In addition to this guide the BMRA website serves as a valuable resource for the Division of Biology and Medicine faculty and staff. Included on this site are policies and procedures, forms, and links to various funding agencies. In addition BMRA works closely with the Office of Sponsored Projects (OSP) which supports Brown University faculty and staff in the acquisition, performance, and administration of projects and programs funded from external sources. This guide is not an extensive listing of all the policies and procedures for sponsored research projects but rather a reference. Both the BMRA and OSP websites have more extensive listings of policies and procedures. Your Department’s Administrative Staff are also valuable resources in pre and post Award Management of sponsored projects.

BMRA is here to help you in all your sponsored research needs. Please do not hesitate to contact us with any questions!

**For New Hires:**

One you have settled into Brown University you should:

- Find your Department’s Grants/Financial Coordinator
- Review **trainings** you should complete before submitting any research for funding.
- Complete the Conflict of Interest Assurance of Compliance form and if needed the Reporting form: [Assurance of Compliance](#)
- Complete the Patent and Invention Agreement: [Patent and Invention Agreement](#)

PHS Principal Investigators and those associated with their funding who are responsible for the design, conduct and reporting of research must complete [FCOI Training](#) before an award will be institutionally accepted.
# Table of Contents

**About BMRA** .................................................................................................................. 4

**Related Departments** .................................................................................................... 5-7
- OVPR ................................................................................................................................. 5
- OSP .................................................................................................................................... 5
- ORI ..................................................................................................................................... 5-6
- IECV ................................................................................................................................... 7

**Difference between a Grant, Contract, and Cooperative Agreement** .............................. 7

**Trainings offered by Brown University** ........................................................................... 8-9
- Compliance Training .......................................................................................................... 8
- Environmental Health and Safety (EHS) ........................................................................... 8
- OSP Training ...................................................................................................................... 8
- Research Protections Training ............................................................................................ 9

**COEUS** ............................................................................................................................ 9

**Finding Funding** .............................................................................................................. 10-12
- SPIN ................................................................................................................................. 10
- Grant Finding at Brown ...................................................................................................... 10
- NIH Matchmaker ............................................................................................................... 10
- Internal Funding Opportunities .......................................................................................... 11
- Additional Resources ......................................................................................................... 11-12
- Gifts .................................................................................................................................. 12

**Obtaining User ID for FastLane and/or eRA Commons** ................................................ 13

**Pre-Award** ....................................................................................................................... 14-28
- Proposal Development and Submission ............................................................................. 14
- 5-Day Rule and Amendments ............................................................................................ 15-16
- Detailed Proposal Development Flowchart ........................................................................ 17-18
- Are you the PRIME Proposal with Subawards Flowchart ................................................ 19
- Are you the Subaward on a Proposal Flowchart ................................................................ 19
- Grants.gov Submissions’ Flowcharts .................................................................................. 20-22
- Budgeting ............................................................................................................................ 23
- Tip Sheet for Developing Proposal Budgets ......................................................................... 24
- Direct Charging Guidelines ................................................................................................. 25
- Cost Sharing on Sponsored Projects ................................................................. 26
- Institutional Facts & Reference Documents ..................................................... 27-28

**Post-Award** ........................................................................................................ 29-31
- Award Documentation .......................................................................................... 29
- Account Management ........................................................................................... 29
- Effort Reporting ..................................................................................................... 30
- Cost Transfers ....................................................................................................... 30
- Subrecipient Monitoring ....................................................................................... 31
- Award Closeout ..................................................................................................... 31

**Compliance** ........................................................................................................ 32-35
- Responsible Conduct of Research ....................................................................... 32
- Intellectual Property (Patent and Copyright Policies) ............................................ 32
- Export Controls .................................................................................................... 32-33
- Environmental Health and Safety ......................................................................... 33
- Conflict of Interest ............................................................................................... 33
- Human Subjects (IRB) .......................................................................................... 34
- Animal Subjects (IACUC) .................................................................................... 34
- Data Sharing ......................................................................................................... 34
- Research Misconduct ............................................................................................ 35

**Useful Websites** .................................................................................................... 36

**Organizational Charts** ........................................................................................ 37-38
- BioMed Academic Organizational Chart ............................................................. 37
- BioMed Administration Organizational Chart ....................................................... 38
About BMRA

The Office of BioMed Research Administration (BMRA) serves as a central resource to faculty, staff, and students in the Division of Biology and Medicine in their pursuit of research, training, and other scholarly activities while insuring compliance with University, federal, and private sponsor regulations, terms, and conditions. BMRA directly contributes to the academic mission of the Division of Biology and Medicine by providing support for obtaining sponsored research funds and managing sponsored research activity. The BMRA office is comprehensive in its scope and mission, handling both pre-award and post-award services.

BMRA is organized into two sections: Pre-and Post-Award Management.

Pre-Award Management is responsible for:

- Providing information on sources of support
- Assisting principal investigators in identifying research funding opportunities
- Providing advice & assistance for completing application form pages
- Budget development
- Assisting faculty in the submission of applications
- Assuring compliance with the University and sponsors' policies and requirements
- Interpreting regulations of federal agencies and private sponsors
- Clarifying University policies and procedures for faculty and sponsors

Post-Award Management is responsible for:

- Overseeing the financial management of sponsored programs
- Maintaining accounts and records
- Preparing and submitting financial reports
- Administering the expenditures of funds
- Monitoring compliance with University and sponsor's financial provisions
- Assisting in audit resolution
BMRA works closely with other departments within Brown University. Each of these departments serve a specific role in Sponsored Research Administration and includes:

### Office of the Vice President for Research (OVPR)

OVPR’s mission is to advance the research enterprise at Brown University.

**Office of The Vice President for Research located at:**
350 Eddy Street, Brown University, Box 1937
Phone: (401) 863-7408
Fax: (401) 863-9994
Link to Website: [http://www.brown.edu/research/office-vice-president-research/office-vice-president-research](http://www.brown.edu/research/office-vice-president-research/office-vice-president-research)

### Office of Sponsored Projects (OSP)

OSP supports Brown University faculty and staff in the acquisition, performance, and administration of projects and programs funded from external sources.

**Office of Sponsored Projects is located at:**
350 Eddy Street, Brown University, Box 1937
Phone: (401) 863-2777
Fax: (401) 863-7292
Link to Website: [https://www.brown.edu/research/office-sponsored-projects](https://www.brown.edu/research/office-sponsored-projects)

### Office of Research Integrity (ORI)

The Office of Research Integrity (ORI) supports the Brown University research community by providing guidance, education and resources to facilitate the conduct of ethical research in accordance with governing federal and state regulations and University policies. The ORI’s multidisciplinary team:

- Provides administrative support and regulatory advisement to the University’s Institutional Review Board (IRB), Institutional Animal Care and Use Committee (IACUC), and Conflict of Interest Review Board;
- Handles allegations of research misconduct or other reports of research-related noncompliance;
- Conducts outreach and education to researchers and staff regarding best practices to facilitate regulatory compliance and required institutional approvals;
- Promotes integrity in scholarship by supporting education in ethical and responsible conduct of research and through provision of customized sessions in research integrity by invitation;
- Assists researchers with adhering to requirements associated with international research, including running the University’s Export Control compliance program.
**Institutional Review Board (IRB)**
The IRB is charged with reviewing all research protocols involving humans to ensure compliance with federal, state, and local requirements.

**Institutional Animal Care and Use Committee (IACUC)**
The IACUC is charged with reviewing all research protocols involving animals to ensure compliance with federal, state, and local requirements.

**Financial Conflict of Interest**
Committed to academic integrity and research objectivity, the University has established annual and ad hoc processes for the reporting and evaluation of research-related significant financial interests, and the identification and management of real or potential FCOI. These processes are outlined in Brown’s [Conflict of Interest Policy](http://www.brown.edu/research/office-vice-president-research/offices/research-protctions-office/research-protctions-office).

