

THE PROPOSAL SUBMISSION PROCESS AT THE UNIVERSITY OF NEW MEXICO MAIN CAMPUS

The Proposal Development and Awards Guide (PDAG) is designed to assist those who are preparing proposal documents to navigate the grant application process. The PDAG is *not* a policy or regulatory document but merely a document that assists you with understanding that there are policies and regulations that must be considered and reviewed at other sites in order for the Principal Investigator (PI) and their team to be compliant. Furthermore, the PDAG is a 'living' continually-updated document, with changes being made in response to changes in policies and procedures at UNM, and regulations at the federal or state level. It is advisable that you consult the latest version online. For the most up-to-date information please visit the websites mentioned herein.

The PDAG provides detail on many subjects, but it is not a comprehensive document, so we encourage you to contact the Faculty Research Development Office for additional guidance: <http://frdo.unm.edu/>

QUICK START: From Finding Funding to Submission

Step One: Contact your Department-level research administrator, your College-level research administrator, or the Faculty Research Development Office (FRDO).

Faculty Research Development Office (FRDO), a unit of the Office of the Vice President for Research, can help faculty, students, and staff to obtain external funding. We provide a number of services that are helpful in the preparation of the proposal for review and approval by the UNM Office of Sponsored Projects (OSP).

Request FRDO assistance: <https://researchsupport.unm.edu/Account/Login>

Step Two: Obtain Funding Agency Accounts and Cayuse Research Suite Account

CayuseSP is UNM's internal submission software. You will need a Cayuse account to record and route your proposal for UNM review and approval. You may also need to request a user account from the funding agency where you are submitting a proposal or affiliate an existing account to UNM. Here is the link to request a variety of accounts from the Office of Sponsored Projects

(OSP): <https://login.unm.edu/cas/login?service=http%3a%2f%2fosp.unm.edu%2fdocs%2frequest-for-cayuse-account.html>

Step Three: Be Aware of Funding Agency Deadlines & UNM's Internal Deadline

UNM requires that all proposals be routed for department approval and received by the OSP **five (5)** business days before the funding agency deadline. Note: if you are collaborating with another entity and your work will be considered a subaward, your collaborator's home institution may require additional time for review before submission of the final proposal to the sponsor. Please plan accordingly.

Step Four: Plan and Prepare your Budget

A final budget and narrative budget justification should be included in the CayuseSP record at the 5-day deadline, so it is important that you develop the budget based on the funding agency guidance and UNM's internal guidelines (fringe benefits, indirect costs, etc.) Approved rates can be obtained at the OSP website: <http://osp.unm.edu/pi-resources/rates.html> under PI Resources and Rates. The FRSOs are also available to assist you in budget development and can provide useful tools and templates.

Step Five: Routing your proposal to Office of Sponsored Projects (OSP) and Submission

There may be several UNM administrators, in addition to the Principal Investigator (PI), who will need to approve the CayuseSP record including the department chair, associate dean for research or other accounting staff from your department. Please build in additional time for these individuals to review the CayuseSP record so that your proposals reach OSP by the 5-day deadline. Once you have finalized your proposal and received OSP approval, OSP will submit your proposal to the funding agency.

Step Six: Post Award Stage

When you receive notice that your proposal is going to be funded, work with OSP. They will need an Award Budget Sheet to process the award. Contract and Grant Accounting will assign a Banner Index and assist your department with the fiscal management of the award. Please see the C&G Accounting website for more information: <http://cgacct.unm.edu/>

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FIND FUNDING

Getting Started with PIVOT

The Pivot database contains pre-populated scholar profiles from the Community of Science database for faculty at UNM (faculty can log in to manage and update their profiles) and matches them to current federal and non-federal funding opportunities. Users can log in to search for funding opportunities as well as potential research collaborators, both internal and external to UNM. Users can also choose to receive alerts when new opportunities are posted that match their saved searches.

Ready to try Pivot? Click here: <http://pivot.cos.com/>

Reviewing the Solicitation

Finding external funding sources is a challenge involving perseverance, time, and effort. Once a source has been identified, it is crucial to develop a project that is both compelling and that fits the priorities and goals of the funding agency. An important goal of the search for funding involves finding a fit between the proposed project objectives and the specific requirements of the funding agency.

Applicants should begin with a thorough reading of the application guidelines or instructions, whether it is a funding opportunity announcement (FOA), request for proposal (RFP), request for application (RFA), call for proposal (CFP), program announcement (PA), Broad Agency Announcement (BAA), Dear Colleague Letter, or other form of solicitation. It is important to verify applicant eligibility, and review programs that the sponsor has previously funded to determine if the proposed project is a good fit. If the applicant still has questions after careful review of the guidelines for a particular opportunity, then contacting the funding agency is recommended. Most federal agencies strongly encourage applicants to discuss their ideas with a program officer prior to submitting a funding proposal.

Determining Eligibility

A review of the solicitation/opportunity determines if its intended purpose is appropriate for the applicant's current stage of career and field.

If the opportunity states "no grants to individuals," the opportunity may allow the investigator to apply either through the University or through the UNM Foundation. If the funding is considered a "gift" or if the sponsor funds grants only to charitable non-profit organizations (a formal 501c3 organization), then the investigator must apply through the UNM Foundation. In these cases, the Office of Sponsored Projects must conduct a review of the proposal budget before it is submitted. Contact the Faculty Research Development Office to assist with coordination between the Office of Sponsored Projects and the UNM Foundation.

If the opportunity states "only institutions can apply," investigators may apply through the University as the applicant institution. UNM is classified as an "IHE," meaning an Institution of Higher Education. Note: If the opportunity states that an "LEA" must apply, this funding is for a Local Education Agency (a PreK-12 school or district). If the guidelines state that only "SEA" organizations may apply, this means funds must go to a State Education Agency. In cases where IHEs are not eligible to apply, the applicant should consider partnering with an "LEA" or an "SEA".

If the opportunity is an established sponsored program and does not have a limit on the number of applications the sponsor receives from one institution, the applicant can proceed with the application. However, if there are limitations on the number of applications that can be submitted by one institution, this is known as a “**limited competition**.” In these cases, the Faculty Research Development Office manages the process of soliciting Statements of Interest or Preliminary Proposals, and organizes a faculty committee to make final selections of those proposals that are invited to proceed. If the sponsor is a foundation or corporation that does not have an established funding solicitation, or limits the number of applications it will accept from an applicant, investigators *are strongly encouraged to contact* the UNM Foundation and Corporate Giving Office before attempting to contact or submit anything to the sponsor.

UNM Designation and Ranking: <http://osp.unm.edu/pi-resources/institutional-facts.html>

- UNM is a non-profit state educational institution, meets the qualifications as an Hispanic Serving Institution (HSI), with a Carnegie ranking Research University / Very High (RU/VH), and is a US Department of Education Title III and Title V eligible institution.

Grants, Contracts & Gifts

A key to success in obtaining *grant* funding is to match the applicant’s interests and needs as closely as possible to the funding agency’s mission and objectives. Funding provided through a *grant* is distinct from funding with a *contract*. Grant funding is flexible in that the researcher is allowed to pursue their objectives with an estimated outcome, without close involvement by the funding agency. Funding provided under a *contract*, however, requires that the applicant meet the sponsoring organization’s specific needs and deliver a specifically agreed-upon final product or service (deliverables). Therefore, a successful proposal for a contract must fulfill the scope of work, be offered at a competitive price, and meet all other qualifications specified in the solicitation.

Sponsored funding can take the form of a grant, contract, cooperative agreement, or a gift. It is important to understand and clearly distinguish between various types of awards, as the processing can be different. Below is a description of each type.

Grants

Grants for financial assistance are made for a stated purpose (in writing) and for a specified period of time. They are typically initiated by the grantee and a Principal Investigator or Project Director is named. Grants carry minimum limiting conditions and the PI retains flexibility within the awarded scope of work. Through awards of funding, property, services, etc., grants enable the PI to achieve some specific goals that fit within the context of the general objectives of the sponsor. Acceptance of a grant obligates the PI and UNM to terms and conditions specified in the funding opportunity, the project as outlined in a proposal, and the policies of the funding agency. This type of agreement has the fewest restrictions on the PI and UNM of any sponsored project.

Contracts

The distinct characteristics of a contract are that it emphasizes and is limited to the purposes and goals of the sponsor through the acquisition of property or services. The contract establishes and describes the rules of the relationship between the parties, setting forth the rights and responsibilities of UNM and the PI in an effort to meet the needs of the sponsor. If the contract involves federal funds, the contract (or

subcontract) will also be subject to Federal Acquisition Regulations (FAR), Department of Energy Acquisition Regulation or DEAR (for DOE), Defense Federal Acquisition Regulation Supplements or DFARS (for DOD). Please note that a solicitation for a contract is similar to that of a grant, and occasionally, a funding agency will opt to use a contracting mechanism instead of a grant award to fund a project.

Note: If a solicitation includes terms for a draft contract to be awarded, immediately contact the Office of Sponsored Projects, who can review the contract terms of the solicitation in parallel with the preparation of the proposal.

Common Types of Contracts

A contract is a binding legal document that may be issued by industrial sponsors, educational institutions, or by federal, state, or local governments. A contract involves a set of PI responsibilities that are articulated in a detailed Statement of Work, with the expectation that the PI will complete the stated deliverables, meet the cost limits and conditions of the budget, meet the stated schedule, submit interim and final reports (as applicable), and approve invoices and effort reporting. A contract requires the signatures of all parties (with UNM, not the PI, as the co-signatory) for both the initial award and for any subsequent modifications. In no instance can a PI from main campus or any branches sign or co-sign an acceptance of terms and conditions on behalf of the Regents of UNM.

Contracts are identified by various names, including:

Basic Ordering Agreement

Collaborative Agreement

Confidentiality or Non-Disclosure Agreement (C/NDA)

Consulting Agreements (CA)

Cooperative Research and Development Agreement (CRADA)

Industrial Sponsored Research Agreement (ISRA)

Inter-Agency (or Intergovernmental) Personnel Agreement (IPA)

Joint Powers Agreement

Material Transfer Agreement (MTA)

Memorandum of Agreement (MOA)

Memorandum of Understanding (MOU)

Professional Service Agreement (PSA)

Small Business Innovation Research (SBIR)

Small Business Technology Transfer (STTR)

Subaward Agreement (SA)

Teaming Agreement

Testing Services Agreement (TSA)

Contracts can be funded (such as research agreements, Inter-Agency Personnel Agreements, and incoming subawards) or unfunded (such as Material Transfer Agreements, Memoranda of Understanding, or Non-Disclosure Agreements). The most common types of funded contracts are cost-reimbursable contracts, which are based on an initial estimate of costs and paid as work is completed. Fixed-price contracts involve a single price for the stated scope of work, but can be invoiced at agreed upon intervals. Most of UNM's contracts are cost-reimbursable, and involve the requirement to notify the sponsor when funds are nearing depletion. The project is then either extended by a contract modification for additional funding, scope or time, or the project is closed if all deliverables have been submitted at the end of the project. A cost-reimbursable contract is sometimes audited during implementation, but more typically, after the project has ended.

Important Note: Any contract committing UNM's resources or personnel must be signed by a duly authorized individual at the University. The Office of the Vice President for Financial Services has primary responsibility for signing funded contracts or grants for the University. Contact OSP to assist in determining the process for obtaining signature on all contracts.

Cooperative/Collaborative Agreements

Though similar to a grant, a cooperative agreement has statutory criteria that allow sponsoring agencies to have substantial involvement with the recipient in project planning and implementation. This feature in some instances will result in the award being more like a contract than a grant. Therefore, the PI will not have as much flexibility in making research-related decisions as with a grant.

Gifts

A gift is not a sponsored project, but a donation or charitable contribution. It can be cash, property or equipment, and is unrestricted for accounting purposes, as opposed to grant and contract funding which are restricted. The UNM Foundation has published rules (Gift Acceptance Policies and Procedures https://www.unmfund.org/unm-depositors-page/?_ga=2.71191831.660021851.1505232910-1061914692.1484670832) for accepting equipment and property. The donor retains no rights to the outcome of the use of the gift beyond knowing that it was used as designated, and the gift can be designated to support faculty or staff projects and programs. All gifts must be processed through the UNM Foundation.

The Difference Between Grants and Gifts

Grants are usually distinguishable from donations or charitable contributions by the following characteristics:

Funds are given to the University in response to a proposal submitted by the investigator.

The sponsor has specific submission guidelines, forms and formats.

The sponsor requires interim and/or a final technical and/or financial report.

The sponsor has rules, regulations, and/or terms and conditions that govern how funds are to be spent or how the project must be managed.

Any unspent funds are to be returned to the sponsor.

Also grants, unlike gifts, typically have regular funding cycles and budget periods.

As it may not be obvious at the time the proposal is written whether the sponsor will give a gift or a grant, the applicant is encouraged to submit the proposal through the Office of Sponsored Projects with the paperwork uploaded into the CayuseSP record, and obtain the appropriate approvals for submission. If the award is in the form of a donation, the award will be set up and administered through the UNM Foundation.

Finding a Targeted Funding Opportunity

A thorough reading of the funding opportunity should reveal whether the opportunity is a good fit for the proposed project. Applicants are encouraged to check the sponsor's current awards and funding history to determine whether the type of projects the sponsor funds are similar to the applicant's project. The PI (Principal Investigator) should also:

- Conduct a literature review. This is an exhaustive bibliographic search that helps avoid duplication of existing studies and demonstrates that the proposed work is evidence-based and/or in dialogue with current developments in the field.
- Consult colleagues by soliciting ideas and assistance. Ongoing consultation with colleagues is recommended throughout proposal development, as they can often offer feedback and share valuable agency contacts.
- Review applicable government regulations. Applicable human subjects and/or animal care requirements and FAR/DFARS requirements should be considered to identify additional costs or changes in timelines.
- Become familiar with any prominent compliance issues (conflict of interest policy, OSHA, HIPAA, industrial security, and export control regulations), or ethical considerations that may be related to the proposed project.
- Contact the sponsor's program officer to discuss whether your project is a good match with their funding priorities and with questions concerning the application process.

