do not express time as the number of hours. It is expected that in most cases the Principal Investigator will propose some level of activity (1% or more) or the minimum that may be required on proposals where they are listed as the PI.

*Faculty* are on a 9.5- or 10-month academic year appointment or in some cases faculty may receive compensation based on a 12-month calendar year service period. An appropriate percentage of the academic year or calendar year salary is specified in the budget. A faculty member on a 9.5- or 10-month appointment may elect to devote additional time during the summer to a sponsored project beyond the academic year and may request and receive additional compensation beyond the base academic year salary for this effort. A maximum of 2.5 months of summer effort and salary (calculated at  $2.5/9.5 \times$  base salary for the new fiscal year) is possible in those cases in which this is acceptable to the sponsor. For 10-month faculty a maximum of 2 months of summer effort and salary at  $2/10$  of the base salary for the new fiscal year is possible. A faculty

member on a 12-month appointment may not receive additional salary for summer research effort.

*Other professional research staff and technicians* may be compensated for periods during which their services will benefit the project.

*Administrative Personnel* and clerical staff should normally be treated as F&A costs; however, direct charging may be appropriate in under special circumstances as explained by the [UMCP Policy for Direct Charging of Costs to Federal Grants, Contracts, and Cooperative Agreements](#).

A *Graduate Research Assistant* may be assigned to research duties with the student's time divided between formal study and research. Tuition remission for graduate research assistants on sponsored projects is to be included as a fringe benefit calculation and requested from the sponsor. The Graduate School annually publishes a [schedule of stipends](#) for guidance.

In no case can funds be requested or used to augment salaries of any faculty or staff beyond University-approved rates.

*Fringe Benefits* include the University's contributions to Social Security, retirement programs, health insurance, and unemployment compensation. Where applicable, tuition allowance should be added for permanent full-time employees, their dependents, and graduate assistants. Graduate Research Assistants are entitled to health insurance benefits and tuition remission; other benefits do not apply. For undergraduate assistants (hourly workers), no employee benefits apply except during the summer if they are not attending classes. If the assistants are not attending Summer Session classes, then Social Security and unemployment compensation are applicable. Permanent part-time employees are entitled to state retirement, health insurance, social security, and unemployment if employed one-half time or more. Part-time employees who work less than one-half time, temporary personnel, and hourly employees are entitled only to Social Security and unemployment compensation. A [table of applicable benefit rates](#) is updated annually and posted on ORA's website.

*Permanent Equipment* needs must be itemized and justified. Permanent equipment is defined as an article of nonexpendable tangible personal property used only for research, medical, scientific, or technical activities, which has a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. In addition, the Principal Investigator must determine that the equipment requested is not already available within the University. The cost of equipment generally includes needed accessories, installation, and delivery costs. In some cases the sponsor may provide the equipment directly rather than provide acquisition funds, or short-term rental may be preferred.

*Consultant fees* may be paid only to experts outside the University who provide a unique contribution to the project. University of Maryland faculty and State of Maryland employees are not eligible to receive compensation for internal consulting services on sponsored projects. Federal agencies specifically prohibit the payment of consultant fees from Federally-supported projects to persons employed by the Federal government and often set a limit on the daily rate that can be paid to non-Federal government employees. Please reference [the Policy on Professional Commitment of Faculty](#) for further information.

*Supplies and Expendable Equipment* items should be identified and justified. Supplies may be charged if they are above and beyond what is incurred during normal operation. Examples of these items include chemicals, glassware, small electronic components, animals and animal rations, unusually large quantities of paper supplies as in the preparation and distribution of questionnaires or other brochures and forms, and minor fees for informants in anthropological or sociological studies. Equipment items should be identified and justified. Also browse [UMCP Policy for Direct Charging of Costs to Federal Grants](#), Contracts and Cooperative Agreements.

*Travel* is an expected practice and an accepted cost in most projects if there is a need for the Principal Investigators to consult with colleagues and disseminate new knowledge through scholarly discourse (i.e. meetings, conferences, symposia, etc.). There must be a correlation between the project and the purpose of the meeting. Such costs may include transportation and room and board. For travel abroad, federal agencies require the use of U.S. flag carriers. For more information, review the [U.S. Fly America Act](#).

If the project requires travel to various locations in order to perform the work, these costs should also be identified. An itinerary may be required if travel is a significant portion of the total cost. Some examples would be travel to various localities to collect samples, to interview respondents, or to make special measurements. Proper identification and justification of planned travel costs is essential to having these costs funded by the sponsor. Refer to the University Travel Policies.

*Publication* costs including manuscript illustration, costs of reprints, page charges, and technical reports to be incurred in publishing articles resulting from the projects should be included in direct costs. The publication costs of a book or monograph are not generally allowed; special permission should be obtained from the sponsor.

*Subcontracts* with other entities which provide a substantial programmatic contribution to the project require specific approval of the sponsor. Thus, the proposal must include documentation (i.e., statement of work, budget and justification, and endorsement by Subcontractor's Authorized Official) of the services to be performed. Subcontracts must adhere to applicable federal program compliance regulations. More information on subcontracting during the pre-award phase may be found in the [Subcontract Manual](#).

