A Guide for Principal Investigators:

Managing External Grant Post-Award Activities

Updated May 11, 2015

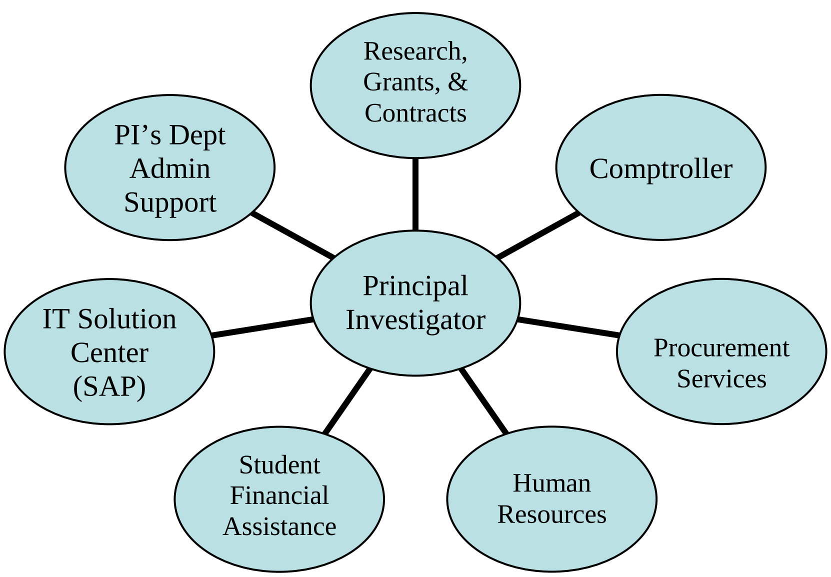
Developed by the NKU Office of the Comptroller and the Office of Research, Grants & Contracts with input from Procurement Services, Human Resources, Student Financial Assistance, Information Technology Solution Center, and numerous other faculty and staff.

Introduction

The purpose of this manual is to provide a roadmap for the Principal Investigator (PI) in administering and managing key **grant/contract post-award** activities. These activities span the post-award process from negotiating the initial grant award contract to preparing final reports at the close of the grant project. This manual also includes NKU-specific information such as processes, regulations, and personnel contacts that pertain to the management of the grant award.

To successfully manage a grant award, there are several NKU departments that instruct and assist the Principal Investigator in the grant award endeavor. For example,

- The Office of the Comptroller grant & contract staff manages the grant financial accounting and serves as the contact point with funding sponsors and PIs on fiscal matters; manages NKU employee and staff travel; conducts grant post award administration training, and assists the Information Technology Solution Center with SAP grant training. Provides a grant administrator position to assist with grant transactional duties within SAP.
- Procurement Services assists with purchasing supplies/equipment, obtaining a University issued procurement credit card (Pro-card), and contracting with external vendors/contractors.
- Human Resources assists with hiring NKU faculty and staff on the grant.
- Student Financial Assistance helps with hiring NKU students on the grant.
- Information Technology Solution Center helps train the PI on use of SAP grant management functions/reports and on use of the Business Warehouse database tool.
- The PI's Departmental Administrative Support assists with personnel hiring paperwork and can offer guidance in Finance, Human Resources, and travel processes.
- The Office of Research, Grants and Contracts (RGC) assists with grant award contractual matters through the life of the award. RGC also maintains and monitors all research protocols and provides support to individuals to ensure compliance with state and federal research guidelines.



See Appendix I for a list of the main website and key contact information for each of the above departments.

Table of Contents for Post-Award Activities

This manual was designed so that the Principal Investigator (PI) can easily navigate to the needed post-award topic. For example, if the PI has no external hiring needs with his or her awarded grant, then that section of this manual need not be reviewed.

Additionally, the content of this post-award manual attempts to minimize replication of instructional materials already posted on NKU departmental websites. Instead, this publication offers links to specific website-based instructions and forms.

Contents

Depending on the grant award, there may be other duties (not listed in this manual) required by the funding sponsor. It is the PI’s responsibility to identify these duties and deliver as needed.

Overview responsibilities of Principal Investigator

Externally funded grants/contracts are awarded to NKU as the fiscal agent; therefore all university policies and procedures must be followed. While the Principal Investigator (PI) may delegate some duties to others, the accountability and responsibility of managing post-award activities always remains with the PI.