Cost Share and Other Budget Issues

Does the funding opportunity state that the sponsor expects the institution to share costs on the project? This is often identified as "**cost share**," "**in-kind**," "**leverage**," "**matching**," or "**institution/applicant support**." It is the applicant's responsibility to identify and secure approvals for this additional cost of funding for the proposed work prior to submitting the proposal to the Office of Sponsored Projects for review. UNM only allows cost share if it is required by the sponsor and stated in the funding solicitation/announcement. UNM does not allow "voluntary" cost share (for more information, please see UNM's Administrative Policies: <http://policy.unm.edu/university-policies/2000/2430.html>)

Proposal Timing and Deadlines

Applicants must be sure that there will be sufficient time to prepare, schedule, and obtain the requisite reviews and approvals for the proposal well in advance of the deadline. For initial routing for internal approvals in CayuseSP, applicants must have uploaded a statement of work, solicitation/proposal announcement guidelines, budget and budget justification (depending on the proposal, additional documents may be necessary at the time of routing—please contact the FRDO if you have any questions or would like assistance in setting up your proposal for routing). Applicants may continue working to perfect the project narrative, as long as the scope of work and budget are not changed, while the proposal is being routed electronically for the required approvals and reviews. For proposals resulting in contracts which will contain federal procurement clauses (FARs, DFARS, DEARS, etc.), contact the Office of Sponsored Projects as early as possible. **All proposals must be routed in CayuseSP and submitted to the Office of Sponsored Projects for approval no later than five (5) business days prior to the sponsor due date.**

Internal/UNM Funding Opportunities for Faculty

RAC (Research Allocation Committee) Grants: The UNM Research Allocation Committee offers small grants (\leq \$10,000) to support the career development of faculty (research and creative works) who are in various stages of career development, but priority will be given to faculty: 1) in the early stage of their careers, 2) embarking upon new directions, or 3) in fields and disciplines where there is limited funding. The major objectives of RAC are to help junior faculty practice in preparing national-level proposals (NSF, NEA, etc.), to promote transition to extramural funding mechanisms, and to facilitate national exposure for research and creative works by UNM faculty. Certain limitations apply. See the RAC Policies, Guidelines, and Application Process (<http://rac.unm.edu/>) for details.

Teaching Allocation Grants (TAG): These grants are sponsored by the Faculty Senate Teaching Enhancement Committee, managed by the Office of Support for Excellence in Teaching (OSET) of the Provost's Office. Awards are made to complete a defined project and cannot exceed \$5,000 for one year. Funds are available for grants to faculty in support of proposals whose primary purpose is to enhance teaching effectiveness. It is the intent of the TAG to support **new** and **innovative** teaching and learning methods and to enhance effective communication of information, ideas, or methods of inquiry in an academic environment. Proposals for upgrading existing courses, developing interdisciplinary approaches, or utilizing modern technologies as teaching tools are encouraged. Funds can be used only for the purchase of supplies, equipment, travel, and services as requested and approved in the award recipient's submitted budget, but not to compensate faculty time spent on the project. The announcement requesting proposals is sent to tenured and tenure-track faculty, usually in October, with a deadline date in December. Details about the program can be accessed online at: <http://ctl.unm.edu/faculty/awardsgrants/teaching-allocation-grants.php>

Internal/UNM Funding Opportunities for Graduate Students

The Office of Graduate Studies (GS), the Graduate and Professional Student Association (GPSA), and UNM Career Services offer funding for graduate students. Each of these programs supports a specific range of activities, such as research to complete theses and dissertation work, travel to conferences to present papers, and other funding needs associated with completion of degree programs. Additionally, students should check with their departments, colleges and other student organizations, and announcements of positions on campus to identify other resources available to them, such as assistantships and appointments.

For information on the following graduate opportunities, visit the office of Graduate Studies (<http://grad.unm.edu/funding/index.html>) and Graduate and Professional Student Association (<http://gpsa.unm.edu/>) web sites.

GS: <http://grad.unm.edu/funding/research-travel-grants/research-supplement.html>

Graduate Research Supplement: The Graduate Research Supplement awards up to \$2000 to facilitate completion of the MFA or PhD dissertation. These awards support direct expenses incurred for archival or field research. This award may not be used for stipends, books, travel to conferences, or equipment expenses.

GPSA: <http://gpsa.unm.edu/funding/index.html>

Student Research Grant (SRG): May fund travel and lodging to conduct research in the field (includes artistic projects like photography or dance), the cost of research materials, and/or travel/lodging and conference fees for conferences at which the applicant is making a presentation. Up to \$500.

Professional Development Grant (PDG): May fund travel/lodging fees for job interviews, auditions, clinicals, mock trials, unpaid internships, conferences at which the applicant is not making a presentation, and other professional development or travel related expenses. May not fund expenses eligible for the SRG. Up to \$500.

New Mexico Research Grant (NMRG): May fund travel, lodging, supplies, and other costs related to field research. Projects with a New Mexico state agency, nonprofit or community organization require a letter of recommendation from a representative of the organization, and are eligible for up to \$5000 (high priority). Other research projects are eligible for up to \$3000 (general priority).

UNM Limited Competitions

A limited competition is an opportunity in which the funding agency places a limit on the number of proposals an institution may submit. In order to avoid multiple submissions and inevitable disqualification of proposals, the Office of the Vice President for Research (FRDO) conducts an internal competition for which applicants must submit brief pre-proposals. The Limited Competitions Faculty Committee evaluates the pre-proposals, selects the one(s) that can go forward for submission, and provides comments and suggestions for improvement to applicants. For more details and to access the list of active limited competition announcements, see http://frdo.unm.edu/limited_competition. Join the PI listserv for announcements of limited competitions. Using your username and password you can sign up at OVPR PI Listserv (https://list.unm.edu/cgi-bin/wa?SUBED1=ovpr_pi-l&A=1).

External Funding Resources

PIVOT is a database that contains pre-populated scholar profiles from the Community of Science database for faculty at UNM (faculty can log in to manage and update their profiles) and matches them to current federal and non-federal funding opportunities. Users can log in to search for funding opportunities as well as potential research collaborators, both internal and external to UNM. Users can also choose to receive alerts when new opportunities are posted that match their saved searches.

Click here to access Pivot: <http://pivot.cos.com/>

FedBizOpps.gov provides daily information about federal business opportunities. <https://www.fbo.gov/>.

Foundation Directory Online is a subscription-based directory managed by the Foundation Center. This multi-level searchable database provides comprehensive information about private funding sources (foundations and corporations). <https://fdo.foundationcenter.org/>

Guidestar is a searchable database that contains comprehensive information about private funding sources (foundations and corporations). It requires individuals to register by entering a username and password for access: <http://www2.guidestar.org/>.

Grants.gov is a searchable central database of federal government funding opportunities. It provides application instructions and forms for more than 1,000 grant programs, covering nearly all federal agencies, and offers access to about \$500 billion in funding annually.

<http://www.grants.gov>. Investigators can subscribe to receive daily notifications of new grant opportunities and updates on Grants.gov at: <https://www.grants.gov/web/grants/manage-subscriptions.html>.

National Institutes of Health offers an official publication of NIH medical and behavioral research grant policies, guidelines, and funding opportunities: *The NIH Guide for Grants and Contracts*. These opportunities are included in the grants.gov listing. The Guide can be searched for opportunities at <http://grants.nih.gov/grants/guide/>. Investigators can subscribe to receive weekly notices of new announcements from the previous week and links to the guidelines:

https://grants.nih.gov/grants/guide/listserv_dev.htm

National Science Foundation posts *NSF Opportunities*, which lists funding opportunities that can be identified through a search at <http://nsf.gov/funding/>. NSF funding programs are also included in the grants.gov listing. *NSF's Proposal & Award Policies & Procedures Guide (PAPPG)* can be found at: http://nsf.gov/publications/pub_summ.jsp?ods_key=gpg

PI Eligibility

Determining Eligibility

Principal Investigator eligibility can be determined in various ways, as follows:

- A review of the solicitation/opportunity determines if its intended purpose is appropriate for the applicant's current stage of career and field.
- If the opportunity states "no grants to individuals," the opportunity may allow the investigator to apply either through the University or through the UNM Foundation. If the funds are issued as a "gift" then the investigator may apply through the UNM Foundation. If the sponsor awards funds only to charitable non-profit organizations (a formal 501(c)3 organization), then the investigator routes the proposal package to OSP as normal and OSP works with the UNM Foundation to submit the proposal.
- If the opportunity states "only institutions can apply," investigators may apply through the University as the applicant institution. UNM is classified as an "IHE", meaning an Institution of Higher Education. Note: If the opportunity states that an "LEA" must apply, this funding is for a Local Education Agency (a PreK-12 school or district). If the guidelines state that only "SEA" organizations may apply, this means funds must go to a State Education Agency. In cases where IHEs are not eligible to apply, the applicant should consider partnering with an "LEA" or an "SEA."
- If the opportunity is an under an established sponsored program and does not have a limit on the number of applications the sponsor receives from one institution, the applicant can proceed with the application. However, if there are limitations on the number of applications that can be submitted by one institution, this is referred to as a "limited competition," and the UNM Limited Competitions process applies: http://frdo.unm.edu/?q=limited_competition
- If the sponsor is a foundation and the solicitation is not clear as to whether the award will be a grant or a gift, investigators should contact OSP or FRDO for assistance. If the award mechanism is a gift investigators *are strongly encouraged to contact* the UNM Foundation and Corporate Giving Office before attempting to contact or submit anything to the sponsor.

Principal Investigator Eligibility

To serve as a UNM principal investigator (PI) on a sponsored project, an applicant must meet the PI eligibility requirements per UNM guidelines. The criteria that determines eligibility depends upon an individual's affiliation with UNM. There are different criteria, and in some instances, special approvals are required for certain individuals to serve as PIs.

Criteria for Faculty and Staff

Faculty members who are automatically eligible to serve as a principal investigator/project director (PI/PD) or co-principal investigator/co-project director (co-PI/co-PD) include:

- All full-time faculty regardless of academic rank
- Research faculty
- Individuals who possess a Letter of Academic Title (LAT)
- Visiting faculty/visiting research scientists on UNM's payroll
- Members of the Emeritus faculty

Professional staff members who hold titles typically associated with independent activity, and have an appointment subject to a rigorous review of credentials, are eligible for PI and co-PI status if:

They are full-time, academic, or non-administrative professionals in positions at or above a Grade 15. Others (including Post-Doctoral Fellows) as designated by the approval of the appropriate academic chair, a Category III Center Director, Dean, or a Vice President (and must complete the PI Eligibility exception form).

Grants Management Program/New PI Training is available to UNM PIs and research administrators. Applicants are to complete this training before accepting an award as a PI or co-PI and are required to be recertified every three years thereafter.

Criteria for Students

Students can be a PI or co-PI under the following conditions:

- **Pre-doctoral** grants whereby the work is conceived of and carried out entirely by a graduate student. (examples: NASA: Harriett G. Jenkins Predoctoral Fellowship Program, NIH: Ruth L. Kirschstein National Research Service Awards for Individual Predoctoral Fellowships [F31] to Promote Diversity in Health-Related Research, NIH: Pre-doctoral Training at the Interface of the Behavioral and Biomedical Sciences, DOE: The National Methane Hydrates R&D Program - Graduate Fellowship Program).
- **PI Eligibility** exception form must be completed, to note the student's faculty mentor as the supervising faculty member, and uploaded to the proposal Cayuse record as part of the package that is routed to OSP prior to the proposal being submitted to the sponsoring agency.
- **Direct submissions** by students of proposals that do not require institutional approval or signature are not required to be routed through the Office of Sponsored Projects (examples include: NSF Graduate Research Fellowship, Ford Foundation Diversity Fellowships for Achieving Excellence in College and University Teaching). As a reminder, any taxes associated with individual awards are the responsibility of the recipient.

Who is NOT Eligible?

The following individuals are not eligible to serve as a PI or co-PI:

- Staff below grade 15
- Visiting and other short-term appointees without a Letter of Academic Title

Exceptions: In some cases, exceptions can be made. An exception requires completion of the PI Eligibility exception form signed by department chair, dean or Category III Center Director, and clear justification as to why an exception should be made. The exception form should specify the qualifications of the individual who will serve as principal investigator/project director. Forms should be sent to the Associate Vice President for Research for a determination. Decision appeals can be requested from the Vice President for Research.

DEVELOP PROPOSAL

Overview

The proposal format must follow the sponsor's instructions and formatting requirements outlined in the Funding Opportunity Announcement (FOA), Request for Proposals (RFP), Request for Applications (RFA), or Program Announcement (PA). Proposals should be formatted with headings mirroring those found in the sponsor's guidelines. If the agency does not have specific guidelines, proposal preparers and principal investigators may want to use a general guide to preparing proposals, as listed below. The components listed below are standard for most proposals, though not necessarily for all. Furthermore, the components may appear under different titles and/or in a different order than those listed here.

Abstract

This is usually a one-page summary of the proposal, presenting essential elements of the proposed project. Some agencies require that specific kinds of information are included here (i.e., NSF requires the Intellectual Merit and Broader Impacts be included). Attention should be paid to this component as it may be the only thing that the reviewers read. The sponsoring agency may use abstracts to disseminate proposal ideas. Suggestion: Write this component last. Cut and paste elements from the completed proposal to generate the abstract.

Proposal Narrative

Proposal Narrative: (Sometimes called Project Description, Project Narrative or Technical Proposal)

This is a description of the proposed project detailing precisely what is being proposed, and responds to the sponsor's RFP or guidelines following the requirements of the sponsor in the order given. Pay particular attention to specific instructions regarding font style and size, page limits, margins, etc. As a general guide, the following sections may be required:

Introduction: Briefly explains the reason for and the basic elements of the proposal, and can be used to describe significance and context.

Need: This section tells what needs to be done and why. Based on research, this describes what the trends are and what the data shows.

Background: With regard to the proposed project and/or research, this component explains what has been accomplished to date, what still requires attention, and what aspects need refocusing.

Goals and Measurable Objectives/Outcomes: Goals are general statements regarding proposed accomplishments. Objectives are precise and measurable, leading to accomplishing goals often through "benchmarks" or specific outcomes that show progress toward accomplishing overall goal(s).

Project/Research Hypothesis and Objectives: This component lists the Research question(s) to be addressed, statements of measurable outcomes based on hypothesis, and other research and/or data.

Project Implications/Broader Impact: Preliminary results and impact of the proposed project and/or research are addressed in this component. Questions to be addressed include: “Why is it significant to the field?” “What is the broader significance...for society... the state... the nation?” and “What are future steps that might be explored?”

Methodology: This component describes the design of the project and its overall strategy. How will the problem be approached and what methods will be employed to accomplish the stated goals and objectives? Describe specific program activities, personnel, data compilation, etc.

Researcher or Institution Capability/Capacity (sometimes called Organizational Background): The ability and capability of the researcher and/or the institution to carry out the project should be detailed in this component.

Resources: This component lists the people, equipment, facilities and services necessary to accomplish the aims and objectives of the project.

Personnel: Provide qualifications of principal investigator/project director as well as project senior personnel in this section. Include job descriptions for the personnel to be hired.

Time Frame/Timeline: Give a projected time frame with reasonable starting and ending dates for the proposed project. Include a detailed timeline of activities, research, services, and the personnel necessary to accomplish the aims and goals of the project.

Evaluation Plan/Milestones Chart: A project program flow chart indicating anticipated accomplishments at specific times. This section might also include deliverables (measurable objectives/outcomes), and benchmarks of significant achievements enroute to completing the project.