*Other Direct Costs* may have to be identified such as:

- Copying and Duplication costs: Unusually large costs must follow the [UMCP Policy for Direct Charging of Costs to Federal Grants](#), Contracts and Cooperative Agreements
- Purchase of goods or services from a vendor related to and required by the project in order to conduct the research. UMCP determines the difference between a subcontract and a vendor by following Federal guidelines on the topic. Some examples of direct costs incurred in special circumstances include:
  - renovation of space that is necessary in order to carry out the project,
  - rental of space in those special cases where this is necessary,
  - maintenance of specialized equipment which is necessary to the project,
  - communication costs such as long distance telephone costs and postage charges where large volumes of mailing are required,

- special costs such as the purchase or lease of airplanes, boats, or other vehicles, and
  - stipends for participants in special training programs are allowable when specified by the sponsor.
- ◆ [Facilities and Administrative \(F&A\) Costs](#) (previously "Indirect Costs") are calculated based on the project's Modified Total Direct Cost (MTDC). The MTDC is the total direct costs minus: permanent equipment over \$5,000; the portion of subaward costs over \$25,000; tuition, scholarships and fellowships; capital expenditures (alterations and renovations); and rental of off-campus facilities. The Campus calculates its F&A cost rates and negotiates these with the U.S. Department of Health and Human Services, acting as the cognizant audit agency on behalf of all federal agencies.

There are F&A cost rates for instruction, other service type activities, Intergovernmental Personnel Act (IPA), off-campus research and on-campus research. Projects partially performed off-campus for a period of at least three consecutive months may be apportioned between the two applicable off-campus rates. It is the position of the Campus that all proposals requesting support from any sponsor, either government or non-government, must include a request for full F&A cost recovery. However, some sponsors, particularly some foundations, have specific written policies that preclude the use of the Campus' full indirect cost rates. The rate or administrative fee allowed by the sponsor may be used in these cases. Exceptions to this rule may be necessary in a few instances; consult ORA for further information. Reference the [Facilities & Administrative \(F&A\) cost rate memo](#) for further guidance.

- ◆ [Cost Sharing](#) or matching may be required in some cases by Federal sponsors. This requires that the Campus make a contribution towards the total costs of a project. The amount of such contribution required may vary from less than 5% to greater than 50% of the total project cost. The Campus' share of such costs may come from several sources:
- other support for the same project, i.e. from non-Federal sources if the project is to be Federally-funded;
  - a portion of the faculty member's project time and related fringes for which no support funds are being requested;
  - a portion of the Facilities and Administrative (F&A) costs may have to be contributed (special Campus approval is required); and or
  - contributed resources from the Department or College.

Cost-sharing should be included only where absolutely required by the Federal agency. It is never to be assumed to be a voluntary or gratuitous gesture. Cost-sharing imposes a substantial burden on the Principal Investigator to provide supporting documentation to the Office of Contract and Grant Accounting. For further guidance on cost sharing, consult either OCGA's document "[Cost Sharing in Brief](#)" or view the [official policy \[IV-4.00\(A\)\]](#) in its entirety.

## Budget Summary Checklist

- Does it ADD up?
- Does the budget identify cost elements?  
Were price quotes obtained for large dollar items?
- Did you include an escalation factor for future years?  
*ANTICIPATE! Budget adjustments for salary increases in all budgets that are longer than one year or that span University fiscal years must be included.*
- Are Fringe Benefits included?
- Is the F&A rate correct?
- Are administrative costs included?  
Do the costs comply with university policy and federal guidelines?
- Are all anticipated travel costs included?  
Do the costs comply with university policy and federal guidelines?
- Are subcontractor costs reasonable?
- Does the budget justification match the budget?

The following is a listing of possible costs chargeable to a sponsored project. It may be useful in avoiding costly omissions when preparing proposal budgets.

