



Grants and Contracts
All Externally Funded Sponsored Activity
Policy, Practice and Guidelines



Grants Policy, Practice and Guidelines:

External sponsored activity for the University is a needed and necessary component of our funding strategy and strategic plan. The following contains policy and guideline information regarding grant applications and the University services available to assist in the application effort. The information contained here will apply for all externally sponsored activities, regardless of budget value, external sponsor or University requestor.

Eligibility:

Who can apply?

- All tenure and tenure track faculty
- Full time instructional staff
- Full time permanent administrative staff
- Masters and Ph.D. graduate students as Co-PI if a tenure/tenure track faculty member agrees to serve as a PI or Co PI

Pre-Award Services:

Detail scope of services to aid the application process

The purpose of the pre-award service is to identify funding opportunities for Principal Investigators and to work with Principal Investigators in developing an application for external funds. This application development will include preparing and finalizing the sponsor application materials, working with the Principal Investigator (PI) to develop and complete the budget request/justification, and circulating the application for University approval. Interested faculty are encouraged to seek out funding opportunities. Pre-award administrative services are coordinated by either Advancement or the pre-award liaisons at each College or the Law School depending on the sponsor type and the nature of the proposal being prepared. Throughout the remainder of this document, "Pre-Award Administrator" refers collectively to either Advancement or one the College/School liaisons.

The Pre-Award Administrator's role will vary depending on whether the proposal being prepared is administered through Advancement or solely through one of the Colleges or the Law School. The Pre-Award functions described below are met to be generic descriptions of what might occur during the proposal process. The various functions depicted may or may not exist for a specific proposal. At the Dean's discretion, each College and the Law School can assign any pre-award responsibilities involved between faculty members, their College/School liaison, or any other staff as deemed appropriate Dean. None of the sample pre-award functions identified represent an assignment of responsibilities to any specific individual or position. Ultimately, the faculty member serving as Principal Investigator is responsible for all aspects of any proposal being prepared and submitted for review.

During this pre-award process, the responsibility of the Principal Investigator is to:

- Develop an over-all project plan including work statement, project timelines, budget expectations, outcomes and other proposal items that may be needed by sponsors.
- The PI will work with the Pre-Award Administrator as needed and necessary during the pre award stage in order complete the application and supporting documents.
- The Pre-Award Administrator may consult with and advise the Principal Investigator on various aspects of the application including sponsor submittal requirements, budget planning, University policy and internal approval. The Pre-Award Administrator will also work with the Controller’s Office to refine the budget specific issues and to assure compliance with audit and federal spending guidelines. The function of the Pre-Award Administrator is to facilitate the development and submission of the proposal and to support an application that will be successfully funded by the sponsor.

Step 1: The Principal Investigator may meet with the Pre-Award Administrator to discuss concepts, work scope, sponsor requirements and the timeline necessary to successfully complete the application for a timely submission. The Pre-Award Administrator will advise the Principal Investigator of all sponsor and University requirements necessary to support the proposal and application.

Step 2. Principal Investigator develops draft scope of work and proposal budget and submits to the Pre-Award Administrator for review.

Step 3. The Principal Investigator should contact the Institutional Review Board to determine if an IRB review is needed or necessary. The Institutional Review Board must review and approve all research involving human subjects.

<https://www1.wne.edu/academic-affairs/institutional-review-board.cfm>

Dr. Jessica Carlson, Professor of Psychology, jcarlson@wne.edu

Step 4. The Pre-Award Administrator works with the Principal Investigator to provide input and consult on the application, sponsors requirements, budget and other proposal elements. The Pre-Award Administrator may assist in editing the proposal and application in order to produce an application that has a high probability of being successfully funded. If there are specific budgetary or financial concerns with the proposal, the Pre-Award Administrator may contact the Controller’s Office for guidance prior to formally routing the proposal for review.

Step 5. The Principal Investigator will sign off on the application/University routing approval sheet. The Pre-Award Administrator will route the application for all necessary approvals.