Management Plan/Governance: How will the project be managed or governed in order to meet its aims and objectives?

Plan for Dissemination/Utilization: Describe how the findings or results will be disseminated and utilized. If practical, provide a plan for utilization of the findings; this component can include the question of whether this program can be adapted at another location or organization, and thus is often referred to by government sponsors as “transferability.”

Sustainability: How will the project and/or research be continued following funding?

Literature Review: Cite familiarity with similar projects completed or in progress. Provide evidence for the needs outlined earlier in the proposal, as well as complementary studies that may have an impact on the proposed project or indicate gaps this project may fill. Indicate whether or not the Principal Investigator or Project Director has performed similar work. Cite references used in the proposal narrative.

Resources and Facilities: This component lists the equipment, facilities and services necessary to accomplish the aims and objectives of the project. As appropriate, provide a statement of the physical facilities available and necessary to conduct the project. This component may include a short or long listing of specific pieces of equipment or other research resources, including physical, electronic and library resources. NIH and NSF, for example, encourage investigators to upload documents with detailed

information about research resources.

Line Item Budget (sometimes called a Cost Proposal or Financial Plan): This is a line-item budget (often required to be given in specified categories) to support the project costs. In some instances cost share, matching or in kind contributions or potential program income may be required. Some sponsoring agencies require use of their own budget form. All amounts should be rounded to the nearest whole dollar.

Budget Justification or Budget Narrative to Accompany the Line Item Budget: Depending on the funding agency, this is a separate narrative explanation or justification of expenditures. This detail (level of effort, quantification of materials and supplies, travel, vendor quotes, etc.) is to help the agency understand and verify the costs that make up the budget, and how those costs relate to the project goals and/or activities. Budget justifications/narratives should also include an explanation of how each line item was calculated. Calculations, therefore, should be provided for each line item.

Subawards: If a portion of the research will be conducted by another institution or outside entity, provide a scope of work specifying what activity/work is to be accomplished, include their budget and matching budget justification, and a copy of their F&A rate agreement. Be sure to follow any other specific instructions, including form preparation, required by the sponsoring agency. In addition, if a subaward is necessary to complete part of the work or service, provide some details on what, how much and when. For more information, see the Subaward section in the Building a Budget section.

Budget Development

Personnel Definitions/Description

Principal Investigator (PI) is used to describe a UNM employee qualified to manage the proposed project with the approval of the unit (department, institute, center) head. If more than one PI is assigned to the project, each is designated as co-PI. Additional information on PI eligibility can be found at: <http://osp.unm.edu/pi-resources/Procedures%20and%20Guidelines.html>

Multi-Investigator is used to describe a collaborative proposal/award on which researchers have agreed to share full PI responsibilities. This can only happen when the sponsor allows multiple principal investigators.

Research Faculty is used to describe an individual who is engaged primarily in research activities and has credentials similar to those held by instructional faculty. A research professor is generally funded from sponsored projects and typically holds a non-tenured appointment. (Normally a 12 month appointment.)

Other Faculty is an individual, other than a PI, who is a member of the University faculty and who will participate in the proposed project as a significant contributor.

Postdoctoral Associate or Fellow is an individual who holds a doctoral degree, but does not have an academic appointment. Individuals who are engaged in special study and research at the postdoctoral level, and are paid from designated funds, are given the title of postdoctoral fellow.

Research Assistant (RA) is a graduate student working in a research capacity, who holds at least a bachelor's degree and is enrolled in a degree granting program leading to an advanced degree.

Project Assistant (PA) is a graduate student working in a research capacity, holds at least a bachelor's degree, and is enrolled in a degree granting program leading to an advanced degree. The main difference between an RA and a PA is that PAs are paid bi-weekly.

Undergraduate Student is a student enrolled in a degree program (part-time or full-time) leading to a bachelor's degree.

Other Personnel is used to describe a person who is not faculty, may or may not hold a doctoral degree, and is generally reported as a staff member. Machinists, professional technicians, systems experts, computer programmers, and other research scientists and engineers are considered in this category. Only under very limited circumstances are clerical and administrative support staff allowed to be listed as "Personnel" in a proposal budget. See OMB Uniform Guidance sections 200.413, 200.430: http://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1#_top

Any personnel category for which funds are requested should include the number of persons expected to receive support. Where called for in the budget, designate the full-time equivalent (FTE – calculated as the percentage of that person's normal full-time effort) for each person and give each individual's base salary so that the agency may confirm the amount of remuneration proposed. It is important to coordinate employment requirements through the department/unit administrator and through the appropriate employee data center as early as possible, and to plan well in advance.

Useful Links regarding Personnel can be found at UNM's: Human Resources website <https://hr.unm.edu/>, Faculty Contracts website <http://ofas.unm.edu/>, Graduate Studies (GS) <http://grad.unm.edu/home/>, and Student Employment <http://stuemp.unm.edu/>.

Salary: Faculty

The budget should clearly denote which of the following types of payments are proposed for each faculty member.

Faculty Release Time is a percentage of a nine-month (or 12-month when appropriate) faculty member's time paid for by a contract or grant to allow the faculty member to be released from teaching duties. For example, depending on the college, 12.5% (or 1/8) of a nine-month salary would release a faculty member from teaching the equivalent of one course or 3 teaching load units in one semester. Release time must be coordinated through the faculty member's designated department/unit administrator.

Faculty Summer Salary: Faculty on nine-month academic year contracts (195 days) may work typically up to 65 days during the summer. If a summer salary is budgeted in the proposal, calculate the nine-month base salary/195 days = appropriate daily rate x summer days and enter the total amount of summer salary.

Twelve-month and Research Faculty Time: Salaries for twelve-month and research faculty should be shown as a percent of time equal to the amount of time to be devoted to the sponsored project. Note: Twelve-month faculty are not eligible for summer research.

Sabbatical Salary: Normally, a faculty member approved for sabbatical (for an academic year), who will be paid 67% of their salary by the University, can request the additional 1/3 of their salary in the proposal budget. This must be coordinated with the department chair and dean, so the additional 1/3 is reflected correctly in the sabbatical request and can be paid using a Non-Standard Payment form. PIs should work with their department/unit administrator and the Faculty Contracts Office when planning a sabbatical leave.

Extra Compensation: Research, public service, and instruction are normally considered part of a faculty member's contracted responsibilities. As such, extra compensation is rarely permitted on a proposal budget. Since intra-university consulting is assumed to be undertaken as a university obligation, requiring no compensation in addition to full-time base salary, this principle also applies to faculty members who function as consultants, or otherwise contribute to a sponsored project conducted by other faculty members at the same institution. Federal contracts and grants (including federal money that flows down through another agency or institution to UNM) do not allow payment of extra compensation unless it is for consulting across departmental lines, or involves a separate or remote operation; the work is in addition to a regular departmental load, and payment of extra compensation is approved in writing by the funding agency. A faculty member cannot be a consultant on his/her own contract or grant. Any employee of UNM must be paid through the University Payroll Department. Extra compensation must be clearly identified and justified in the proposal budget and justification.

In addition to the above detail in the proposal budget, the PI is required to obtain specific prior written approval from his/her Department Chair, the College Dean and the Office of the Vice President for Research and Economic Development. This extra compensation request form is located at <http://osp.unm.edu/forms/index.html>. If, after award, UNM wants to pay extra compensation to a person

on the grant which was not part of the original proposal budget, the sponsoring agency's contracting or grant officer (person who can legally sign the contract or grant, not a program or technical officer) must approve the use of Extra Compensation before payment can be issued to an individual at UNM. The PI should work with the Office of Sponsored Projects to obtain agency approval. The PI may also want to get verbal concurrence from the program officer at the funding agency prior to contacting the contracting or grant officer.

Postdoctoral Fellows: The academic department of the postdoctoral fellow (PDF) will set salaries. However, the minimum annual salary must be at least \$47,476 in order to comply with the FLSA. Each fiscal year, the PDF may be given salary increases in accordance with University guidelines if funding is available. More information on Hiring and Paying of Postdoctoral Fellows are available online.

Salary: Staff - allowed only in restricted circumstances as identified in OMB Uniform Guidance sections 200.413, 200.430: http://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1#_top

Exempt Employees: Salaries for exempt staff employees should be shown as a percent of time equal to the amount of time to be devoted to the contract or grant. As exempt employees, UNM policies do not usually allow for payment of overtime or extra compensation. See the UNM Administrative Policies for additional information. Salaries for non-exempt staff employees should be shown as number of hours at the employee's hourly rate.

Salary: Graduate Student Research Assistants

Graduate Students: For graduate research assistants, salaries are usually shown as number of months. Graduate project assistants and other (primarily undergraduate) students are usually shown as number of hours (maximum 700 hours/academic year, maximum 520 hours/summer and in rare cases, maximum 160 hours/between fall and spring semester).

Assistantship Workload

During the Fall and Spring semesters the typical workload for students who hold assistantships is 20 hours per week (.50 or 50% FTE). A student may not be appointed for more than 30 hours per week or 75% FTE as a Teaching Assistant TA/TA Special, Graduate Assistant GA/GA Special, Teaching Associate, Research Assistant (RA) or Project Assistant (PA), alone or in any combination.

Note: The Bureau of Citizenship and Immigration Services (BCIS) regulations limit international students on J-1 and F-1 visas to appointments of no more than 20 hours per week or 50% FTE. [This requires filling out an Export Control Screening Form with the appropriate information for review.] The rule that allows graduate students to work 30 hours per week does not relieve international students or the University of the responsibility for complying with BCIS regulations.

During the summer session continuing assistantship recipients (including international students) may be employed up to 40 hours per week or 100% FTE, provided they are not enrolled. However, entering graduate students awarded an assistantship during the summer session must be enrolled in a minimum of 3 hours of course work, which applies to their graduate degree. This may not exceed 75% FTE, or 30 hours per week. Assistantship recipients who are not enrolled for both summer sessions are required to pay Federal FICA tax (Social Security and Medicare) for that summer session in which they were not enrolled.

Assistantship recipients may concurrently hold a student employment or work-study position provided the combined FTE does not exceed 75% FTE (50% FTE for international students) during the Fall and Spring semester, and 100% FTE during the Summer session. Assistantship recipients may not concurrently hold a University of New Mexico staff position.

Research Assistant (RA) and Project Assistant (PA) Tuition and Health Insurance

Health Insurance

Health insurance must be included as a fixed amount per RA/PA in the fringe benefit category for each year of the budget. For current rates and benefit guidelines: <http://osp.unm.edu/pi-resources/rates.html>

There is no fringe benefit expense related to the tuition portion of the salary. The budget items for RA/PA salary and tuition should be shown separately because the tuition is F&A excludable.

Tuition

Tuition is an allowable cost on a proposal budget in two circumstances. First, unless otherwise prohibited by the sponsor, in-state tuition and health insurance should be included for RAs and PAs working on sponsored projects at least 25% FTE (working at least half of a semester or 10 hours per week.) The University waives the out-of-state portion of the tuition for RAs and PAs, provided the eligibility criteria listed above are met. Student tuition is excluded from F&A cost calculation. Secondly, tuition may be allowable by the sponsor for participants in training projects (see information under "Student Costs"). This form of tuition is also excluded from the F&A cost calculation when the university's federally negotiated F&A rate is used. When budgeting for future costs, use an escalation rate of 6% for future years.

Salary: Student Employees (often undergraduate students)

Student employees and work study are classified and paid based on the required knowledge and skills necessary to complete their job. The pay scale is available on the Student Employment website: <http://stuemp.unm.edu/Forms%20and%20Information/pay-scale.html>. Undergraduate students are not eligible to receive health benefits or tuition remission on a grant.

Cost Share

The portion of a project or program cost that is not funded by the sponsor and expected to be funded by UNM is considered cost share. Cost sharing can either be mandated by a sponsor as a condition of the sponsored award or, in very rare circumstances, can be voluntarily offered by the University of New Mexico to demonstrate its commitment to a project. Terminology used by individual funding agencies may vary, and can include: cost share, matching funds, in-kind, and institution/applicant support. Federal accounting regulations require that all such costs be documented in the University's financial record system (Banner).

UNM's policy is to assume a cost sharing commitment only when required by the sponsor or by the competitive nature of the award. Cost share is offered only to the extent necessary to meet specific circumstances (UNM Administrative Policies and Procedures Manual: [2430 Cost Sharing on Sponsored Projects.](#)) Federal agency guidelines vary.

For the National Endowment for the Arts cost sharing is usually mandatory.

The National Endowment for the Humanities “strongly encourages” cost sharing and rarely funds 100% of proposed project costs.

National Science Foundation generally prohibits the inclusion of voluntary committed cost share, with a few exceptions. In those exceptions, NSF will issue guidance to their program managers and proposal reviewers that cost sharing in excess of the amount specifically stated in the program guidelines cannot be a consideration when determining the relative merits of a proposal. This alleviates the pressure put on the investigator and institution trying to make a proposal more favorable by committing more institutional resources.

Proposals with cost sharing requirements must include a completed costshare budget template and spending plan form which must be uploaded into CayuseSP prior to routing for internal approvals. The form requires disclosing all Banner indexes/sources of funding for the cost sharing and those authorized to commit cost sharing from the accounts being committed must be included in the proposal routing chain.

Only in rare circumstances can restricted funds be used for cost sharing.

Cost sharing commitments from third parties, i.e., Sub-awardees, must be documented with a signed letter of commitment from the authorized signatory of the organization and must specify what they will be providing and how it was calculated.

Fringe Benefits

Employee fringe benefits are real and identifiable costs in direct support of employee salaries. Fringe benefit rates are applied to all University salaries and wages listed in the proposal and should appear as a separate line item in the proposal budget. The principal elements that comprise University fringe benefits are: FICA, Medicare, Retirement, Group Insurance, Worker's Compensation, Unemployment Compensation, Tuition Remission, and other University benefits. When the established University employee fringe benefit rates change, the new rates are announced via email alert and online (<http://osp.unm.edu/pi-resources/rates.html>).

Materials and Supplies

This category includes most expendable items and expenses necessary to carry out a sponsored agreement that can be directly allocated to a project, such as lab supplies, books, chemicals, glassware, non-capital equipment less than \$5,000, etc. UNM policies and procedures related to procurement of materials and services can be found in the UNM Administrative Policies. Office supplies, such as printer paper, ink, toner, pens, pencils, etc., for sponsored projects are typically not allowable charges as these are considered part of indirect charges.

Services

This category includes expenses used exclusively for, and directly allocable to, the project. Laboratory cleaning, long-distance phone calls, subscriptions, photocopying, maintenance agreements, consultant services, and equipment installations are some services that can be charged to a sponsored project, if

they are exclusively related to that project, and usually only if the sponsor considers it an allowable expense. UNM policies and procedures related to procurement of services can be found in the University Administrative Policies.