**Office of Research integrity is located at:**
350 Eddy Street, Brown University, Box 1937
Phone: (401) 863-3050
Fax: (401) 863-9994
Link to Website: [http://www.brown.edu/research/office-vice-president-research/offices/research-protections-office/research-protections-office](http://www.brown.edu/research/office-vice-president-research/offices/research-protections-office/research-protections-office)

**IRB and IACUC are located at:**
350 Eddy Street, Brown University, Box 1937
Phone: (401) 863-3050
Link to Website: [http://www.brown.edu/research/institutional-review-board-irb](http://www.brown.edu/research/institutional-review-board-irb) and [http://www.brown.edu/research/RPO/IACUC](http://www.brown.edu/research/RPO/IACUC)

**Export Control:**
350 Eddy Street, Brown University, Box 1937
Phone: (401) 863-3050
Fax: (401) 863-9994
Link to Website: [https://www.brown.edu/research/conducting-research-brown/research-compliance-irb-iacuc-coi-export-control/export-control](https://www.brown.edu/research/conducting-research-brown/research-compliance-irb-iacuc-coi-export-control/export-control)
Industry Engagement and Commercial Venturing (IECV)

The Industry Engagement and Commercial Venturing Office (IECV) works with faculty to commercialize inventions created from research at Brown. IECV aims to generate revenue for inventors, the research enterprise, and the University. Brown's IECV strives to achieve these goals by fostering strategic collaborations with industry through licensing, sponsored research, and launching of new ventures.

Industry Engagement and Commercial Venturing Office (IECV) is located at:
350 Eddy Street, Brown University, Box 1937
Phone: (401) 863-7499
Link to Website: https://www.brown.edu/research/conducting-research-brown/commercializing-technology

Difference between a Grant, Contract, and Cooperative Agreement

Grant: A type of financial assistance awarded to Brown for the conduct of research or other program as specified in an approved proposal. A grant, as opposed to a cooperative agreement, is used whenever the awarding office anticipates no substantial programmatic involvement with the recipient during the performance of the activities. Grants are normally awarded by sponsors whose purpose in supporting research is scientific, cultural or philanthropic.

Contract: A mechanism for procurement of a product or service with specific obligations for both sponsor and recipient. Typically, a research topic and the methods for conducting the research are specified in detail by the sponsor, often in the Request for Proposal (RFP) which announces the funding opportunity. In general, there are greater performance expectations associated with contracts, including project milestones and detailed deliverables (e.g., reports). The arrangement is usually designed to benefit the sponsor by achieving an expected outcome or product.

Important Note: At the time of contract proposal submission, a sponsor will often require an indication of what terms and conditions will be acceptable to Brown in the event of an award. Exceptions to a sponsor’s contract terms are addressed by OSP in a transmittal letter accompanying the proposal. For many sponsors OSP will often include a copy of the standard “Brown University Research Agreement”.

Investigators who are aware of special sponsor requirements should discuss them with the OSP Representative or BMRA well in advance of the proposal deadline.

Cooperative Agreement: An award similar to a grant, but in which the sponsor’s staff may be actively involved in proposal preparation and anticipates having substantial involvement in research activities once the award has been made.
**Compliance Training**

**Division of Biology and Medicine RCR Training:** Responsible Conduct in Research (RCR) training is required for all entering PhD students in the Division of Biology and Medicine and organized by the Associate Dean for Graduate and Postdoctoral Studies. This fulfills NIH required training in Responsible Conduct of Research. Others, including postdoctoral researchers, master students and junior faculty with career development grants are welcome to participate by making a request to Tracey_Cronin@brown.edu.

Link to RCR Training: [http://www.brown.edu/about/administration/biomed/graduate-postdoctoral-studies/responsible-conduct-research-rcr](http://www.brown.edu/about/administration/biomed/graduate-postdoctoral-studies/responsible-conduct-research-rcr)

**Brown Ethical and Responsible Conduct of Research Education Program (BEARCORE):**
Brown University requires that all undergraduate students, graduate students, and postdoctoral researchers supported by NSF complete the CITI Course in the Responsible Conduct of Research (RCR) with at least 80% grade on the module quizzes. NSF-funded investigators are responsible for assuring that any student (Graduate and Undergraduate) or postdoctoral research completed the CITI RCR training within one year of their beginning NSF supported work.

**Environmental Health and Safety (EHS)**

Environmental Health and Safety (EHS) offers a wide variety of safety training courses for faculty, students, and staff. To access EHS training resources please contact your Department Training Administrator or EHS at 863-3353.

To learn more about EHS training courses please visit the following link: [EHS Website](http://www.brown.edu/about/administration/biomed/graduate-postdoctoral-studies/responsible-conduct-research-rcr)

**OSP Training**

**OSP Training:** The Office of Sponsored Projects offers training for staff and faculty involved in research. To register for any Sponsored Projects training, please visit [Workday Learning](http://www.brown.edu/about/administration/biomed/graduate-postdoctoral-studies/responsible-conduct-research-rcr)

Once logged into your LearningPoint account search ‘Sponsored Research Related Training.’ OSP offers trainings in the following areas.

- **Coeus Training:**
  Learn how to use the University's grant management system, Coeus. Classes range from constructing proposals & creating budgets to submitting Grants.gov proposals or viewing award records.

- **Post-Award Training:**
  Learn best practices in Post Award management. These sessions will cover several issues relating to the administration of a project once the award has been set-up.

- **Pre-Award Training:**
  Learn best practices for Pre-Award management. These sessions will cover issues relating to preparation of proposals, budgets, negotiation of terms and conditions of awards, issuance of subcontracts and other actions required during the life cycle of an award.
Research Protections Training

**IRB Training:** As of April, 2005 all research personnel involved in human research projects, all IRB Members, and all IRB staff are required to complete the Brown University web-based human research protections education program, CITI, The collaborative Institutional Training initiative. Research personnel include principal investigators, co-investigators, faculty advisors for student investigators, research assistants, and any research team members who have contact with research participants and/or their research data and identifiers.

If you have any questions please contact the IRB Coordinator at (401) 863-3050 or via email at rpo@brown.edu

**IACUC Training:** The ORI offers a course to guide Brown University faculty, students and staff through the process of working with the IACUC to conduct research with animals. Topics covered include an overview of the laws, regulations, and policies that govern the IACUC as well as an overview of the Brown University IACUC. You can register for courses on Workday Learning.

To Access the CITI Training please click on the following link: CITI Training

COEUS

Coeus is a research administration and grant management system developed by Massachusetts Institute of Technology's Office of Sponsored Programs and implemented by the University in April 2006. The system centralizes stored information about proposals, protocols, awards, and subawards and is the system of record for all research activities for the University. In addition, it contains interfaces for proposal-development and IACUC protocol submissions that are electronically routed and approved within Coeus.

**Coeus has two interfaces:**

- **Coeus Premium** - Full featured application which allows users to prepare and view proposal funding applications and then route the completed applications for internal approval. In addition, it has full functionality to complete special requirements of a proposal and submit the proposal to Grants.gov.
- **Coeus Lite** - Web-based version of Coeus which allows users to prepare and view proposal funding applications and then route the completed applications for internal approval.

In order to access Coeus you must complete the Coeus Request for Access form - (C06) found on the IT Service Center Page.
Finding Funding

There are a variety of federal, state, private, and internal sources of support for research. In addition, an excellent way to identify potential sponsors is to network with faculty, industry representatives, and government agency personnel.

**SPIN**

**SPIN**: Brown University has access to InfoEd’s SPIN search engine. The SPIN database allows users to search for funding program announcements via three types of searches: Basic, Keyword, or Advanced.

**Grant Finding at Brown**

The Library at Brown University offers a workshop entitled, “Grant Finding @ Brown and Beyond.” This training session provides participants with an overview of the most comprehensive grant finding tools available to the Brown University community. Participants will cover the basics of how to search the grant databases and navigate the results. This workshop is intended for researchers in all fields and at all career levels including those staff members who support them in finding funding opportunities. To see when the workshop is offered you can visit the Library Calendar.