Principal Investigator primary post-award responsibilities include:

- conducting the project as described in the grant award agreement
- performing as technical liaison with the funding sponsor
- assuring there is no conflict of interest with anyone involved on the project
- spending budget funds in accordance with funding sponsor/university/state/federal regulations
- maintaining records in accordance with funding sponsor/university/federal regulations
- completing recommended training on how to use the NKU SAP system related to grant award management

Additional PI responsibilities may vary depending on the grant initiative and funding sponsor:

- recruiting, hiring, and managing project personnel
- completing time and effort certification that verifies time worked for positions that are fully or partially funded by grant *or* match funds
- monitoring sub-award performance and assuring that all deliverables listed in the subcontracts are supplied
- working with NKU Office of the Comptroller's staff to document external cost-sharing (match) committed in the grant award
- following NKU policies and procedures related to research compliance
- preparing and submitting required non-financial reports

Finalizing the grant award contract

The Office of Research, Grants & Contracts (RG&C) is NKU's authorized signature authority for external grant-related efforts; the Principal Investigator (PI) is *not* authorized to sign contracts. Whenever grant contractual documents are concerned, the RG&C must be involved.

The steps involved in finalizing the grant award include:

1. Negotiating the initial award. There are instances when a negotiation of the award amount, contract terms, and/or scope of work is needed *before* finalizing the award and forwarding the contract to NKU. For example, if the PI's original grant proposal requested $50,000 and the funding sponsor offered $40,000, then a negotiation is warranted. This could entail revising and resubmitting the budget and budget justification. In this scenario, RG&C assists the PI in conducting these negotiations.
2. Receiving the grant paperwork. When a funding sponsor awards a grant, RG&C is the typical recipient of the funding sponsor's award notification along with the approved budget and the contract (that includes terms and conditions). On occasion, the funding sponsor sends this award notification/paperwork to the PI. If that happens, the PI should contact RG&C and immediately forward the paperwork to RG&C for processing.
3. Checking the grant paperwork. Following receipt of the contract paperwork, RG&C reviews the contract for compliance and communicates with the PI to ensure that all documentation is accurate. Should there be a need to revise the contract language, RG&C will negotiate the contract terms with the sponsor on the behalf of the PI. Once all parties (RG&C, PI, and sponsor) agree on a final version, the RG&C Director will sign on behalf of the university.
4. Setting up the SAP grant account. Once the final contract is executed with all signatures, RG&C sets up the initial grant account in SAP. RG&C then forwards the grant authorization paperwork, which includes a signed copy of the NKU Routing Form, the Authorization to establish a restricted grant account, the final approved grant budget and the budget narrative to the Office of the Comptroller for final SAP setup; this begins the post-award administration of the grant project.
   Remember, an NKU SAP grant account cannot be set up until the NKU Routing form is fully signed <u>and</u> all contractual paperwork is complete.
5. Scheduling the post-award grant meeting. For first time PI's, RG&C emails the PI to set up a post-award meeting to discuss grant administration and management. Those present at this post-award meeting are the PI, their RG&C liaison who has worked with the PI on the grant project, and the Office of the Comptroller Director of Research FDN Accounting & Grant Administration and Grant Administrator. The PI also should invite his or her Departmental Administrative Support to this post-award meeting, given that this person may assist the PI with administrative grant tasks.

At the post-award grant meeting, the PI receives:

- The 7-digit SAP account number that has been set up specifically for the grant and the associated cost center(s).
- Verbal instructions on general management of the grant award, including frequency of required progress and/or financial reports. Relevant university policies and procedures, such as those detailed within the remainder of this document, are discussed.
  After this post-award meeting, the PI is encouraged to review *this* user manual as needed.
- A copy, as appropriate, of the funding agency's grant management guidelines or the web link to those guidelines.

Managing the overall grant award

The following provides general tips for the Principal Investigator (PI) in managing the grant award.

The Principal Investigator:

1. Holds the *only* NKU authorization on key grant-related documents including purchase requisitions, travel documents, interdepartmental bills, budget transfers, and Personnel Action Requests (PAR). Any grant paperwork received in the Office of the Comptroller will be returned if it has *not* been signed by the PI. Many approvals are now completed thru SAP workflow.

2. Understands the terms and conditions of the grant agreement *and* implements the research/project with a focus on scope of work, timeline, budget, and staffing commitments. Changes in *any* of these components must be addressed and managed by the PI with the assistance of his or her Research, Grants & Contracts (RG&C) liaison or the Office of the Comptroller. As needed, RG&C reviews the contract and/or contacts the funding sponsor to determine whether sponsor approval is needed for a change.