Travel: Domestic and Foreign

Travel costs are frequently necessary to complete a project. Costs include registration fees, airfare or mileage, hotel, per diem for meals, ground transportation, and miscellaneous expenses related to travel to conferences, fieldwork, etc. Budget the costs based upon actual travel plans. Rates used must conform to the University Administrative Policies manual. Some agencies will require specific written authorization for a particular trip, even if it is included in the proposal budget. Check the proposal instructions and/or agency guidelines carefully as prior approval is usually required for foreign travel. Requests for prior approval should be submitted to and obtained from the sponsor, with a copy of the approval provided to Contract & Grant Accounting. This may require obtaining approval 60-90 days before the departure date. Domestic and foreign travel should be budgeted separately in the proposal and on the Award Budget Sheet (ABS). Many federal agencies require that air travel be on U.S. air carriers regardless of the costs involved. Some exceptions exist, but PIs should check agency regulations before deviating from this rule. For planned international travel, an Export Control Exclusion Screening (ECES) form is required before any award can be processed. The ECES form can be found on the Export Control webpage: <http://researchcompliance.unm.edu/exportcontrol/ecforms>.

Equipment

Capital equipment is defined as equipment or furniture having a unit cost of over \$5,000 and a useful life of at least one year. Many agencies have proposal guidelines that specify the amount of detail needed for budgets that include equipment. Most agencies will not fund what they consider to be general-purpose equipment such as desks, chairs, shelves, file cabinets, or office computers. Please note that some funding opportunities do not allow expenditure of funds for equipment purchases. The funding agency may also have regulations concerning ownership and disposal of equipment purchased under contracts and grants. Equipment may have to be returned to the funding agency at the end of the project. If the equipment is to be returned, it may be necessary to budget shipping costs in the proposal budget. Equipment costs over \$5,000 are excluded from facilities and administrative cost calculations when the proposal funding includes UNM's full federally-negotiated F&A cost rate.

Consultants/Independent Contractors

Consultants are non-UNM entities or person(s) licensed to do business in the State of New Mexico as evidenced by a number of criteria, including a New Mexico gross receipts tax number and the fact that they offer their services to the general public. Costs for an independent contractor should include all associated costs, including New Mexico gross receipts tax. A consultant letter of commitment is strongly encouraged.

If a consultant is not determined to be an independent contractor, the consultant must be hired as an employee of the University of New Mexico. Persons who are already UNM employees cannot be categorized as consultants in a proposal for budget purposes. They should be shown as employees with fringe benefits including a description of the work they will perform in the proposal narrative or budget justification (<http://policy.unm.edu/university-policies/4000/4325.html>).

Honorarium

If a non-UNM person will be paid a one-time payment not commensurate with services rendered, the non-UNM person can be paid an honorarium according to the UNM Administrative Policies and Procedures Manual (<http://policy.unm.edu/university-policies/2000/2170.html>).

Participant Costs

Participant costs are paid for taking part in workshops, surveys, studies, etc. These are usually small fixed amounts given to the participants as incentives, or to defray the cost of their travel to and from interviews and events, or to reward them for their continued participation (i.e. compensation for participation in research projects). (Please note, the NSF does not consider the following expenses participant costs: incentive payments “human subject payments”, fees for speakers and trainers, costs related to sponsor funded conferences such as room rental fees, catering, and supplies.) Participant costs are excluded from the F&A cost calculations. (<http://policy.unm.edu/university-policies/2000/2480.html>).

Student Costs

Student costs are commonly included on training projects or fellowships. If an individual is providing benefit to a project under the direction of a principal investigator, he or she should be paid as an employee, therefore a salary (a Research Assistant if a graduate student or a Postdoc if a postdoctoral fellow)

Stipends: A payment made to an individual under a fellowship or training grant in accordance with pre-established levels to provide for the individual's living expenses during the period of training. A stipend is not considered compensation for the services expected of an employee. Generally, stipends do not include tuition or health insurance and might be excluded from the calculation of F&A costs. (Please refer to the proposal application instructions.)

Space Rent

UNM departments or units located in space that is leased or rented by the University can charge for rent in two ways:

- Charge the full on-campus F&A cost rate and then use the amount returned to pay for rent. This method should be carefully reviewed, if selected, to ensure that sufficient funds will be available to pay the rent.
- Charge the sponsored project directly for the rent, utilities, and other facility costs. The contract or grant would be charged the off-campus F&A cost rate, in this instance, and the space rent would be excluded from the calculation of F&A costs. This method should be reviewed by the Controller if multiple contracts and grants need to be charged, to ensure that the charges for rent and other facility costs are apportioned correctly.

Subawards

If a portion of the work under the proposed contract or grant will be performed by another institution or a private company, those costs related need to be included in the budget as a subaward. In order to determine whether a collaboration qualifies as a subaward or a vendor, please refer to UNM's policy on

establishing subawards at:

<http://policy.unm.edu/university-policies/2000/2470.html>

Each subaward will be a single line item on UNM's budget, and the PI must attach a separate detailed budget and budget justification to the proposal for each subaward. If this is a system-to-system submission (grants.gov), this should be in the same format as the full UNM budget. To ensure that the subawardee has obtained official endorsement of the collaborating institution, the proposal should include a letter of commitment signed by the authorized institutional representative, budget, budget justification, statement of work and F&A rate agreement. The University Administrative Policies outlines procedures for setting up a subaward and provides guidance for distinguishing between a subaward and a regular procurement of services. UNM's F&A costs are calculated on modified total direct costs (MTDC) and therefore on the first \$25,000 of each subaward; otherwise, when a reduced F&A rate is used, the F&A is calculated on total direct costs (TDC).

Facilities and Administrative Costs (Indirect Costs)

Indirect Costs (also called "Facilities and Administrative costs," "F&A costs" or "overhead") are payments from sponsors to the University to cover expenses related to the overall infrastructure that supports sponsored research, public service, and instruction programs. They are those costs 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. F&A costs are often misunderstood or incorrectly construed to be "profit" in the proposal budget. As is true for any organization that receives external support, these costs cover real and necessary expenses for the University. F&A costs should be included as a separate line item in the budget of each proposal submitted to external funding agencies. These costs must be budgeted so the University can recover the true costs incurred by sponsored research, public service, and instruction projects.

F&A costs are broad categories of costs. "Facilities" is defined as depreciation and use allowances, interest on debt associated with certain buildings, equipment, and capital improvements, operation and maintenance expenses, and library expenses. "Administration" is defined as general administration and general expenses, departmental administration, sponsored projects administration, student administration and services, and all other types of expenditures not listed specifically under one of the subcategories on Facilities.

For main campus, the Vice President uses a portion of the F&A recovered to cover its costs. The amount remaining is allocated to the college, school, or center from which the successful proposal(s) originated. These funds may be used by the dean of the college or school, or by the director of a center to support its general research activities. In the case of projects with multiple departments/units, an F&A split is made possible with the submission of separate internal budgets for each of the units. For projects which involve HSC an F&A split form must be completed and uploaded into CayuseSP with your proposal. The form can be found here <http://osp.unm.edu/forms/index.html>.

F&A Categories

The University submits financial data and proposals to the Department of Health and Human Services (DHHS) periodically in order to obtain a Federally Negotiated Facilities and Administrative Rate Agreement. This is negotiated with DHHS and is accepted by all federal agencies. UNM uses the rates prescribed by the negotiated agreement for all proposals submitted to outside funding sources (see

exceptions below). There are different rates for research, public service/other, and instructional projects. Click here to link to UNM's current F&A rate agreement: <http://osp.unm.edu/resources/UNMRateAgreement.pdf> Click here to view the F&A rates for the Non-federal New Mexico Public Sponsor Agreement rates: <http://osp.unm.edu/resources/FandARates.pdf>.

UNM F&A Rates by Activity Type

There are different rates for research, public service/other, and instructional projects. The F&A rate you must charge on your proposal depends on the type of activity, as well as where the proposed work will be taking place.

Organized Research - all research and development activities of an institution that are separately budgeted and accounted for. It includes:

(1) *Sponsored research* means all research and development activities that are sponsored by Federal and non-Federal agencies and organizations. This term includes activities involving the training of individuals in research techniques (commonly called research training) where such activities utilize the same facilities as other research and development activities and where such activities are not included in the instruction function.

(2) *University research* means all research and development activities that are separately budgeted and accounted for by the institution under an internal application of institutional funds. University research, for purposes of this document, must be combined with sponsored research under the function of organized research.

Instruction - the teaching and training activities of an institution. Except for research training as provided under Organized Research, this term includes all teaching and training activities, whether they are offered for credits toward a degree or certificate or on a non-credit basis, and whether they are offered through regular academic departments or separate divisions, such as a summer school division or an extension division. Some examples of Instruction include:

- Curriculum development projects at any level, including projects which involve evaluation of curriculum or teaching methods; such evaluation may be considered "research" only when the preponderance of activity is data collection, evaluation and reporting
- Projects which involve UNM students in community service activities for which they are receiving academic credit
- General support for the writing of textbooks or reference books, video or software to be used as instructional materials.

Other Sponsored Programs - projects financed by Federal and non-Federal agencies and organizations which involve the performance of work other than instruction and organized research. Examples of such programs and projects are health service projects and community service program, operating clinics, providing technical assistance, or organizing and conducting workshops (includes public service). The PI should contact the Office of Sponsored Projects if it is unclear which category is applicable to the specific project.

On Campus or Off Campus. Rates are further differentiated according to whether the project is to take place on-campus or off-campus.

“On-campus” is defined as research that is conducted in facilities owned or leased/rented by the University and for which the University is bearing the costs. For space used for on-campus research, the University has already included the costs associated with that space in the “facilities” portion of the on-campus F&A rate.

“Off-campus” is defined as research that is conducted in facilities not owned by the University and not otherwise paid for by the University from University funds. The facilities portion of the on-campus F&A rate does not include the rental or lease costs of such space.

Reduced F&A Costs

There are situations in which the University is unable to charge the fully negotiated F&A rate. Not-for-profit foundations usually have written guidelines that state they will not pay F&A costs or that they will pay only a reduced amount. Federal agencies have special programs that mandate reduced F&A rates. Projects with New Mexico state and local governments have traditionally been at a reduced rate. The University allows these proposals to be submitted, and the reduced F&A rates are accepted; the applicable F&A rate is charged on total direct costs. The PI must submit a copy of the written application guidelines with the proposal to justify the rate. In the case of state agencies, OVPR has a list of rates to be used.

F&A Rate Calculations

The current base used to determine F&A costs is modified total direct costs (MTDC), which is total direct costs less capital equipment (>\$5,000), space rental for off-site facilities, participant support costs, subaward amounts in excess of the initial \$25,000 per subaward, and student support costs such as tuition, scholarships, and fellowships. For a proposal budget, F&A costs are determined by applying the appropriate F&A rate to the base. For budgets to non-federal agencies that will not pay the full federally negotiated F&A rate, total direct costs (TDC) should be used to calculate the F&A for the project. Agencies often request a copy of the University's current negotiated F&A rate agreement. This document may be obtained from the OSP web site.

ENSURE RESEARCH COMPLIANCE

Introduction: Sponsored Project and Research Compliance

The process of securing grant and contract funding from federal and state agencies, and even from foundations and corporations, is regulated by federal and state statutes as well as university policies and sponsor's mandates. This section covers the primary areas that PIs must attend to while engaged in submitting proposals and managing grant and contract funding.

Conflicts of Interest in Research Policy and Procedures

Conflicts of interest (COI) are an inevitable part of conducting research, projects and creative activities, and do not necessarily suggest any impropriety on the part of the principal investigator. In a research university setting these interests can compromise, or be perceived to compromise, important academic values, research integrity, the protection of human subjects, or the University mission.

Conflict of interest (COI) in research may occur when an investigator's private interests (such as outside professional or financial relationships) may compete with his or her professional obligations to UNM. Most conflicts can be resolved without impeding sponsored activities. The UNM Faculty Handbook Policy E:110, Conflicts of Interest in Research, (<http://handbook.unm.edu/policies/section-e/e110.html>) applies to all UNM faculty, staff, and students, as well as non-UNM research investigators who participate in UNM research (sponsored or non-sponsored).

Disclosing the required information at the earliest possible time affords the best protection. ~~PIs~~ Investigators are encouraged to disclose any situation that could be viewed as a potential conflict of interest or a reportable financial interest. When in doubt, it is safer to disclose than to not disclose. UNM Faculty Handbook Policy E:110 defines and gives examples of professional and financial interests that need to be disclosed. It also instructs that UNM research includes projects which are funded by or through UNM (including outside sponsored funding); conducted at UNM, regardless of funding; or non-sponsored and conducted off campus by UNM employees. All disclosures are considered confidential and handled accordingly. For detailed specifics on confidentiality and COI in Research process, please see the UNM Faculty Handbook Policy E:110, Conflicts of Interest in Research, (<http://handbook.unm.edu/policies/section-e/e110.html>).

Examples of Potential Conflicts of Interest

- An applicant's consulting relationship with a sponsor of his/her project.
- A management role or a financial interest in an entity that is sponsoring his/her project, conducting business in an area related to the university research, or selling goods or services to the University.
- Ownership of patents or technology that is the subject of his/her project.
- Supervising the same student(s) both in a University activity and as an employee of his/her company.

Each investigator, including the PI, must complete the online COI Disclosure Form annually, accessible at <http://researchcompliance.unm.edu/submit-fcoi-disclosure> . In addition to the annual COI disclosure, *Public Health Service (PHS) disclosure submissions*, by federal regulation, are required for each PHS, NIH, or NIH-affiliated agency proposal submitted. -The PHS project-specific disclosure is to be completed no later than the time of application for PHS-funded research.

Each investigator who will be involved in the design, conduct, or reporting of the proposed project needs to submit a PHS project-specific disclosure. The PI needs to ensure that all key members of his/her research team file their annual COI in Research disclosure. For sponsored projects, key members are research investigators who are designated as key research team members on the grant/proposal application or in the Statement of Work and budgets. Persons who are responsible for and can impact the design, conduct or reporting of UNM research need to file a COI in Research disclosure. For example, a person who files research reports but cannot influence its content does not need to file the COI in Research disclosure.

Completing the Conflict of Interest Form

The COI disclosure must be on file at the time of proposal submission. Preferably, it should be submitted during the annual call for disclosure period at the start of the academic year. However, as warranted by circumstances, COI disclosures can be completed at any time during the academic year. Investigators who are applying for funding to Public Health Service agencies (includes NIH, CDC, FDA, etc.) need to file a PHS project-specific COI disclosure at the time of applying for each PHS grant and must do so in addition to their annual disclosure.

The COI disclosure is a confidential disclosure. UNM COI disclosures can be accessed at: <http://researchcompliance.unm.edu/submit-fcoi-disclosure> .