Necessary Components of Grant Applications:

Minimum elements needed to be included in a grant application

1. Scope of Project/Statement of Work
2. A designated “Pre-Award Contact” who will assume responsibility of the application during the proposal and submission stages of the project. The Pre-Award Contact may be a representative from Advancement or one of the College or School Liaisons. The faculty member serving as Principal Investigator should not serve as the Pre-Award Contact.
3. If needed, a review by the IRB or demonstration that application has been made to the Board.
4. Budget summary by cost categories with appropriate justification.
5. An annual budget is needed for each budget period (for multi-year projects) with a consolidated budget for the total project period.
6. For those applications where cost sharing is required (either via a lump sum or a matching formula), the funding source for the cost sharing must be identified. Cost sharing expenses should be segregated by either in-kind or cash based resources.
7. Approval for release time. Any faculty release time will require approval from the Department Chair and Dean. Staff release time will need approval from the Department Chair and Dean or the Department Manager and Vice President as appropriate.
8. Faculty investigators applying for grants and submitting proposals must maintain compliance with the University’s Financial Conflict of Interest (FCOI) policy. This includes completing the required FCOI training and submitting the FCOI disclosure reporting form when a significant financial interest exists. The FCOI policy is available at <https://www1.wne.edu/academic-affairs/policies.cfm>. The FCOI certification questions that appear on the cover page of the Grand Budget Template and Routing Form must be completed for every proposal being submitted for University review.
9. Completed version of current Grant Budget Template and Routing Form (available at <https://www1.wne.edu/controller/financial-management.cfm> under “Grants”. Prior versions of the form will not be accepted for review. Do not make changes or edits to the formulas or layout of the grant budget template without consulting the Controller’s Office.
10. For all proposals, internal review and signature approvals must be received sequentially from the following individuals or offices prior to submission to the sponsor:
 - a. Faculty member serving as Principal Investigator
 - b. Chair of Faculty member’s department
 - c. Dean of Faculty member’s College or School
 - d. Advancement (*only if the proposal is related to a private sponsor as defined by Advancement*)
 - e. Controller’s Office (Senior Financial Analyst)
 - f. Vice President for Finance and Administration
 - g. Provost

Note: the University is currently using an electronic review and approval process via email due to COVID-19 issues as outlined in Appendix A of this document and as posted on the Controller’s Office website.



All grant proposals and applications will require an indirect cost rate unless the non-federal sponsor has a documented policy that they do not provide funds for indirect costs. For Federal (or Federal Pass-Through) proposals, the approved federally negotiated rate (the standard rate) must be used. For non-federal sponsors, the application should include the federally negotiated rate. Acceptance of non-standard rates (including not allowing any indirect costs) is at the discretion of the Vice President of Finance and Administration (VPFA). Typically the VPFA will accept a lower indirect from a non-federal sponsor when the rate has been established through published policy as evidenced by its appearance on the sponsor's website, official program announcement or company letterhead. If a non-federal sponsor allows indirect cost and the principal investigator is seeking to waive any indirect costs from their proposal budget, all such requests must be approved in advance by the VPFA.

Authorized Signatures:

A grant or contract represents an obligation on the part of the University. The only individual authorized to approve and allow the submittal of a grant or contract is the Vice President of Finance and Administration. At his/her discretion, the VPFA may delegate submission authorization to the Provost and Vice President of Academic Affairs.

Post Award Services:

The Controller's Office will be solely responsible for implementing and provided post award grant administrative services.

Post award grant administrative services include accounting, fiscal reporting, sponsor invoicing, compliance monitoring, as well as any other administrative responsibilities required by the sponsor, external regulations or University policy.

Each grant award will be assigned a project number and a set of general ledger account numbers to track the individual revenue and expense activity associated with the grant. The Controller's Office will assign the necessary numbers when the grant is awarded and those numbers will remain active during the life of the grant. The Controller's Office will complete any financial reports required by the sponsor and initiate reimbursement requests depending on the type of award and the sponsor involved.

During the post award period, the Principal Investigator will initiate and approve all expenditures to be charged to the grant or contract. It is the Principal Investigator's responsibility to approve all grant expenditures to ensure that all funds are used appropriately and that they directly support the project or activity that was awarded. The Principal Investigator will ensure that all expenditures are consistent with any special terms, conditions, or limitations that apply to a particular grant or sponsor. The Principal Investigator should never authorize any expenditure that would exceed the total funds awarded for a given period under any grant or contract. The Principal Investigator is responsible for signing-off on each expenditure charged to a grant or contract. All approved non-compensation grant expenditures must be forwarded to Procurement Services for processing. The Controller's Office is



available to advise or consult with Principal Investigator's during the award if specific questions arise on the allowability of costs per sponsor policy, external regulations or University policy.

In some cases, the grant or contract may specify expenditure limits per budget category or line item and the Principal Investigator will assume accountability for adhering to those limits.

