



Office of Research

Sponsored Awards Handbook

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I. Introduction

A. Mission Statement

The Kennesaw State University Office of Research's mission is to support externally funded research, service, and scholarly activity. The Office of Research (OR) provides information on potential sources of funding, technical expertise and assistance in proposal development and submission. When awards are received, the Office of Research assists faculty in the legal and financial administration of their projects. The OR is responsible for ensuring that the business interests of the University are protected throughout the operation of such agreements. The Office of Research maintains auditable records of direct and indirect charges to contracts and grants and prepares fiscal reports required by grantor agencies. The OR is also responsible for billing and collecting costs incurred on cost reimbursement contracts and for requesting funds related to contracts. The Office of Research is committed to providing accurate and timely reports so that project directors can assess actual performance against awarded and budgeted funds.

B. Kennesaw State University Research and Service Foundation

The Kennesaw State University Research and Service Foundation, Inc. (KSURSF) is the applicant for and fiscal agent for external funding on behalf of Kennesaw State University (KSU). All contract and grant proposals, agreements, and payments are made in the name of Kennesaw State University Research and Service Foundation. The Foundation was organized and is, at all times, operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of Kennesaw State University. The University performs the work for which KSURSF is contracted, and KSURSF and KSU have signed a Memorandum of Understanding governing this relationship. KSURSF was incorporated under Georgia law as a nonprofit corporation on September 7, 2005, and was granted 501(c)(3) status on December 27, 2007, with August 29, 2005, as the effective date of exemption.

Most projects housed in KSURSF have a portion of their funds managed by Kennesaw State University (e.g., faculty salaries, supplies, travel, equipment, and scholarships). In some cases KSURSF manages the funds directly. The best approach to budget management will be determined the by Principal Investigator/project director and the Office of Research.

When funds are managed directly by KSURSF, the foundation's forms must be used (e.g., payment request form, travel reimbursement form).

C. Purpose of Handbook

This handbook is an overview of the activities required for researchers to prepare, submit, and manage externally funded projects at Kennesaw State University. The handbook is divided into five parts: 1) introductory material, 2) pre-award activities, 3) post-award management of the project, 4) research compliance, and 5) miscellaneous matters.

The introductory material (sections I-III) covers the Office of Research, its mission statement, staff, services, and the nature of sponsored programs. The pre-award sections (IV-VI) provide an overview of activities required to initiate a funding proposal and prepare it for submission.

Sections VII-IX cover post-award project management. The Office of Research assists investigators in the management of their projects and provides guidance for assuring compliance with Federal and state laws, University System of Georgia Board of Regents regulations, as well as University rules, regulations, and policies pertaining to fiscal management of contracts and grants.

Research Compliance (e.g., responsible conduct of research, conflicts of interest, human subjects, and animal care and use) is covered by section X. In addition to the University's policies, research conducted at Kennesaw State is governed by federal, state, and institutional rules. Policies that apply to Kennesaw State University generally (e.g., Conflicts of Interest) are detailed in the University's Faculty Handbook and Kennesaw State University's web site. Other funding-agency specific policies apply to a subset of projects (e.g., National Science Foundation, National Endowment for the Humanities) and should be consulted as necessary.

Miscellaneous matters are covered by section XI.

II. Vision, Guiding Principles, and Services

A. Vision

- To promote a campus climate that will cultivate an interest and proficiency in pursuing sponsored funding

B. Guiding Principles

- Provide the Kennesaw State University community with leadership in sponsored program development, administration, and compliance
- Offer services that are responsive to the needs of the KSU community
- Provide assistance to the KSU community based upon individual needs and experiences with sponsored programs
- Facilitate the pursuit of external funding related to research, creative activity, instruction, and community service

C. Services

1. *Proposal Development*

- Communicate information on funding opportunities to faculty, department chairs, and deans in support of their research interests and institutional goals
- Provide researchers with proposal-writing support
- Identify and interpret sponsors' guidelines and regulations
- Develop researchers' skills in electronic proposal submission
- Provide proposal budgeting guidance based on the project director's needs, agency guidelines, and university policy
- Assist in the logistics of large-scale interdisciplinary proposals
- Provide guidance on the preparation of sponsors' forms and assurances
- Process and submit accurate proposals in a timely manner
- Suggest alternative funding sources and assistance with resubmitting proposals

2. *Contract Review*

- Review and approve proposals, budgets, and contracts
- Negotiate acceptable terms and conditions with sponsors who want to contract with the university
- Verify that appropriate regulatory approvals and assurances are in place
- Obtain authorized organizational representatives' signatures on proposals and contracts
- Issue subawards

3. *Project Administration*

- Interact with sponsoring agencies and other KSU offices on the behalf of project directors
- Monitor submission of technical reports
- Assist project directors with the administration of their grants, including financial management, procurement activities, and human resources processes
- Assist project directors with budget revisions

- Obtain no-cost extension for grants
- Notify appropriate officials of non-compliance

4. *Technical Support*

- Maintain a user-friendly and informative web site
- Provide technical assistance to researchers using online systems for proposal submission and project administration

5. *Information*

- Maintain an archive of proposals and awards and provide reports
- Analyze funding trends as they relate to research and program strengths of KSU
- Work with deans and department chairs in meeting their needs and those of the faculty

III. Nature of Sponsored Programs

A. General Definition of Sponsored Programs

Sponsored programs are scholarly, professional, and creative activities that KSU personnel conduct with support from external funding instruments including grants, contracts, cooperative agreements, or other arrangements.

B. Specific Definitions

In addition to the general definition above, any one of the following conditions is sufficient to define a sponsored program:

1. *Conditions Pertaining to the Nature of the Agreement or Activity*

- A formal proposal exists requiring the endorsement of a Kennesaw State University-authorized official.
- Progress, technical, final reports, and/or other exchanges are required. The proposed activity binds KSU to a specific delivery of work including service to a sponsor.
- The activity has a specified performance period or completion date.
- The agreement for the activity contains compliance terms and conditions.
- The agreement for the activity contains provisions for confidentiality.
- The testing/evaluating of proprietary products is involved.

2. *Conditions Pertaining to Financial/Institutional Involvement*

- Initial pricing, expenditures, financial reporting, and/or performance may be subject to external audit.
- Billing, separate accounting procedures, and/or report of expenditures are required.
- Reimbursement/payment is contingent on completion of specified exchanges.
- Cost sharing/cash matching is involved in the performance of the activity.
- The activity includes budgeted indirect costs.
- The activity involves disposition of property, whether tangible or intangible, that may result from the activity (e.g., equipment, inventions, copyrights, or rights in data).

3. *Insufficient Conditions*

Among the conditions that *do not* create a sponsored program are:

- A voluntary donation of funds or personal property (e.g., cash, securities, books, equipment) given irrevocably and without expectation of tangible or economic (except tax) benefit.
- The transfer of property with no implied responsibility on the part of Kennesaw State University or the Kennesaw State University Research and Service Foundation to provide the donor a product, service, technical or scientific report, intellectual property rights, or any other exchanges.
- Donations of real estate.
- Funds received directly by a faculty member (e.g., summer fellowships or travel grants).
- A project conducted as an external professional activity for pay (i.e., consulting).

- Honoraria -- funds given directly to a faculty member by agreement not requiring administrative endorsement.
- Testing and service agreements processed through re-charge centers having an established fee for service.
- Professional services (consulting) provided by university personnel on a fee-for-service basis, which do not meet any conditions for a sponsored program.
- Non-technical services to external organizations (e.g., lodging and food service to groups on campus; meeting facilities; sporting events).
- Fellowships and/or scholarships without a service component or other restrictions.

C. Contractual Agreements

All contractual agreements (whether a contract, subcontract, or consulting agreement) under which Kennesaw State University faculty or staff will provide services or perform research for an external sponsor are subject to the same internal review process as standard grant proposal submissions.

1. Policy

The Office of Research is authorized to negotiate contractual agreements for compliance with agency, University System of Georgia, and Kennesaw State University policies. All agreements processed through the OR are signed by the Vice President for Research or named designee. *Faculty are not authorized to sign grants, contracts, or other agreements on behalf of Kennesaw State University or the Kennesaw State University Research and Service Foundation.*

2. Procedures

Faculty are encouraged to seek collaborative projects with external sponsors including industry. Contracts typically involve technical discussions and provision of informal quotes. Faculty members are strongly encouraged to contact the Office of Research before providing any quotes. Once the project has been developed between faculty and a sponsor, the faculty member must formalize the quote and a contractual agreement through OR. Procedures for submitting a proposal routing form and finalizing contracts are the same as those for grant proposals. See Sections VI and VIII of this manual for specifics.

IV. Proposal Process Overview

Grants-in-aid of research are available from hundreds of private foundations and public agencies. Most have particular areas of interest and limitations on the size of possible awards. Almost all foundations and agencies have deadlines for receiving proposals. Therefore, having ready access to information about funding opportunities is essential. The Office of Research provides this information through several outlets described below.

A. Identifying a Funding Opportunity

The Office of Research routinely sends descriptions of grant opportunities to individuals, departments, and colleges. To set up an appointment to discuss your research interests, email sponprog2@kennesaw.edu.

Available Resources

- [Pivot \(Community of Science\)](#) – This website provides search tools for funding opportunities in all disciplines (not just the sciences) and possible collaborators. Hosted by the KSU Library, COS has a comprehensive search engine that can help you find funding from federal and non-federal sources. Please contact the library for training.
- [Grants Resource Center](#) – Use the GrantSearch tool available through KSU’s subscription to Association of State Colleges and Universities Grants Resource Center or check out available GRC Publications. Contact the [Office of Research](#) for the username and password.
- [The Foundation Center](#) is the leading source of information about funding for the non-profit sector. It includes free search tools as well as subscription-only tools. Contact sponprog2@kennesaw.edu if there is a specific foundation you'd like information on.

The Office of Research also provides additional sources of information [here](#).

B. Communicate Your Intent to Apply

1. Department Chair and Dean

When you have found an appropriate funding source for your project, you need to begin communicating with others about your interest in applying for support. Talk with your department chair first. The chair may suggest that you meet with the dean of your college if your project has broader implications or will involve personnel in more than one department or college, especially if personnel from other colleges will be co- investigators.

- Find out what parts of the application package your chair and dean expect to review. In some cases, they may need just the abstract and budget; in other cases, they may need to see the complete proposal.
- Discuss your budget in detail with your department chair and dean as needed. Issues such as course reassignment time, the use of indirect costs for the project, and cost sharing require their approval. If you have not prepared a grant budget before, contact the [Office of Research](#).

- Inform your department chair of your proposal deadline and ask about the chair's availability to review and sign documents before the due date.

2. Office of Research

After discussing your project with your department and college, notify the Office of Research of your intention to apply for external funding by sending an email link for the program to which you intend to apply to sponprog2@kennesaw.edu no later than 10 days before the sponsor's deadline. An Office of Research staff member will contact you to discuss how the office can support your proposal. In most cases, the next step is to review program guidelines and develop a timeline for completing and submitting the proposal.

3. Foundation or Agency Program Officer Contacts

Unless the program's guidelines explicitly discourage it, you should always speak with the appropriate program officer at the foundation or agency about your plans and ask for guidance.

4. Formal Letter of Intent

If a formal letter of intent is required, the Office of Research can help you prepare it.

C. Limited Proposal Submissions

1. Policy

Funding agencies (e.g., the National Science Foundation) may limit the number of proposals an institution is permitted to submit for a solicitation. Proposals submitted to these programs must be reviewed and approved by the Vice President for Research.