What Happens in the Case of a Conflict

The disclosure review will focus on the ~~how~~ an investigator's outside professional and financial interests are related to their institutional responsibilities and UNM research activities. An investigator's institutional responsibilities are defined as:

"An investigator's professional responsibilities on behalf of the institution, including but not limited to, activities such as research, research consultation, teaching, professional practice, institutional committee membership, service on boards/panels, and administrative appointments."

Each disclosure will receive an initial review where it will be reviewed for completeness. Disclosures determined to have disclosable interests will receive further review.

The COI in Research Committee (COI-C) will review each disclosure that has disclosable interests. The Committee evaluates if disclosed interest may constitute a potential COI and it may determine that a decision memo with stipulations is needed or a management plan is necessary to manage, reduce, or eliminate a potential or actual conflict of interest. Investigators are notified of Committee decisions via e-mail. COI is often stigmatized as bad but in an increasingly intertwined world, COI often cannot be avoided. Not all COI needs to be eliminated. In fact, most of COI can be successfully managed or reduced.

For further specifics on the COI in Research and the associated process, please see UNM Faculty Handbook Policy E:110 (<http://handbook.unm.edu/policies/section-e/e110.html>) and COI in Research web site (<http://researchcompliance.unm.edu/coi>). **Also, please feel free to contact the COI Compliance Assistant, Sue Marker, at coiresearch@unm.edu with any questions related to COI in Research.**

Export Control and Industrial Security

Export controls are laws and regulations that govern the export of certain commodities and/or information to persons and entities outside the U.S. as well as to foreign nationals inside the U.S. for reasons of national security or protection of trade.

Export controls apply to a wide variety of activities at the university. These regulations apply to sponsored research, non-sponsored research, international travel, international collaboration, purchasing, property accounting and disposal, material transfer, non-disclosure agreements, I-129 petitions, and transactions with certain foreign countries, entities or individuals.

UNM and its employees are required to comply with all federal export control laws. Penalties, including fines and/or jail time, for violations of these laws can be quite severe for the employee as well as the institution.

Some RFPs and awards contain special security requirements or deal with critical technology requiring protection and/or export licensing. MTAs, CDAs, and NDAs may also require a review. The Export Control Office also provides Restricted Party Screening for individuals and businesses.

What is an Export?

Any item that is sent from the United States to a foreign destination is an export. "Items" include commodities, software or technology, such as building materials, circuit boards, automotive parts, blue prints, design plans, retail software packages and technical information. How an item is transported outside of the United States, whether it is by regular mail or hand-carried on an airplane, or whether it is temporary or permanent, or whether it is for sale or a gift, does not matter in determining export license requirements. More information is available on the Bureau of Industry and Security, US Department of Commerce web site.

Regulating Exports: Export control laws regulate the distribution of strategically important products, services and information to foreign nationals and foreign countries. The responsible agencies governing these laws are: the Department of State, Directorate of Defense Trade Controls regulates inherently military technologies under the International Traffic in Arms Regulations (ITAR: 22 CFR). Examples of exports regulated by ITAR include military equipment, military and space electronics, computers designed for military application, cryptographic techniques, and encryption software.

Department of Commerce, Bureau of Industry and Security regulates purely commercial items as well as commercial items that might also have military or proliferation applications ("Dual-Use") under the Export Administration Regulations (EAR: 15 CFR). The term "proliferation applications" refers to the spread of biological, chemical, nuclear, and other weapons of mass destruction to countries not originally involved in developing them.

Department of Treasury, Office of Foreign Assets Control (OFAC) prohibits transactions with countries subject to boycotts, trade sanctions, and embargoes.

Special exports such as endangered species, medical devices, and nuclear materials and equipment are regulated by other governmental agencies, e.g., USDA, NASA, and NRC.

Export Control at Proposal Submission

In CayuseSP, there are questions regarding export control. If the answer is “yes” to any of those questions or to the third Compliance question, or international travel is planned, upload a completed Export Control Exclusion Screening (ECES) Form in CayuseSP. Additionally, if writing or working on software, upload the completed Checklist On Encryption And Other “Information Security” Functions Form. Link to forms: <http://researchcompliance.unm.edu/exportcontrol/ecforms>

Export Control on Award

If the proposal is accepted and the funding is awarded, The Office of Sponsored Projects will coordinate a review with the Export Control Office. If export control restrictions are applicable to a project, a Technology Control Plan (TCP) will be implemented. If foreign nationals are involved, a copy of birth certificates or passports for all pertinent personnel must be submitted to the ECO for license determination. The TCP includes a description of what is to be protected and how, project work location, list of project personnel. The funding sponsor may require prior written approval of a foreign national’s participation. If a license is required, the application can take from two weeks to six months to obtain. If it is ITAR related, a license typically costs a minimum of \$1500.

A signed TCP must be in place before work begins, and any subsequent changes affecting the TCP must be reported to the Export Control Office. Note: Even if a project is not export controlled, the equipment *used* in the project may be. In this case a departmental TCP is required and everyone with access to the equipment must sign a Letter of Assurance (LOA). In addition, an export-control license may be required for some personnel.

When purchasing new equipment it is the PI’s responsibility to determine if the equipment is export controlled. The supplier or Purchasing will be able to assist you. If there are any questions on new or used equipment, contact the ECO.

If any changes to a TCP-controlled project occur during its lifetime (project sponsor, duration, personnel, location, equipment, etc.), notify the Export Control to revise or close out the TCP as applicable. The work site will be audited for TCP compliance during the project.

For more information on Export Control contact Krista Laybourne at Export@unm.edu.

Foreign Nationals and Foreign Travel

Citizenship is a complex issue related to export control. If the project is subject to ITAR, only U.S. citizens and permanent resident aliens (Green Card holders) may have access to the export controlled information and technology. If the project is subject to EAR, the same applies except a foreign national may be able to participate with written sponsor permission. The Export Control Office can determine if a license is required.

A “foreign national” is an individual who is not (1) a United States citizen, (2) a permanent resident alien of the United States, (3) a lawfully-admitted temporary resident alien or refugee, or (4) other protected individual as defined by 8 U.S.C. 1324b(a)(3). For purposes of export control, individuals on a student visa or specialty occupation visa (including foreign visiting faculty) are considered foreign nationals.

The term “foreign person” includes any foreign corporation, business association, partnership, trust, society or any other group not incorporated or organized to do business in the United States, and any international organization, foreign government, or diplomatic entity.

The University hosts and sponsors individuals from other countries as part of the educational, research, and public service mission of the University. These individuals include students, employees, and conference participants. Foreign nationals may provide a variety of services which may, depending on the circumstances, warrant reimbursement.

Payments made to foreign nationals must comply with U.S. Citizenship and Immigration Services (USCIS) and Internal Revenue Service (IRS) regulations, must be allowable by any applicable contracts or grants, and must be appropriately documented. Tax regulations regarding reimbursement or remuneration for foreign nationals may be different from those for legal or immigration purposes. Advance planning (up to several months in some cases) to arrange for payment to foreign nationals is critical to ensure contractual, programmatic, legal, and regulatory compliance. For example, foreign nationals may need to apply for tax identification numbers, which can take up four (4) months to obtain.

All J-1 and F-1 nonimmigrant visa holders (for foreign national students seeking educational opportunities, and for exchange visitors, respectively, more information is available at <https://travel.state.gov/content/visas/en/study-exchange.html>) are required to check in with the UNM Global Education Office (GEO) to ensure compliance with federal laws. Advance planning (two months or more in most cases) is critical to ensure that foreign nationals can fulfill the intended purpose of the trip and the University can comply with any agreements made.

UNM employs foreign nationals with nonimmigrant visas as well. Such visas generally fall within two classifications: H-1B and O-1 visas. H-1B visas are issued to individuals in specialty occupations in fields requiring highly specialized knowledge acquired through the completion of a specific course of higher education. O-1 visas are issued to individuals with extraordinary ability or achievement in the sciences, arts, education, business, or athletics. All UNM departments seeking to sponsor an individual for H-1B or O-1 status for new or continuing employment must arrange for legal services pursuant to the Office of University Counsel guidelines.

Other questions related to Foreign Nationals should be directed to GEO or, for questions about sponsoring foreign nationals for new or continuing employment, to the Office of University Counsel. See the UNM Administrative Policies <http://policy.unm.edu/university-policies/2000/2180.html>.

Foreign Travel As a Focus for Export Control

Anyone traveling outside the continental U.S. on an export-controlled or classified project or traveling to an embargoed country must:

(1) contact the Export Control Office with a list of personnel, equipment, destination, and purpose, and (2) attend a pre- and post-travel briefing. Please note that foreign travel often requires prior written authorization from the sponsor and conference presentations may require prior sponsor review before release (see *Industrial Security section*).

Classified Research/Industrial Security Department

Some proposals or Intergovernmental Personnel Agreements (IPA) contain special security requirements or may require security clearances for classified work. The following terms are indicators of security

requirements: OPSEC, COMSEC, NATO, FOUO, DD Form 254, DTIC, RD, FRD, CNWDI, Special Access Information, Tempest Requirements, Classified Material, Visit Authorization Letters (VAL),

Note: UNM does not have facilities for classified processing on any campus. UNM obtains and maintains clearances for personnel who will be working off-site at cleared facilities.

When to Contact Industrial Security

Contact Industrial Security if there is a need for any of the following: Security clearances, OPSEC plan, Travel briefings, and Visit Requests to a government site or base.

The Industrial Security Officer also provides a variety of training to all UNM faculty and staff. Topics include: DOD/DSS training, international travel security for faculty, staff, and students; cyber security; social networking security issues; and active shooter/workplace violence. Contact Industrial Security for customized training or to assist with classified contracts at dkudis@unm.edu.

Human Subjects: Institutional Review Board (IRB)

Protection of Human Subjects Used In Research

NO research that involves human subjects, whether it is clinical, behavioral, or uses an identifiable data set, may begin until the research is reviewed and approved by the UNM Institutional Review Board (IRB). All human research projects that are conducted by main or branch campus faculty, staff, or students are reviewed by the UNM IRB. If the UNM IRB lacks the appropriate expertise to review the project, the OIRB will make a determination regarding deferral to an external IRB. The UNM IRB is managed through the UNM Office of Research and Compliance by the Office of the IRB (OIRB). Failure to comply with IRB determinations can result in serious consequences for the principal investigator and for UNM. More importantly, noncompliance can potentially expose participants to risk of harm. Some issues that are of concern, based on prior infractions by researchers, include:

- violating research participants' rights to privacy, confidentiality, and the ability to make an autonomous decision to participate through the use of informed consent;
- causing undue burden and harm to participants' welfare (mental and physical); and
- not adhering to special protections for vulnerable populations.

The IRB conducts an ethical review of proposed research that is informed by the Belmont Report, federal regulations, federal and state laws, and UNM policies. For more information on the Belmont Report and other regulations and policies, see the OIRB website (irb.unm.edu) and the UNM Researcher Handbook. To ensure that appropriate regulations are used in the review of a research project, it is crucial for the researcher to notify the UNM IRB if the research is federally funded or will be submitted for federal funding, as well as the source of funding.

The OIRB website [http://irb.unm.edu/](http://irb.unm.edu) provides detailed information about how to submit to the UNM IRB, using IRBNet. There are a variety of educational opportunities and assistance for researchers preparing a submission including: workshops, outreach, and one-on-one consults. More information about these services and events is available on the OIRB website. The review process can take time (30 days on average, but the actual time depends on the complexity and completeness of submissions). Determinations are not automatic and submissions are carefully reviewed. Once approved, studies may

be subject to continuing review and/or post approval monitoring by the UNM Human Research Protections Program.

The PI is responsible for monitoring the conduct of all aspects of the study and for ensuring compliance with all applicable laws and regulations, UNM IRB determinations, UNM policies, as well as funder requirements. This includes submitting amendments (changes to the research), continuing reviews, unanticipated problems, adverse events, or other submissions as requested by the UNM IRB. The OIRB website provides information on UNM IRB requirements and expectations, as well as policies and guidance, and is an important resource to anyone submitting to the UNM IRB.

Animals: Institutional Animal Care and Use Committee (IACUC) and Office of Animal Care Compliance (OACC)

Protection of Animals Used In Research

Research that involves the use of vertebrate animals cannot begin until the protocol (the research plan) is submitted to the UNM Office of Animal Care Compliance (OACC), and reviewed and approved by one of two UNM Institutional Animal Care and Use Committees (IACUC). The review process by the IACUC is guided by the Mission Statement of the OACC and IACUC to abide by the three R's: (1) Reduction – can fewer numbers be used? (2) Replacement – can alternate models be used such as in vitro or computer models? And (3) Refinement – can the pain category be reduced, can procedures be changed to cause less distress? The primary issues that concern OACC and IACUC are humane treatment and responsible use of animals, and maintaining their wellbeing and habitat; and safety, proper training and medical clearance of personnel handling animals in research.

Federal Regulations on Animal Protections

The federal regulations that research institutions and principal investigators are legally obligated to comply with on all research projects (whether funded or not) that involve animals include: 1) The Public Health Service (PHS) under the Department of Health and Human Services regulates vertebrate animal use as promulgated by the Health Research Extension Act. The PHS Office of Laboratory Animal Welfare (OLAW) is responsible for monitoring institutional compliance of PHS Policy. OLAW relies on three primary documents for judging compliance: NIH Principles of Use of Animals, PHS Policy on Humane Care and Use of Laboratory Animals and the NIH Guide for the Care and Use of Laboratory Animals. The University also has an approved PHS Assurance document that defines our specific research program of care and oversight. 2) The U.S. Department of Agriculture (USDA) Animal, Plant Health Inspection Service (APHIS) has broad authority to regulate animal research as directed by the Animal Welfare Act. The University has a USDA registration and the USDA makes unannounced visits to inspect our program (protocols, IACUC records), animal research facilities and PI study areas.

The OACC website <http://hsc.unm.edu/som/research/acc/> provides detailed information about how to prepare and submit research protocols, and how to report incidents and violations.

Principal investigators should contact OACC staff or the UNM Attending Veterinarian for answers to questions, for assistance with proposals, and to understand responsibilities. For ongoing vertebrate animal research, protocols must be amended prior to any significant changes, renewed annually (annual progress report) and resubmitted every third year with a new application. All changes, renewals, and resubmissions should be submitted in TOPAZ through the OACC for IACUC review and approval. PIs are

encouraged to work with both the OACC, and the Attending Veterinarian to resolve any issues and to develop a strong team for the ethical and responsible use of animals in research. For more information, please see OACC web site at <http://hsc.unm.edu/research/oacc>.