3. Adheres to the award contract start and end dates, ensuring that project efforts and spending are contained within those dates. All goods & services must have been received by the grant end date.

4. Follows NKU policies and procedures related to Research Compliance.

   Research Compliance
   RG&C provides support to the research compliance committees for each regulated aspect of NKU research. This includes human subject, animals, use of recombinant DNA, biological toxins, microorganisms and infectious agents. The RG&C compliance manager also maintains and monitors all research protocols and provides support to individuals to ensure compliance with state and federal guidelines.
   Website: http://rgc.nku.edu/ (Select *IRB, IACUC, and BioSafety Research Compliance)*

5. Adheres to NKU policies and procedures related to Conflict of Interest.

   Conflict of Interest
   At NKU, the PI and any Co-PIs are required to define their Conflict of Interest status through the NKU Routing Form. For example, the PI and Co-PIs are asked to declare, via several questions, whether they have any substantial financial or personal interests related to their own research or project efforts. By completing this section of the NKU Routing form and signing the form, the PI and Co-PIs agree to the best of their knowledge that they are in compliance with NKU policy on this topic. If the PI or Co-PIs fail to comply with this agreement, they could face NKU disciplinary action or not be allowed to submit internal or external grant applications in the future.
   Website: http://rgc.nku.edu/ (Find NKU Routing form link in upper right-hand corner)

6. Attends appropriate NKU sponsored training to learn how to manage an external grant. See "*Training on SAP grant functions*" section of this manual for course details.

7. Communicates research misconduct, misuse of grant award funds, or fraud to NKU chair, supervisor, or dean.

Managing the grant award budget - maintaining and authorizing general expenses

When managing the grant budget, the Principal Investigator (PI):

1. Attends NKU sponsored training to learn how to use the NKU SAP system in tracking grant budget items and spending.
   See "*Training on SAP grant functions*" section of this manual for course details.

2. Reviews the Federal "*Grant unallowable costs*" document published on the NKU Office of the Comptroller's website to avoid misspending of grant funds.
   Website: http://comptroller.nku.edu/grants.html

3. Ensures all cost transactions occur *during* the grant award funding period, regardless of when invoices are paid. Items purchased for a grant must be on campus by the grant end date. No pre-award *or* post-award spending is reimbursed without written permission of the funding sponsor.

4. Manages the agreed match (in-kind and third-party) funds. Recognizes that if match is part of the grant award, then all match expenses must be documented and tracked in the same detail as direct expenses paid by the funding sponsor. All match expenses are subject to audit. It is the PI's responsibility to ensure documentation is obtained to support funding matches, and that the documentation is forwarded to the Office of the Comptroller to satisfy audit requirements.

   Match
   In-kind match is a contribution to the grant project that has value but is not monetary in nature. For example, in-kind support can include the value of NKU faculty or professional staff release or re-assign time. An NKU faculty, for instance, can be released by his or her dean from teaching a course during the academic year to focus on the grant initiative. The Office of the Comptroller will set up all release or re-assign time. No PAR paperwork is required.
   In-kind support documentation for faculty and monthly staff is managed via *Time and Effort Certification* in the myNKU portal within the SAP system.

   Third-party match are those funds provided by non-University contributors. These contributions were promised within the original grant proposal and must be met. Third-party match could be volunteer time or cash. For example, a local museum curator agreed to donate 8 hours of time towards the grant project. Therefore, the PI ensures that the curator delivers on this commitment and provides a final written summary that details: (a) total hours spent by the third party, (b) the cost equivalent of those hours (typically the hourly wage rate); and (c) a signature of the third party. The PI forwards this documentation to the Office of the Comptroller.

5. Coordinates budget transfers.

   Budget transfers
   On occasion, the PI may need to transfer budget dollars between line items within his or her grant budget. For example, the PI may want to reallocate funds from the supplies line to the travel line. Since every funding sponsor handles budget transfers differently, the PI must work with the Office of the Comptroller to determine whether this budget modification is allowable. Steps for requesting a budget transfer can be found in the *Grant Budgeting*

document posted on the NKU Comptrollers website below.
Website: http://comptroller.nku.edu/grants.html

6. Manages a no-cost extension if needed. If the PI wishes to extend the end date of the award period so that the original scope of work can be achieved using available funds, then a no-cost extension should be considered. A no-cost extension should *not* be requested just to spend down remaining project funds.