2. Selection Process

Faculty and staff who plan to prepare a proposal for a program with a submission limit must notify the Office of Research of their intention by providing a one-page abstract *no less than four weeks prior to deadline*. If fewer abstracts are received than the number allowed by the agency, all proposals will move forward toward submission. If more abstracts are received than the number allowed by the agency, the Vice President for Research will decide which applications will be submitted. Depending upon the number of competitors and the expertise required for review, the Vice President for Research may appoint *ad hoc* review committees as needed.

If the solicitation requires that the institution be the named applicant, recommendations of the faculty committee will be forwarded to the Vice President for Research who will make the final decision regarding which proposals will be submitted. When the applicant is an individual, the appointed committee makes the decision. In the event that two or more proposals might be combined and submitted, the committee may make this suggestion to the Vice President for Research.

V. Proposal Development

A. Coordinating your Submission with the Office of Research

1. Initial Meeting

Planning is a key element of successful proposals. The Office of Research must know the deadlines of all proposals under development as early as possible. Schedule a meeting with the Office of Research to go over the program's guidelines, to set up a timeline for finishing all the required sections of the proposal, to plan for technical support, to review the budget, and to coordinate the final proposal submission. Research involving foreign nationals or travel outside the United States must follow federal laws restricting the export of technology and information. Proposals with subawards require additional time for the Office of Research to coordinate with the subawardee's sponsored research office. Email sponprog2@kennesaw.edu to set up the initial meeting.

2. Support Services

One of the goals of the initial meeting is to determine how much support you will need to assemble your application package. Those who are new to the process typically need editorial support, help with budget development, and technical support with electronic proposal submission.

B. Components of a Proposal

The proposal development process includes reading the guidelines, developing a timeline for completing the proposal, budget development, revision and editing of the narrative and other documents, submission of the final version, and submission of any updates required or allowed by the sponsor. The Office of Research staff will provide assistance throughout the process. In nearly every instance, the Office of Research is responsible for submitting the final proposal, usually in an electronic format.

All proposals will require some legal and financial information from the requesting institution. The [Institutional Information Sheet](#) contains commonly needed information such as financial identification and compliance assurance numbers, indirect cost and fringe benefit rates, and authorized institutional representatives. Additional information for applications can be obtained from the Office of Research.

Most proposals include an abstract, a project narrative, a budget, a budget justification, and additional documents, such as letters of support from Kennesaw State University or collaborators, and price quotations.

1. Cover/Title/Face Page

Unless a form is provided, the initial page of the proposal, written on Kennesaw State University Research and Service Foundation letterhead and addressed to a specific person, a) indicates why you have written, b) briefly describes the project, c) states the amount requested, d) states how funds will be used, e) contains contact information, and f) is signed by KSU / KSURSF's authorized representative.

2. Abstract

An abstract is a short summary, often 200-500 words, typically written after the project narrative has been completed. Funding agencies usually give specific instructions regarding the abstract's

content, length, and order. If no instructions are given, the abstract should identify the applicant institution, establish credibility, state the main objectives and the activities to be conducted, and amount requested. A well-written abstract is critical because some reviewers may read only this part of the proposal.

3. Narrative

The narrative describes the proposed project in as much detail as is permitted by the guidelines. Most sponsors prescribe the format and limit the length of the narrative. Clarity and focus are essential in a good narrative. Members of the Office of Research staff are available to review agency guidelines with faculty, provide editorial support, and ensure compliance with the sponsor's requirements.

4. Budget and Budget Justification

Represents a reasonable estimate of projected costs of the proposed project. Standard line items include salary, fringe benefits, travel, consultants, subcontracts, materials, equipment, and indirect costs. A justification or budget narrative explains how the overall cost for each element listed in the budget was formed. The project must be realistic for the amount requested and must be within the funding agency's range. The Office of Research staff will assist researchers in preparing their budgets and justifications.

5. Curriculum Vita

A current *curriculum vita* (CV) is typically required for the Principal Investigator and all co-investigators. Some organizations (e.g., the National Science Foundation) specify the maximum lengths of CVs and what information must be included. Researchers must follow the required format if one is specified. Exhaustive *curricula vitae* are rarely expected. In most cases 2-3 pages of the information most relevant to the proposed investigation will be appropriate. The Office of Research has templates available upon request.

6. Appendices

Appendices are included only if allowed or required. Appendices are generally used to expand on information in the narrative, not to add information essential to the project. The proposal's table of contents should contain a list of the appendices included.

7. Attachments

Most application packages consist of more than the project narrative and budget. Documents such as financial statements, letters of support, and various appendices require time to assemble. The Office of Research can help you gather the required documents, but your timeline must be known in advance of the submission date.

a. Tax Exemption Letter

Many proposals require a copy of a letter from the Internal Revenue Service stating that the Kennesaw State University Research and Service Foundation is not subject to federal taxation. This letter is available [here](#).

b. Annual Financial Report/Audit

The Office of Research will provide the financial information required by sponsoring agencies.

c. **General Letters of Support**

Sponsors may require letters of support for projects involving multiple organizations. Program announcements sometimes specify the necessary content of such letters. When not specified these letters should explain the relationship of the sponsor to the primary investigator or the university, why the project is being supported, and specifically what will be done to assist and support the program. Letters of support are usually addressed to the projector's director, not the sponsor or reviewers. Letters of support are *evidence*, not testimonials. Letters of support from the Office of Academic Affairs must be coordinated through the Office of Research.

d. **Letters of Support from the KSU President**

Letters from the President in support of proposals are arranged by the Office of Research. Requests for these letters must include evidence that the project has the approval of the faculty member's Dean, a draft of the proposed letter of support, and the proposal guidelines. The OR must receive these documents *at least 15 calendar days prior to the submission deadline* in order to refine the draft and receive the President's signature. Exceptions to this procedure are rare.

The draft letter must include the following information:

- The specific information required by the proposal guidelines
- How the project advances the mission of the University
- How the project relates to similar work being done at the University

Letters that do not follow these guidelines will be returned to Principal Investigator(s) for completion. The Office of Research does not write the letters but will edit them to meet the requirements of the President's office.

C. Budget Preparation

1. *Direct Costs*

Direct costs are easily identified as belonging to a specific sponsored project. Examples of direct costs include the following:

- Salaries, wages, and fringe benefits of faculty, technicians, scientists, research assistants, post-docs, students, or other personnel who are necessary to meet the goals of the project
- Scientific and technical equipment (including shipping and installation)
- Computer costs (hardware, software, supplies, and services) if specific to the project and not general purpose
- Materials, including non-capitalized equipment
- Participant expenses (e.g., travel and per diem of workshop participants)
- Supplies (consumables, e.g., chemicals, glassware)
- Services (including outside consultants)
- Subawards
- Subject costs (e.g., incentives paid to research subjects from whom data are collected)
- Travel for the Principal Investigator(s) and other project personnel
- Conference fees (e.g., abstract submission, registration)
- Publication and page charges

2. *Facilities and Administrative (Indirect) Costs*

In addition to the direct costs of conducting a project, most proposals will include an amount to cover Facilities and Administrative Costs (F&A), often referred to as indirect costs or overhead. F&A costs reimburse the University for laboratory and office space, utilities, administrative services (e.g., purchasing, accounting, research administration, personnel, security), custodial services, library services, and building, grounds, and street maintenance. In summary, facilities and administrative costs cover the institutional infrastructure essential to support sponsored research that cannot be allocated and directly charged to a specific grant or contract. Capital expenditures (including items of equipment costing more than **\$5,000**) and the portion of each sub-grant or sub-contract in excess of **\$25,000** are excluded from the calculation of indirect costs.

Kennesaw State University collects F&A costs based upon a *federally negotiated rate*. The University has separate Facilities and Administrative cost recovery rates for research performed on and off campus.

- **On-Campus Rate** – Kennesaw State University’s negotiated rate with federal agencies is **34.6%** of the total direct costs. Total direct costs include everything except for capital expenditures (including items of equipment costing more than \$5,000) and that portion of each subaward in excess of \$5,000
- **Off-Campus Rate** – KSU’s federally negotiated Facilities and Administrative off-campus rate is **15.2%** of the total direct costs. In general, if 50% or more of the project will be conducted off-campus (in facilities not owned by Kennesaw State University), the off- campus rate should be used for the whole project. If there is any question about which rate to use, investigators should confer with Office of Research staff.

Some sponsors limit Facilities and Administrative cost recovery or prohibit it altogether. If a sponsor prohibits or limits F&A charges, a copy of the sponsor’s F&A rule must be attached to the Proposal Routing Form. If the sponsor does not have a rule on F&A costs, but there is a compelling reason to waive or reduce the charges, the PI must complete the [Request for Facilities and Administrative Waiver form](#). Without documentation of the sponsor’s limit or an approved waiver request, the University applies the standard F&A rate to all proposals.

3. *Allowable Costs*

[Subpart E of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards codified at Title 2, Part 200 of the Code of Federal Regulations](#) establishes principles for determining costs applicable to grants, contracts, and other agreements with educational institutions. These principles apply regardless of whether the item is treated as a direct or indirect cost. Not all items of cost are listed in the Circular; however, this does not imply that a cost is either allowable or unallowable. In order for costs to be allowable, similar or related items must be treated consistently.

4. *Budget Elements*

A [generic budget spreadsheet](#) is available to assist researchers with their budget calculations. Standard line items include the following:

a. Personnel

Personnel costs include salaries and wages for faculty, staff, and student workers who are employees of Kennesaw State University.

Payments for work performed on sponsored agreements by faculty members are based on the person's regular rate of compensation. This figure is stated in the individual's annual contract letter as the base salary and excludes any salary supplements or overloads paid during the contract period, whether or not they are listed in the initial contract letter or an addendum.

KSU faculty members have either a 9-month appointment or a 12-month appointment. For most members of the faculty, the period that constitutes the basis of their salary is for the academic year (a period of 9 months). For 9-month faculty, the monthly rate is the base salary divided by 9. (Their pay may be distributed among 10 checks, but this does make them 10-month faculty.)

Most administrative appointments (e.g., department chairs, deans, associate deans) and some special faculty appointments are given 12-month fiscal-year contracts. For 12-month faculty, the monthly rate is their contract amount divided by 12.

Exceptions to this principle involve consultation across departmental lines or work in a separate or remote operation. If the work performed by the individual is in addition to the person's regular departmental load, payments beyond the base salary may be allowable provided that the arrangements follow the procedures for overload compensation in the KSU Faculty Handbook and are specifically provided for in the agreement or approved in writing by the sponsoring agency. Only the Office of Research may approve such payments.

Proposals to the National Science Foundation that include salaries are subject to additional rules. In budgets for all such proposals, KSU follows NSF's compensation policy as stated in the [NSF Proposal and Award Policies and Procedures Guide](#). In general, NSF will pay no more than two months' salary for senior personnel. Senior personnel are PIs, Co-PIs, and faculty associates, as defined in the NSF guide. Salary must be based on the faculty member's regular monthly rate (as described above), and time and effort must be documented in accordance with federal guidelines.

In practical terms, this means NSF-funded faculty may do their work in summer, during the academic year, or any combination of the two. Faculty members receive summer salary for work performed in summer, while investigators' departments receive compensation for work performed during the academic year. The two-month limit for each person covers all NSF-sponsored projects, meaning a faculty member may earn two months' compensation from one project, or may distribute the two months' salary across multiple projects.

Under certain circumstances, NSF allows institutions to ask for more than two months of support for a faculty member. Requests for more than two months of support must be:

(1) approved by the Office of Research, (2) disclosed in the proposal budget, (3) justified under the applicable federal regulations, and (4) specifically approved in writing by the appropriate agency official at the National Science Foundation.