Biosafety in the Conduct of Research

Principal investigators who use biologically active hazardous materials in research must abide by various regulations and institutional policies that prescribe procedures for procuring, handling, and disposal of specific agents and substances. Procedures must be followed for the purchase of biosafety lab materials and training completed before one is to work with a number of biosafety operations, including: biological safety cabinet use, safe sharps container use, autoclave use and validation, and shipping and transporting infectious organisms. Sometimes licenses need to be obtained from different government agencies in order to procure or provide biological material. The licenses from certain government agencies may require planning well in advance. These and other common biological laboratory operations are discussed in detail on the Biohazard web site (requires UNM username and password to gain access):

https://hscssl.unm.edu/fusebox ldap login v2/index.cfm?fuseaction=home.login_form&apname=Biosafety.

Institutional Biosafety Committee

UNM has an Institutional Biosafety Committee. Approval from the committee is necessary to ensure compliance with federal and state regulations and guidelines concerning research hazards and their potential adverse effects on the employees, the public, and the environment. Approval for use is required for the following types of bio- hazardous agents:

- Recombinant and Synthetic DNA (rDNA) molecules integrated into living cells (human, vertebrate animals, and Biosafety Level 2 thru 4 microbes), used in in vivo and in vitro experiments.
- Microbial pathogens of humans of Biosafety Level 2 thru 4.
- Select Microbial Agents and Biotoxins that are listed as potential bioterrorism agents.
- USDA restricted microbial pathogens of domestic animals and plant crops.
- Xenotransplants to humans or Human Gene Transfer/Therapy trials.
- The Institutional Biosafety Committee Approval process is described online at site (requires UNM username and password to gain access): <http://hsc.unm.edu/research/biohazard/index.html>

For hazardous material disposal, contact UNM Safety and Risk Services, which manages the disposal of all hazardous substances on campus.

BioInventory Requirements

The UNM BioInventory is used to rate and post the biosafety level of a UNM laboratory and to assign faculty accountability for all biologically active hazardous materials held on UNM campuses. All principal investigators must report any biological materials in their laboratories (including Biosafety Level 1 materials such as microorganisms), human, non-human primate or plant cell cultures or preparations, other potentially hazardous biological agents (such as animal or human sera or tissues), and certain microorganisms or biotoxins with the potential for bioterrorism. Inventories must be filed annually with the Biohazard Compliance Office. Inventories must also be filled out when a laboratory or the biomaterials in

them are moved to another location on campus; when acquiring new biomaterials; or when it is necessary to eliminate biological agents or toxins from the Bioinventory.

If any laboratory illness or incident involving BioInventory listed materials occurs, the PI must instruct the affected individual to immediately visit Employee Occupational Health Services or the Student Health Center for evaluation and appropriate medical follow-up. After regular business hours, the affected individual should visit the UNM Hospital Emergency Center. The PI must report the incident to the Biohazard Compliance Office by the next business day.

For contact information to the Biohazard Compliance Office, please go to:
<http://hsc.unm.edu/research/oacc> <http://hsc.unm.edu/research/biohazard>.

Safety and Risk Services to Assure Safe Conduct of Research

UNM Safety and Risk Services maintains vigilance and services for a very broad range of activities that impact research, academic life, and other campus activities. SRS staff are on call 24 hours a day, 7 days a week, to respond to safety situations. This includes responding to fire alarms, gas leaks, chemical spills, and accidents that require campus police or specialized safety officials to respond. Additionally, SRS is responsible for other areas of campus safety such as environmental affairs that produces the annual water quality reports, and EPA protection of natural resources, ergonomics, and industrial and chemical hygiene to protect employees' work environments (hearing protection, heat stress prevention, lead-based paint awareness, and fume hood use). Other areas of responsibility include indoor chemical and lab safety compliance, laser safety for non-ionizing, and non-medical lasers, air quality, mold and moisture control, hantavirus cleanup, asbestos abatement, campus insurance, radiation safety in the use and the proper disposal of materials, staff training in the use of hazardous materials and defensive driving, employee accidents, and incidents of workers' compensation.

SRS utilizes the building coordinator system, has specialized staff, and works with the UNM Campus Police to maintain researcher, employee, and student health and safety. They also work to ensure the safety of participants at various events on University property, including at the PIT and at the football stadium, and other campus locations.

PIs who have questions can obtain more information about SRS services at <http://srs.unm.edu>. PIs should contact SRS to report incidences, or if they have questions about or need training on how to handle or dispose of hazardous materials.

Radiation Safety

The Radiation Safety office is responsible for ensuring the safety of individuals using ionizing radiation (radioactive materials and radiation-producing machines) and ionizing lasers at the UNM campus and in other locations where these items may be used by University faculty and staff. The objective is the protection of people and the environment from unnecessary exposure to radiation through a radiation protection program to the University community which is in compliance with both Federal and State Radiation Protection Regulations. The review process and permit applications can be discussed more by contacting the Radiation Safety office staff at: <http://hsc.unm.edu/research/radiation-safety/contact-us/index.html>. Also, the Office's web site is available at: <http://hsc.unm.edu/research/radiation-safety/>.

Research Integrity

Research integrity is fostered through Responsible Conduct of Research training program and through investigations of Research Misconduct as defined under UNM Faculty Handbook Policy E:40 (<http://handbook.unm.edu/policies/section-e/e40.html>).

Research Misconduct

UNM Faculty Handbook Policy E:40 defines research misconduct as fabrication, falsification, or plagiarism in proposing, conducting, reporting, or reviewing sponsored or unsponsored research. The Policy also defines fabrication, falsification, or plagiarism and it applies to faculty, students and staff. Anyone can bring allegations of Research Misconduct under it. UNM Faculty Handbook Policy E:40 does not include disputes over authorship nor inventorship. For further specifics or for information on how to file a claim of Research Misconduct related to UNM research conducted on Main Campus or the Branch Campuses, please see UNM Office of Research Integrity web site at: <http://researchcompliance.unm.edu/responsible-conduct-of-research> .

Responsible Conduct of Research (RCR)

The Responsible Conduct of Research (RCR) is a phrase used by federal oversight agencies that refers to the practice of scientific investigation with integrity. RCR is research ethics, but RCR is not the same as the training required by the Institutional Review Board (IRB) which is needed to conduct human subject research.

RCR education first became a compliance requirement in 2010 with the National Science Foundation (NSF) and the National Institutes of Health (NIH) issued regulations that required completion of a certified training in RCR based on the America COMPETES Act passed by congress in 2007 and updated in 2013. Section 7009 from the Act states that, *The Director shall require each institution that applies for financial assistance from the Foundation for science and engineering research and education describe in its grant proposal a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research projects.*

The RCR includes awareness and application of established professional norms following ethical principles while performing the activities of scientific research.

UNM's response to federal regulatory requirements for RCR compliance is to provide undergraduate students, graduate students, postdoctoral researchers, trainees, fellows, and scholars, who receive federal support (in particular NSF, NIH, or NIDA grants) certification in RCR. It is the responsibility of the PI to support, ensure, encourage, and, if needed, provide themselves, adequate research ethics content to meet certification standards.

As part of assurance to funding agencies from UNM, there is a statement with every UNM grant that is submitted from our Office of Sponsored Projects that the PI describes how she/he will go about meeting the RCR training requirement. The assurance attests that the PI will follow a plan of RCR training for project personnel to be completed within one year from when funding is received. Certifications will likely become necessary as well for submissions to other federal agencies in the future. To that end, all graduate students and undergraduates who are involved in research are encouraged to complete RCR certification.

In order for the university to help the PI meet this requirement and that university researchers conduct themselves in accordance with principles of RCR, UNM has a Scientific Integrity Plan. This Scientific Integrity Plan (“SIP”) establishes appropriate standards for RCR instruction, <http://grad.unm.edu/aire/unm-policies-and-scientific-integrity-plan.html>.

In addition to the SIP, the Academic Integrity and Research Ethics program in Graduate Studies promotes and conducts all research ethics education, provides standard regular educational sessions (customized sessions are offered as well), documents completion of training, and issues certificates of completion to participants.

RCR Content Areas Include:

- Conflict of interest and commitment
- Ethical use of human and animal subjects in research
- Authorship and publication
- Data acquisition, management, ownership, and sharing
- Peer review & DATA reproducibility
- Mentoring and mentee relationships
- Research misconduct (plagiarism, fabrication, falsification) and whistleblower ethics
- Collaborative research, including with industry
- Financial management
- Scientists as responsible members of society.

(Note: this list of content evolves and can include additional component.)

The UNM Academic Integrity & Research Ethics program has a variety of resources to assist principal investigators in meeting RCR requirements in accordance with federal guidelines and the University plan and include RCR certification, compliance to RCR regulation, participant qualification and tracking, consultation, instruction, research on research ethics, guidance and development for faculty (and other instructors) in the creation of their own discipline-specific academic integrity and research ethics curriculum. In addition, the AIRE program keeps informed on issues of human and animal institutional committees, assists as needed with issues of research misconduct, and communicates with programs outside UNM to encourage outreach on research ethics.

Teaching resources include a variety of educational opportunities including symposia, workshops, and intensive eight contact-hour courses (that can be customized to need and range from two days to eight weeks). RCR instruction can also fit within existing courses or professional development seminars.

Please contact Dr. William Gannon (wgannon@unm.edu) who can provide additional information on the requirements, services provide, consultations on issues of ethical conduct, and for customized training for your lab, research methods course, or to accommodate any other needs promoting ethical research at UNM. <http://grad.unm.edu/aire/index.html>

SUBMIT PROPOSAL

Electronic Submission

UNM's Main Campus and Branches primarily use two systems in the life cycle of an award:

- **Cayuse Research Suite** (Proposal Development, Routing, Authorization, and Submission)
- **Banner** (Award Financials)

Internal Proposal Creation, Routing, Authorization, and Submission using Cayuse Research Suite

The Cayuse Research Suite is a comprehensive web-based system that allows principal investigators and research administration from the Main Campus and Branches to electronically route, authorize, and submit proposals for sponsored projects and review their award data. The research suite consists of two modules:

- Cayuse SP: The main portal for creating an internal proposal record, submitting the record for authorization, reviewing past proposal information and viewing award project data.
- Cayuse 424: Only used for creating a paired SF424 package within SP for submitting system to system (S2S) to Grants.gov

All sponsored project proposals must be entered in the Cayuse SP research suite.

To start a new proposal record, initial information must be entered into the "**General Information**" tab of Cayuse SP and saved. A proposal record and number will be generated in Cayuse SP and additional tabs will be created for completion before submitting the record for internal authorization.

A green checkmark is required on each tab. Once all the tabs have been completed (have the green checkmark), the proposal record can be submitted for internal authorization and auto-routing will begin. Auto-routing includes emails sent to the PI for certification of the record and to the authorized department personnel (usually the department chair or center director) for approvals. When the record has been certified and authorized, it will automatically be received by the Office of Sponsored Projects for review, final authorization, and submission to the sponsoring agency.

Step 1: Cayuse SP General Information Page Requirements	Next Step: Additional Tabs to Complete
Funding Agency	Cayuse 424 (only if selected in the initial questions on Step 1)
Funding Opportunity Number	Investigator/Research Team
Title	Budget
Start and End Dates of Project	Conflict of Interest
Activity Code (most always Basic Research)	Regulatory Compliance
Submission Method (defined in next section)	Subcontractors
Submitting Unit & Contact Person	Export Control
Sponsor Deadline	Intellectual Property
Create a Paired Proposal – only check this radio button if your proposal is being submitted via grants.gov	Location of Sponsored Activities
	Application Abstract
	Attachments
	Approving Departments
	Additional Notes

Proposal Submission Methods Available in Cayuse SP Dropdown Menu

Within Cayuse SP, a principal investigator and/or university administrator will select the required method for submission of the proposal package to the sponsor in accordance to the solicitation. The list of methods includes:

- **Cayuse424:** If Cayuse 424 is selected, a link to Cayuse424 will be included in the list of items to complete in Cayuse SP. This link takes the user to the web-based SF-424 forms that are required by the sponsor and can be electronically submitted directly from the system to Grants.gov. When the Cayuse 424 forms are completed, the assigned Proposal Specialist in the Office of Sponsored Projects will electronically submit the Cayuse424 application.
- **Grants.gov forms:** If Grants.gov is selected, complete the Adobe Acrobat proposal package downloaded from the Grants.gov website for the opportunity you are applying to. Once completed, upload the package into the “Attachments” section of Cayuse SP record before submitting for routing. The Office of Sponsored Projects office will submit the document via Grants.gov. This method is used in rare cases when the application forms are not supported by Cayuse424.
- **NSF FastLane:** If FastLane is selected, complete the required sections in FastLane and the CayuseSP record. The Fastlane budget and budget justification should be uploaded into the CayuseSP record and the completed Cayuse SP record should be routed to the Office of Sponsored Projects for review. At the same time the FastLane application should be released to the Sponsored Research Officer “SRO”, i.e., (Office of Sponsored Projects staff) to “Allow SPO to view, edit and submit proposal.” You may continue to work on the Project Description up until two business days prior to the submission deadline. Once the OSP has completed their review of your FastLane record they will submit it to the NSF and will upload a copy of the final application into the “Proposal Attachments” section of the CayuseSP record.
- **Sponsor website:** If Sponsor website is selected, complete the package for submission to the sponsor in accordance to the solicitation guidelines. Upload the document(s) in the “Proposal Attachments” section of CayuseSP before submitting for routing (this does include the draft of the

proposal narrative). The Office of Sponsored Projects will submit the proposal application via the sponsor website.

- **Email:** If Email is selected complete the package for submission to the sponsor in accordance to the solicitation guidelines. Upload the documents in the “Proposal Attachments” section of Cayuse SP before submitting for routing. The Office of Sponsored Projects will submit the document via email. Be sure to include the sponsor’s point of contact and e-mail information in the “Additional Notes” section of the CayuseSP record.
- **Paper:** If Paper submission is selected, complete the package for submission to the sponsor in accordance to the solicitation guidelines. Upload electronic versions of the documents in the “Proposal Attachments” section of CayuseSP before submitting for routing. The Office of Sponsored Projects office will authorize and sign the required documentation. The package with OSP approvals will be returned to the PI for mailing/shipping.

Signature Authority

PIs do not have signature authority to sign contracts or grants for UNM ([University Administrative Policies and Procedures Manual – Policy 2010: Contract Signature Authority and Review](#)). Sponsored projects are awarded to the institution. UNM, on behalf of the Regents of The University of New Mexico, as the applicant institution, is responsible for following sound accounting practices to ensure proper use of awarded funds. Funds may not be used for any other purpose than that agreed to in the contract, grant, or cooperative agreement. Transfers cannot be made between contracts or grants. Funds are, therefore, “restricted” to a specific account or index code. Funding methods may vary by sponsor for multi-year projects. However, most contracts or grants awarded for the project period are funded annually in specified increments in accordance with the award agreement and/or the sponsor’s policy. Please note that annual increments are contingent upon the PI showing progress in achieving the proposed project goals and objectives by submitting reports or deliverables, as agreed upon, to the funding agency.