In many instances, the sponsor will permit re-budgeting of awarded funds across budget categories. Re-budgeting may be at the Principal Investigator's discretion or require prior approval of the sponsor. Principal Investigators should contact the Controller's Office if they have questions on re-budgeting policies in effect for their award.

Timelines:

Essential timelines necessary to complete the review and application submission

In order for the University to fully review and understand the application, including any matching or cost sharing commitments or other University obligations, it is essential that sufficient time be allotted to complete the internal review and approval process prior to any submission to the sponsor.

It is recommended that the formal internal review process be initiated at least **10 working days** prior to the sponsor's official submission and application deadline. This will allow sufficient lead time for all internal reviewers to complete their review and for any required changes to be incorporated into the proposal prior to formal submission to the sponsor. Proposals routed for review with less than the 10 working day lead time will not be guaranteed for completion prior to the sponsor's submission deadline. Any proposal that has not been completely reviewed and approved internally can't be submitted to the sponsor without specific approval from the Vice President of Finance and Administration or the Provost. Consequences for submitting a formal proposal to a sponsor prior to receiving full internal approvals will be determined by a combination of the Vice President for Finance and Administration and the Provost.

The grant proposal and application must be completed and ready for submission at least 24 hours before the official submission deadline. A completed proposal and application indicates the internal review and approval process has been completed and that all the required reviewers have signed off on the proposal. Once full internal approval is obtained, the Principal Investigator or Pre-Award Administrator is responsible for formal submission to the sponsor depending on specific sponsor policy and their application process.



Essential Budget Elements:

When developing a grant budget, Principal Investigator's should work with the Pre-Award Administrator to draft the proposal budget. The Pre-Award Administrator may consult with the Controller's Office to ensure the proposal reflects appropriate costs according to sponsor policy, external regulations and University policy. The University will adhere to the cost principles outlined in Federal Uniform Guidance regulations that require costs to be reasonable, allocable, consistently treated, and allowable.

Faculty Salary: Salary costs must be defined and justified. Any faculty salary must be calculated using the faculty member's full-time academic base pay rate.

Faculty salary can be budgeted in several forms;

- Faculty summer salary must be budgeted based on grant effort and work performed during the summer months when the University is not formally in session. Summer salary is paid as additional compensation and must be based on the faculty member's academic base pay rate in relation to the amount of work performed during the summer.
- Current University policy allows faculty members with 9-month academic year appointments to receive up to 2 months of summer salary (2/9th) funding from grants based on their academic base pay. The 2-month limitation is consistent with NSF policy on faculty summer salary. The University's 2-month summer salary limitation applies to all grants and contracts, regardless of sponsor type (federal, state, private, etc.). Waivers to the 2-month summer salary limitation should be requested through the Provost and will only be considering if no federal grant funding is involved.
- The 2-month summer salary limitation is applied on a cumulative basis to all external funding sources providing faculty summer salary (i.e. the limitation is not applied per individual grant or contract).
- Faculty salary for work performed during the academic year will be charged to the grant via a re-allocation of academic base pay from the faculty member's departmental operating budget to the grant budget. Cost savings generated by the grant funding of academic base salaries must be used to fund adjunct replacement costs if necessary. Use of any remaining savings are to be determined by the Vice President for Finance and Administration and/or his/her designee.
- Faculty members with 12-month academic appointments are not eligible for faculty summer salary in the form of additional compensation. Any 12-month faculty effort on a grant represents academic year effort and a re-allocation of academic base pay from the faculty member's departmental operating budget to the grant budget as noted above.
- **Note:** Faculty members are not entitled to receive additional compensation payments for grant work performed during the academic year. Academic year grant work represents a re-allocation of existing academic base pay.
- All non-exempt staff and student positions included in the grant budget must comply with all Massachusetts and Federal minimum wage laws.



Fringe benefit costs must be calculated and charged using the prevailing fringe benefit rates based on employee type (faculty, staff, student), position type (full-time, part-time, temporary) and work performance period (academic year, summer).

The current University fringe benefit rates are as follows and are incorporated into the current version of the Grant Budget Template available from the Controller’s Office website:

Salary/Position Type	Fringe %
Full-Time Academic Year Faculty Salaries	38.00%
Full-Time Summer Faculty Salaries	8.00%
Adjunct or Part-Time Faculty Salaries	8.00%
Full-Time Staff Salaries	38.00%
Part-Time or Temporary Staff Salaries	8.00%
Academic Year Student Salaries	0.00%
Summer Student Salaries	8.00%

All non-personnel costs must be defined and justified.