**NIH Matchmaker**

**Matchmaker** is a new NIH query interface in the Research Portfolio Online Reporting Tools (RePORT). The interface allows you to enter abstracts, research bios, or other scientific text (up to 15,000 characters in length), and retrieve a list of similar projects from the RePORTER database on analysis of key terms and concepts. You are presented with a list of the top 100 most similar NIH funded projects ranked by match score. Exploring NIH’s research portfolio can help you identify the best ICs to reach out to as you put together an application and where your application is likely to be reviewed. It can also help you identify collaborators, potential labs to move into if you’re a trainee, and more.
Internal Funding Opportunities

**OVPR Internal Funding Opportunities**
The Vice President for Research is pleased to offer a number of research funding opportunities for Brown Faculty. Research Seed Funds and Salomon Awards are competitive grants distributed directly to faculty researchers and administered by the Office of the Vice President for Research (OVPR). OVPR distributes the Humanities Research Funds to department chairs, who then make allocations to individual faculty within their departments.

- For questions on the internal funding opportunities listed here, please contact Margaret Manning, Research Development & Support Services Program Manager, at (401) 863-5145.

**Limited Submission Funding Opportunities**
Many funding agencies and foundations have established limited submission policies and will only review a limited number of applications from each institution. Applications or nominations submitted without proper institutional endorsement, or submission of a number over the limit, may result in automatic rejection of all Brown proposals. The Vice President for Research, in coordination with the Dean of Medicine and Biological Sciences and the Dean of the Faculty, has established processes to facilitate the selection and submission of applications for programs with limited submission policies.

**Grant Resubmission Awards:** provides support for investigators to improve an already highly-rated proposal for re-submission. The awards will be for up to $15,000. Applications accepted on a rolling basis.

---

**Additional Resources**

**Federal Resources:** *(Please note this list is not an exhaustive list and includes some of the most common resources)*

- Centers for Disease Control and Prevention (CDC)
- Department of Health & Human Services
- EPA
- Fogarty International Center - Programs & Initiatives
- Grants.gov
- HRSA - Health Resources and Services Administration
- National Oceanic & Atmospheric Agency (NOAA)
- NIH Funding Opportunities
- NIH RePORTER
- NSF Funding Opportunities and Awards
- U.S. Department of Agriculture
State Resources:
- Rhode Island Science & Technology Advisory Council (STAC)

Fellowships:
- AACR Research Fellowships
- NIH-Research Training Opportunities
- NSF Graduate Research Fellowship Program (GRFP)

Private Foundation Resources:
- American Cancer Society
- American Diabetes Association
- American Heart Association
- American Lung Association
- Burroughs Wellcome Fund
- Cancer Research Fund (Damon Runyon-Walter Winchell Foundation)
- Cancer Research Institute
- March of Dimes
- National Board of Medical Examiners
- National Kidney Foundation
- Rhode Island Foundation
- Robert Wood Johnson Foundation Funding Opportunities
- Whitaker Foundation
- Whitaker International Program

Other Resources:
- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- Additional External Funding Opportunities
- Brown University Corporate and Foundation Relations

**Gifts**

If the funding of your research is a gift, Corporate and Foundation Relations must be notified. Confirmation that support is a gift, as opposed to a grant should be established. An award to Brown University, for a restricted current purpose received in response to a proposal, which normally has a specific work objective, and includes any of the following features, will be considered a grant/contract for purposes of financial accounting and reporting:

- Requires that a detailed budget be followed, with deviation to be approved by the sponsor
- An award document that requires financial and/or programmatic reports
- Sponsor defines a period of performance during which funds must be expended and unspent funds must be returned to the sponsor at the conclusion of the project
- Includes sponsor imposed restrictions with respect to published rules or regulations (e.g., patents, copyrights, or rights in data)

Other awards to Brown University will be considered gifts for the purpose of financial accounting and reporting. The Office of Sponsored Projects is responsible for administrative, control and reporting of grants and contracts. The Development Office is likewise responsible for gifts.
Office of Foundation Relations:
110 Elm Street
Alison Buckser, Associate Director, foundation Relations
Alison_Buckser@brown.edu
Phone: (401) 863-7527
Link to Website: http://ofr.brown.edu/index.html

Obtaining a User ID for FastLane or eRA Commons

FastLane is the National Science Foundation's (NSF) online website NSF uses to conduct extramural research business with researchers and potential researchers, reviewers, and research administrators and their organizations.

To obtain an NSF ID for FastLane, please use the following form: Request NSF ID for FastLane

eRA Commons: NIH has developed a system to facilitate the discrete exchange of essential information between NIH and applicant organizations. The “Commons” is a Web interface where NIH and the grantee community are able to conduct their extramural research administration business electronically.

- To obtain a User ID for eRA Commons, please click the link below and complete and submit the form. OSP will contact you as soon as you are set up in eRA Commons. Questions on the form should be directed to OSP - (401) 863-2777. Brown University’s eRA Commons User ID Request Form

*Note* - Effective October 2014 - NIH requires an eRA Commons ID for all individuals in graduate and undergraduate student roles who participate in NIH-funded projects for at least one person month or more.
Proposal Development and Submission

The Principle Investigator (PI) should:

- The PI should work with his/her respective department’s administrative staff in developing his/her proposal with sufficient time for necessary review and approval from department, school, OSP, and other relevant offices.
- Meet Brown University, sponsor, and other project-related due dates. Brown University has a 5-Business Day Rule in submitting proposals. Proposals are due to BMRA 5 business days before the sponsor due date. Below is a chart showing the 5-business day rule.
- Determine that the level of effort required to complete the project can be met relative to the PI’s existing effort commitments.
- Receive Departmental and/or other appropriate approval for all cost sharing (mandatory and voluntary) at the time of proposal preparation.
- Recognize that your signature on a submitted proposal demonstrates that you have a responsibility to the sponsoring agency.
- Recognize that you share responsibility with the department’s administrative manager and staff for the ongoing administrative management of sponsored projects.
- Before submitting your proposal for approval, Use the COEUS Proposal Development Checklist to make sure you have included all the necessary components of the proposal.

Below are several charts and flow charts on the Brown University 5-Business Day Rule and Proposal Development.
### 5-Day Rule for Proposal Submissions

<table>
<thead>
<tr>
<th>Day 1</th>
<th>Day 2</th>
<th>Day 3</th>
<th>Day 4</th>
<th>Day 5</th>
<th>Sponsor Deadline</th>
</tr>
</thead>
</table>

**OSP/BMRA Review - Comments and Corrections Addressed by PI/Department**
- The submitted proposal must include all required elements specified in the sponsor’s application guidelines.
- Technical/Science sections submitted in draft format should be labeled in the document file title by section name and followed by “DRAFT” or “FINAL”.
- If, on Day 1 a submitted proposal does not include all required elements specified in the sponsor’s application the PI will be directed to the appropriate senior officer to request a waiver of the 5 Day Rule.

**Revised Technical/Science Sections Uploaded to Coeus**
- PIs will have until Day 3 of the 5 day period prior to the Sponsor’s due date to replace a draft version of technical/science document with the corresponding final version in the Coeus proposal record. It is expected that the final science documents will differ only slightly (e.g., minor editing, figure captions, update to data tables, typo corrections) from the original version. OSP/BMRA will not review or provide feedback on ‘final’ technical sections.
- Changes made to the scientific components **must not** affect any of the following elements:
  - Budget changes
  - Involvement of non-Brown employees; subcontractors; consultants and collaborators; foreign nationals or Federal employees; Export control concerns (ITARs/EARS);
  - Intellectual property, proprietary, privileged or potentially patentable information, conflicts of interest;
  - Involvement of human research participants, laboratory animal subjects and the environment, proposed clinical trials, or use of human embryonic stem cells;
  - Use of recombinant DNA, potentially infectious agents, hazardous waste, select agents, radiation producing or radioactive materials, biohazards;
  - Use of University facilities and equipment, additional space, alterations/construction, specialized or fabrication of equipment.