- **Note:** Always contact the Office of Sponsored Projects if you are unsure as to who should sign required forms for funded or unfunded agreements such as Non-Disclosure Agreements or Material Transfer Agreements.

Award Tracking Using Cayuse SP

Cayuse SP has the functionality that allows the user to view and monitor current awarded projects. The information available includes:

- Award Amount and Funding Increments
- Status of Awarded Projects
- Confirmation of Official Start and End Dates
- Subcontract Activity
- Notes and correspondence by Office of Sponsored Projects
- Award Documents

Financial Management of Awards using Banner Finance

Banner Finance is a comprehensive and integrated information system comprised of finance, human resources and student modules. The finance module of this administrative software is used to record financial transactions resulting from activity at the UNM.

After a project has been awarded by the sponsor, the Office of Sponsored Projects transmits the proposal and award documentation to Contract and Grant Accounting (Post-Award). A grant number is assigned in Banner Finance and the award budget is setup. A unique index number is set up for each project by Contract and Grant Accounting. When the index number is available Contract and Grant Accounting will notify the PI and department contact via email and attach a Signature Authorization form. The PI will return the signed copy of this form to Contract and Grant Accounting. This will allow expenditures to be charged to the project.

Finance Self-Service provides an intuitive, user-friendly interface to Banner through LoboWeb (accessed through <http://my.unm.edu/home>).

With Self-Service, users can:

- Approve Purchase Requisitions, Journal Vouchers, and Direct Pay Invoices
- View Document Approval History
- Query Finance Transactions with drill down capabilities to access more detailed information and view related documents.
- Export/download capabilities to Excel for further analysis

External Electronic Systems: Federal Agency Proposal and Award Management Systems

For UNM Main Campus and Branches, Cayuse424 is the system of choice for grant submissions to Grants.gov. However, a very small percentage of federal grant applications are not supported by Cayuse424. In the rare cases where the SF424 forms are not supported by Cayuse424, use the Adobe proposal forms downloaded directly from Grants.gov. (Be sure to use FastLane, NSF's award submission and management system, when submitting to the National Science Foundation).

Grants.gov (All Federal Agencies)

Grants.gov is the central portal used by the federal government to manage grant submissions. Grants.gov is intended to be a unified source to electronically find and apply for grant opportunities from all federal grant-making agencies.

All first time users of Grants.gov should review the application instructions that are provided when the download of the Adobe application is done. While these guides are tailored for the specific applications, they do give insight for preparing Grants.gov proposals for any other eligible federal agency.

Note: Users do not need to register with Grants.gov nor Central Contractor Registration (CCR); UNM is already registered with both entities and the Office of Sponsored Projects is responsible for the submission of the proposal package utilizing the Adobe proposal application.

National Science Foundation's FastLane

NSF's FastLane system is an interactive, real-time system used to submit proposal to the NSF. While NSF can receive proposals through Cayuse424's system-to-system capabilities (Grants.gov), it is recommended that proposal submissions be done through FastLane. Other proposal types, such as "Collaborative Proposals", must be prepared and submitted using the FastLane system. Principal investigators will need to request a FastLane account associated with UNM through The Office of Sponsored Projects prior to proposal submission.

Research.gov (NSF)

Research.gov is the National Science Foundation's (NSF) grants management system that provides easy access to research-related information and grants management services in one location. Eventually Research.gov will replace FastLane. However, that is years away. FastLane will continue to be available to NSF grantees in the foreseeable future, as its capabilities are moved to Research.gov. Additionally, Research.gov offers Single Sign on with FastLane so you can seamlessly access both systems when logged into Research.gov.

Future enhancements to Research.gov will enable institutions and grantees to access in one place a menu of grants management and information services for partnering funding agencies. NSF is the lead agency; however, NASA and DOD are also partner agencies. Users can log into Research.gov using their NSF FastLane login identifications.

Other Common Federal Agency Proposal and Award Management Systems

National Institutes of Health (eRA Commons)

While the majority of proposals at UNM Main and Branch Campuses are submitted to NIH directly using Cayuse424's S2S capabilities, the award management functions are handled in eRA Commons. A Principal Investigator (PI) role has the following privileges:

- Edit Personal Profile
- Delegate edit authority of own Personal Profile authority to others
- View status of all grant applications for which they are the designated Program Director/Principal Investigator (PD/PI), including any errors or warnings that may have been triggered
- View assembled image of submitted grant applications before they move on for further processing
- View Study Section/Meeting Roster of the Review Group that will be reviewing an application
- View Review outcome information and Summary Statements
- View Notice of Award (NOA) for all grants for which they are the designated PD/PI
- Delegate Authority (Progress Report, xTrain, and check grant status) to the Assistant (ASST) so that they can perform same actions and receive same notifications as a PI

Principal investigators will need to request an eRA Commons account associated with UNM through The Office of Sponsored Projects prior to proposal submission.

ADMINISTER AWARD

Managing Active Awards

Completing the Award Budget Sheet (ABS)

The award budget sheet is located on the OSP website under forms.

When an official award notice has been received from the sponsor or funding agency, the PI will be required to finalize the budget; listing the budget amounts according to the Banner Account Codes that correspond to the type of expenditures (i.e., Account Code for Lab Supplies is "31S0"). The ABS template includes the most commonly used account codes. If a specific account code is not listed on the ABS form, you can obtain the code from the UNM Operating Ledger Account Code Definition List found at: Operating Ledger Account Code Definitions (<https://ua.unm.edu/resources/oplegacctdef-7-10-17.pdf>) and add it to the ABS sheet you are working on.

The Office of Sponsored Projects will send the completed ABS budget along with the award documentation to the Contract and Grant Accounting Office who will request an index code and enter the budget information into Banner. The ABS budget is important because it specifies how the budget is to be set up in Banner.

Request to Spend Funds (RTSF)

Prior to the receipt of an official notice of award for a grant which specifically authorizes pre-award spending, the PI may request permission to spend up to 25% of the anticipated award total for a period not to exceed 90 days. This is called a "Request to Spend Funds (RTSF)" and it can be found on the OSP website under forms. The following criteria must be met for approval of the Request to Spend Funds form.

The anticipated award mechanism must be a grant, not a contract.

Requests must have written Sponsor documentation that an award is forthcoming and anticipated in the near future. Contracts require confirmation of a "hard start date" in the documentation provided.

An Award Budget Sheet (ABS) for the anticipated award total needs to be submitted with the Request to Spend Funds form.

An unrestricted index is required on the form to cover any over expenditures that may result from the failure of an agency to make the awards anticipated. Additionally, a signature from the PI's department, college/school, or other unit implies the risk of a delayed start date or failure of an agency to make an award as anticipated will be covered by the department signing the form.

"Wet-Signatures" are required on this form. Please note that no costs incurred under a Request to Spend Funds will be borne by the OVPR and the Department requesting the RTSF will be liable.

The signed form should be scanned into .pdf, and attached along with both the Award Budget Sheet and sponsor documentation. These forms should be emailed to: OSP@UNM.EDU

No Cost Extensions

In the event that more time is needed to complete the statement of work of a sponsored project; it may be necessary to request a no-cost extension (NCE) close to the end of an approved project period. A no-cost extension assumes the PI has the funds available to extend the period of performance/project period within the approved budget. A request for an extension should be directed to Office of Sponsored Projects as soon as the PI is aware a no-cost extension is necessary. Most federal funding agencies require a minimum of 45 days' notice prior to the period of performance end date.

Process:

- PI determines that a NCE is necessary.
- PI notifies the Office of Sponsored Projects of the need for a No-Cost Extension.
- Depending on the funding agency, a one-time No-Cost Extension can be automatically granted. On NSF awards, for example, the only requirement is for the PI to initiate the NCE in Fastlane. Submission of the notification to NSF is then processed by an administrator in OSP. A second No-Cost Extension for the same project will require NSF approval.
- If the OSP determines written approval from the funding agency is required, the PI must provide a request of the extension to OSP in writing. The OSP will endorse the PI's request and submit it to the agency.
- After approval from the agency is received; the No-Cost Extension is processed in OSP and sent to Contract & Grant accounting. Contract & Grant accounting will extend the end date of the project in the Banner system.

Note: No Cost Extensions on a sub award, are also processed via OSP. OSP works directly with the institution/agency that has issued the sub award to UNM

See the chart below for the No-Cost extension steps for National Science foundation and National Institutes of Health:

National Science Foundation (NSF)		National Institutes of Health (NIH)	
Grantee Approved NCE	NSF Approved NCE	Initial No Cost Ext.	Second No Cost Est.
1. PI prepares a New Notification in Fastlane, selecting "Grantee Approved No Cost Extension".	1. PI prepares a New Notification in Fastlane, selecting "NSF-Approved No Cost Extension".	1. PI notifies OSP of need to request No Cost Extension and provides written justification.	1. PI notifies OSP of Request for Second No Cost Extension.
2. Indicate Revised End Date.	2. Indicate Revised Expiration Date.	2. OSP will log in to NIH eRA Commons and initiate and submit the request.	2. PI prepares a written request letter and sends it to OSP.
3. Provide Justification.	3. Indicate Remaining Funds.	3. OSP will be notified of approval of extension.	3. OSP will sign/endorse the letter.

4. Save & Forward to SRO (UNM OSP).	4. Provide Justification & Plan to Spend Unobligated Funds.	4. OSP will process paperwork to Contract and Grant accounting so they can update the project period dates in Banner.	4. OSP will send the letter to NIH Grants Management Personnel.
5. SRO (UNM OSP) will be notified of extension.	5. Save & Forward to SRO (UNM OSP).		5. OSP will be notified of approval/denial of extension.
6. OSP will process paperwork to Contract and Grant accounting so they can update the project period dates in Banner.	6. SRO (UNM OSP) will submit the request to NSF.		6. OSP will process paperwork to Contract and Grant accounting so they can update the project period dates in Banner.

Transfer of Principal Investigator, Project, and Other Transfers

Internal Transfer of PI to a New College/Department/Center

In order to transfer proposals and awards from one college/school/center within the University to another, the principal investigator must complete the following steps:

Process:

Submit a memo to OSP via email at osp@unm.edu indicating the changes needed to an existing award or submitted proposal project. The memo should contain all details of the transfer and must be signed by the chair of the current department/center and the chair of the new department /center.

On proposal changes, OSP will make the changes to the record in Cayuse and will notify the department requesting the changes when these have been made.

Changes to an existing award, OSP will make the changes in Cayuse and then process a transmittal to Contract and Grant Accounting. C&G will then make the changes needed in Banner and notified the department when the updates to Banner have been made.

Transfer of Principal Investigator from UNM to another institution

Sponsored research grants administered by the University are legally awarded to the Regents of the University of New Mexico but can usually be transferred with the principal investigator to another institution. The exception involves grants for public service or training projects which normally remain at the institution, and so for those a new PI is assigned. Sponsored projects that are administered in the

form of a contract will usually remain with UNM or the contract will be terminated to relieve UNM of any further obligation.

Funding agency guidelines usually direct the institution on how to transfer the grant, or alternatively, how to request the assignment of a new PI.

Once the PI's departure date is known, notification to the Office of Sponsored Projects is required, to schedule a meeting to discuss active sponsored projects. The following list includes topics that will be discussed:

- All active funding projects (contract, grant, etc.) held by the PI.
- Effective end date of projects to be transferred (when spending ceases).
- Responsibilities of each party regarding the transfers

Transfer of Principal Investigator from another institution to UNM

Before a PI starts employment at UNM, it is necessary to schedule a meeting with the Office of Sponsored Projects. The areas to be discussed include:

- Discuss the responsibilities of both the PI and OSP.
- Identify the PI's active sponsored projects to be transferred to UNM.
- List relevant background intellectual property and any compliance issues: IRB, animals, export control—and their status.
- Once employed, PI will obtain a UNM NetID and submit a request to OSP for access to CayuseSP, NIH, NSF, etc.
- PI must register and attend Grants Management Training.

Transfer of Project to a New PI at same institution

It may be necessary to transfer an ongoing or continuing project to another principal investigator if the original PI leaves the institution or is assigned different duties.

Process:

- Original PI notifies Office of Sponsored Projects of the potential change in PI.
- Submit a memo to OSP via email at osp@unm.edu indicating the changes needed to an existing award or submitted proposal project. The memo should contain all details of the transfer and must be signed by the chair of the current department/center and the chair of the new department /center.
- Prepare a request to the sponsor to include the following information: New PI name, Justification for the transfer of PI, Qualifications of new PI, and include a CV. Email this request to osp@unm.edu.
- The Office of Sponsored Projects will submit the request to the relevant sponsor for approval.

Internal Transfer of PI to a new college/department/center

In order to transfer proposals and awards from one college/school/center within the University to another, the principal investigator must complete the following steps:

Process:

- Submit a memo to OSP via email at osp@unm.edu indicating the changes needed to an existing award or submitted proposal project. The memo should contain all details of the transfer and must be signed by the chair of the current department/center and the chair of the new department /center.
- On proposal changes, OSP will make the changes to the record in Cayuse and will notify the department requesting the changes when these have been made.
- Changes to an existing award, OSP will make the changes in Cayuse and then process a transmittal to Contract and Grant Accounting. C&G will then make the changes needed in Banner and notified the department when the updates to Banner have been made.

Transfer of Equipment Purchased with Funding from Expired Awards

This category includes all equipment that was purchased with sponsored research funds on an award that has now expired and that the principal investigator would like to transfer to the new institution. The University may allow the transfer of other equipment under certain circumstances. As a state educational institution, the University is not allowed to relinquish title to equipment without compensation and approval of the Board of Regents.

Requests to transfer equipment not covered by an active federal sponsored grant should be routed first to the Department Chair or Center Director for approval. The request should also detail the means of determining the current market value (usually by independent appraisal, i.e., by a certified appraiser) of the equipment and proposed method of payment by the new institution. The independent appraisal should be paid for by the new institution/organization.

If the equipment is needed in the unit, the Chair or Director has the right to disapprove the request. If the Chair or Director approves the request and concurs with valuation of the equipment, the request should be forwarded to the Office of Sponsored Projects. After OSP approves the request, it will be submitted to the Vice President for Research, who will arrange to have it presented to the Board of Regents at its next regularly schedule meeting.

Hiring faculty, staff, and students using restricted funds

When the award arrives and an index code has been assigned to the project in Banner, the hiring process for any faculty, staff and students can begin as long as there are funds budgeted for each of the salary categories. During the development of the budget at proposal stage, if an individual was specifically named in a staff or faculty position, they can be hired following the alternative appointment procedure described in the University Administrative Policy 3210 section 5.5 <http://policy.unm.edu/university-policies/3000/3210.html>)

Staff are hired through UNM Human Resources (<https://hr.unm.edu/>)

Faculty hires are processed through UNM Office of Faculty Affairs & Services (OFAS) (<http://ofas.unm.edu/>) OFAS serves as a central service center for administrators and faculty engaged in

the recruitment, selection, appointment, promotion, retention and oversight of faculty within academic units on UNM Main and Branch campuses.