<b>Salaries</b>	<ul style="list-style-type: none"> <li>▪ Faculty:               <ul style="list-style-type: none"> <li>▪ academic year</li> <li>▪ calendar year</li> <li>▪ summer months</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Other Professional Research Staff</li> <li>▪ Technicians</li> <li>▪ Graduate Research Assistants</li> <li>▪ Hourly Personnel</li> </ul>
<b>Fringe Benefits</b>		
<b>Equipment</b>	<ul style="list-style-type: none"> <li>▪ Non-expendable equipment</li> <li>▪ Accessories</li> </ul>	<ul style="list-style-type: none"> <li>▪ Freight</li> <li>▪ Installation</li> </ul>
<b>Consultants</b>	<ul style="list-style-type: none"> <li>▪ Fees</li> </ul>	<ul style="list-style-type: none"> <li>▪ Travel</li> </ul>
<b>Supplies and Expendable Equipment</b>	<ul style="list-style-type: none"> <li>▪ Questionnaire forms</li> <li>▪ Animals and animal maintenance supplies</li> <li>▪ Chemicals</li> <li>▪ Glassware</li> </ul>	<ul style="list-style-type: none"> <li>▪ Electronic components</li> <li>▪ Brochures and announcements</li> <li>▪ Audio &amp; video tapes</li> <li>▪ Film and film processing supplies</li> </ul>
<b>Travel</b>	<ul style="list-style-type: none"> <li>▪ Domestic and foreign</li> <li>▪ Field work</li> <li>▪ Conferences</li> </ul>	<ul style="list-style-type: none"> <li>▪ Subsistence costs</li> <li>▪ Transportation</li> </ul>
<b>Publications</b>		
<b>Subcontracts</b>		
<b>Other Direct Costs</b>	<ul style="list-style-type: none"> <li>▪ Space rental</li> <li>▪ Equipment rental</li> <li>▪ Alterations &amp; renovations</li> <li>▪ Human subjects participant fees</li> <li>▪ Service contracts (e.g. equipment maintenance, photographic services)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Communications</li> <li>▪ Animal care</li> <li>▪ Stipends for participants</li> <li>▪ Vehicle lease or purchase</li> </ul>
<b>Facilities and Administrative Costs</b>	Ex. Research On-campus, Research Off-campus adjacent or Off-campus remote, instruction , other sponsored activities, IPA (See F&A Rate Agreement for appropriate rate)	
<b>Cost Sharing</b>	(only where required)	

## **ELECTRONIC PROPOSAL SUBMISSION**

Many sponsors, including all Federal agencies, are allowing or requiring proposals to be electronically prepared and submitted. All Federal agencies use the find and apply system [Grants.gov](http://Grants.gov) as well as other submission systems. For applications that require Grants.gov submissions, download and complete the Grant Application Package from [Grants.gov](http://Grants.gov). Principal Investigators should refer to the individual sponsor's guidelines for information about the required method of submission. The sponsor's guidelines will also include information about the necessary file format for documents submitted with the proposal. Many Federal agencies require the completion of the R&R 424 set of forms as part of the proposal. Samples of these forms and other commonly used systems can be viewed [here](#).

The PI should notify their Contract Administrator as soon as he or she is aware that the proposal is to be submitted electronically. An [Internal Routing Form](#) must be completed and signed and submitted along with one hard copy of the proposal to ORA six business days before the submission deadline. Unless a department uses Coeus for S2S proposal submissions, the electronic version of the proposal should be uploaded to ORA's website as early as possible to allow time to adequately respond to any issues that may arise. The upload site can be accessed [here](#). The individual uploading the proposal will need to sign in using his or her Directory Identification information. More information on routing proposals to ORA can be found below.

## **SPONSOR FORMS AND GUIDELINES**

Sponsors may require specific forms be completed and submitted with the proposal. The Principal Investigator should complete all of these forms prior to routing the proposal.

Sponsors may also provide specific information on the format of the proposal, including page limitations, font types and sizes, number of paper copies, electronic file names, page numbers, budget limitations, project length limitations and required components of the scope of work. Neglecting to follow these guidelines may result in the proposal being declined by the sponsor before it ever reaches the review committee.

## **DEADLINES**

Some sponsoring agencies have specific deadlines for proposal submission. This information is available directly from the sponsor. Alternatively, departmental administrators or ORA can provide assistance. Note that all Requests for Proposals (RFP) have strict deadlines that cannot be modified; this information is always in the RFP application package obtainable from the issuing agency.

## **CLASSIFIED RESEARCH AND RESTRICTIONS OF PUBLICATION**

The University of Maryland does not enter into agreements to carry out research if the grant, contract, or other award instrument restrains the freedom of the University and its faculty to disclose the existence of the grant or contract, the general nature of the inquiry to be conducted, or the identity of the sponsor.

The University reserves, for its faculty, the right to publish the results of the research without the prior approval of the sponsor. Please reference the [UMCP Policy on Classified and Proprietary Work](#) for further clarification.



# Proposal Processing

A formal proposal to conduct a research, training, or service project with support from an external agency represents an offer by the University of Maryland at College Park acting as an agency of the State of Maryland. It is necessary, therefore, that any such proposal have the endorsement of those responsible for carrying out the project, as well as those authorized to commit the University and the Campus to a legal offer. For proposals, the President has delegated the authority to officially commit the campus to ORA. A review and routing procedure has been established in order to ensure that each proposal or application for sponsored programs has been reviewed and endorsed by the various responsible persons and that compliance exists between sponsor, University, and State policies. All proposals for external support of training, research, or service projects must be submitted to ORA.