**Proposal Submitted by OSP/BMRA to Sponsor**
- On the morning of Day 4 (8:30 am AY/8:00 am Summer) OSP/BMRA is authorized to submit the proposal without further review.
- The final version of a proposal will be submitted by OSP/BMRA in advance of a Sponsor’s due date whenever possible to ensure it is successfully received by the sponsor.
Amendments to the 5-Day Rule

- For deadlines that fall on a Monday, complete proposals may be delivered to OSP/BMRA up until 9:00 AM of the Monday prior to the deadline date. (Oct 1, 2009)
- Pre-proposals requiring University signature, OSP/BMRA submission and a COEUS record are due 3 (three) business days prior to the sponsor’s due date (e.g., NSF Biological Sciences Directorate). (January 5, 2012)
- For White Papers, Letters of Intent and basic Pre-proposals for which no Institutional signature is required by the sponsor’s instructions, the 5 day rule is waived. (January 5, 2012)

Beginning in August 2011, for University Holidays that fall on a Monday, proposals ordinarily due to OSP/BMRA the Friday preceding the long weekend will now be due on the Tuesday after the Holiday by noontime (12pm).

The Holidays include:
- Victory Day Second Monday in August
- Labor Day First Monday in September
- Fall Weekend (observed) Second Monday in October
- Martin Luther King, Jr. Day (obs.) Third Monday in January
- Memorial Day Last Monday in May

January 2012 Pre-Proposal Submission Guidance
Amendments to the Five Day Rule

Three (3) day rule applies (i.e. Pre-Proposal due to OSP/BMRA 3 full business days in advance of sponsor’s receipt date):

Pre-Proposal NSF Biological Sciences Directorate
- Division of Environmental Biology (DEB) and Division of Integrative Organismal
- Systems (IOS) beginning January 2012 and annually thereafter
- Follows Solicitation instructions (currently NSF11-572 or NSF 11-573)
- Limit of 2 Preliminary Proposals per PI per year/including CoPI and Subaward PI
- No budget required
- **OSP/BMRA Signature required, COEUS record required**
- FastLane submission by OSP/BMRA

Pre-Proposal – other programs/sponsors
- 1-2 page narrative with minimal other components (e.g., Biosketch, COI List)
- Total cost estimate, no budget detail
- OSP/BMRA signature is required per Sponsor instructions, COEUS record required
- **OSP/BMRA submits to sponsor**

White paper
- No OSP/BMRA review, PI submits directly to sponsor

Letter of Intent to apply (no specific deadline)
- 1 -2 page narrative
- Total cost estimate only, no detailed budget
- **OSP/BMRA approval is optional (per Sponsor instructions)**
- No COEUS record, PI submits if University approval is not necessary

Pre-Proposal
- 1-2 page narrative with minimal other components (e.g., Biosketch, COI List)
- Total cost estimate, no detailed budget
- **OSP/BMRA approval is not required (per Sponsor instructions)**
- No COEUS record, PI submits directly to sponsor

Five (5) Day Rule is waived for the following categories:
Proposals are due in BMRA FIVE (5) Full Business Days before the Sponsor’s Deadline

NOTIFY BMRA
Send Program/Funding Announcement link to BMRA System Support Specialist: Rebecca_Martish@brown.edu

Upload Proposal Components
Narrative, Biosketches, Required university approvals, Signed IDNA and COI forms

Due Date
Proposals are due in BMRA FIVE (5) Full Business Days before the Sponsor’s Deadline
*Final Science due by Day 3 of 5 Day Rule

CREATE COEUS Shell
Work with Department Administrator (DA) to create proposal shell in COEUS

If Proposal includes Subawards (SUB)
Refer to PRIME Flowchart. If a SUB on a PRIME refer to SUB Flowchart

SUBMIT to Agency
Once routed in COEUS reviewed and approved by BMRA the Proposal is deemed complete and ready for submission

DEVELOP Budget
Contact Proposal Coordinator (PC) with information to develop budget* spreadsheet
*see Appendix A

REVIEW Budget
PC emails budget for review. Return with revisions/changes

CREATE COEUS Shell

DEVELOP Budget

ReVIEW Budget

Electronic Submission (Grants.Gov, ERA Commons, Fastlane)
BMRA official submits proposal electronically

Not Done Yet
Until electronic application is accepted by Agency, the PI or DA needs to be available for possible corrections

Errors or Warnings
PI notified if submission results in errors and when the submission is received by the funding agency

Grants.gov
Review Grants.gov FLOWCHART for NIH and NSF submissions

Paper Submission
PI or DA contacted for pick-up of original copy so it can be mailed to sponsor agency Or PDF returned for uploading to Sponsor submission system

DEVELOP Budget

Electronic Submission

Grants.gov

Errors or Warnings

Final Science due by Day 3 of 5 Day Rule
Appendix A:

Information needed to develop a budget spreadsheet:

1. Start date and duration of your research project
2. Names and percent effort (see attached conversion chart) of personnel who will work on the project. Please note that the principal investigator MUST have paid effort unless approved for cost sharing by Senior Officer. Approval for cost sharing should be requested in writing (email is fine). Once a final decision is reached, notice should be forwarded to proposal coordinator for inclusion in proposal file.
3. If anyone is “to be named” or “to be hired” specify the starting salary. See HR salary ranges.
4. Graduate student costs will include stipend, tuition, fees and health insurance. See graduate student salary and fee projection table.
5. Will your budget be modular (even increments of $25,000) or non-modular? For NIH submissions, budgets up to $250,000/year in direct costs are submitted in the modular format and budgets exceeding that amount must be submitted in the detailed (non-modular) format. If the budget is modular, how many modules are you requesting per year (this can differ from year to year)?
6. How much do you want to budget for equipment each year? Equipment is defined as durable research necessities with a useful life of > a year and costing $5000 or more per unit.
7. How much do you want to budget for travel each year? How much of your travel budget will be for local travel (estimate mileage), domestic travel and how much for foreign travel?
8. Will you employ any consultants and if so, how much will you pay them each year? If so, we need daily rates and estimated number of days.
9. How much will you budget for supplies each year?
10. Do you have other miscellaneous expenses (for example, animal care, publication costs, and facility use charges)?
11. Are you planning to employ one or more subcontractors to contribute to your research efforts? If so, what are the direct and indirect costs for each subcontractor for each project year?
Are you the PRIME Proposal with Subaward(s)?

**PRIME Flowchart:**

- **SUB Package to Brown**
  - Should be received a week prior to Brown Internal Deadline.
  - Includes: LOI, Budget, Biosketches, Budget Justification, Resources, Scope of Work

- **LOI**
  - Letter of Intent (LOI) signed by Authorized Organizational Representative (AOR) of the Subawardee, NOT the PI only

- **LOI Components**
  - Dates: of prime project
  - Project Title
  - Name of Sub PI
  - Costs: Initial Year & Project Period: direct, indirect & total
  - Consortium wording for specific PRIME agency

- **Budget & Justification**
  - R&R Budget and justification

- **Other Components**
  - Resource page
  - Biosketch

- **Scope of Work**
  - Brief description of research activity to be performed by subawardee, and/or deliverables

Are you the Subaward on a Proposal?

**SUB Flowchart:**

- **SUB Package to Prime**
  - LOI, Budget, Biosketches, Budget Justification, Resources, Scope of Work from Brown

- **LOI**
  - Letter of Intent (LOI) signed by Brown AOR, NOT the PI only

- **LOI Components**
  - Dates: of prime project
  - Project Title
  - Name of Sub PI
  - Costs: Initial Year & Project Period: direct, indirect & total
  - Consortium wording for specific PRIME agency

- **Budget & Justification**
  - R&R Budget and justification

- **Other Components**
  - Resource page
  - Biosketch

- **Scope of Work**
  - Brief description of research activity to be performed by Brown Investigators, and/or deliverables
**Grants.gov Submissions**

**NIH Flowchart:**

1. **Due to BMRA**
   - Proposals are due in BMRA FIVE (5) full Business Days before the Sponsor Deadline

2. **Electronic Submission**
   - Electronic Applications are submitted when everything is complete and correct.
   - Example of grants.gov SF424 Application: [Form Sets](#)

3. **Notification from NIH**
   - For an NIH Grants.gov submission the PI will receive an e-mail notification that the proposal has been received by NIH and notice of any Errors or Warnings

4. **Assigned for Review**
   - After that, if you do nothing, your proposal will be assigned for review

5. **View Application**
   - You can view your submitted application in sponsor’s system (eRA Commons) after it has been accepted by NIH. If the application cannot be viewed, NIH cannot review it!
   - If something is amiss in the application image, a changed/corrected application can be submitted via grants.gov as long as its prior to the sponsor deadline. If changed/corrected application is submitted after the deadline, your application will be late!
   - If the application is acceptable no further action is needed.
     - The application will automatically move forward to division, receipt, and referral after two (2) business days. If changes are needed they must be COMPLETED BY SUBMISSION DEADLINE.