   No-cost extension
   The Office of Research, Grants & Contracts (RG&C) liaison can help the PI with a no-cost extension:
   - The RG&C liaison reviews the funding sponsor award agreement and/or contacts the funding sponsor to determine if a no-cost extension is permitted. The RG&C liaison reviews whether committed matching funds are impacted by a no-cost extension. The PI should plan a no-cost extension at least 30 days before the project end date - this timeline can vary by sponsor.
   - Assuming a no-cost extension is allowed, the PI provides the following information to RG&C: remaining actual funds available; a proposed new end date that enables grant-related work to be completed *and* for supplies/equipment to be received on campus by that new target date; a write-up explaining the rationale for the date extension that outlines the proposed activities during the extension period; and a timeline for the activities. The PI explains how any new proposed activities enhance or support the original award objectives.
   - Once approval is received from funding sponsor, the RG&C liaison notifies the Office of the Comptroller of this new end date and supplies documentation of the approved no-cost extension. The Office of the Comptroller updates the SAP grant data accordingly.

7. Manages program income in accordance with the Office of the Comptroller counsel. Some awarded grant projects generate program income, e.g., participants pay a registration fee to attend the grant-funded event. In this case, this money is considered program income. This program-generated income must be accounted for and spent following funding sponsor and/or university policies. Therefore, the PI should contact the Office of the Comptroller for counsel on the appropriate procedures to follow. Program income *must* be approved in the grant award. If not included in the grant award, sponsor approval *must* be received before program revenue can be generated.

8. Ensures that receipts and accurate cost records are maintained. The PI should file receipts/records in an orderly way so information is easily retrieved in the event of an audit. The original MasterCard Pro-card receipts and all other records must be kept by the PI until the retain-thru-date on the closing letter from the Office of the Comptroller (typically sent 90 days before grant end date). If the PI leaves NKU, then the complete grant file should be given to the chair of the department. The grant is still subject to an audit, even after the PI has left.

9. Monitors the grant budget using the myNKU Grant Management Report, ensuring that monies are spent responsibly and cost over-runs or major cost under-runs are addressed. Also to ensure all expenditures posted are correct and there are not expenditures posted in the grant that should not be. The Director of Research FDN Accounting & Grant Administration will send a monthly reminder to complete this reconciliation/review.

10. Follows NKU fiscal year-end close-out procedures for June 30. Even though the PI is managing grant funds that stem from an external funding sponsor and may have a different

end date, the PI still must follow NKU's annual year-end fiscal procedures. This effort enables the university to experience an orderly accounting closing process and to meet its annual reporting deadlines and external audit requirements. For example, in the 2013-2014 period, a PI needed to complete all procurement (MasterCard Pro-card) purchasing by June 20 or those charges would be billed to the new fiscal year.

The Comptroller's office publishes an annual *Closing Procedures* document found at:
Website: http://comptroller.nku.edu/accounting.html

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Purchasing supplies

"Supplies" within the context of a grant award are materials and other consumable items necessary for conducting the project, cost less than $5,000, and generally need to be replaced during the lifetime of the grant award. Supplies can be office supplies, laboratory supplies, or personal computers and software. (Supplies are different from "equipment", which is a single item that costs $5,000 or more and has a useful life of more than one year. Refer to the *Purchasing equipment* section of this manual for details about equipment.)

The Principal Investigator (PI):