Payments to non-KSU employees are budgeted as consulting or subawards, *not* personnel costs. Contact the Office of Research for additional salary information.

b. Fringe Benefits

Benefits are paid for Kennesaw State University employees. Fringe benefits for 9-month (academic year) faculty are calculated as 30% of their institutional base salary during the academic year and 20% during summer. The benefit rate for 12-month (fiscal year) faculty, staff, and administrators is 30% for an entire calendar year. The rate for temporary employees and part-time employees is 7.65%.

c. Capital Expenditures (Including Equipment)

Capital expenditures include individual items of equipment, new buildings, and alterations and renovations of the existing physical plant.

- Construction, Alterations, and Renovations – Projects that include new construction involve planning at the institutional level and are beyond the scope of this handbook. However, alterations or renovations of existing space are often required for the installation of new equipment or the creation of new laboratories or other special purpose rooms. The costs of these changes are considered as capital expenditures. Such projects require coordination with the offices of the Vice President for Research, Information Technology Services, Environmental Health & Safety, and/or Plant Operations. When renovations or alterations are required, the appropriate offices should be consulted early in the budget planning process.
- Equipment – Equipment includes property that costs more than \$5,000 and that has an expected service life of more than one year. Because the prior approval policies of sponsoring agencies vary, listing equipment in an award does not necessarily provide approval to purchase the equipment. Budgeted equipment must comply with the specific rules and regulations of the sponsoring agency. Before requesting any new equipment, the Principal Investigator must determine that equipment already available to the University either will not meet the project's needs or is not available for use when required. Proposals should specify the manufacturer and model number or specifications of the instrument(s) required for the project. The amount budgeted for each item should include the cost at time of purchase and any installation and shipping costs, usually documented by a price quotation from an appropriate source.

d. Travel

The costs of travel for personnel to conduct research or attend conferences, presentations, or workshops in performance of the project are an important component of many budgets. For travel within the state of Georgia, follow the [state's travel regulations](#). For domestic travel outside Georgia, use the lodging and per diem [rates established by the U.S. General Services Administration](#). For travel outside the United States, use the lodging and per diem [rates established by the U.S. State Department](#). Special rules often apply to travel outside of the United States. All business travelers should review Kennesaw State University's travel regulations.

e. Participant Support Costs

Participant support costs are defined in 2 CFR 200.75 as “direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.” Participants are not Kennesaw State University employees and are not part of the project implementation team. Costs for transportation, per diem, stipends, and other expenses for participants or trainees should be budgeted as participant support costs when there is a category for participant support costs in the funding opportunity budget guidelines. Many agencies do not allow institutions to charge indirects on participant support costs, such as NSF.

NSF Participant Support Costs

When submitting a proposal to NSF that will include participant support costs, close attention must be paid to NSF guidelines. NSF defines participant support costs in Section II.C.g (v) of the Grant Proposal Guide:

This budget category refers to costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with NSF-sponsored conferences or training projects. Any additional categories of participant support costs other than those described in 2 CFR § 200.75 (such as incentives, gifts, souvenirs, t-shirts and memorabilia), must be justified in the budget justification, and such costs will be closely scrutinized by NSF. (See GPG Chapter II.D.9). For some educational projects conducted at local school districts, however, the participants being trained are employees. In such cases, the costs must be classified as participant support if payment is made through a stipend or training allowance method. The school district must have an accounting mechanism in place (i.e., sub-account code) to differentiate between regular salary and stipend payments.

The number of participants to be supported must be entered in the parentheses on the proposal budget. These costs also must be justified in the budget justification section of the proposal. Indirect costs (F&A) are not allowed on participant support costs. Participant support costs must be accounted for separately should an award be made.

Funds provided for participant support may not be used for other categories of expense without specific prior NSF written approval. Such requests must be submitted electronically via use of NSF’s electronic systems.

Of particular note:

- Participants are not KSU employees.
- Funds budgeted for participant support costs may not be rebudgeted out of participant support costs without prior approval from NSF.
- Indirects are not charged on participant support costs.
- PIs will need to provide participant selection documentation, as well as documentation of actual attendance (sign-in, attendance sheets), to the Office of Research Post-award Accounting Department.

f. **Other Direct Costs**

- **Materials and Supplies** – This expense category includes all expendable materials to be used during the course of the grant period. Special purpose computers costing less than \$5,000 are included in this category.
- **Publication, Documentation, and Dissemination Costs** – The costs of documenting, preparing, publishing or otherwise disseminating the findings of the research are included in this item. Examples of dissemination expenses are page charges, illustrations, indexing of data, and archiving sample collections.
- **Consultants** – Each individual’s expertise, primary organizational affiliation, normal daily compensation rate, and number of days of expected service should be included. A description of consultants’ qualifications should be included if these individuals have not been identified. Please see the Office of Procurement and Contracting for information on hiring consultants.
- **Computer Services** – Computer services include the cost of software, hardware and leasing of computer equipment. Note that the cost of general- purpose computers is included in the University’s Facilities and Administrative costs.
- **Space Rental** – In some cases a University department, school, or center may require rental space to house a sponsored project. If off-campus space is required, the Office of Research must be contacted early in the proposal stage to assure that University and State regulations are followed.

5. Subawards

Subawards cover significant parts of research contracted or otherwise transferred to another organization. A clear description of the work to be performed, the basis for selection of the sub-awardee, and a separate budget and budget justification for the subaward should be included as part of the proposal, along with a completed Subrecipient Commitment Form or a letter of participation from the subawardee’s sponsored research office. The letter should state that the subaward organization has reviewed the budget and scope of work and agrees to participate in the proposal.

Subawards must be approved by the sponsoring agency in advance. Subaward documents must also be approved by the sponsor agency prior to finalization of any such agreement. During any programmatic discussions with potential sub-recipients, financial commitments or arrangements must be coordinated with and approved by the Office of Research.

All subaward costs are considered a composite direct cost by the University and should always be shown in the subaward cost line of the proposal. Subaward costs must be broken out and supported in the subawardee’s proposal to the University. Subaward costs should never be intermingled with Kennesaw State University cost elements. Subawards that include Facilities and Administrative charges as part of the budget must provide a copy of the institution’s most recent federally negotiated Facilities and Administrative costs rate agreement.

6. Cost Sharing or Matching

a. Types of Cost Sharing

The three types of cost sharing are:

- *Mandatory cost sharing* is required either by federal statute or by the established policy of the sponsor. Time and effort reports are required.
- *Voluntary committed cost sharing* is volunteered to demonstrate the University's commitment to a project. Voluntary contributions specified in proposals become required financial commitments if the proposal is funded, even if the amounts are not included in the budget but are quantified in the proposal narrative. Time and effort reports are required.
- *Voluntary uncommitted cost sharing* is defined as effort over and above that which is committed and budgeted for in a sponsored agreement. More specifically, this is either additional time or resources provided by the applicant, which were not quantified in the budget or in the narrative of the proposal.

b. Guidelines for Cost Sharing

Commitments to cost sharing and matching should only be made when there is a compelling reason, such as when required by the funding agency or when the agency encourages costs sharing and it becomes a review criterion. Regardless of the percentage, the ability of the University to meet the commitment from acceptable resources must be clear.

As part of the proposal review process, when a Principal Investigator plans to include either KSU's resources or external entities' resources as cost sharing, this information must be specifically identified on the routing form and the [Cost Share Authorization form](#). Proposals for cost sharing constitute a formal commitment to the sponsor by the department chair, dean of the academic unit, director of the center or institute, the Vice President for Research, or the Provost. In cases where the matching involves external entities, a letter of commitment from each entity and a detailed budget must be submitted with the proposal. If subcontractors are providing cost sharing, their budgets need to identify these commitments.

D. Research Compliance at the Proposal Stage

1. Institutional Review Board and Animal Care and Use

For research involving human subjects, most sponsors require the investigator to provide specific information about protection of human subjects at the time of proposal submission. However, most sponsors do not require certification of Institutional Review Board (IRB) approval or evidence of training until they are ready to recommend an application for funding.

Similarly, proposals involving the use of vertebrate animals normally require some description of the animals, proposed procedures, care and, use; however, certification of the Institutional Animal Care and Use Committee (IACUC) approval is usually not required until the agency is considering making an award. This is known as the "just-in-time" concept. Thus, investigators should expect to describe their proposed use of human subjects or animals as part of their proposal, and should be prepared to certify that approvals are in place later, as a condition of receiving an award.

Instructions for submitting a protocol for review can be found [here](#).

2. *Financial Conflict of Interest*

Investigators submitting proposals to the National Science Foundation, the National Institute for Justice, or any Public Health Services agencies (National Institutes of Health, Health Resources and Services Administration, or the Agency for Healthcare Research and Quality) must disclose any significant financial interests at the time of proposal submission. The definition of a significant financial interest varies by agency. Please see the links below for the appropriate policies and definitions for your proposal and then fill out and return the corresponding forms to the Office of Research before the proposal deadline. With the implementation of the Uniform Guidance at 2 CFR 200, all federal agencies are required to have conflict of interest policies. Contact sponprog2@kennesaw.edu if you are applying to a federal agency other than those listed below as not all agencies have published their policies.

- [Proposals to National Institutes of Health, Health Resources and Services Administration, or the Agency for Healthcare Research and Quality and National Institute of Justice](#)
- [Proposals to the National Science Foundation](#)

VI. Proposal Approvals and Submission

A. Proposal Approvals

Before a proposal is submitted to an external funding agency, the application must be approved through the University's established procedure. SmartGrant Online Routing is used to gather the approvals. By electronically approving the proposal in SmartGrant, each signatory accepts accountability for the roles and actions assigned to them by the University, as described below.

1. *SmartGrant Online Routing*

SmartGrant gathers information required for processing a grant or contract and electronic signatures showing the University's support. Routing is required for every grant proposal or contract submitted to the OR. If circumstances prevent online routing, the paper form is available on the Office of Research website.

The routing process must be completed before the proposal can be submitted.

- a. The **Intro Proposal Data** section includes information on the Principal Investigator (PI) and Co-Principal Investigator(s), the project type, proposal due date, name of sponsoring agency, and proposal title. Questions regarding conflict of interest, involvement of human subjects, and cost sharing are addressed. You may need to check with the OR for specific information.
- b. The **Budget Preliminary Info** section records project start and end dates, specifies Indirect Costs Rates, and sets up your budget.
- c. The **Budget Detail** section will need to be generated and Personnel effort entered.
- d. The **Print Forms** section allows you to create an abstract or upload other documents your Chair/Dean may need to see for approval.

Once the above steps are completed, routing can be initiated. Electronic approval is required from the PI, co-PIs, and the department chair(s) and college dean(s) of the PI and co-PIs. Depending on the scope of the project, other approvals (see below) may be necessary. All of the required approvals must be obtained before the proposal will be submitted to the funding agency.

Call the Office of Research if you need help entering your proposal in SmartGrant and initiating Online Routing. The usual practice is to upload the abstract, budget, and budget justification for Chair/Dean review. They may ask for the complete proposal if they would like to review it in more detail.

2. *Principal Investigator, Project Director, and Co-Principal Investigators*

The e-signatures of the principal investigator and all co-principal investigators are required. By electronically approving the proposal, the PI and co-PIs agree to:

- Accept responsibility for the intellectual content of the research or scholarly activity that is proposed
- Accept responsibility for the quality and completeness of both the fiscal and technical portions of the proposal

- Ensure that all necessary institutional approvals (see “Other Approvals” below) are received prior to submission of the proposal to an outside funding source
- Avoid conflict of interest
- Adhere to the principles of responsible conduct in research or other creative work described in the [KSU Faculty Handbook](#).
- Assure that the sponsored project is conducted safely and in accordance with university, federal, state, and local regulations
- Meet deadlines for the completion of reports to the sponsoring agency
- Accept responsibility for administration of the awarded activity
- Use funds for the awarded project appropriately and ensure that all expenditures are consistent with the terms and conditions of the award
- Report potentially patentable or other commercial results
- Complete the work on schedule and within the project’s agreed upon budget
- Assure compatibility with the total academic assignment determined in consultation with the department chair or director and dean

3. *Other Committed Personnel*

“Other committed personnel” means KSU faculty or staff who are either paid from the grant or committing time to the project as specified in the proposal, but are not involved in the implementation or development of the project. Routing approval from other committed personnel (OCP) is not required, but proposed effort should still be discussed with and approved within their Department. It is the OCP’s responsibility to confirm availability (e.g. course releases) for a project with their Chair/Dean. If other committed personnel would like internal approval on file with the OR, they can complete and submit an optional paper routing form.