6. **Availability of PI/Department Manager**
   - The PI or Department Manager should be available to correct errors until the submission is validated and accepted by funding agency.

7. **Errors and Warnings**
   - The PI will be notified if there are warnings or errors.
   - Warnings advise you to double check that the application complies with application instructions. Warnings will not prevent submission from completing the electronic submission process but should be corrected if necessary. If corrections needed then do so with a submission of change/corrected application. Changes must be completed prior to Sponsor Deadline.
   - Errors MUST be addressed with submission of change/corrected application prior to the Sponsor Deadline.
   - PI is notified when the submission is forwarded to the funding agency.
NSF Flowchart:

Due to BMRA
Proposals are due in BMRA FIVE (5) full Business Days before the Sponsor Deadline

Electronic Submission
Electronic Applications are submitted when everything is complete and correct. Example of grants.gov SF424 Application: Form Sets

Assigned for Review
After that, if you do nothing, your proposal will be assigned for review

Notification from NSF
For an NSF Grants.gov submission the PI will receive an e-mail notification that the proposal has been received by NSF and notice of any Errors or Warnings

View Application
You can view your submitted application in sponsor’s system (FastLane) after it has been accepted by FastLane. If changes are needed they must be COMPLETED BY SUBMISSION DEADLINE

Errors and Warnings
The PI will be notified if there are warnings or errors. If PI receives a warning message the application will need to be corrected through a file update in FastLane. Corrections to Budget must be made via revised proposal budget in Fastlane.

If there are errors the application cannot be inserted into the FastLane system. If application is not inserted in Fastlane due to errors a new application must be created and submitted via COEUS.

PI is notified when the submission is forwarded to the funding agency.

*See Attached Appendix B. For File Update

Availability of PI/Department Manager
The PI or Department Manager should be available to correct errors until the submission funding agency validations
Appendix B: NSF File Update

How to track and correct an application that’s been accepted in Fastlane

For NSF applications submitted through Grants.gov the applicant should use:

- Research.gov to check the status of an application after it has been received and validated by NSF.
- Fastlane to add or correct information in the application after submission via Grants.gov and a notification is received from NSF that the application has been inserted into Fastlane. Note NSF does not use changed/corrected application type. Applicants that wish to change or correct a previously submitted application should use the Proposal File Update Module in Fastlane.

The Fastlane Proposal File Update Module allows the organization to request the replacement of files or revision of other Proposal Attributes, associated with a previously submitted proposal. (Note: The Fastlane Proposal File Update Module must not be used for submission of revised budgets. All budgetary revisions must be submitted through use of the Fastlane Revised Proposal Budget Module).

A request for a file update automatically will be accepted if submitted prior to:

- The deadline date specified in a program solicitation;
- Initiation of external peer review in the cases when a target date is utilized; and
- Initiation of external peer review in the case of an unsolicited application.

A request for a file update after the timeframes specified above will require acceptance by the cognizant NSF Program Officer. Such requests shall be submitted only to correct a technical problem with the application (e.g., formatting or print problems). Changes in the content of the application should not be requested after the timeframes specified above.

How to track and correct an application when not accepted in Fastlane

For NSF applications submitted through Grants.gov the applicant should use:

- Research.gov to check the status of an application after it has been received and validated by NSF.
- IF the application is not inserted into Fastlane due to errors, an updated application must be created in COEUS and resubmitted via grants.gov.

The revised application must be submitted prior to Sponsor Deadline.
The budget serves to identify the cost of the project to the sponsor. The budget also serves as a further measure of the Principal Investigator's capabilities since there must be a reasonable correlation between the project as described and the Principal Investigator's assessment of the various cost elements. Sponsors usually require a budget and a budget justification.

Budget justification: A budget justification is a narrative explanation of each of the components of the budget, which “justifies” the cost in terms of the proposed work. The explanations should focus on how each budget item is required to achieve the aims of the project and how the estimated costs in the budget were calculated. To read more about budget justification please click on the following link Budget Justification Best Practices. See the tip sheet for developing proposals budgets below.

The budget will always contain a listing of the Direct Costs and the Facilities and Administrative ("Indirect") Costs. See the section on Direct Charging below.
Read through the Funding Opportunity Announcement (FOA)

- Is there a cap on faculty salary? [link]
- Are facilities and administrative costs allowed or capped?

Identify Any Sponsor Budget Restrictions

- Uniform Guidance – establishes cost principles to be used in determining allowable costs
- Cost Accounting Standards – establish methods for measuring, assigning and allocating costs and describe how to handle certain costs as either direct or indirect in a consistent manner.
- Purchasing Rules – For example Equipment is defined as nonexpendable, tangible personnel property having an anticipated service life of one year or more and a unit acquisition cost of $5,000 or more.

Know Brown’s Compliance Requirements

- Brown Fringe benefit rates: [link]
- Facilities and Administrative Costs (aka. indirect or overhead rate) which is applied to Modified Total Direct Costs: [link]
- Sponsored agreements will not be subject to more than one facilities and administrative cost rate. If more than 50% of a project is performed off-campus, the off-campus rate will apply to the entire project.
- Don’t forget to include Tuition and fees for Graduate Students.

Fringe Benefit, F&A Rates and Cost Elements to be Applied to Project Budgets

- Cost Sharing/Matching
  - Cost share only when mandated by the sponsor. Typical cost share items are: PI Salary, fringe benefits, and the related facilities and administrative cost.
  - Cost sharing in excess of the amount required should be questioned and minimized at the departmental level.
  - Cost Sharing must be approved by a senior officer. In BioMed cost-sharing is approved by the Executive Dean for Administration. [link]

Read the FOA to determine how much money is available as this will drive the scope of the project.
Direct Charging Guidelines

Federal sponsors require that direct costs of research be related to specific actions supported by a grant.

**Direct Costs are those costs that are:**
- Allowable- as specified by sponsored regulations ([Uniform Guidance Subpart E Part 200 Cost Principles](Uniform Guidance Subpart E Part 200 Cost Principles)).
- Allocable- expenses can be allocated to the sponsored project based on benefit derived, or other equitable relationship.
- Reasonable- a prudent person would have purchased this item and paid this price.
- Consistently Treated- like expenses must be treated the same in similar circumstances.

**Facilities & Administrative Costs** (F&A; formerly indirect costs) are those costs that are incurred for common or joint objectives and benefit more than one cost objective, therefore cannot be easily identifiable with specific projects.

- The University is allowed to apply F&A costs to federal grants and contracts on an average rate basis to help offset infrastructure costs.
- As required by the Uniform Guidance, the University negotiates an F&A cost rate agreement with the federal government to arrive at the F&A reimbursement rate.

This rate is applicable to all awards that do not restrict F&A costs.
- In the process of developing the F&A rate proposal, a number of institutional cost pools are applied to identify the indirect cost of conducting research.
- The cost pools include obvious “Facilities” items, such as, space, utilities, depreciation,
- The cost pools also include other “Administrative” items such as, library services, sponsored program administration, and a portion of departmental and central personnel.

For more information please read Brown University’s current [F&A Rate Agreement](F&A Rate Agreement) and [Direct Charging Guidelines](Direct Charging Guidelines).
Cost Sharing on Sponsored Projects

Cost sharing is defined as a portion of total project or program costs that is contributed to a sponsored project/program by someone other than the primary sponsor.