To Route or Not to Route	
<b>Yes:</b>	<b>It Depends:</b>
Proposals for grants, cooperative agreements, and contracts White papers with institutional cost share commitments Revised budgets Intergovernmental Personnel Assignments (IGPAs) Non-disclosure Agreements (NDAs) Material Transfer Agreements (MTAs) Equipment Loan Agreements	Progress reports White papers Letters of Intent Campus Nominations
	<i>Contact your Contract Administrator with any questions on routing procedures</i>

## INTERNAL ROUTING AND REVIEW

The people or offices involved in the internal review and processing are as follows:

- **Principal Investigator** is responsible for the budget, technical content, quality, and preparation of the proposal in accordance with sponsor guidelines.
- **Department Chair** is responsible for certifying to the academic soundness of the project, the compatibility of the project with the Principal Investigator's other commitments, the availability of space and facilities, any cost-sharing commitments, while assuring that the project is in keeping with department and University objectives, and concurring that the proposal should be submitted to the agency named.
- **Dean of the College** is responsible for determining the appropriateness of the project within College and University programs, and that resources will be available.
- **ORA** is responsible for ensuring compliance with applicable laws and regulations and with University administrative rules. Concurrently, problems of institutional financing, cost sharing, acceptance of contractual terms, and budget matters will be resolved. ORA works with the Compliance Office in the Division of Research to review matters involving human subjects, DNA research, hazardous substances, export control issues and the experimental use of animals. In some unusual instances, a proposal may be presented to the Board of Regents.

## **THE REVIEW CYCLE**

Each proposal must be accompanied by the current [Internal Routing Form](#) in either a paper or electronic version. The Routing Form must have appropriate endorsement signatures before submission of the proposal to ORA. **THIS INCLUDES PROPOSALS SUBMITTED ELECTRONICALLY.** Proposals proceed from the Principal Investigator to the Department Chair, then to the Dean of the College, and then to ORA. If applicable, in accordance with the required compliance requirements mentioned on the routing form, items such as an Initial Application for [Review of Research using Human Subjects](#), or a Protocol for [Animal Research/Care](#) or other compliance requirements must be filed or addressed.

In regard to submitting the proposal to the agency, a distinction exists between those proposals submitted in paper ("hard copy") format and those submitted electronically.

**Non-Coeus routing department – “Paper” proposal submission:** When all PI, Chair and Dean approvals are in hand, forward a scanned copy of the signed routing form and proposal to ORA using the [ORA Proposal Upload site](#) for review and final approval six business days before the submission deadline. ORA will sign the proposal on behalf of the University and if appropriate attach a transmittal letter. This standard letter refers the sponsor to the PI for technical matters and to ORA for administrative or contractual matters. ORA will then notify the department for pickup. The department is responsible for making any additional copies that are required and mailing the proposal to the sponsor.

**Non-Coeus routing department – Electronic proposal submission:** When all PI, Chair and Dean approvals are in hand, forward a scanned copy of the signed routing form and proposal to ORA using the [ORA Proposal Upload site](#) for review and final approval, six (6) business days before the submission deadline. Complete and final Grants.gov electronic proposals should be uploaded to <http://ora.umd.edu/esubmissions/grantsgov> no later than 48 hours before the deadline. If the proposal is being prepared in an online system (ex. NSF FastLane or NASA NSPIRES), provide submit access to proposal at least 24 hours before the deadline. Upon review and approval, an ORA Contract Administrator electronically submits the proposal to the sponsor. The Principal Investigator will receive electronic confirmation of submission. More information about Grants.gov and about particular agencies and their electronic submission systems, can be found [here](#).

**Coeus routing department** – Department prepares and completes proposal information in the Proposal Development module of Coeus, including completing all required sections and uploading all appropriate documents. Proposal is then electronically routed through the PI, Department Chair and Dean’s office to ORA. Complete and final Coeus proposals, including S2S (system to system) proposals should be routed completely to ORA no later than 48 hours before the deadline. If the proposal is being prepared in another online system (ex. FastLane or NSPIRES), provide submit access to proposal at least 24 hours before the deadline. Upon review and approval an ORA Contract Administrator will electronically or in hard copy (depending on the sponsor) submit the proposal to the sponsor. The Principal Investigator will receive electronic confirmation of submission. More information on Coeus proposal development and routing may be found at [ora.umd.edu/coeus/modules](http://ora.umd.edu/coeus/modules)

Be sure to allow enough time for review. Principal Investigators should bear in mind that the ease of submitting electronic proposals is directly related to the amount of time prior to the deadline date that ORA has to submit the proposal, as system failures due to overload may result on the actual deadline date.

# Acceptance of an Award

An award to the University from a sponsoring agency is a document which legally obligates the University. An award may be simply in the form of a letter issued by an authorized agent of the sponsor or it may consist of a lengthy contractual document. In some cases acceptance by the University (and then by the agency) is required before the award is in force, while in other cases no formal acceptance is required. ORA is the office authorized to accept and execute awards on behalf of the UM. ORA will consult with the Principal Investigator if the award differs from the submitted proposal, so that the award may be accepted, modified, or rejected. **No charges may be incurred against a sponsored project until such time as the Office of Research Administration has received and processed an original award notification from the sponsor, and an account number has been issued by the Office of Contract and Grant Accounting to the Principal Investigator.**

On some occasions, receipt of the actual award documents authorizing expenditures for a project may be delayed. If a delay will seriously impede the course of the project, it is possible to obtain permission to initiate expenditures for a short time in advance of actual receipt by the Campus of an award document. For this purpose, an [Advance Account Number Authorization \(AANA\)](#) form should be submitted to ORA. This form requests the issuance of an account number and commits the Principle Investigator's department to reimburse campus accounts in the event that the expected sponsor authorization is not forthcoming. ORA will approve such a commitment only after the proper authority at the granting agency has assured us of their intent to provide such funding.