4. *Department Chair and/or Center/Institute Director*

The department chair or center/institute director of the Principal Investigator and all Co-Principal Investigators must approve all sponsored activities prior to proposal submission to the dean(s). In certain cases, center/institute directors are delegated oversight responsibilities. The electronic approval of the department chair or center/institute director or designee in SmartGrant indicates acknowledgement of the:

- Research or creative activities that are being conducted in the department/center/institute
- Research or creative activity conforming to the short or long-range objectives of the department/center/institute
- Needs of the proposal in terms of space requirements, materials, staffing, or health and safety hazards associated with the conduct of the activities
- Commitment to provide any necessary requirements if the proposal is funded
- Approval of release time (if any) for designated faculty
- Coverage of any over expenditure or disallowed expenditures from departmental funds
- Adherence to all applicable department, college, and university procedures
- Competency of the PI to conduct and manage the proposed project

5. *Dean*

The dean or designee assures that he/she:

- Acknowledges the proposed project

- Recognizes the project as compatible with the institutional goals and objectives of the college
- Makes available staff and space necessary for conducting the project
- Recognizes personnel descriptions as appropriate and consistent in the college
- Is aware of the budgetary impact of the project on the college

6. Other Approvals

Depending on the nature of the project, additional approvals may be needed before the proposal is submitted to the Office of Research. Projects requiring special assistance from the offices of Information Technology Services, Environmental Health and Safety, or Plant Operations (if alterations are required to the physical plant) must be signed off by the applicable responsible official.

The following paper documents may also be required for internal approval:

- Cost Share Authorization Form
- Conflict of Interest Form (Federal)
- Subrecipient Commitment Form
- Drug Free Workplace Certification (Federal)

B. Proposal Submissions

IT IS THE RESPONSIBILITY OF THE PI TO SUBMIT THE PROPOSAL FOR TIMELY SUBMISSION TO THE SPONSOR. FOR PROPOSAL SUBMISSIONS MADE LESS THAN THREE (3) BUSINESS DAYS PRIOR TO THE SPONSOR'S DEADLINE, THE PI ACCEPTS THE RISKS OF THE PROPOSAL MISSING THE DEADLINE OR BEING REJECTED FOR ERRORS.

1. Standard Process

If the application is to be submitted electronically, the Office of Research will provide technical support (including uploading documents, if necessary) and take care of the electronic signature. For many electronic submissions, there are parts that must be completed by the PI and parts that must be completed by the Office of Research. Plan to be available on submission day to answer last minute questions, especially for electronic submissions. Occasionally questions arise that are not covered in the application guidelines. If a paper application is required, the Office of Research will manage copying and shipping.

Deadlines vary widely among sponsors and sponsor programs. Proposal deadlines can be based upon a postmark by the U.S. Postal Service or receipt in the sponsor's mailroom. With electronic systems, an accepted proposal may mean the electronic proposal file has been transferred and processed by one or two systems. In most cases, sponsors will not consider proposals that miss a deadline.

2. Multiple Proposal Submissions

In some cases, identical proposals may be submitted simultaneously to more than one sponsor provided each sponsor is advised that this has occurred. Careful attention must be given to agency restrictions on the submission of identical proposals to multiple sponsors. Please consult the Office of Research well in advance of any deadlines.

3. Submission Timeline

This timeline is not intended to represent the most OR can do, but the minimum OR will do. If possible, OR will provide a more thorough review of the proposal and will let PIs know when a proposal will receive less than a complete review due to time constraints.

a. Acquisition of Signatures and Approval

Two (2) weeks prior to deadline:

- Start circulating Cover Pages, Letters of Support/Commitment or other program-specific documents that require signatures from you Chair, Dean, President, etc.
- Start the proposal in [SmartGrant](#). If you have not already contacted OR, this will alert the Proposal Submission Coordinator that you are going to apply.
- Initiate Electronic Routing through SmartGrant. Even if your proposal is not final, starting routing early will allow plenty of time for circulation. You will still be able to edit your proposal while it is going through the approval process. If your Chair/Dean requires a final draft for approval, make sure they are aware of the approval process so it can be completed in a timely manner.

b. Review (Office of Research)

At least 3 days prior to submission, OR will perform a complete review, including:

- Comparison of proposal to sponsors' guidelines (e.g. forms and formatting)
- Review of budget (calculation, rates, relevance to project description, cost-sharing)
- SmartGrant Intro Proposal Data
- Compliance issues (e.g., human/animal subjects, health and safety, conflict of interest)

1 to 2 days prior to submission, OR will review at least the following:

- Review of budget for correct rates and cost sharing
- SmartGrant Intro Proposal Data
- Compliance issues (e.g., human/animal subjects, health and safety, conflict of interest)

With **less than 1 days'** time prior to submission, OR may only be able to verify that Routing Approval has been completed (the minimum requirement for any proposal to be submitted) and that FCOI disclosures have been submitted, if applicable.

c. Submission

Proposals and Routing should be complete **3 days prior** to the application deadline. The Office of Research cannot guarantee successful submission if final documents and routing are not complete before this time. However, OR will still do its best to submit proposals that are completed less than 3 days before the deadline.

4. Tips for Successful Submission

- Fill out the SmartGrant Intro Proposal Data and email a copy of the abstract, budget, and budget justification to the Office of Research for pre-approval. The budget is usually the most time consuming portion of a proposal to check, and advance copies allow us to help correct possible errors while the text is still in its draft stage.

- Email or call OR if the proposal is being submitted in response to a specific Broad Agency Announcement, Request for Proposals, Research Announcement, etc. so that we can review the proposal along with the solicitation guidelines.
- Allow time for corrections and make sure a contact is available. In many cases, proposals sent are ready to be signed and submitted without further correction or revision. However, there are times when corrections need to be made, particularly if a budget has not been sent in advance or if a PI is applying to a sponsor with which s/he or the OR is unfamiliar. Allowing time for corrections helps to ensure the proposal is at its best when it is sent out. The PI and/or a departmental/divisional contact must be available to make corrections until the proposal is ready to submit to the sponsor.

VII. Funding Agency Review, Award Negotiations, Acceptance, and Financial Management

A. Funding Agency Review

After the funding agency receives your proposal, a comprehensive review process begins that usually includes a thorough analysis of your proposed project by a peer group. The evaluations received from the peer review process are commonly submitted with recommendations from the program office to an awards council for final action. If your project is selected for funding, the agency's grants officer will notify the Office of Research or the Principal Investigator. Award and contract negotiations begin at that time.

B. Award Notification

Contact the Office of Research if you receive notice of an award or a rejection. Sometimes the Office of Research will receive the information first and sometimes the Principal Investigator will be notified of the decision.

C. Negotiation of Terms

Before an award is made, negotiations concerning the terms and conditions (e.g., scope of work, budget, intellectual property) of the contract or grant are sometimes necessary. These negotiations must be coordinated through the Office of Research.

D. Communication with Sponsor Agencies

Direct communication between the University and the sponsoring agency's program directors on matters affecting contractual agreements must be conducted by the Office of Research. Technical communications between Principal Investigators and their counterparts in the sponsoring agencies are authorized and encouraged. The Kennesaw State University Research and Service Foundation (KSURSF) proposal number or the grant number assigned by the agency should be referenced in all written correspondence.

E. Award Acceptance

Because the Kennesaw State University Research and Service Foundation, not the Principal Investigator, is the legal applicant, the Office of Research legally accepts all awards. The OR will obtain the signature of the authorized institutional representative to accept the award. *Faculty members may not sign contracts that obligate the University.*

F. Initial Financial Management

The Office of Research is responsible for acting as a liaison between the project directors and the agency regarding fiscal matters. This includes financial reporting and financial compliance monitoring. This includes, but is not limited to:

- Modification of project terms or amounts
- Budget revisions
- Interpretation of contract or grant language
- Events that may require formal approval of the University or sponsor.

G. Pre-Award Expenditures

For federal awards, approval may be granted for expenditure of funds **up to 90 days prior** to the expected start date of a new award. To qualify for advance funding the expenditures must be necessary for the effective and economical conduct of the project. Pre-award costs will not be approved unless a department chair or dean guarantees to reimburse the University if the grant is not received. Most federal agencies allow pre-award costs. Requests for pre-award expenditures are made with the OR's [Administrative Action Request Form](#). Please contact the Office of Research for additional information.

H. Reapplication

Most funding programs are highly competitive and, for this reason, successful initial submissions are uncommon. Although it is impossible not to be disappointed when a proposal is declined, careful examination of the reviewers' comments will usually indicate why the proposal was not successful and how it can be improved. Success improves with persistence.

If your application is declined, contact the sponsor and find out if reviewers' comments are available. Forward a copy of your reviews to the Office of Research for your project folder. Schedule an appointment with the OR to talk about your resubmission strategy.

VIII. Award and Project Management

A. Getting Started

As soon as possible after notification that a proposal has been approved for funding, the Grants Accountants will create accounts for the award and schedule a meeting with the Principal Investigator(s) to review appropriate regulations and receive budget information for the new award.

1. *Principal Investigator(s) Responsibility*

The Principal Investigator's most important responsibility is to pursue and complete the research, training, or public service described by the funded proposal within the specified time frame. The award document will outline the rules and guidelines that govern the project and specify the required technical and financial reporting. The Principal Investigator(s) must understand the award agreement and execute the work under these guidelines. The PI is also responsible for the programmatic direction of the research project and for initial authorization of all expenditures charged to the award budget. The Principal Investigator is ultimately responsible for making prudent use of the award by ensuring that expenditures are appropriate and directly relate to the budget and intent of the award and comply with applicable University, state, federal, and agency regulations.

Before an externally funded research project is undertaken at Kennesaw State University, the Principal Investigator(s) and Co-Principal Investigator(s) must familiarize themselves with and agree to comply with all applicable policies on issues governing the conditions of the award including:

- Intellectual honesty and research integrity (see Section X.A)
- Conflict of interest (see Section X.B)
- Use of human subjects
- Use of vertebrate animals
- Biohazardous materials
- Radioactive materials
- Other controlled substances
- Export controls (for research involving foreign nationals or travel outside the United States see Section X.D)
- Laws and University regulations dealing with intellectual property and patents.

Intellectual honesty, conflict of interest, and conflict of commitment policies apply to all projects and are covered in detail by the [University Handbook](#). Regulations governing other issues should be consulted as necessary.

2. *Responsibilities of the Office of Research*

The Office of Research has the primary responsibility for providing the Principal Investigator(s) with financial information necessary to manage a sponsored project effectively and to ensure that the project complies with the financial terms of the agreement. The following list covers many of the activities included in that responsibility:

- Issue invoices to funders

- Prepare financial reports for the awarding agencies
- Set up budgets and assign grants numbers
- Refer the PI(s) to other University offices, as needed
- Remain current on federal, state, and University policies related to grants
- Train project directors and staff in research administration regulations and procedures
- Serve as a liaison with auditors on financial matters
- Implement approved budget revisions
- Make all requests for no cost extensions
- Review and approve transactions
- Initiate draw downs for sponsored programs accounts
- Provide reports for project directors

B. Financial Management

The Kennesaw State University Research and Service Foundation is the official recipient of grant and contract awards from government agencies and other sponsors and is required to comply with numerous rules and regulations. The Federal Office of Management and Budget establishes broad policies governing grant and contract financial administration. Every government agency that awards grants and contracts (e.g., the National Institutes of Health and the National Science Foundation) has its own regulations for administering grants and contracts as do most non-governmental sponsors.