Cost sharing expenses must be quantified and the source of funding identified for each cash based cost commitment. Cost sharing must be segregated between cash based costs and in-kind costs (faculty release time, waived indirect, lab or equipment use, etc.).

Only mandatory cost sharing amounts should be disclosed in the proposal budget. Mandatory cost sharing represents project costs that are funded by University resources (vs. the sponsor) and are required as a condition of the award based on overall sponsor policy or individual award terms and conditions. Voluntary cost sharing commitments should not be disclosed in the proposal budget.

Indirect costs should be included according to the University’s current federally negotiated indirect cost rate. The University federal rate must be used for all federally funded awards (either federal direct or pass-through awards). Indirect rates for non-federal sponsors should reflect specific sponsor policy or specific award provisions.

Indirect Costs, Facilities and Administrative (F&A), Overhead: Indirect, F&A or overhead are all interchangeable terms describing the same type of cost. These funds provide reimbursement to the University for costs that are related to the project but are not separately identifiable. Indirect costs represent those common University shared costs that can’t be separately allocated or attributed to a specific grant or project. Examples of items of indirect cost include (but may not be limited to) utilities, facility costs, administrative costs and general sponsored program administration costs.

Subcontracts or Subawards are agreements to participate in a grant application and award as either a Pass Through Entity (PTE) or a Subrecipient.



When the ***University is the Pass Through Entity***, the proposal and application should have detailed budget information for the deliverables and funding that will be included in the subaward to the subrecipient participating institution. The final subaward does not have to be included in the application, but the subrecipient budget and deliverables must be defined. Formal subaward agreements are drafted and issued by the Office of General Counsel. If available, a letter of support from the subrecipient institution, agreeing to participate as a subaward, should be included in the application materials. When serving as the PTE, the University and Principal Investigator assume specific compliance and risk monitoring responsibilities of the subrecipient institution.

When the ***University is the subrecipient***, the budget and deliverables must be defined and routed for approval in the same manner as a standard grant application. The sponsor listed in the proposal document should be the Pass Through Entity (i.e. another University) providing funds directly to Western New England University (i.e. not the federal agency where the award originated). If the funding originating from the Pass Through Entity are federally sourced, that must be identified and disclosed in the proposal. A subrecipient relationship requires a formal and fully executed subaward between the Pass Through Entity and the subrecipient.

Allocation of grant sourced indirect cost revenues:

Indirect cost revenues were historically allocated as follows and this allocation formula was in effect for any grant providing indirect costs through March 31, 2020:

- 80% of indirect cost revenues are retained centrally by University Administration to help cover items of indirect costs (utilities, facility costs, grants administration, etc.).
- 20% of indirect cost revenues are allocated to the College or School affiliated with the faculty member serving as Principal Investigator of the grant that included indirect costs. Control over the 20% share of funds allocated to the College or School reside with each Dean.

Effective April 1, 2020, any grant providing indirect costs will have the resulting revenues subject to the following allocation formula:

- 34% of indirect cost revenues will be retained centrally by University Administration to help cover items of indirect costs (utilities, facility costs, grants administration, etc.).
- 33% of indirect cost revenues will be allocated to the College or School affiliated with the faculty member serving as Principal Investigator of the grant that included indirect costs. Control over this 33% share of funds allocated to the College or School will reside with each Dean.
- 33% of indirect cost revenues will be allocated to the individual faculty member as Principal Investigator of the grant that included indirect costs. Control over this 33% share of funds will reside with the individual faculty member.



Please refer to the email below dated January 16, 2020 from Vice President Wagner outlining the current indirect cost revenue (overhead) distribution policy.



Thu 1/16/2020 1:30 PM

Richard A. Wagner

New rules for grant overhead distribution

To James Krittell; Sharienne Walker; Sudha Setty; Saeed Ghahramani; S. Cheraghi

Cc Anthony S. Caprio; Linda E. Jones; Julie A. LeBeau; Rosanne Mastrangelo; Noel Skerry

[Bing Maps](#)

Good afternoon Deans,

As you know, the current grant overhead distribution does not apportion any funds directly to the PIs. I, and you, have long considered this a disincentive to the fund seeking behavior we are otherwise encouraging – thus the discussions we initiated last year.

Beginning on April 1st, we will start distributing any received overhead monies according to the following formula: 34% to the University, 33% to the College or School, and 33% to the PI. It is my understanding that this formula was generally acceptable to the deans, discussed with Linda, and vetted with the Controller. To the extent we occasionally have some grants administered by PI's outside of academic affairs, we will deal with that separately and as/when necessary. The Controller's area will set up the necessary PI-specific accounts which will be ready when we enter the 4th quarter of the fiscal year.