If a sponsored project has a cost sharing component, the following applies:

- Departmental and Senior Management approval is required for all cost-sharing (mandatory and voluntary committed) at the time of proposal preparation;
- Cost sharing cannot be provided by another federal project;
- If proposed, cost sharing is committed and must be provided;
- Unallowable costs are not eligible as cost sharing; and
- Costs benefiting another project cannot be counted to fulfill a cost sharing requirement (e.g., costs benefiting Project A cannot be included as part of the cost sharing on Project B).

The University must ensure that cost sharing requirements of sponsored agreements are proposed, approved, accounted for, and reported in a manner consistent with the requirements of the sponsor and the University. Cost sharing can be of the following types: Mandatory, Voluntary committed, Voluntary uncommitted, Matching and In-kind. Mandatory, voluntary committed cost sharing, matching and in-kind must be identified, administered and accounted for consistently throughout the University. Only voluntary uncommitted cost sharing does not need to be identified, administered and accounted for.

Brown’s objective is to maximize sponsor cost reimbursement to support the continued growth of the research enterprise. Accordingly, the University provides only the minimum amount of cost sharing necessary to meet sponsors’ requirements and discourages voluntary committed cost sharing. Some sponsors require institutional Cost Matching on their grants and contracts as a matter of statute, regulation, or policy. Individual solicitations may also indicate a Cost Matching requirement. In these cases, the University follows its long-standing practice of meeting published mandatory Cost Matching requirements for targeted programs.

Brown University does not typically Cost Share on a voluntary basis. However, a voluntary Cost Sharing commitment can be made where the competitive forces and perceived institutional benefit of receiving the award are deemed to be sufficiently strong to warrant the commitment. For both voluntary and mandatory Cost Sharing/Matching, in-kind contributions should always be considered first. An in-kind contribution represents an item of cost for which faculty support is already in place (and, therefore, no new cash outlay is required), such as salary or tuition. Cash Cost Sharing/Matching contributions should only be considered if in-kind mechanisms do not suffice to meet sponsor requirements or competitive needs. A cash contribution represents a new, incremental cost such as for equipment, travel, or additional staff necessary to conduct the sponsored project.

It is prohibited to include voluntary cost-sharing commitments in all components of both solicited and unsolicited National Science Foundation proposals [http://www.nsf.gov/pubs/policydocs/pappguide/nsf11001/gpg_2.jsp](http://www.nsf.gov/pubs/policydocs/pappguide/nsf11001/gpg_2.jsp). For other funding agencies, voluntary Cost Sharing commitments must be supported by a well justified plan that aligns with the goals of the research or education program and clearly demonstrates the value added by the voluntary cost share commitment.

For more information please read Brown University’s Cost Sharing Policy and Cost Sharing FAQs.
Institutional Facts & Reference Documents:

**Institutional Fact Sheet**  
Revised: February 2016

Please use the following information to assist you in the preparation of proposals to external sponsors.

| Applicant Organization and Address: | Brown University  
Office of Sponsored Projects  
Box 1929  
Providence, RI 02912-9002 USA |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of Application</td>
<td>Private University</td>
</tr>
<tr>
<td>Entity Identification No. (EIN)</td>
<td>05-0258809</td>
</tr>
<tr>
<td>DUNS Number</td>
<td>00-178-5542</td>
</tr>
<tr>
<td>Cage Number</td>
<td>23-242</td>
</tr>
<tr>
<td>NAICS Number</td>
<td>611310</td>
</tr>
<tr>
<td>FICE Number</td>
<td>00 3401</td>
</tr>
<tr>
<td>VETS-100 Compliance Number</td>
<td>V094030</td>
</tr>
<tr>
<td>County</td>
<td>Providence</td>
</tr>
<tr>
<td>Congressional District</td>
<td>RI-001</td>
</tr>
<tr>
<td>Human Subjects Assurance Number</td>
<td>FW#00004460</td>
</tr>
<tr>
<td>Animal Welfare Assurance Number</td>
<td>D16-00183</td>
</tr>
<tr>
<td>AAALAC Accreditation Date</td>
<td>July 6, 2017</td>
</tr>
<tr>
<td>AAALAC Accreditation Number</td>
<td>000211</td>
</tr>
<tr>
<td>Misconduct in Science Assurance Number</td>
<td>1/1/1990 Date of Initial Assurance</td>
</tr>
<tr>
<td>IPEDS Code (US Dept. of Education)</td>
<td>217156</td>
</tr>
<tr>
<td>OPE ID# (US Dept. of Education)</td>
<td>00340100</td>
</tr>
</tbody>
</table>
| Authorized Institutional Official: | Patrice A. Carroll, Director  
Office of Sponsored Projects  
Telephone: (401) 863-2777  
Fax: (401) 863-7292  
Email: resadmin@brown.edu |

**Fringe Benefit Rates for 7/1/17 - 6/30/18**

<table>
<thead>
<tr>
<th>Fringe Benefit Rates for 7/1/17 - 6/30/18</th>
</tr>
</thead>
</table>
| Full-Time Employees 31.00% (including Faculty and Administrative/weekly staff)  
Part-Time Employees 7.50% (including Faculty and Administrative/weekly) |

<table>
<thead>
<tr>
<th>Fringe Benefit Rates for 7/1/17-8 - 6/30/19</th>
</tr>
</thead>
</table>
| Full-Time Employees 30.70% (including Faculty and Administrative/weekly staff)  
Part-Time Employees 7.10% (including Faculty and Administrative/weekly) |

<table>
<thead>
<tr>
<th>Fringe Benefit Rates for 7/1/18 until amended</th>
</tr>
</thead>
</table>
| Full-Time Employees 30.70% (including Faculty and Administrative/weekly staff)  
Part-Time Employees 7.50% (including Faculty and Administrative/weekly) |

**Facilities & Administrative (F&A Costs):**

*Base*  
Modified total direct costs, consisting of all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel and up to the first $25,000 of each subaward (Regardless of the period of performance of the subawards under the award).

Modified total direct costs shall exclude equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of $25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

**ON Campus – Organized Research**

<table>
<thead>
<tr>
<th>Dates</th>
<th>F&amp;A Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/1/16 - 6/30/19</td>
<td>62.50% MTDC</td>
</tr>
<tr>
<td>7/1/19 - Until Amended</td>
<td>62.50% MTDC</td>
</tr>
</tbody>
</table>

**OFF Campus – Organized Research**

<table>
<thead>
<tr>
<th>Dates</th>
<th>F&amp;A Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/1/14 - 6/30/19</td>
<td>26.00% MTDC</td>
</tr>
<tr>
<td>7/1/19 – Until Amended</td>
<td>26.00% MTDC</td>
</tr>
</tbody>
</table>