Although the Office of Research grants managers or departmental or administrative personnel may assist the PI in carrying out administrative activities related to the grant or contract, the PI must provide guidance and oversight. The Principal Investigator best understands the scope of the project, the effort committed to it by faculty and staff, and the relationship of that project to other projects with which resources may be shared. Therefore, project directors are ultimately responsible for all direct costs that are charged to their grant. In this usage, *direct costs* are expenses that can be identified specifically with a particular sponsored project or expenses that can be assigned to a project with a high degree of certainty. Deans, directors, and department heads have a corollary responsibility for assuring that all sponsored programs conducted within their units conform to the applicable guidelines.

1. Cost Allowability

In order for costs to be allowable, all agencies require that they be reasonable, allocable, consistently treated, and permitted according to the terms of the award. When dealing with multiple grants or contracts, neither the availability of funds nor a project's expiration date allows discretion in which project may be charged for a particular expense. All expenditures, whether for personnel, equipment, supplies, or other categories must be properly allocated to the grant or contract benefiting from the expense. The project's director, not the project's sponsor, is responsible for ensuring that expenses budgeted and/or charged to an award are allowable. Definitions of expense allowability are established by the University, the sponsor's policies, the project's Notice of Contract or Grant Award, and by federal policy. In general, to be allowable, costs must meet the following tests.

- Expenses must be *reasonable*:
 - Necessary for performance of the sponsored agreement
 - Do not impose on the restraints and requirements of federal and state laws and regulations, and sponsored agreement terms and conditions incurred by individuals who exercised due prudence

- Expenses must be *allocable*:
 - The expense must benefit the grant directly
 - The expense must be necessary to the operation of the grant
 - The expense must be assignable to the grant
 - If the expense benefits more than one sponsored project, the expense should be allocated to the different projects in proportion to the benefits received by each.
- Expense treatment should be *consistent*:
 - With policies applied to other federal and non-federal funds of the University
 - In treatment in like circumstances regardless of the funding source.
- The expenditures must conform to any limitations or exclusions established by the University or in the sponsored agreement as to types or amounts of cost items. Any expense that does not meet all of these criteria cannot be charged to the externally sponsored project.

2. *Unallowable Costs*

Most federal and non-federal sponsoring agencies issue policy guidelines defining acceptable expenses for their programs. Federal guidelines are contained in 2 CFR 200 Subpart E. Despite a great deal of commonality in content, variations in policy make it impractical to maintain a policy compendium. Individual agency or organization directives must be consulted for authoritative guidance; however, the following items are almost universally treated as unallowable expenses:

- advertising (recruitment of study subjects may be allowed)
- alcoholic beverages (unless the subject of the research project)
- alumni activities
- commencement and convocation expenses
- entertainment expenses
- personal use of goods and services

Project directors are ultimately responsible for tracking expenditures to prevent disallowable costs and overdrafts. If unallowable costs are erroneously charged to a sponsored project, the project director must notify an grants manager immediately. If the issue is not resolved, the PI's home department will be charged with disallowed expenditures and overdrafts.

3. *Procurement Cards*

Allowable costs of less than \$5,000 are normally paid with a University Procurement Card.

a. Responsibilities

The project director is responsible for verifying that all procurement card purchases charged to his or her grant are in compliance with the award or contract. Additionally, the project director is responsible for following the procurement card [policies of the KSU Office of Finance and Accounting](#). Repeated violations of these policies will result in the revocation of procurement card privileges.

b. **Invalid or Unauthorized Expenditures**

Project directors are responsible for all charges booked to their project with procurements cards regardless of who holds the card. If invalid or unauthorized purchases are charged to a grant using a procurement card, the project director's college or department budget will absorb the expense. Charges that cannot be paid by the college or department (i.e., expenses cannot be paid with state funds) will be the responsibility of the project director. The Office of Finance and Accounting will create a receivables account in the project director's name to collect funds that cannot be absorbed by the Director's home department of college.

4. Procurement of Goods and Services (ePro)

Requisitions for goods and services are created through eProcurement (ePro), a module in PeopleSoft Financials for University System of Georgia institutions. ePro requisitions must be approved by the project director. This approval certifies that the cost is allowable and solely allocable to the grant. ePro requests must include an itemized receipt or invoice. Consult the [ePro Reference Materials](#) for answers to many questions.

5. Equipment Management

The Office of Research and the Office of Finance and Accounting are responsible for establishing and maintaining accountability for equipment acquired under grants, contracts, and subcontracts for sponsored programs in accordance with sponsoring agency directives and University policy. The acquisition cost threshold for what is considered non-expendable equipment may vary among sponsors. Most federal sponsors use the definition contained in OMB Circular A-21, i.e., an acquisition cost of \$5,000 or more per unit or the institution's definition, whichever is lower. The threshold amount at Kennesaw State University is **\$5,000**. If your project includes funds for equipment, please contact your Grants Manager for assistance in obtaining quotations (bids) from vendors and placing orders. [Procurement Services](#) oversee KSU's purchasing policies. Questions about these policies or equipment purchased on a federally sponsored award should be directed to the Office of Research.

a. **Receiving Requirements**

The Principal Investigator is responsible for assuring that equipment received is as ordered and in good condition. Any discrepancies or damage should be immediately reported to the Procurement Department.

b. **Maintenance**

Responsibility for maintaining physical control of all equipment acquired under an award and safeguarding it against loss, damage, or unauthorized use rests with the Principal Investigator. Subcontractors or sub-grantees are also responsible for compliance with equipment policies and requirements as described in sub-award documents.

c. **Equipment Transfers**

Equipment owned by the federal government or other sponsors is subject to transfer to another institution when approved and directed by the sponsor agency. A request for transfer of such property can originate with a researcher transferring to another institution and requiring the equipment in the pursuit of continuing research or with the sponsor agency itself. A transfer originated by a faculty member requires the advance approval of the appropriate department head, dean, Vice President for Research, and, in some instances, the federal or sponsor agency.

Agency-originated disposition or transfer instructions do not require such approval. However, if agency- directed or contemplated transfers are likely to impair continuing research or training projects at the University, such considerations should be brought to the attention of the agency promptly through the Office of Research in an attempt to dissuade the agency from making the transfer. Much of the property acquired on research or training awards becomes University (State of Georgia) property upon acquisition or by subsequent vesting of title. Disposition or transfer of such property is subject to University and state policies.

6. Travel

As budgeted in the project's award, travel expenses are allowable if they are in direct support of the project. All travel reimbursements, both to University and non-University employees, are subject to state and University travel policies except when more restrictive policies and limitations may be imposed by a specific award. Federal travel regulations apply when required by federal awards. For more information refer to the part of this handbook dealing with travel budgeting (section V.C.4.d of this handbook).

7. Consultants

Costs of professional and consultant services rendered by persons who possess a special skill and who are *not* officers or employees of the University System of Georgia are allowable.

- Hiring – The Office of Research and the Office of the Vice President for Operations are the only units on campus authorized to execute an agreement with consultants when sponsored funds are to be used. Requests to hire a consultant require the [Consultant or Contractor Form – Sponsored Funds Only](#). Requests must be approved by the OR prior to a consultant commencing work on a project.
- Named Consultants – If a consultant is not specifically named in a grant and the agreement is \$5,000 or greater, but a description of work is stated in the grant, then a [Sole Source Form](#) must be completed by the project director and submitted with the Office of Research Consultant or Contractor Form and a resume.
- Payment – To initiate payment of a consultant/contractor, an eProcurement request should be submitted along with an invoice and a copy of the signed contract. Multiple approaches are available for paying consultants. Project directors should consult with their Grants Manager for assistance.

8. Lecture and Performance Agreements

Lecture and performance agreements are used when a guest lecturer speaks during a class, workshop, seminar, etc. Requests to hire a lecturer should be made using the [Lecturer Performance Agreement Form](#) and Instructions. Requests to hire a lecturer must be fully approved prior to providing any service. *Active Kennesaw State University employees cannot be paid as a lecturer.*

9. Copy Charges

If your grant has an amount budgeted for on-campus photocopying, the project director should contact [Copy/Print Services at KSU](#) to request a copy code be created for charges to the grant. The project director must provide the grant name and grant speed chart number for the code to be established. At the close of the grant award, the project director is responsible for notifying Print

Copy Services to terminate the charge code. If this code is used beyond the grant end date, the copy charges will default to the project director's home department.

10. Fixed-Price Contracts

Most awards are cost-reimbursable. However, under some circumstances, a fixed-price contract may be negotiated. In those cases where an agreement is a fixed-price contract (generally research institutes and centers), provisions must be made by the Principal Investigator and/or department or center having primary responsibility for the project to cover any overdrafts or excess expenses.

11. Post-Award Budget Changes

Post-Award changes to project budgets require prior approval. Requests for changes are made with the OR's [Administrative Action Request Form](#).

12. Recommended Purchasing Deadlines for Grants

All grant expenditures must be posted or encumbered on Kennesaw State University's financial ledgers prior to the grant end date.

- Last Month of Award – During the last 30 days of the award Project Managers should notify their Grant Accountant of any purchases (procurement card, ePro requisitions, travel, etc.) incurred. Notification should be provided immediately to assure that the expenses are posted to KSU's ledgers prior to the award end date. In general, supplies and materials purchased for the project should be consumed by the award's end date. Residual inventories of supplies valued at more than \$5,000 are subject to specific requirements for their handling.
- Grant-Specific Deadline(s) – You must reference the individual grant/contract for grant-specific deadlines set by funding agencies (i.e., narrative reporting, etc.). The Office of Research is responsible for all fiscal reporting. Please contact the OR if you have any questions about these deadlines.

C. Personnel Issues

1. Hiring Personnel

The following sections provide a brief overview of the process and rules for hiring both students and non-student employees. Please contact your Grants Manager or the Department of Human Resources for additional information and assistance.

2. Salaries and Wages

Salaries and wages are allowable as a direct cost to the extent that they are reasonable and conform to established University salary and wage policy.

a. General Policy

All personnel involved in a sponsored project effort, whether faculty, professional staff, clerical staff, or students (research assistants), must be paid in accordance with University and state guidelines. Budgeted amounts contained in a proposal do not in any way supersede University policies. The salary and wage categories and job or position classifications on sponsored projects must be congruent with those established for other employees of the University. Salary rates and increments are, therefore, subject to the regulations applied to all other University employees of the same classification. Exceptions may result in audit disallowances.

b. Summer and Maymester Payroll

Summer and Maymester pay is subject to requirements different from those during the remainder of the academic year.

- The project director is responsible for ensuring his/her department chair submits to Academic Affairs the faculty names, amounts, and grant account for those that are budgeted to be paid Maymester and Summer payroll from externally funded grants and contracts.
- Maymester payroll is charged to the current fiscal year (ending June 30). Maymester payroll is paid for work completed during the month of May, not June.
- If work is done during the summer months (June and July), faculty should be paid through summer payroll, which posts in the next fiscal year (which begins July 1). Thus, the grant end date should carry into the next fiscal year in order to support the processing of summer payroll through the award.
- In addition, a Time and Effort report is required as backup documentation for any Maymester or summer payroll charged to federal sponsored awards.
- For specific Kennesaw State University submission deadlines for faculty payroll, please contact the Office of Academic Affairs. For KSU Maymester or summer payroll check dates, please contact the Office of Payroll.