Graduate Student contracts are processed through UNM Graduate Studies
(<http://grad.unm.edu/funding/assistantships.html>)

Student employees (often undergraduate students) are hired through the UNM Student Employment Office (<http://stuemp.unm.edu/>)

CLOSEOUT & REPORTING

Award Closeout – Workflow

At the end of a project, the UNM Contract and Grant Accounting Office will close out the award. Begin working with your department administrator and fiscal monitor at least 90 days prior to the budget period end date to ensure the closeout of the award is completed within the required time as per the OMB Uniform Guidance. Closeout of the award may include final financial reports, final technical reports, and property and patent reports as applicable.

The closeout Workflow process can:

- Increase efficiency in the closeout process for the Principal Investigator, Department/Unit Administrator, the Office of Sponsored Projects (OSP) and Contract & Grant Accounting departments (CGA).
- Enhance communication, tracking, and accountability during various stages of the process.

Click on this link for Workflow Training

The fund closeout process begins when the budget period end date is about to expire. The Workflow process runs nightly and checks for funds ending in 90 days. An e-mail is sent to the Principal Investigator and Account Administrators.

- CGA works with the Account Administrator via Workflow to prepare to close the fund.
- A Closeout Reconciliation form will be sent via Workflow which will need to be signed by the PI and returned to CGA.
- The PI and or department staff work with CGA to ensure that all expenditures all are allowable and that all expenditures have finished posting to the index.
- CGA prepares any Financial Reports that are required and the PI prepares the Technical or Progress Report.
- When the fund is closed, the beginning of the fund title in Banner FTMFUND is changed to FROE (Final Reconciliation of Expenditures).

The fund can also be FROE'd by CGA outside of the Workflow system, but this process is followed only when absolutely necessary.

Record Retention

Per OMB 2 CFR 200 Subpart D- §200.333: Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be generally retained for a period of three years from the date of submission of the final expenditure report, as authorized by the Federal awarding agency. The only exception is if any litigation, claim, or audit is started before the expiration of the 3-year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.

Please be aware that record retention dates for federal sponsored awards may differ from the retention dates published in UAPPM.

The University of New Mexico Records Retention Schedule

ADDITIONAL INFORMATION

Intellectual Property

The term intellectual property encompasses a variety of different forms of intangible property rights that serve to protect unique, original, and/or valuable creations of the human intellect. Intellectual property can encompass, but is not limited to, ideas; inventions; literary works; chemical, business or computer software and processes; company and product names and logos; and other creations.

In the course of conducting University-administered activities or using University facilities, faculty, staff, and students often create intellectual property that may be protectable by patent, copyright, or other means. UNM facilitates the protection and commercialization of such property in ways beneficial to the creators of such property, as well as to the University, and the public. Faculty Handbook E-70 Intellectual Property Policy, <http://handbook.unm.edu/section-e/e70.html>, governs the ownership, utilization, and commercialization of intellectual property (IP) at UNM (the "UNM IP Policy"). This information is specifically focused on intellectual property developed under sponsored research projects.

Disclosing Inventions

PIs are required to disclose inventions and creative works to UNM under agreements sponsoring and facilitating research and other projects.

To assure UNM's ability to comply with obligations arising under federal laws or in sponsored agreements, faculty, staff, and students participating in sponsored research are required as a condition of such participation to file disclosures for any invention or creation that was made during the course of their University activities.

The principal investigator on a sponsored research grant or contract is responsible for:

- Assuring that an invention or copyright disclosure form is filed for any such invention or creation. Click here for access to the appropriate disclosure forms at STC.UNM, UNM's dedicated technology transfer organization: Invention Disclosure Form
- Providing complete and accurate information as required on the form.
- Filing the form with STC.UNM either electronically or by paper.

Here is the link for the online disclosure form: <http://unm.wellspringsoftware.net/>. The log-in is the PI's UNM net id and password.

Preserving Intellectual Property

If non-UNM personnel, including personnel of the sponsor or another institution, will participate in the sponsored research, a separate agreement may be required.

A Principal investigator should remember that a sponsored research agreement may not obligate the intellectual property of non-UNM personnel unless such personnel have signed a separate intellectual property agreement prior to commencing work. While such matters may not seem important at the time a

grant or contract is being processed, and may seem far removed from the actual making of an invention or creation of other intellectual property, in fact they are very important. Failure to address such matters may lead to legal disputes and may also jeopardize patent or copyright, or other types of intellectual property protection.

PIs must be careful not to enter into personal agreements with third parties where IP rights are implicated.

Frequently faculty will be asked to sign agreements in their personal capacity for consulting or other outside services. These type of agreements include, but are not limited to Independent Contractor Agreements, Confidentiality Agreements, and Visitor Agreements, Read these agreements carefully as they may contain provisions that affect the ownership of intellectual property rights, or even require that those rights be assigned to such third parties. If the consulting project involves the use of UNM funds, facilities (labs), equipment or personnel (students) (UNM Resources), it is more properly categorized as a sponsored research project and the intellectual property rights will belong to UNM. Third party sponsors should be made aware that the use of UNM Resources in the development of intellectual property will vest ownership in UNM.

Avoiding Conflicts

PIs need to review proposals and third party agreements for conflicting obligations.

When developing proposals, the PI must carefully consider any concurrent and previously funded projects, as well as any individual agreements, such as a consulting agreement, that they may have.

The principal investigator should not knowingly develop a project proposal in which the subject matter would create a conflict regarding intellectual property rights previously licensed. If Background IP is necessary for the proposal to proceed, contact STC.UNM immediately to begin the process of negotiating a license to such Background IP. UNM cannot grant an exclusive license to one party and non-exclusive to others for the same intellectual property. If an invention covered by a third party agreement was supported with federal funding, the company may only receive such rights, as consistent with obligations under federal law.

Assigning Intellectual Property Rights

PIs must assign to UNM rights to inventions conceived under federal funds or under sponsored research agreements.

If an invention is funded in whole or in part by a federal agency, the principal investigator must assign rights of the invention to the University. The protection and commercialization of such intellectual property is handled by STC.UNM, and the principal investigator must cooperate and assist in the efforts to secure intellectual property protection and to pursue commercialization by executing all appropriate legal documents, including assignments, to establish the University's legal rights and comply with sponsor requirements.

PIs must not assign rights to an invention, or license commercial rights to such invention, to any sponsor directly. PIs must consider whether the project involves existing IP (“Background IP”).

Under federal law, UNM is prohibited from assigning ownership rights in federally funded inventions to third parties, except in the case of its technology transfer office where assignment is allowed (Bayh-Dole Act). Under the private business rule, UNM is restricted in its ability to assign ownership of or grant in advance licenses to non-federally funded inventions to external sponsors. UNM is permitted to grant external sponsors a non-exclusive, royalty free, internal research license, and an option to negotiate a commercial license with STC.UNM. If an invention covered by a third party agreement was supported with federal funding, the company may only receive such rights, as consistent with obligations under federal law.

In any agreement with an external sponsor, the PI must consider existing obligations, funding sources, and Background IP (intellectual property that is already in existence and usually in STC's portfolio). This is especially important where the agreement under negotiation is for research that has the same or similar purpose as research conducted using personnel or resources that are funded, however minimally, by another sponsor. Failure to reconcile potentially conflicting claims regarding intellectual property may result in legal disputes or infringement claims against UNM, STC, or the sponsors and damage to the professional reputation and credibility of the principal investigator. It is incumbent upon the PI to disclose all funding sources when filing an Invention Disclosure Form with STC.UNM.

The principal investigator should be careful to not commit any Background IP as part of a proposal without first consulting STC.UNM. STC.UNM can begin the process of negotiating a license for such Background IP to the extramural sponsor.

Commercializing Intellectual Property

PIs will receive royalty payments from commercialization of any UNM intellectual property as provided in the UNM IP Policy.

Royalties received from commercialization of UNM intellectual property by STC.UNM shall be divided as follows (after recouping unreimbursed costs):

- Forty percent (40%) to be divided equally (unless otherwise unanimously agreed to and represented on the submitted invention disclosure form) among the creators;
- Forty percent (40%) to STC.UNM; and

Twenty percent (20%) to the University to be invested and administered by the Vice President for Research, generally in amounts consistent with the source(s) of the UNM intellectual property. Accrued revenues will be used, in consultation with faculty, to support University units involved in ongoing research, creative and educational pursuits relevant to commercialization efforts or will otherwise be administered as required by sponsor(s).

Audits

The Role of Internal Audits

The Regents of the University established the Internal Audit function to perform comprehensive audits of the diverse records and operations of the University. The Internal Audit Department can assist UNM administrators and principal investigators by:

- Evaluating processes used in administering sponsored projects. The goal of this evaluation is to give advice on process weaknesses which might lead to non-compliance with the contractor's/funding agency's requirements and/or University policies.
- Conducting independent audits of sponsored project activity for compliance with applicable policies, laws, and regulations.
- Providing reports on the results of these evaluations and reviews, which will include recommended methods to improve processes. Where appropriate, these results will also be reported to the Audit Committee of the Board of Regents, the funding agency, the State Auditor's Office, and law enforcement.
- Providing consulting services and being available for PIs to obtain advice or guidance on individual sponsored project issues.

Note: The policy on Internal Auditing can be found in the Board of Regents' Policy Manual, Section 7.2 and 7.3.

External Audits, Reviews, Site Visits, or Investigations

As a recipient of federal/state funds, the University is responsible for stewardship of these funds. Therefore, UNM is subjected to frequent visits by sponsoring agencies as well as an annual external audit per OMB Uniform Guidance subpart F http://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1#_top. The purpose of sponsor site visits varies, from providing oversight and technical assistance, to ensuring compliance and achievement of stated goals. Unfavorable outcomes resulting from these reviews could result in disallowances of claimed costs that are refunded to the sponsor, termination of an agreement, and/or the awarding, or lack thereof, of future contracts or grants based on failing to fulfill UNM's contractor responsibilities.

All audits, site visits, reviews, or investigations initiated by the sponsoring agency should be routed through Contract and Grant Accounting. If a PI or department is notified by a sponsoring agency of an impending financial audit or investigation, they need to immediately contact Contract and Grant Accounting and the Office of the Vice President for Research. An entrance meeting will be scheduled with the controller to discuss the scope and nature of the audit or investigation.

Financial Compliance Audits

The scope of a financial compliance audit is usually based on compliance with sponsoring agency regulations and guidelines as stipulated in the sponsored agreement (FAR's for federal contracts and OMB Uniform Guidance for federal grants: http://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1#_top). An annual audit is conducted by an external firm separate from sponsors and UNM. External audits are a Federal requirement and include a review of: internal controls, supporting documentation for expenditures, procurement, property control, fiscal management, and University business policies and procedures, etc. The samples tested are selected at random for both Main Campus and the Health Sciences Center.

Site Visits

The main focus of a site visit is usually related to technical/programmatic progress and issues, or a review of a prospective funding award (such as for a training grant or for establishing a Center) to answer questions regarding institutional capacity, PI credentials and ability, and validity of claims made in the proposal. A site visit could involve financial processes as well. A site visit is usually performed by the program office from the sponsoring agency.

Investigations

The focus of an investigation is generally a response to potential or actual fraud or misconduct in research. The funding agency becomes aware of the potential or actual fraud or misconduct through a whistle blower or a university internal audit. An investigation is usually conducted by an auditor or through the agency's investigator office or Office of the Inspector General.

Research Space & Renovation

Some large equipment purchases may require renovation of the space needed to house the equipment. Before finalizing the budget and submission of the proposal it's important to consult with UNM's Planning Design & Construction to get an estimate on the type of renovation necessary and the cost. (<http://goto.unm.edu/projectintake>) Some sponsors will not allow renovation costs to be charged to the award and so the PI is responsible for finding other sources of funding to cover the required renovation in the event that an award is made.

UNM's Planning, Design & Construction (PDC) provides seamless delivery of professional support services and to facilitate best practices in capital project planning, development and construction on behalf of our internal clients. PDC provides comprehensive guidance related to the institution's built environment; specifically, strategic guidance supportive of campus master planning, programming, architectural development, building efforts and best design practices. <http://pdc.unm.edu/index.html>

Purchasing materials & supplies, equipment, goods & services, etc. using restricted funds

The Purchasing Department serves as the central purchasing authority for the University of New Mexico. This department issues all Purchase Orders for goods and services for Main Campus, the Health Sciences Center, and all branch campuses. Purchase requisitions that are submitted through LoboMart are reviewed and approved by the Contract and Grant Accounting Office, if restricted funds are used, to ensure that the purchase is allowable on the award.

For assistance with purchasing using LoboMart or receiving in Banner, please contact purch@unm.edu. If you would like to speak to a Contract Specialist, please see our [Staff and Commodities](#) listing.

Link to UNM Purchasing <http://purchase.unm.edu/index.html>

Travel reimbursements

When you wish to reimburse an employee, non-employee, or student for travel expenses incurred, you can do so using Chrome River. Chrome River replaced the DPI/DPEZ process for direct payments and travel reimbursements effective December 1, 2016.

For assistance with [creating a travel expense report](#) using Chrome River, or for other job aids available for Chrome River, please refer to the Chrome River resources webpage at <http://chromeriver.unm.edu/>. A UNM Net ID and password is required to access the Chrome River Resources page.

Subaward Invoices

Subaward invoices should be mailed or emailed directly to CGA. We encourage all sub-recipients to email invoices to indexcga@unm.edu. If this is the first invoice on the subaward, a fully executed subcontract and a Banner encumbrance must be in place before CGA can process the invoice. After the fiscal monitor in CGA has reviewed the subaward invoice, it is then uploaded to the subaward invoice workflow for the Department Administrator to approve in workflow. Before the workflow can be approved by the Department Administrator, the PI is responsible for approving the invoice. There are three options for approving this invoice:

1. Print Subaward Invoice, and the PI manually signs.
2. Electronic signature of the PI on the Subaward Invoice Approval Form (attached to the invoice in workflow).
3. Attach an email approval from the PI.

The PI's approval certifies that:

1. All expenditures on the subaward invoice (through the date of the invoice) align with the approved project budget.
2. All work for the invoice attached has been completed satisfactorily and in compliance with applicable Federal or non-federal statutes, regulations, and subaward terms and conditions.
3. All required progress reports, technical reports and/or deliverables due through the date of the invoice have been received, reviewed and accepted.
4. If this is the FINAL Invoice, I certify that I have received all work required, all required reports and all deliverables as required by the contract.

After the department approves in workflow, with the attached invoice approved by the PI, the invoice is paid by A/P.