In some cases an award may be issued by the agency after a series of negotiations which may involve revisions to the scope of the project and/or to the proposed budget. ORA is the authorized agent for conducting and approving such revisions, but no changes to a project or a budget are authorized without the express consent of the Principal Investigators. Faculty researchers are reminded that the acceptance of a revised scope of work or budget is a judgment that only they can make; it is not a judgment or condition that may be unilaterally imposed by the granting agency. If the agency requires the submission of a revised work plan or budget, this must be prepared by the Principal Investigator and submitted to ORA for institutional endorsement and for forwarding to the agency.

Upon receipt and approval of an official award by both ORA and OCGA, the Principal Investigator, Departmental Business Person, Chair of the Department and Dean of the College (or their designated representative) will receive a Coeus Transaction Notification generated by COEUS informing them of pertinent award information and the account number established for this project. Once the account number is available, the PI and Department have access to a copy of the award or any modifications to the award for review and reference.

# Project Administration

## **PRINCIPAL INVESTIGATOR'S RESPONSIBILITIES**

Upon acceptance of an award for support of a research or training project, the Principal Investigator assumes primary responsibility for the technical conduct and management of the project to assure that award conditions are met, and to make certain that the program stays within its budget.

The Principal Investigator, the Department Chair, and the College Dean are all expected to exercise responsible judgment in the administration of the project, particularly with regard to the terms of the agreement and University policies. In particular, financial liabilities which result from failure to comply with, or to provide adequate oversight for the grant or contract become the responsibility of the Principal Investigator's department and college.

## **RECORDS**

A separate account is established for each project. Each account will bear a unique Kuali Financial System (KFS) number assigned by the Office of Contract and Grant Accounting. This information is sent to the Principal Investigator, Department Chair, Dean of the College, and other administrative personnel through the COEUS Transaction Notification.

The issuance of the account number for the project is a form of credit line against which the Principal Investigator may charge obligations and expenditures without concern for sponsor payments and cash flow considerations. In reality, sponsoring agencies most often do not pay the University until expenditures are incurred and invoices are submitted to the agency by the Office of Contract and Grant Accounting.

Once the account has been established the Principal Investigator will receive monthly financial statements showing the status of the account. The Principal Investigator is expected to keep sufficient internal records to control expenditures, particularly those budgetary lines which may not be exceeded without special approval. For more information on maintaining financial records and generating reports, go to [UMCP's Kuali Financial System](#).

## **BUDGET REVISIONS**

Re-budgeting may or may not require sponsor prior approval. You will need to review the award terms carefully to determine whether or not prior approval needs to be sought. Grants awarded under the Federal Demonstration Partnership or those with Research Terms & Conditions incorporated have more flexible re-budgeting terms. Consult the award document to identify agency-specific rules regarding re-budgeting.

Some awards have restrictions on the percentage of the budget that may be re-budgeted without sponsor approval. This percentage must be monitored closely since it is a cumulative percentage (e.g. 10%) over which sponsor approval must be sought.

In those instances where re-budgeting requests can be submitted through a Sponsor's post-award management system (e.g. FastLane), no additional paperwork is necessary. In all other instances, a letter will need to be drafted by the department that explains the re-budget request and the effect it will have on the project. A revised budget will need to accompany the letter. This letter should be signed by the principal investigator and counter-signed by an authorized University signature (ORA), who will forward the request to the sponsor for action.

If you are unsure whether or not re-budgeting is allowed under a sponsored project, please contact your [Contract Administrator](#) for guidance.

## **CHARGES TO THE PROJECT**

The Principal Investigator is responsible for assuring that all approved expenses in support of a project are properly charged to it. Charging departmental budgets for sponsored projects is normally not appropriate. Prompt and accurate charging to the correct account will preclude costly department labor and paperwork later to effect cost-transfers (see also Accounting) to rectify errors and ultimately avoid audit findings.

## **PERSONNEL**

Personnel assigned to sponsored projects, like all other personnel, must be appointed and compensated in keeping with State and University personnel rules. Exempt and Non-Exempt staff, Faculty and all other types of personnel are governed by the policies and procedures found at: [www.president.umd.edu/policies/](http://www.president.umd.edu/policies/).