1. Understands the specific purchasing commitments that were detailed within the grant award contract prior to making any purchases. If the PI is unsure whether he or she can purchase a specific item, the PI should first review the grant agreement and/or the original grant proposal.
   a. If the desired item for purchase *is not* in the agreed budget, the PI should contact the Office of the Comptroller to discuss the purchase to determine whether a conversation with the funding sponsor is needed.
   b. If the item *is* in the budget, the PI either uses the NKU Pro-card (explained below) or submits a purchase requisition for the item using the NKU SAP system.
2. Contacts NKU Procurement Services office before *any* purchases (or commitments to purchase) from a vendor are made. NKU Procurement (ext. 5171) helps the PI to understand university policies and practices for how to purchase agreed equipment/goods, how to define the best price, and how to expedite the process. The Procurement Services website below details the department's services.
   Website: http://procurement.nku.edu/
3. Determines need for NKU-issued Procurement Card (Pro-Card). The PI may want to consider obtaining a Pro-Card if his or her grant has a total operating budget for non-travel expenditures of at least $2,000. The PI works with Procurement Services to complete an application for an USBank Visa or Pro-Card, which enables easier ordering for grant-related, low-dollar supplies (single items under $1,000). The PI must include both the SAP Grant account number and grant Cost Center on the Pro-card application.
   The standard maximum expenditures for the Pro-Card are $1,000 for a single transaction and $5,000 monthly.
   If the cardholder needs to make a transaction greater than $1,000, he or she should contact Procurement for counsel. Often, these $1,000+ purchases are processed through the SAP purchase requisition method.
   Website: http://procurement.nku.edu/card.html
4. Follows all NKU Pro-card policies and procedures if the Pro-Card is used to make purchases for the grant. This includes retaining all Pro-card detailed original receipts, completing the NKU meal/entertainment form as needed, and most important, reconciling the Pro-card expenses in the USBank system by the targeted date every month. Procurement Services posts a schedule on their website detailing the *Card Reconciliation* date targets.
   Website: http://procurement.nku.edu/card.html

5. Understands information technology (e.g., personal computers, hardware, and software) is generally considered *supplies* on most grant awards.

   Purchasing information technology

   PI works with Procurement (ext. 5171) to ensure that the identified component (such as a certain model of PC laptop) can be supported on NKU's network through NKU Information Technology and/or where NKU already has viable software site licenses. The PI should send the technology specifications to Procurement for their assessment to ensure it aligns with NKU's infrastructure.
   Information technology (computers, hardware, or software) **cannot** be purchased on the NKU Pro-Card. When in doubt about technology purchase, first contact Procurement.

6. Must utilize on-campus service departments (Printing Services, Copy Center, and Food Services). If necessary goods or services are *not* available, the PI must receive approval from the Procurement department before an outside vendor can be used. It is NKU policy that meals or refreshments for on-campus, "catered" events must be purchased through Chartwells.

7. Understands that any supply item ordered *must* be received on NKU campus *prior* to the grant end date.

8. Understands that any purchases made with grant funds become the property of the University. As appropriate, grant funded computer equipment is tagged within the PI's department. Any equipment purchased with federal funds, also has a FED identification label placed next to the NKU tag.

9. Regarding Petty Cash spending, see the following link for the *Petty Cash Reimbursement Process*.

10. Understands the completion date is the date on which all work under the grant/contract agreement should be completed and is the date on which all goods and services must be received. All expenditures must meet a reasonable and necessary test to be allowable charges. It is extremely difficult to defend large or numerous expenditures in the final weeks of a project. Many times such costs are disallowed because the PI was trying to "spend all the money". At times, written justification may be required for large expenses incurred or requested during the final weeks of a project.

Website: http://procurement.nku.edu/policies/faqs.html

Purchasing equipment (> $5,000 item cost)

Equipment within the context of a grant award generally is a single item that costs $5,000 or more and has a useful life of more than one year (this definition may vary by funding sponsor). Often major equipment items have an associated maintenance contract to help ensure maximum equipment performance and life.

The Principal Investigator (PI):

1. Contacts NKU Procurement Services office before *any* purchases (or commitments to purchase) from a vendor are made.
   NKU Procurement (ext. 5171) helps the PI to understand university policies and practices for:
   - how to purchase agreed equipment,
   - the number of vendor quotes required,
   - how to define the best price, and
   - how to expedite the process.

   The Procurement Services website below details the department’s services.
   Website: http://procurement.nku.edu/
2. Understands that any equipment item ordered *must* be received on NKU campus *prior* to the grant end date.
3. Understands that any equipment purchases made with grant funds become the property of the University (unless otherwise stipulated in the contract). As appropriate, equipment is tagged within the PI’s department. Any equipment purchased with federal funds, also has a FED identification label placed next to the NKU tag.
4. Understands that some equipment requires purchase of an associated maintenance contract. Depending on the sponsor, funds for the maintenance contract cost may have been included in the award for the duration of the grant project. Fortunately, much grant funded equipment outlives the duration of the award; therefore, it is the PI's responsibility to coordinate future maintenance contracts after the end of the grant. The PI should discuss and define with his or her chair and dean how this future maintenance contract cost will be covered.