3. Leave Benefits

Personnel paid from a sponsored program account receive the same leave benefits as personnel paid from other University funds. Staff and fiscal year appointees are encouraged to utilize accrued vacation before the program's termination date. If the contract or grant does not have sufficient funds to pay the accrued vacation, it is the responsibility of the employing department to provide the necessary funding. The Principal Investigator must ensure that these employees accurately report their vacation time prior to the project's expiration.

4. Training Stipends

A training stipend is an allowance granted to an individual to assist with his or her living expenses during a period of training (e.g., while attending a workshop or conference). Training stipends are not considered compensation for the services expected of an employee. Payment to KSU faculty or staff for work on a grant or contract is paid as salary, not as a stipend.

5. Time-Limited Appointments

Normally, positions under contracts and grants are time-limited and for a stated definite term. Otherwise, an employing unit has a continuing obligation to the person after the end of the funding period. During the recruitment period, the Principal Investigator will be advised by staff in the Office of Human Resources about how to describe the position to interviewees.

6. Reduction in Force (RIF) Policy

The Board of Regent Reduction in Force (RIF) Policy applies to the following contingencies:

- Grant expiration, budget reduction, and/or funding changes; *i.e. grant funding is scheduled to expire and will no longer be available to support the salaries for the position*
- Programmatic changes that result in the elimination of or decrease in services; *i.e. enrollment in a program is low and can no longer support the salaries for the positions servicing the program*
- Reorganization that results in a shifting of responsibilities or elimination of certain tasks altogether;
- Business process changes that redistribute work so that a position is no longer required; and
- Other organizational changes that might prompt an adjustment to staffing needs.

Note that the RIF Policy specifically prohibits its use to address employee performance issues.

The hiring manager is responsible for notifying the KSU Human Resources office at least 90 days before funding for a position is scheduled to end. This timeline applies even when there is the potential for the funding to be extended. If funding is continued, the Reduction in Force Policy process can be halted.

The KSU Human Resources office will assist the hiring manager in following the guidelines of the RIF policy, including appropriate notification to the employee in writing. Adhering to this policy limits the amount of liability the University could face during the separation process

7. Charging Administrative and Clerical Salaries and Staff Benefits as Direct Costs

Salaries and fringe benefits of administrative and clerical staff may be charged as direct costs if a project requires the services of administrative and clerical staff beyond the normal level provided by departmental administrators paid from a department account. The total cost of these services may be budgeted, charged, and reported as a direct cost to a sponsored project when *all* of the following conditions apply.

- The specific type and nature of the services are not provided by the departmental administration account.
- The services are required by the project's scope.
- The cost can be accurately identified to the project.
- The approved project budget narrative clearly describes the need for the service. For example, charging administrative and clerical salaries and fringe benefits as a direct charge to a sponsored project may be permissible for projects requiring:
 - Extensive data accumulation, statistical analysis and entry, database management, surveying, tabulation, cataloging, or literature review.
 - The preparation and production of manuals and large reports or books. (This does not include routine progress and technical reports.)
 - Extensive travel and meeting arrangements for a large number of participants, such as conferences and seminars.
 - The management of a project at locations geographically inaccessible to normal departmental administrative services, such as research field-sites remote from campus.
 - Special research security services at a level not normally provided by campus security.

- Large, complex programs (such as general clinical research centers, primate centers, environmental research centers, engineering research centers, and other federally sponsored projects) that entail assembling and managing teams of investigators from a number of institutions or units. National Institutes of Health R01 Grants do not qualify as complex programs.

These examples are not an exhaustive list, nor do they imply that direct charging of administrative or clerical salaries would always be appropriate for the situations illustrated in the examples. Furthermore, separate projects cannot be grouped together to meet any of the criteria listed above. The project director must support and justify in the proposal all direct costs to be charged to a sponsored award and are, therefore, strongly advised to discuss such costs with the Office of Research staff.

8. Release Time

If a grant supports a course release, the project director is responsible for notifying the Office of Research via email or memorandum about the course release(s) schedule to charge against the appropriate grants during the semester in which the course release is taken. Reassignment of faculty time from standard teaching responsibilities to a sponsored program may occur by paying a different person to teach one or more of the researcher's courses. The following rules govern course releases and reassignments.

- The project director is responsible for notifying the Office of Research via email or memorandum about the course release(s) scheduled to charge each semester (Fall and Spring). The cost of the reassignment is charged to the appropriate grant or contract during the semester in which the course release is taken.
- Once notified, the Office of Research will process the course release(s) journal against the appropriate grant to release the funds in the corresponding department.
- When the Office of Finance and Accounting has processed the journal, the Office of Research will notify, via email, the Business Manager with a copy to the Academic Fiscal Affairs Officer in Academic Affairs.
- The Business Manager is responsible for working with the appropriate person(s) within their college and the Academic Fiscal Affairs Officer in Academic Affairs to process any budget amendments to redirect the funds for the college.
- A Time-and-Effort Report will be required as backup documentation for any course releases and/or redirects charged to federally sponsored awards.

D. Treatment of Facilities and Administrative Costs

1. Distribution of Indirect Costs

Indirects/Facilities and Administrative (F&A) costs earned on awards are shared between the Kennesaw State University Research and Service Foundation (KSURSF) and KSU. Indirects retained by KSURSF are used to defray audit, banking, and other administrative costs it incurs, and are also used to support research and intellectual property development.

Each award is tied to the Principal Investigator's (PI's) department. University indirects are distributed as follows:

- **50%** - Dean of responsible college (the PI's home college) to share with department(s) and investigator(s)

30% - Office of the Vice President for Operations

20% - Office of the Vice President for Research and Dean of the Graduate College

2. *Transfer of Earned Indirect Costs*

The Office of Research transfers earned indirects to the respective dean's indirects account upon payment to the University by KSURSF. Business Managers receive email notification indicating that the indirects journal has been posted. Business Managers may, upon approval of the Dean, transfer funds from the Dean's indirects account to an indirects account established under a department within the college; funds cannot be transferred to a regular state departmental account.

3. *Indirects Earned on Inter-College/Intra-University Collaborations*

When faculty/staff from more than one college collaborate on a proposal, the question, "Who gets the indirects?" often arises. The distribution of the PI college's share of indirects is decided by the project investigators and their deans, not the Office of Research (OR). Although projects often have multiple investigators, only one is named the PI and is the contact for the OR and the sponsor. The collaborating investigators decide who will serve as the PI.

Where more than one college is involved, it is advisable to have a written plan signed by the respective investigators and deans, and possibly also the department chairs and college business managers. This should be done at the proposal stage.

Once indirects are earned, the Office of Research will post them as listed above. The college business manager will be responsible for transferring the agreed-upon amount(s) to the collaborating college(s)/unit(s).

E. Cost Sharing or Matching

1. *Fulfillment of Cost Sharing Agreement*

Once a sponsor accepts a proposal containing cost sharing, it is considered binding upon the University and the University accepts the same fiduciary responsibilities in expending these funds as for the funds from the sponsoring agency. Written approval from the sponsor is required to change the matching or cost sharing commitment. The Principal Investigator is responsible for ensuring that any cost sharing commitments are met and that all necessary documentation is provided to the Office of Research. Cost sharing or matching expenditures incurred or services rendered must occur during the period of the award and are subject to the same sponsor guidelines and regulations.

If, at the time of award, the sponsor's level of support is less than the University's originally proposed budget, any original matching commitments offered by the University or external entities on behalf of KSU should be reconsidered for possible reduction or elimination from the award in consultation with the Office of Research. If conditions arise that make it impossible to satisfy the matching requirements, the Principal Investigator should inform the Office of Research immediately. The Office of Research is responsible for renegotiating any reduction in the level of matching required by the sponsor. The Principal Investigator is responsible for eliminating any matching shortfall requirements.

2. *Characteristics of Contributions to Shared Costs of Federally Sponsored Projects*

The Office of Management and Budget (OMB) Circular A-110 definitions of cost sharing and matching contributions require that they meet all of the following criteria:

- Are verifiable from the records of the Principal Investigator.
- Are not being included as contributions for any other federally assisted project or program.
- Are necessary and reasonable for proper and efficient accomplishment of project or program objectives.
- Are allowable under the applicable cost principles.
- Are not paid by the federal government under another award, except where authorized by federal statute to be used for cost sharing or matching.
- Are provided for in the approved budget when required by the federal awarding agency.
- Unrecovered indirect costs may be used as cost sharing or matching only with the prior approval of the federal-awarding agency.

3. *Capturing Required Information*

To assist the Principal Investigator in capturing the cost sharing information in accordance with University requirements, the Office of Research will provide guidance.

F. Program Income

1. *Definition*

Program income is the gross revenue earned from activities for which the direct costs have been charged to a grant (or sub-grant) or counted as a direct cost toward meeting a cost sharing or matching requirement of a grant.

2. *Examples of Program Income*

In addition to other possible sources, program income includes:

- Fees for services such as laboratory drug testing or conference fees
- Proceeds from sale of equipment or supplies purchased or constructed with grant funds if title does not vest in the grantee
- Usage or rental fees charged for use of facilities or equipment such as computer use charges
- Funds generated by the sale of commodities such as sale of tissue cultures, cell lines, or research animals
- Third party patient reimbursements for hospitals or other medical services where such reimbursement occurs because of the grant supported activity
- Patent or copyright royalties

3. *Accounting of Program Income*

The Office of Research should be contacted at the time it is recognized program income will be generated. The OR will assist in establishing the proper method of accounting for the income. Because program income has the same accountability requirements as federal grant funds, the Office of Research will select a mechanism that will account for program income in accordance with federal requirements. Program income, in accordance with specific agency requirements, will be reported to the sponsoring agency on financial reports that are prepared periodically.

G. Time and Effort Reporting

Kennesaw State University uses an after-the-fact system of documenting time and effort charged to federal grants and contracts. The University's payroll distribution system meets the United States Office of Management and Budget (OMB) standards. [OMB, 2CFR, Part200.430, paragraph \(i\)](#) states that charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed.

Grant Accounting prepares and distributes effort certification reports via email to the PI for salaries and wages charged to federally sponsored grants and contracts either as a direct charge or as a cost shared commitment. These reports are based on payroll records. KSU distributes effort reports per semester.

The recipient of an effort report should certify his/her own effort report unless the employee is no longer available to certify. In this event, the Principal Investigator, or person with direct knowledge of the employee's workload, must certify the report. Grant Accounting accepts original signatures returned via campus mail and scanned reports via email.

For questions regarding time and effort reporting, please contact Grant Accounting at grantoff@kennesaw.edu.

H. Project Residual Funds

1. Residual Balances

A residual balance is unobligated money remaining in a fixed-price sponsored project after closeout. Cost reimbursement grants and contracts cannot have residual balances. Projects that have a balance after the period of performance has ended may be permitted to carry that balance forward if allowed by the sponsor under the specific terms of the project.

2. Kennesaw State University Research and Service Foundation Funds

Before KSURSF can close out an award, the project director must sign and return the KSURSF Grant Closeout Form acknowledging that:

- All deliverables have been met;
- All sponsor-required activities have been completed;
- All program reports have been submitted to the funding agency; and
- All project related expenses have been posted to the account.

If there is a residual balance at closeout, after ensuring that the appropriate F&A rate or management fee has been applied, KSURSF will transfer the residual funds to a KSURSF department or center operating account. These accounts do not lapse. Funds in these accounts must be used to support KSURSF's mission.

3. Kennesaw State University Funds

If the award was made to the University (not the KSU Research and Service Foundation) the project director has the time remaining in the current fiscal year and one additional fiscal year to spend the residual funds. The Office of Research will notify the project director when one fiscal year remains

in which to expend the residual balance. Any funds remaining in the account at the end of the period will be transferred to the project director's home department budget and will become lapsable at fiscal year-end. Grant accounts with a residual balance of less than \$100 will automatically be transferred to the departmental account at project closeout.