I hope this will be considered both fair and incentivizing to our faculty. However, as you know, in order to increase grant funded activity on the campus we will need to find ways provide additional assistance to faculty in grant application development and preparation. Best, dw

Richard A. Wagner, Ph.D. (d)
Vice President for Finance and Administration
Western New England University
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voice: 413.782.1219 fax: 413.782.1746
email: richard.wagner@wne.edu



Indirect Cost Rates for Grant Applications:

Indirect costs are required. All federal proposals will require the approved federally negotiated rate. All non-federal proposals will use the federally negotiated rate in the absence of specific sponsor policy or award conditions on providing indirect costs.

For non-federal sponsors who do not have, or do not identify an indirect cost reimbursement policy and will not pay the full federally negotiated rate, rates should be negotiated with the sponsor on a case-by-case basis. The Vice President for Finance and Administration retains the authority to accept or decline any non-standard rate (including waiving the provision of any indirect costs).

The University's current federal indirect cost rate agreement is dated 02/28/2017 and contains the following provisions:

SECTION I: Facilities And Administrative Cost Rates					
RATE TYPES: FIXED FINAL PROV. (PROVISIONAL) PRED. (PREDETERMINED)					
<u>EFFECTIVE PERIOD</u>					
<u>TYPE</u>	<u>FROM</u>	<u>TO</u>	<u>RATE (%)</u>	<u>LOCATION</u>	<u>APPLICABLE TO</u>
PRED.	07/01/2016	06/30/2021	45.00	On-Campus	All Programs
PRED.	07/01/2016	06/30/2021	16.00	Off-Campus	All Programs
PROV.	07/01/2021	Until Amended			Use same rates and conditions as those cited for fiscal year ending June 30, 2021.

***BASE**

Direct salaries and wages including all fringe benefits.



Appendix A

During the University's remote operations, routing paper copies of external grant budgets and proposals in order to obtain internal approvals evidenced by actual signatures will no longer be required.

Until further notice, all grant budgets and proposals will be routed electronically via email for review and approval. The faculty member serving as the grant's principal investigator or project manager will initiate the email routing process. The email must include an attachment containing all grant proposal documentation. In addition to providing the proposal's submission deadline date on the proposal and routing form, the originator should provide the submission deadline date in the body of the initial email that is sent to begin the routing process.

Each reviewer will conduct their review and then forward the proposal via email to the next reviewer providing their approval in the body of the email (in lieu of an actual signature on hard copy). All email approvals signify the same assurances as outlined on the signature page of the proposal budget routing form. If any reviewer is unable to provide their approval, they will forward the email thread back to the originator and provide an explanation as to why they can't provide their approval, along with any corrective action that may be necessary. The email routing and forwarding will follow the same sequence as the signature order on the paper form:

1. Faculty member serving as Principal Investigator (PI)
2. Department Chair (if applicable) for PI
3. Dean of College or School for PI
4. Advancement (for private sponsors as applicable, beverly.dwight@wne.edu; jonathan.edwards@wne.edu)
5. Controller's Office (noel.skerry@wne.edu)
6. VP for Finance & Administration (richard.wagner@wne.edu)
7. Interim Provost and VP for Academic Affairs (curt.hamakawa@wne.edu)

Assuming all reviewers provide their approval, the Provost's Office will provide a final email forward to the originator indicating full internal approval has been obtained and the faculty member is authorized to submit the proposal and application to the sponsor. The final email will originate from either the Interim Provost (curt.hamakawa@wne.edu), or the Provost's Assistant (jackie.scalzo@wne.edu).

In order to assist reviewers in identifying emails that contain a grant proposal that is being routed for review, the original email to initiate the review should contain a standard identifier in the email subject line as follows: "**External Grant Proposal: Faculty Member Name – Sponsor/Project**". For instance, if Professor Grant Seeker were initiating the routing of a new National Science Foundation (NSF) proposal



on COVID-19, the email subject line would be “**External Grant Proposal: Grant Seeker – NSF/COVID-19 Grant**”.

The University’s internal routing form, proposal budget and all other supporting grant documents (statement of work, budget justifications, etc.) should be attached to the email as a **single PDF document** so that each reviewer does not have to open multiple attachments in order to conduct their review.

For questions on the above process, please contact the following:

Noel Skerry
Senior Financial Analyst
noel.skerry@wne.edu
(413) 782-1241