In July 1994, the Federal Government implemented budgeting and costing principles embodied in the U.S. Office of Management and Budget (OMB) Circular A-21, "[Cost Principles for Educational Institutions](#)". In December 2014, the OMB Circular A21 will be replaced by the [OMB Uniform Guidance: Cost Principles, Audit, and Administrative Requirements for Federal Awards](#). According to these principles, federally sponsored projects (either awarded directly by a Federal agency or by virtue of a subcontract through another prime contractor) may not normally be charged for secretarial and administrative salaries, office supplies, postage or telephone costs unless a particular project requires an unusual and extensive degree of administrative support. Please browse [OMB Circulars Relevant to Research Administration](#) and the materials from [Class #5: OMB Circular A21](#) of the Certificate Program for examples of the kinds of unusual circumstances under which direct charging might be appropriate and allowable.

OMB also requires that the University maintain records that will substantiate the effort of each individual charged to a sponsored project in accordance with the commitment of effort included in the proposal (unless the sponsor's policies permit otherwise). Therefore, time records must be carefully maintained. For faculty, staff, and graduate assistants paid on a sponsored project, effort is recorded on the Effort Report form distributed to each faculty investigator by the Office of Cost Accounting twice per year. Since the great majority of costs associated with sponsored projects are attributable to labor charges, it is incumbent upon the Campus to assure that these records are properly maintained.

## **TRAVEL**

University travel regulations (available at <http://www.dbs.umd.edu/travel/policy/index.php>) govern travel performed with sponsored funds. In some instances a particular contract or grant may specify travel limitations different from the University policy and these take precedence. When domestic or international travel is charged to a sponsored project, it is only allowable in accordance with that sponsor's terms and conditions. Note that federal agencies have restrictive regulations concerning international travel. Even though the awarded proposal may have included a line item for international travel, agency prior approval may still be required.

**PLEASE NOTE: Under the [U.S. Fly America Act](#), federally funded travel must use a United States flag carrier even if it is more expensive.** Contact your ORA [Contract Administrator](#) if there is no U.S. flag carrier service or if other special circumstances exist.

Reimbursement of travel expenses on sponsored projects will be in accordance with University of Maryland travel reimbursement rates.

## **CONSULTANTS**

In some cases, a sponsored project may require the use of one or more consultants. Care should be taken that this is an approved expense for the particular project. Employees of the University of Maryland may not receive compensation for consulting with their colleagues within the University. (See also [UMCP Policy on Conflict of Interest and Conflict of Commitment](#)). Note that some sponsors cap the daily rate of consultants paid on a project.

## **EQUIPMENT**

Equipment is defined as an article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost equal or greater than \$5,000.

The sponsoring agency's award may include provision for the acquisition of special-purpose equipment. The equipment in some cases may be supplied directly by the sponsoring agency, in which case title to the equipment generally remains with the agency, and it must be returned at the completion of the project. In the majority of cases, the approved equipment is purchased through the University. The Principal Investigator has the responsibility for:

- a) assuring first that the equipment is not already available within the Campus;
- b) determining the proper specifications and issuing the requisition for the equipment; and
- c) assuring proper receipt, inventory identification, and functioning of the equipment prior to authorizing vendor payments by the University.

It should be noted that any equipment that is to be purchased which has not been specifically approved in the award notification may require authorized written approval to purchase it, by an agency official. Such requests by Principal Investigators, stating the need for the equipment and the source of funds (additional funds or budget reallocation), must be submitted to ORA for institutional endorsement. Because there may be restrictions placed on equipment received or purchased on a sponsored project, disposition must be coordinated through ORA. Contact your [Contract Administrator](#) for assistance in acquiring authorization for special-purpose equipment.

## **CHANGE OF PRINCIPAL INVESTIGATOR**

Circumstances may, on occasion, warrant the designation of a new temporary or permanent Principal Investigator. A sponsor must be advised and prior written approval obtained before a new Principal Investigator may be designated. If the Principal Investigator finds it necessary to nominate someone, such requests must bear the signed endorsement of the Department Chair and the Dean of the College. If the request is made by the Department Chair, it must be endorsed by the Dean of the College. (If the Principal Investigator is also the Dean, then the request should bear the endorsement of the next higher authority).

In those instances where the request can be submitted through a Sponsor's post-award management system (e.g. FastLane), no additional paperwork is necessary. In all other instances, a letter will need to be drafted by the department that explains why the key personnel is no longer able to continue on the project, the name of the individual who is replacing the key personnel and evidence of the qualifications of replacement personnel, including a c.v. This letter should be signed by all affected key personnel (when practical) and counter-signed by an authorized University signature (ORA), who will forward the request to the sponsor for action.

## **TRANSFER OF CONTRACT OR GRANT**

To Another Institution:

A Principal Investigator who is transferring to another institution may wish to continue his or her sponsored research projects there. Steps are initiated to transfer the grant or contract only upon concurrence of the Department Chair and the Dean of the College.

Permission must be obtained from the sponsoring agency for such transfers (transfers are by no means automatically granted by all sponsors); arrangements must proceed through ORA. Transfers are generally at the discretion of the university. Since sponsored awards are made to the University of Maryland (not to individual Principal Investigators), there may be instances in which the Campus may elect to retain a project and nominate an alternate Principal Investigator; this also requires agency approval.