Residual funds must be used for a purpose that is related to the project or to enhance programs to which the project is tied within the director's home college. Residual funds may be used to support the project director's professional development or for the professional development of other faculty members in the director's home college. The State of Georgia's rules and regulations apply to the use of residual funds.

I. Cost Transfers

1. Introduction

A cost transfer occurs when costs are moved from a non-sponsored project account to a sponsored project or from a sponsored project to any other account. Cost transfers receive careful scrutiny by sponsors, especially federal government contracting officers and auditors, and are exceptional activities that should not occur frequently.

2. Exclusions

The following accounting activities are *not* defined as cost transfers.

a. Initial Transfers

Initial transfers of charges for supplies or services from an inventory account, cost center, or other similar operations in accordance with established accounting procedures.

b. Corrections Processing Errors

Corrections of processing errors that occur within the Office of Finance and Accounting's accounting systems, such that when the correction is made, the accounting records are in agreement with the documentation that authorized the change.

3. Error Correction by Cost Transfers

Cost transfers required to correct errors or to achieve proper, consistent, and equitable distribution of costs to sponsored projects are allowed, provided adequate justification for the change is furnished and necessary approvals that certify the accuracy of the charges are received. Corrections must be made promptly after the error is discovered. A cost transfer made within **30 days** after the posting date of the transaction requiring a transfer will be considered timely. In other exceptional instances, cost transfers may be required after the 30-day period. The transfer must be supported by a written explanation of how and why the error occurred and a certification of the correctness of the accounting change. An explanation that merely states that the transfer was made "to correct error" or "to transfer to correct project" is not sufficient. The Office of Research will approve or disapprove the request for a cost transfer when all requested documentation and justifications have been provided.

4. Cost Transfers of Personal Service Expenses

Cost transfers of personal service expenses (salary or fringe distribution changes) requests require adequate supporting statements that clearly indicate that the costs being moved to a project are directly related to the project scope and allowable by the project budget and have been incurred in a

timely manner to benefit project activities. In addition, a Time and Effort report will be required as back-up documentation prior to any personal services reallocations for federal awards. Justification must always consist of more than simple statement such as “to correct an error” or “posted to the project number.” While such statements may be correct, justification must be considered adequate to convince a sponsor or auditor of the accuracy of the charge to the sponsored project. The Office of Research approves the cost transfer as to accuracy of the accounting, the proper authorization, and the adequacy of the documentation.

5. Unallowable Cost Transfers

Costs may not be shifted between accounts or from one budget period to the next solely to cover cost overruns. Cost transfers based on funding considerations are prohibited (i.e., cost transfers cannot be done to expend remaining funds). The intentional “parking” of charges on a restricted grant or contract pending transfer to another grant or contract account upon its funding is unallowable. Parking of charges for any reason is considered a misuse of grant funds.

J. No-Cost Extensions

Should you be unable to complete your project by the end date, you may be allowed to request a no-cost extension. Extensions are not appropriate when the sole purpose is to spend down remaining funds. Most federal agencies allow the institution to have a one-year no-cost extension. For other agencies, prior approval is required from the funder.

Requests for a no-cost extension must be sent to the Office of Research *at least 15 days prior to the project end date* using the OR’s [Administrative Action Request Form](#).

IX. Close Out of Agreements

A. Closeout Process

To comply with federal regulations, a formal project closeout consists of the following steps:

- In order to explain the closeout process, the Office of Research will contact the Principal Investigator 60 days prior to the end of the project.
- The Principal Investigator is responsible for initiating requests for extensions by the funding agency via the Office of Research using the [Administrative Action Request Form](#). Prior to requesting the extension, an assessment of the budget status and the timeframe in which to complete the expenditures should be addressed with the Office of Research. This will help assure that all fiscal matters, including matching, are appropriately considered in the request for extension.
- Accounts will be made inactive after the project termination date. The Principal Investigator will work with the Office of Research to ensure that all transactions are completed and charged to the accounts prior to the prescribed sponsor deadline.

Programmatic reports due to the funding agency at the close of the grant are the responsibility of the project director.

B. Audit Matters and Reports

1. General

All contract and grant funds awarded to the University are subject to audit. Audits may be performed at multiple levels including the:

- University Internal Auditor
- Office of the State Auditor
- Federal Auditors
- Public Auditors

2. Focal Point for Audit Matters

The Office of Research is responsible for coordinating all audit matters related to sponsored research of the University. Federal, state, and public firm auditors must make their initial contact with the OR. Subsequent contacts by auditors with other University departments will be preceded by advance notice from the OR. The purpose of the advance contact is to identify the auditors, outline the general purpose of the visit, and facilitate the audit. Questions concerning the official status of an auditor should be referred to the OR.

3. Grants Accounting Administration Representation

Depending upon the nature of the audit or subject matter, the Office of Research may elect to be represented in audit discussions at the departmental level. Should departmental personnel require guidance at any time, the OR must be contacted without hesitation. The OR participates in and

coordinates audit exit briefing as deemed necessary by the significance and nature of the audit findings and recommendations.

4. Right of Access

Under the legal terms of grants and contracts awards, auditors have the right of access to all official University records associated with an award. The University is obligated to make such records readily available for examination.

5. Exit Conference

At the conclusion of an audit and prior to the issuance of the formal report, auditors normally conduct an exit conference. The purpose of this meeting is to review audit findings and tentative conclusions, exceptions, and recommendations. At this meeting, the University has an opportunity to comment on the audit findings and to provide additional information where appropriate.

6. Audit Response

The Office of Research is responsible for coordinating the University's response to audits of contracts and grants. This responsibility in no way relieves the Principal Investigator or department concerned from providing necessary input in a timely manner or from resolving financial liability, which may ultimately be assessed as a result of audit exceptions.

The University's response must be coordinated through established channels. Under no circumstances may a department or individual initiate a direct response to an audit.

7. Cost Disallowance

Financial responsibility for audit disallowances rests with the Principal Investigator, department, and college having primary responsibility for the project on which costs are questioned. Disallowances cannot be charged to any federal or state-funded accounts. Personal liability may be considered and assessed when an audit disallowance stemmed from gross negligence or malfeasance on the part of an employee or staff member.

C. Research Records

The preparation, sharing, and retention of appropriate records are essential components of any research endeavor at Kennesaw State University. The University, its faculty, and its trainees have a common interest and a shared responsibility to assure that research is appropriately recorded, shared, and retained. Original records may be required to:

- protect the University's intellectual property rights,
- answer ongoing questions regarding the management of a research program,
- address possible questions that may arise regarding the propriety of research conduct, and
- comply with the data sharing requirements of many sponsors (e.g., NIH).

Most importantly, it is essential that original research records be mutually available to all the collaborators on a research project.

Research records include, by way of example but not limitation, material contained in research notes, in laboratory notebooks, and in other media, such as computer disks and instrument printouts. Significant research materials or products generated by any research are also part of the record and should be retained and available.

Research records must be available to collaborators (co-investigators, supervisors, and their trainees). In collaborative projects, all investigators should know the status of all contributing research records and have access to them consistent with confidentiality restrictions. Investigators also should be aware if their research records are subject to specific data sharing requirements of a sponsor.

Faculty members, or the responsible investigators, have the obligation to ensure that, for all aspects of their research programs, sufficient records are kept to document the experimental methods and accuracy of data collection as well as the methods and accuracy of data interpretation. This policy does not create an obligation to retain the research records of an unfunded project unless it results in publication or involves the use of animals or human subjects. The *original* research records should be archived for a **minimum of five years** after final reporting or publication of a project (or longer if required by an external sponsor, law, rule, or regulation). In addition, the records should be kept for as long as may be required to protect any patents resulting from the work. If questions regarding the research are raised during the required retention period, the records must be retained until all the questions are fully resolved. In the event an investigator leaves Kennesaw State University for any reason, the original research records must be retained at the University and the investigator's department and collaborators notified as to their location.

Kennesaw State University is the primary owner of research records. The University has the right of access to the supporting records for all research carried out through the University with the understanding that information or data that would violate the confidentiality of sources or subjects involved in the research should not be disclosed. In addition, extramural sponsors providing support for research at the University may have the right to review any data and records resulting from that extramural support.

X. Research Compliance

A. Scholarly Misconduct

1. Background

Federal regulations define Research Misconduct “as fabrication, falsification, or plagiarism in proposing, performing, or reviewing research or in reporting research results.” Faculty, staff, and students of KSU are expected to conform to the highest standards in research and creative activities including ethical, legal, and regulatory standards of the University, funding agencies, and regulatory agencies. The scholarly misconduct policy is located in the [KSU University Handbook, Section 5.2.3](#).

2. Training Plan

Prior to submission of a National Science Foundation proposal, personnel to be involved in the project must complete sections of an [online research ethics course](#). Complete the course Introduction and Sections One (Ethical Issues in Research), Two (Interpersonal Responsibility), Three (Institutional Responsibility), and Four (Professional Responsibility). *Include the certificates with your Internal Routing Form at proposal submission.* Other online training programs may be acceptable; please check with Office of Research.

The Office of Research Integrity is the federal agency charged with ensuring the responsible conduct of research and creative activity. The ORI website includes instructional materials for use by faculty in teaching postdoctoral and student researchers all aspects of ethical conduct of research (<http://ori.hhs.gov>). The Office of Research staff can direct you to other sources of instructional material.

3. Training for Students

KSU students will complete the CITI online RCR training for their respective discipline and forward the curriculum completion report to their faculty research supervisor, who will keep a copy and forward a copy to the Office of Research. This training must be completed before commencing paid research with NSF funding. In addition to this online training, students will complete a face-to-face training segment with the faculty member under whose direction they are conducting research. Office of Research staff will work with the faculty member on this segment. Possibilities include having students read *On Being a Scientist* or *The Immortal Life of Henrietta Lacks* and then discuss it with the faculty member. Office of Research staff will follow-up with the faculty member on this face-to-face training.

B. Conflicts of Interest in Research and Sponsored Programs

1. Policy

Kennesaw State University complies with federal regulations ensuring that sponsored activities will not be compromised by investigators’ financial interests that could be reasonably expected to bias the design, conduct, or reporting of the research. In accordance with these regulations, the University has the responsibility to disclose, manage, reduce, or eliminate any actual or potential conflicts of interest that may be presented by a financial interest of an investigator. This policy and

the implementation procedures apply to research, educational, or service projects funded by federal agencies either directly to the Kennesaw State University Research and Service Foundation or through another institution or organization by a subaward.

a. Definitions

- 1) Conflict of Interest – A conflict of interest exists when the university reviewer(s) reasonably determines that a significant financial interest could directly and significantly bias the design, conduct, or reporting of the federally-funded research, educational, or service activities.
- 2) Investigator – Investigator means the Principal Investigator, Co-Principal Investigators(s), co-project directors, and any other person(s) responsible for the design, conduct, or reporting of research, educational, or service activities funded, or proposed for funding. Interests of the investigator that would constitute a conflict of interest include interests of the investigator’s spouse and dependent children.
- 3) Institution – Any domestic or foreign, public or private, entity or organization (excluding a Federal agency).
- 4) Research – A systematic investigation designed to develop or contribute to knowledge. The term encompasses basic and applied research and product development.
- 5) Significant Financial Interest – Significant financial interest means anything of monetary value, including but not limited to:
 - Salary or other payments for services (e.g., consulting fees or honoraria), or income generated by the manufacture or sale of products;
 - Equity interests (e.g., stocks, stock options or other ownership interests); or
 - Intellectual property rights (e.g., patents, copyrights and royalties from such rights).

b. Exclusions

Conflict of Interest does not apply to the following:

- Salary, royalties, or other remuneration from the applicant institution;
- Any ownership interests in the institution, if the institution is an applicant under the Small Business Innovation in Research program;
- Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
- Income from service on advisory committees or review panels for public or nonprofit entities;
- An equity interest that when aggregated for the investigator and the investigator’s spouse and dependent children, (1) does not exceed **\$10,000** in value, as determined through reference to public prices or other reasonable measures of fair market value, and (2) does not represent more than a five percent ownership interest in any single entity (both conditions must be met); or
- Salary, royalties, or other payments that, when aggregated for the investor and the investigator’s spouse and dependent children over the next 12 months, are not expected to exceed **\$10,000**.