**ON Campus - Other Sponsored Activity**

<table>
<thead>
<tr>
<th>Dates</th>
<th>F&amp;A Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/1/14 - 6/30/19</td>
<td>23.00% MTDC</td>
</tr>
<tr>
<td>Date of Negotiation Agreement:</td>
<td>2/24/2018</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Federal Agency for F&amp;A Negotiation:</td>
<td>Department of Health and Human Services</td>
</tr>
<tr>
<td>(Cognizant Federal Agency for Grants.gov Forms)</td>
<td>Division of Cost Allocation</td>
</tr>
<tr>
<td></td>
<td>Northeastern Field Office</td>
</tr>
<tr>
<td></td>
<td>Michael Stanco, HHS Representative</td>
</tr>
<tr>
<td></td>
<td>26 Federal Plaza, Room 41-122</td>
</tr>
<tr>
<td></td>
<td>New York, NY 10278 Phone (212) 264-2069</td>
</tr>
<tr>
<td>Federal Administrative Cognizance:</td>
<td>Ms. Judith Michaud</td>
</tr>
<tr>
<td></td>
<td>Contracting Officer</td>
</tr>
<tr>
<td></td>
<td>Office of Naval Research</td>
</tr>
<tr>
<td></td>
<td>495 Summer Street, Room 103</td>
</tr>
<tr>
<td></td>
<td>Boston, MA 02210-2109</td>
</tr>
<tr>
<td></td>
<td>Phone (617) 753-3868</td>
</tr>
<tr>
<td>Federal Audit Agency:</td>
<td>Daniel Levinson, Director</td>
</tr>
<tr>
<td>(Cognizant Agency for Audit Assignment)</td>
<td>U.S. Dept. of Health and Human Services</td>
</tr>
<tr>
<td></td>
<td>Office of Inspector General</td>
</tr>
<tr>
<td></td>
<td>Room 5527, Cohen Building</td>
</tr>
<tr>
<td></td>
<td>330 Independence Avenue, S.W.</td>
</tr>
<tr>
<td></td>
<td>Washington, DC 20201</td>
</tr>
<tr>
<td></td>
<td>Phone: (202) 619-0335</td>
</tr>
<tr>
<td></td>
<td>Email: <a href="mailto:paffairs@oig.hhs.gov">paffairs@oig.hhs.gov</a></td>
</tr>
<tr>
<td>Disclosure Statement (CASB Form DS-2) Effective date July 14,</td>
<td>Mr. Darryl W. Mayes, National Director</td>
</tr>
<tr>
<td>2010</td>
<td>Division of Cost Allocation-Program Support Center</td>
</tr>
<tr>
<td></td>
<td>Financial Management Service</td>
</tr>
<tr>
<td></td>
<td>Cohen Building, Room 1067</td>
</tr>
<tr>
<td></td>
<td>330 Independence Ave, S.W. Washington, DC 20201</td>
</tr>
<tr>
<td></td>
<td>Phone (202) 401-2808 Fax (202) 619-3379</td>
</tr>
<tr>
<td>Address for checks:</td>
<td>Brown University</td>
</tr>
<tr>
<td></td>
<td>Cashiers Office Business Service Center,</td>
</tr>
<tr>
<td></td>
<td>Box 1997, 69 Brown Street, 2nd Floor</td>
</tr>
<tr>
<td></td>
<td>Providence, RI 02912</td>
</tr>
</tbody>
</table>
POST-AWARD

Principal Investigators (PI) of externally sponsored activities are ultimately responsible for all aspects of the research project, including scholarly activity and proper stewardship of awards. The University is responsible for establishing effective administrative systems and processes to support the PI in award management. Brown University is responsible for overseeing compliance with the terms of sponsored agreements in collaboration with the PI and department administrator.

Award Documentation

The PI & Department Manager (DM) should review the following:

- Terms and Conditions of the Award
  - Confirm project deliverables; any restrictions on expenditures and/or project changes; return of balances or carryover authority; and possible associated program income;
  - Identify significant dates and activities, such as due dates for interim reports, final progress/technical reports, completed milestones, and competing renewals.

- Communications
  - Any correspondence between Brown University, the sponsor, and other related parties (e.g., subrecipients) that is related to the award.

- Financial Accounting Requirements
  - WD Expenditure Reports, Final Report of Expenditures

- Expenditure Documentation
  - Demonstrate that the expenditures charged are allowable, allocable, and reasonable and appropriate approvals have been obtained.

Account Management

The PI & Department Manager (DM) should:

- Review sponsored accounts Payroll Actual reports on a regular basis (e.g., monthly but no less frequently than quarterly) to ensure that all expenditures charged are correct and appropriate.
- Ensure appropriateness and accuracy of effort expended on sponsored projects
  - Inform DM of effort distribution as changes become known; and
  - Review and certify effort reports
- Always be aware of funds available to support projects
- Review and approve project changes prepared and maintained by the department. Some changes require prior approval from the sponsoring agency:
  - Changes in key personnel;
  - Significant changes in PI effort (often defined as the disengagement of the PI from a project for more than 3 months and/or a reduction of effort of 25% or more); and
  - Changes to scope of work
Effort Reporting

The Uniform Guidance requires strong internal controls for confirming payroll charges to the federal awards. Institutions are required to provide reasonable assurance that payroll charges are accurate, allowable, and properly allocated. Brown University uses after-the-fact effort certification of labor effort process as part of internal controls.

Effort reporting is the principal means for certifying that the salaries charged or contributed to sponsored projects are reasonable and consistent with the portion of total activity committed to the project.

- Effort is the portion of time spent on a given professional activity and expressed as a percentage of the total professional activity for which an individual is employed by Brown University.
- It is always expressed as a percentage NOT hours. Effort is not based on the standard 37.5 hour work week; it is based on total hours worked.
- Effort certification is required by federal regulation:
  - It ensures that government funds are being spent responsibly.
  - Documents that effort commitments have been met.
  - Provides support for salary charged to grants & contracts.
- Effort reports must include effort devoted to sponsored projects and all other activities for which the individual is compensated by the University.
- Effort reports should be completed using reasonable estimates of actual effort, not payroll distributions. Brown University uses payroll distributions to initially estimate effort. These distributions must be changed if the distribution differs from the actual effort expended.
- Effort reports must total 100% of Brown compensated effort regardless of the number of hours or the appointment status of the individual.
- Certain sponsors (including NIH, AHRQ, and SAMHSA) impose a limit or “cap” on the annual rate of salary that can be charged to an award. Specific attention must be given to these caps so as not to overcharge the award.
- Faculty certify their own effort reports.
- Principal investigator certify Graduate student effort
- Individual employees certify their own effort report

Brown University’s Effort Reporting Policy

Cost Transfers

A cost-transfer is an after-the-fact reallocation or transfer of costs, either salary or non-salary charges, to a sponsored award.

PIs and Department Managers should consider the following when executing a cost transfer:

- Costs not allocable to a project cannot be transferred to that project, even temporarily.
- Appropriate cost transfers must be made within 90 days of the month-end closing date in which the expense was incurred.
- Cost transfers must be supported by documentation that fully explains how the error occurred and a certification of the accuracy of the new charge. An explanation merely stating that the transfer was made “to correct error” or “to transfer to correct project” is not sufficient.
- Transfers of costs from one project to another or from one competitive segment to the next solely to cover cost overruns, are not allowable.

Brown University Cost Transfer Policy
Brown University Cost Transfer Explanation and Justification Form
Subrecipient Monitoring

Monitoring the performance of a subrecipient is the responsibility of the PI. Therefore, the PI and Department Manager (DM) should:

- Review and approve all subrecipient invoices to determine that the amount billed is consistent with accomplishments of the Subawardee during the billing period.
- Approve final invoices only if you are satisfied that the subawardee has completed performance and met/submitted all required deliverables.
- Notify BMRA or OSP immediately if you have concerns about possible non-compliance by the subrecipient.
- Notify BMRA or OSP immediately in writing if it is necessary to terminate the award early.

Award Closeout

At least three months prior to expiration of the award, the PI and the administrative manager should review the project’s financial status. All necessary accounting adjustments (e.g., journal entries and payroll adjustments) should be made to ensure an orderly closeout. The PI and administrative manager should focus particular attention on:

- Ensuring completeness, accuracy, and allowability of all categories of direct cost before the close of the budget period;
- Planning for updates to both payroll and procurement systems to ensure a smooth transition of financial activities to a new account number if appropriate; and
- Assuring that subrecipients have, or will, submit all required deliverables and invoices

Additionally, when a sponsored project ends (or is transferred /terminated) most projects require certain other actions to ensure an orderly closing of award:

- Final technical or progress report
- Final report of inventions
- Final inventory of equipment
- Final financial report (including any required cost sharing)
Responsible Conduct of Research

Brown’s commitment to research and to the sponsors that support the research enterprise goes beyond financial and administrative obligations. Faculty and staff must be familiar with the following policies and guidelines which support Brown’s research integrity commitment.

Intellectual Property (Patent and Copyright Policies)

- Have you identified potential intellectual property (IP) created during your research and notified Brown Technology Ventures Office?
- Have you requested that your sponsors or any party providing data specifically designate and mark data that are to be treated as confidential?
- Have you designated as confidential any information you are transferring to your sponsor or any other party?
- Have you contacted Brown Technology Ventures Office with regard to any materials you may receive from or transfer to your sponsor?

Brown University Patent and Invention Policy
Brown University Patent and Invention Agreement under External Contracts/Grants Form

Export Controls

- Has your sponsor proposed restrictions that may conflict with principles of academic freedom in the University’s research policies?
- If export controlled research or technology is involved, are you aware of the restrictions imposed on international students and staff who you may want to work on the project, based on their country of origin?
- If the project involves international research and foreign researchers in the US or abroad, are you aware of your responsibilities in regard to export control regulations?