From Another Institution:

A faculty member coming from another institution who will be appointed to UM may have a sponsored project he or she wishes to transfer here. Such transfer requires the home institution's approval in addition to the approval of the sponsoring agency. A new proposal (or the revised original) with new budgetary information must then be processed at University of Maryland through the normal routing and approval cycle, prior to submission to the sponsoring agency.

Refer to [Award Transfer](#) more information on transferring a sponsored project to or from another institution.

## **PROGRAM INCOME**

Income derived from services or goods that form part of a project supported in whole or in part by a sponsoring agency, must be reported to the agency, with few exceptions. Such income should be deposited to the appropriate sponsored account.

Any Principal Investigator expecting to recover income through a sponsored project should discuss this with the [Office of Contract and Grant Accounting](#).

## **COMPUTER EQUIPMENT AND COMPUTER TIME**

The acquisition of computer equipment and peripherals typically requires prior approval of all federal agencies; this is true of virtually all other sponsoring agencies whether government or non-government. Please refer to the approval process in the Equipment section above.

## **INTELLECTUAL PROPERTY**

Intellectual property is information resulting from research and creative activities which tend to be measured as a financial commodity, i.e. patents, trademarks or copyrights.

The [University System of Maryland Policy on Intellectual Property \[IV 3.20\]](#) defines the rights and responsibilities of any inventor or author who is a member of the University. The Policy is intended to safeguard the interests of the creators, the University, and the public. All inventions, discoveries or other intellectual property must be disclosed to the University through the [Office of Technology Commercialization](#). This office also obtains all required sponsored project invention reports from faculty researchers.

Except in cases of statutory or other legal restrictions the University does not waive its rights to inventions arising from projects performed under its auspices. The Campus will make every effort to have inventions evaluated, patented, and licensed, so that the results of research can benefit the public.

These efforts are carried out through the  
Office of Technology Commercialization  
2130 Mitchell Building  
College Park, Maryland 20742-9520  
(301) 405-3947; [umdtechtransfer@umd.edu](mailto:umdtechtransfer@umd.edu)  
<http://otc.umd.edu/>

## **REPORTING**

With few exceptions, every sponsored project will require a number of reports during the life of the project and most certainly at its conclusion. Every Principal Investigator should be prepared to submit a final technical report at the very least. The importance of the submission of such a report on a timely basis cannot be overstated. In a grant or contract arrangement, unlike a gift, the sponsor expects and deserves to be informed of results. Negligence by the Principal Investigator may substantially impact his or her (and the University's) ability to receive other support from the sponsor; it will also result in a loss of payment to the University for costs already incurred. Such losses could become a liability chargeable to the department and college.

In addition to the technical report(s), other reports may be required relating to inventions, equipment accountability, fiscal data, and voucher submissions. The latter three are the responsibility of the Office of Contract and Grant Accounting. With the Principal Investigator's input, the Office of Technology Commercialization will provide assistance to ORA with invention reports.

## **ACCOUNTING**

Primary responsibility for technical and fiscal management of any project begins with the Principal Investigator. Many departments have services that provide assistance in fiscal and other administrative matters. The Office of Contract and Grant Accounting (OCGA) is the entity responsible for recording and facilitating all financial matters relating to expenditures and revenues. OCGA will make no adjustments such as encumbrances, expenditures, or cost transfers without initiation of such adjustments from the Principal Investigator or his or her designee. In order to transfer incorrect charges from one account to another the proper form must be filled out, authorized and submitted to OCGA via the Quali Financial System. More information on Accounting for Sponsored Projects may be found in the material for [Class #3 of the Certificate Program](#) or contact [OCGA](#).

## **AUDIT**

Financial and other sponsored project records are regularly audited. Such records are maintained primarily by ORA and Office of Contract and Grant Accounting. In addition each Department is expected to maintain records at the local level, such as those recording and justifying charges to sponsored accounts for personnel appointments, salaries, payroll documents, purchase requisitions and orders, and other primary documents.

Records at the Offices of Contract and Grant Accounting and Research Administration are audited regularly by federal, state, and other external auditors and by the University's internal audit office. However, no external auditors may examine records or interview staff within any campus department or unit without first presenting a letter of authorization to the department chair.

The letter of authorization will be issued by the College Park Comptroller if deemed appropriate and Departments will be given advance notice of such audit visits by the Comptroller. The details of this procedure appear in the UMCP Administrative Procedures and Policies Manual, "Contacts with Auditors External to the Campus" (Administrative Procedure A1.6).

These procedures are designed to protect campus departments from audit "fishing expeditions," and from unnecessary and unauthorized audit reviews.

## **SUBCONTRACTS/SUBAWARDS**

The University of Maryland's [Master Subcontracting Plan](#) has been approved by the Office of Naval Research on behalf of the federal government. The Master Subcontracting Plan is administered by the University's [Department of Procurement and Supply](#). Subcontracting Plans are only required under federally sponsored contract proposals under specific circumstances (please contact your Contract Administrator for any questions).