2. Procedures

Compliance with the federal regulations requires that investigators disclose a listing of significant financial interests (and those of his/her spouse and dependent children) that would reasonably appear to affect the research or educational activity funded, or proposed for funding, or in entities whose financial interests would reasonably appear to affect such activities.

a. Disclosures

Disclosures must be made to the designated university official prior to the submission of a proposal for funding. This official will review the disclosures and determine which, if any, financial interests could directly and significantly affect the design, conduct, or reporting of the research. The institution must, prior to any expenditure of awarded funds, comply with the conflict of interests reporting requirements of the funding agency.

b. Disclosures Process

Financial disclosures must be updated at least annually during the award period and more frequently as new reportable significant financial interests are obtained. The procedural steps for this policy are as follows:

- 1) Investigators applying to the National Science Foundation are required to complete the [Disclosure Questionnaire for Significant Financial Interests](#). If the investigator does have activities to report that may constitute a conflict of interest, the [Statement of Significant Financial Interest](#), must also be submitted in a sealed envelope marked CONFIDENTIAL. Forms should be forwarded to the Office of Research at the same time the proposal is submitted for the administrative review process. Applicants to the programs sponsored by the National Health Service or the National Institute of Justice must complete their [Financial Conflict of Interest Form](#).
- 2) The Director of Proposal Development will review the proposal and disclosure questionnaire only and forward the questionnaire and the sealed envelope containing the Statement of Significant Financial Interest to the Vice President for Research, the designated university official. Disclosure questionnaires will be retained within the investigator's proposal file in the Office of Research.
- 3) After a grant application has been submitted, and prior to the acceptance of an award, the Vice President for Research will review all financial disclosures, determine whether a conflict of interest exists, and if so, determine what conditions or restrictions, if any, should be imposed by the institution to manage, reduce, or eliminate such conflicts.
- 4) Concurrent with the foregoing process, the investigator, in cooperation with the investigator's department chair and dean, shall develop and present to the Vice President for Research a resolution plan that details proposed steps that could be taken to manage, reduce, or eliminate any actual or potential conflict of interest presented by a significant financial interest. This plan will be seriously considered in the determination of appropriate action. Examples of conditions or restrictions that might be imposed include, but are not limited to:
 - Public disclosure of significant financial interests;
 - Monitoring of the research or project by independent reviewers;
 - Modification of the research or educational plan;

- Disqualification from participation in all or a portion of the research or educational activity;
 - Divestiture of significant financial interests; or
 - Severance of relationships that create actual or potential conflicts.
- 5) Should the investigator disagree with the proposed conditions or restrictions, he/she may appeal the decision. The Vice President for Research will convene a review committee comprised of three to four senior faculty (not above department chair level) representing a cross section of disciplines and a research administrator to hear the appeal. The committee will review the disclosed potential conflicts and either concur with the previous resolution plan or suggest amendments based upon supporting documentation and agency regulations. Final resolution of conflict of interest questions will rest with the President of Kennesaw State University.
 - 6) The approved resolution plan shall be incorporated into a memorandum of understanding (MOU) between KSU and the investigator that details the conditions or restrictions imposed upon the investigator in the conduct of the project or in the relationship with the business enterprise or entity. The MOU shall be signed by the investigator, the department chair/unit head, the dean, and the Vice President for Research.
 - 7) If the Vice President for Research determines that imposing the conditions or restrictions would be either ineffective or inequitable and that the potential negative impacts that might arise from a significant financial interest are outweighed by interests of scientific progress, technology transfer, or the public health and welfare, then he/she may recommend that, to the extent permitted by federal regulations, the research go forward without imposing such conditions or restrictions.
 - 8) Prior to expenditure of any funds under an award, the university will comply with reporting requirements of the sponsoring agency concerning the existence of a conflict of interest. The investigator will update any financial disclosures at least annually throughout the period of the award or more frequently as new reportable significant financial interest is obtained.
 - 9) For any interest that the institution identifies as conflicting subsequent to the institution's initial report under the award, the report will be made and the conflicting interest managed, reduced, or eliminated, at least on an interim basis, within 60 days of that identification.
 - 10) Records of investigator financial disclosures and of actions taken to manage actual or potential conflicts of interest shall be retained by the Vice President for Research for **at least three years** beyond the completion of the grant or longer if required by the agency.
 - 11) The university agrees to make information available, upon request, to the sponsoring agency regarding all conflicts of interest for the specified PI identified by the institution and outlining how those interests have been managed, reduced, or eliminated to protect the project from bias.

- 12) If an investigator violates this policy or the terms of the MOU, the Vice President for Research will recommend appropriate sanctions to the President of the university. If failure to comply has biased the design, conduct, or reporting of the funded research or educational activity, the institution will promptly notify the awarding agency of the corrective action taken or to be taken. The awarding agency may take action or refer the matter to the institution for further action.
- 13) Collaborators/sub-recipients/subcontractors from other academic/not-for-profit institutions must either comply with this policy or provide a certification from their institutions that they are in compliance with federal policies regarding investigator significant financial interest disclosure and that their portion of the project is in compliance with their institutional policies.

C. Institutional Review Board (IRB)

1. *Role of the Institutional Review Board*

An institutional review board is a committee established to protect the rights and welfare of all human subjects who volunteer to participate in research studies conducted under the auspices of a university, research institute, or hospital.

The KSU Institutional Review Board (IRB) oversees all research sponsored by the University involving human subjects. This includes the collection and/or analysis of data from human beings intended for publication or presentation or dissemination to an external audience. The IRB ensures that potential research-related risks (physical, social, emotional, and financial) are minimized and fully disclosed so that volunteers can make an informed decision about participation. To provide appropriate oversight and protection:

- All research conducted at Kennesaw State University involving human subjects must be reviewed and approved by the IRB and the research must be conducted according to relevant university, state, and federal regulations.
- Furthermore, all researchers not affiliated with Kennesaw State University must request permission to recruit research participants on the Kennesaw State University campus. Instructions for requesting permission can be found [here](#).

For assistance and additional information contact the IRB Administrator.

2. *Review Process*

Instructions for submitting an IRB application for review can be found [here](#). The following is a brief overview of the process.

An IRB [Approval Request Form, a consent form or cover letter](#), and any survey instruments or questions to be used in the study must be submitted to irb@kennesaw.edu. Protocols for student research must be reviewed and submitted by the student's faculty research advisor; those received directly from students will not be reviewed. Submission of an IRB approval request form by email indicates that the investigator has read and understands the [KSU Assurance of Compliance policy](#).

Approval can often be obtained within two weeks (10 business days); however, if full-board approval is required the proposal must be considered at a regular meeting of the entire IRB, which occurs on the third Tuesday of each month if there are proposals to consider. Request for review of a proposal should be made to the IRB at least 30 calendar days in advance of the third- Tuesday meeting time. IRB approval and training are not required at the proposal stage, but are required before a grant-funded project can commence.

Prior to conducting or assisting with research, each investigator (including faculty, staff and students) *must* complete a training course in human subjects protection to obtain IRB certification. KSU has selected the [Collaborative Institutional Training Initiative \(CITI\) web-based training program](#) as the official certification program for KSU-affiliated personnel. The program consists of a basic course of modules for biomedical research, social/behavioral research, and student research. The certification must be renewed every **three years**.

D. Drug-Free Workplace

As a recipient of Federal funds, Kennesaw State University supports and complies with the provisions of the Drug-Free Schools and Communities Act of 1989 and the Drug-Free Workplace Act of 1988. Kennesaw State University's policy is described in the [KSU University Handbook Section 5.2.9](#).

Completion of an online training program is required of all Kennesaw State University employees included in federally sponsored proposals. The program is located [here](#).

E. Export Controls

The federal government has recognized *fundamental research* as “*basic and applied research in science and engineering where the resulting information is to be shared broadly within the scientific community*” (National Security Decision Directive 189). Restricted or classified research produces results that are not shared broadly. Fundamental research is not subject to export controls when conducted within the borders of the United States. However, fundamental research of any kind occurring abroad is subject to export controls if restricted equipment, software, or information is shipped outside the United States.

Export controls are restrictions imposed by the federal government on access to, dissemination of, and transfers of some equipment, software, and data. Providing access to restricted technology or information to non-US persons (i.e., those who are not either American citizens, legal residents, and other protected persons) while in the United States or while abroad may be considered as an export, re-export, or deemed export. For this purpose, export is “the shipment of tangible items and the transmission or transfer of software code or information to another country, while a ‘deemed export’ is the disclosure of controlled software code or information to foreign nationals.”

Principal investigators of projects involving foreign nationals or travel outside the United States must consider whether or not their work is subject to export control restrictions. The implications of federal law governing restricted technologies and the involvement of foreign nationals in research should be discussed with the Office of Research during the early stages of proposal planning.

Violations of export controls can result in major fines against the institution and individuals found guilty and imprisonment of those held responsible.

XI. Miscellaneous Matters

A. Material Transfer Agreements

All research materials that are transferred in or out of the University must be accompanied by a Materials Transfer Agreement (MTA), which will be reviewed and executed by a representative in the Office of Research.

The purpose is to implement a process for the transfer of research material. This policy is designed to make sure that the University has an opportunity to review the terms that may accompany materials that are transferred in or out of the institution. MTAs are agreements between a supplier and a user of research materials. They govern the use of the transferred material and are necessary to protect the rights of both the provider and recipient. Many MTAs include provisions that can cause the provider or recipient to lose the rights to their creations or inventions. Additionally, these agreements may include language that can be used to prevent the recipient from publishing or even continuing his/her research.

Faculty must complete and submit a [Materials Transfer Agreement Checklist](#) to the OR.

If Kennesaw State University is providing material to another institution, the forms package must also include a copy of KSU's [Materials Transfer Agreement template](#) or, if KSU is receiving material, the provider's MTA, together with the contact information for the representative at the other institution who is responsible for negotiating the Materials Transfer Agreement.

The Office of Research will review the MTA checklist and agreement.

After Office of Research approves the MTA checklist and the terms of the MTA are finalized, the Office of Research will obtain the necessary signatures.

As soon as all of the requisite signatures are obtained, the Office of Research will provide the faculty member with a copy of the fully executed MTA, and the faculty member may send or receive the material.

B. Nomination for NEH Summer Stipend Applicants

National Endowment for the Humanities (NEH) Summer Stipends are awards made directly to individual scholars who are pursuing advanced humanities research. NEH requires applicants who are affiliated with colleges and universities to be nominated by their institutions. NEH allows each institution to nominate two faculty members to apply.

Kennesaw State University's nominating official is the Vice President for Research.

The Office of Research coordinates nominations for NEH Summer Stipends. Faculty who would like to be nominated for a summer stipend must meet the NEH eligibility criteria listed in the program guidelines and should submit the following:

- A proposal draft of 2-6 double-spaced pages (1-inch margins, 12-point Times New Roman font) addressing the areas identified in the program guidelines.
- A one-page bio describing the applicant's qualifications.

Provide these two items as a single Word or .pdf file to sponprog@kennesaw.edu by the **second Monday in June**.

A review committee of KSU humanities scholars will read proposals and recommend two faculty members to receive the nomination. The Vice President for Research makes the final decision. Notification will be made by the **end of June**.