Federal scrutiny concerning the level of compliance with export controls has become more prominent following the events of September 11th. As Brown continues to expand into the global environment, it is important that faculty and other researchers at the University’s departments, laboratories, and centers understand their obligations under these regulations.

Most research activities at Brown are excluded from export controls because they fall under Fundamental Research or Education Exclusions. However, when this is not the case, it is critically important to begin the process early.

The following situations require export control review:

- when one needs to send a tangible research item abroad
- when one needs to use tangible research equipment in their research while traveling abroad
- when one accepts controlled equipment for use on campus

It can take several months to receive a license after submitting an application or to identify and create the infrastructure needed to continue using a controlled item on campus.
For questions or further information related to export controls please contact the Office of Research Integrity at 401-863-3050

For more information please read Brown University Export Control Policy

Environmental Health and Safety

Have you received the necessary authorizations and completed the required training for:

- Institutional Biosafety Committee (IBC):
  - [http://www.brown.edu/Administration/EHS/biological/](http://www.brown.edu/Administration/EHS/biological/)
- University Radiation Safety Committee:
  - [http://www.brown.edu/Administration/EHS/radiation/](http://www.brown.edu/Administration/EHS/radiation/)
- Laboratory Safety:
  - [http://www.brown.edu/Administration/EHS/lab/](http://www.brown.edu/Administration/EHS/lab/)
- Required training, classroom, and schedule information:
  - [http://www.brown.edu/Administration/EHS/training/index.htm](http://www.brown.edu/Administration/EHS/training/index.htm)
- Hazardous Waste Training:
  - [http://www.brown.edu/Administration/EHS/environmental/](http://www.brown.edu/Administration/EHS/environmental/)

Brown University Policies on Environmental Health and Safety

Conflict of Interest

As researchers, innovators, and pioneers, Brown University faculty and investigators engage in a variety of scholarly and academic activities, some of which may take them outside the realm of the University. The experience and knowledge gained through outside consulting and service on advisory committees is valued for its synergistic return to research and student training. Real or potential financial conflicts of interest (FCOI) may arise from such collaborations. An FCOI may occur when an outside financial interest compromises or has the appearance of compromising, the professional judgment of a researcher when designing, conducting, or reporting research.

Committed to academic integrity and research objectivity, the University has established annual and ad hoc processes for the reporting and evaluation of research-related significant financial interests, and the identification and management of real or potential FCOI.

Brown University Conflict of Interest Policy
Assurance of Compliance
Conflict of Interest Reporting Form
Additional Requirements for PHS Investigators

For more information on Conflict of Interest, please contact (401) 863-3050.
**Human Subjects (IRB)**

The Institutional Review Board (IRB) reviews and approves all research and related activities involving human participants. The board weighs the risks and benefits of participation to help protect the health and best interests of research participants. All review is completed prior to the beginning of research.

[Human Research Protection Program Policy and Procedure Manual](#)

[Please click here for more information on Institutional Review Board (IRB)](#)

**Animal Subjects (IACUC)**

Brown University holds a PHS Animal Welfare Assurance, is registered as a research facility with the United States Department of Agriculture (USDA) and is fully accredited by the Association for the Assessment of Accreditation of Laboratory Animal Care, International (AAALAC).

The primary function of the IACUC is to assist faculty, students and staff in upholding Brown University's determination to assure the finest care and most humane utilization of our laboratory animals. To this end, every research, testing, and teaching project involving the use of live vertebrate animals must be reviewed and approved by the IACUC prior to initiation.

- Animal use applications and renewals need to be completed and submitted in COEUS.
- Generally allow 4 weeks for protocol review. Under unusual circumstances review time may be extended.
- For Questions Contact:
  - 401-863-3050
  - [Please click here for more information on the IACUC](#)

**Data Sharing**

An increasing number of private and publicly funded research sponsors require a data management plan (DMP) and/or sharing plan with submissions of proposals for funding. The Center for Digital Scholarship (CDS) at Brown University Library works with graduate students and faculty to write DMPs that meet the standards set by their research sponsors’ data access and sharing policies.

For More information on Data Sharing and Management you can visit the links below:

[Data Acquisition and Management](#)

[Data Management and Sharing Services](#)

For more help with writing a data management and sharing plan, please contact Andrew Creamer

[Andrew_Creamer@brown.edu](mailto:Andrew_Creamer@brown.edu).
Research Misconduct

The community of Brown University condemns any form of dishonesty or misconduct in research and accepts responsibility for developing and maintaining the highest standards of intellectual integrity. A climate of intellectual honesty mandates that all scholars have an obligation to conduct research in a manner reflecting these principles.

Please Click Here to Read Brown University’s Policy on Research Misconduct

Brown University has an anonymous and confidential compliance reporting system: Ethics and Compliance Reporting System (EARS). The University has selected EthicsPoint, Inc., a third party service provider, to provide you with simple, risk-free ways to report activities that may involve unethical or otherwise inappropriate activity or behavior in violation of Brown University’s established policies in the areas of: Accounting and Finance, Information and Technology, Research, and Risk and Safety matters. Issues relating to areas not specifically mentioned here should be reported through existing University channels.

Link to Ethics and Compliance Reporting System (EARS):
Useful Websites

BioMed Research Administration (BMRA)
- [http://www.brown.edu/academics/medical/about/research-administration/](http://www.brown.edu/academics/medical/about/research-administration/)

Brown University Office of Vice President for Research (OVPR)
- [http://www.brown.edu/research/office-vice-president-research/office-vice-president-research](http://www.brown.edu/research/office-vice-president-research/office-vice-president-research)

Brown University Office of Research Integrity

Brown University Office of Sponsored Research (OSP)
- [https://www.brown.edu/research/office-sponsored-projects](https://www.brown.edu/research/office-sponsored-projects)

Brown University Industry Engagement and Commercial Venturing (IECV)
- [https://www.brown.edu/research/conducting-research-brown/commercializing-technology](https://www.brown.edu/research/conducting-research-brown/commercializing-technology)

Brown University Internal Funding Opportunities
- [http://www.brown.edu/research/internal-funding-opportunities-0](http://www.brown.edu/research/internal-funding-opportunities-0)

Office of Corporate & Foundation Relations at Brown University
- [http://cfr.brown.edu/](http://cfr.brown.edu/)

Brown University Office of Research Development
- [https://www.brown.edu/research/conducting-research-brown/preparing-proposal/proposal-development-services](https://www.brown.edu/research/conducting-research-brown/preparing-proposal/proposal-development-services)

Brown University Site for Uniform Guidance
- [https://www.brown.edu/research/conducting-research-brown/preparing-proposal/proposal-review-submission-osp/uniform-guidance](https://www.brown.edu/research/conducting-research-brown/preparing-proposal/proposal-review-submission-osp/uniform-guidance)

Grant Finding: Library Services and Support
- [http://libguides.brown.edu/grants](http://libguides.brown.edu/grants)

National Institutes of Health (NIH)

National Science Foundation (NSF)
BioMed Administration Organizational Chart

Jack Elias, MD
Dean of Medicine and Biological Sciences

Kimberly A. Galligan
Executive Dean for Administration

Kris Cambra
Director of Biomedical Communications

Wendy McHugh
Director, Financial Planning & Analysis

Michelle O’Brien
Director, BioMed Human Resources

Laura A. Helwig, VMD
Director, Animal Care

Adam McGovern
Director, Facilities Planning & Operations

Mary Norton
Director, BioMed Research

Geoffrey Green
CIS (Contact for new BioMed Computer Service projects)

Vacant
Executive Assistant

Christine Conway
Assistant Director
BioMed Research Administration

Karen Quinn
Financial Manager
BioMed Research Administration

Craig Grein
Grant/Contract Accountant
BioMed Research Administration

Rebecca Martish
Grant & Contract System Support Specialist
BioMed Research Administration

Vacant
Proposal Coordinator
BioMed Research Administration