If a sponsored project proposal is to include a subaward for a portion of the work, the UM Principal Investigator must first receive the subawardee's Statement of Work and Budget and endorsement from the subawardee's authorized official, and then incorporate this information into the proposal. The proposal is then reviewed by the appropriate Chair and Dean before it is routed to ORA for review and submission to the sponsoring agency.

When an award is accepted from the sponsor, ORA electronically notifies the Office of Contract and Grant Accounting (OCGA) and an account number is assigned to the project. ORA, the Principal Investigator and the department are notified upon the assignment of the account numbers. Once ORA's Subaward Team has received the Principal Investigator's/Department's request to issue a subaward, via the [Subaward Request Form](#), ORA's Subaward Team will prepare the subaward and submit it to the subawardee for approval. ORA will negotiate any changes to the agreement and issue the subaward. Once the subaward has been signed by both the University and the subawardee, the subaward amount is encumbered in the project KFS account. For more information on subcontracts, see [ORA's Subcontract Manual](#).

In order for a subawardee to be paid, invoices from the subawardee must be reviewed and approved by the PI/Department first, and then forwarded to the Accounts Payable Office for payment.

## **EXPORT CONTROLS**

The Export Administration Regulations (EAR), promulgated and enforced by the Department of Commerce, and the International Traffic in Arms Regulations (ITAR), promulgated and enforced by the Department of State, prohibit the export of specific unlicensed technologies for reasons of national security or protection of trade.

If University research is controlled under EAR or ITAR, the University may be obligated to obtain a license from the Department of Commerce or the Department of State in order for foreign nationals to participate in the research, research to be conducted in cooperation with a foreign company or foreign colleagues, research equipment to be sent to foreign countries, or research to be shared – either verbally, visually, or in writing – with persons who are non United States citizens or permanent resident aliens.

Additionally, the Office of Foreign Assets Control (OFAC) in the Treasury Department, administers and enforces boycotts against specific countries. The scope of the boycott varies depending on the country and may change from time to time. Full descriptions of all countries currently subject to boycott programs are available [here](#).

The University is responsible for assisting the PI in assessing the application of export control regulations and OFAC boycotts to specific projects, however, the primary responsibility for compliance rests with the PI.

Principal Investigators have the responsibility to cooperate with the Export Compliance Office and ORA to determine that applicability of export control before starting any research and notifying the Export Compliance Office and ORA of any change in the scope or staffing of any research project that could alter the determinations about the applicability of export control regulations. Additionally, the PI must notify the Export Compliance Office well in advanced of sending scientific equipment, including GPS equipment and encrypted software, out of the country. All nondisclosure agreements must be routed to ORA for review and signature by the Export Compliance Office.

More information and guidelines, including links to the specific codes and definitions can be found on the [Export Compliance Office](#)'s website.

## UM ASSURANCES

Assurance	Action					
	Protocol/project relationship	Proposal Stage	Award Stage	Renewal	Closeout	When there are subawards or lead
IRB – Human Subjects	Each project involving human subjects needs to have a protocol  Same protocol can be used by more than one project	OK to submit proposal when IRB is pending; takes about 2-4 weeks to obtain IRB approval	Must have approved protocol before ORA can set up accounts	Must request Continuing Review approval annually if human subjects work will continue	Protocol can close before award closes if research on humans is complete; submit Closure Report through IRBNet when human subjects work is complete.	Typically there is one institution of IRB record and often follows location of the award
IACUC – Vertebrate Animals	Each project needs to have a protocol  Same protocol can be used by more than one project	OK to submit proposal when IACUC is pending, takes about 1-2 months to get approval	Must have approved protocol before ORA can set up accounts	Must renew yearly. Every 3 years must apply for new protocol even if the project is ongoing	Protocol can close before the award; need to notify IACUC when protocol needs to close; 2 times each year, IACUC checks protocols	There is no IACUC of record, assurances typically follow the location of the research
DES	Each project needs to have a protocol  Same protocol can be used by more than one project	Disclose issues at proposal stage, with in 1 week DES contacts the PI for information and needed training/registration numbers	Must have approved protocols before ORA can set up accounts	DES initiates review every 5 years, must be renewed in a reasonable amount of time	Notify DES when done with project and/or as necessary	UM is responsible for knowing what subawardees are doing and that they are covered under their DES
Conflict of Interest	Each project needs to have a protocol when conflict is present or if funded by a PHS agency	OK if pending at proposal stage, but it must be disclosed at proposal stage. Resolution takes 4-6 weeks	Conflict must be resolved (eliminated or plan to deal with) in order for ORA to establish account NIH – requires report NSF - requires report of those that can't be resolved	No renewal needed, COI Chair does annual check for changes	No action needed for department	Each organization responsible for their own Conflict of Interest, communication encouraged

For more information, visit <http://www.umresearch.umd.edu/RCO/>