Hiring, paying, managing NKU personnel (faculty, staff, students)

The Principal Investigator (PI):

1. Adheres to the signed Conflict of Interest form (part of the NKU Routing Form) as it relates to hiring personnel for the grant initiative.
2. PI is aware of their time commitments, and should make certain that this does not conflict with time commitments required for any other current or future work.
3. Seeks the support of his or her Administrative Support or the Office of the Comptroller grant administrative support person, if/when hiring NKU personnel for a grant. They have experience in regards to the various NKU Human Resources processes.
4. Understands that paying overtime to any personnel funded by a federal grant is **prohibited**.
5. Communicates regularly with project staff and sub-contractors to ensure they are fulfilling their grant obligations.
6. Reviews the Grant Management Report Labor Distribution tab on a monthly basis to ensure accuracy of faculty, staff, and student employee expenditures to the grant and/or match.
7. Hires personnel listed in the grant award. Below is a table that summarizes typical hiring options. A more thorough explanation follows the table for each personnel type.
8. Is aware that it is a University policy and state law that no relatives of the PI can be hired or paid from their grant.

Table summary of grant personnel hiring options, NKU contacts, and paperwork required

Who is being assigned to or hired for the grant?	NKU contact	Paperwork required	Section Below:
Faculty:			**A**
Current NKU faculty – academic year release paid by grant *or* offered as NKU in-kind (match)	Tonya Smiley (Office of the Comptroller)	No Personnel Action Request (PAR) form required. Office of the Comptroller completes the necessary entries in SAP. Time and Effort certification via myNKU portal (Employee Self-Service tab) will be completed monthly by faculty and approved thru MSS by the PI or PI supervisor.	
Current NKU faculty – summer effort paid by grant	Office of the Comptroller Grant Administrator or the Admin Support of Faculty member on the grant	PAR form required. Faculty member manually completes a summer time & effort form detailing the summer work performed and time period. T&E form must be signed by employee and PI or PI supervisor. Grant Summer Supplemental Pay Time & Effort Certification Form is on the Office of the Comptroller website: http://comptroller.nku.edu/grants.html	
Current NKU faculty – Supplemental compensation during academic year paid by grant. *This is very rare occurrence and must have been detailed in the original grant proposal and approved via the grant contract by the funding sponsor.*	Office of the Comptroller Grant Administrator or the Admin Support of Faculty member on the grant	PAR form required. Faculty member manually completes detailed documentation (hours must be outside normal office and teaching hours). This documentation must include the day worked and the start and end time of the work, a short description of the work performed, the grant account number and cost center. Documentation must be signed by employee and PI or PI supervisor.	

Who is being assigned to or hired for the grant?	NKU contact	Paperwork required	Section Below:
Staff:			**B**
New hire Staff employee (monthly or bi-weekly)	Human Resources	Varies by position; Josie Kroger will counsel PI about required paperwork.	
Current monthly-paid Staff employee – calendar year release paid by grant *or* offered as NKU in-kind (match)	Tonya Smiley Office of the Comptroller)	No PAR form required. Office of the Comptroller completes the necessary entries in SAP. Time and Effort certification via myNKU portal (Employee Self-Service tab) will be completed monthly by staff and approved thru MSS by the PI or PI supervisor.	
Current bi-weekly paid Staff employee	Human Resources	PAR form required. Ongoing for payroll compensation: Biweekly staff employees will sign into their myNKU and enter their time through ESS Time Management. At the end of the pay period, the employee will print their time sheet, sign it and give to the grant principal investigator (PI). This is the biweekly staff time certification for the grant.	
Current NKU staff – supplemental compensation during academic year paid by grant. *This is very rare occurrence and must have been detailed in the original grant proposal and approved via the grant contract by the funding sponsor.*	Human Resources	PAR form required. Staff manually creates detailed documentation (hours must be outside normal office hours). This documentation must include the day worked and the start and end time of the work, a short description of the work performed, the grant account number and cost center. Documentation must be signed by employee and PI or PI supervisor.	
Student:			**C**
NKU Student employee – hourly positions (Undergraduate or Graduate)	Student Financial Assistance	Varies by position; Student Financial Assistance will counsel PI about required paperwork. PAR form required. Ongoing for payroll compensation: Student employees will sign into their myNKU and enter their time through ESS Time Management. At the end of the pay period, the employee will print their time sheet, sign it and give to the grant principal investigator (PI). This is the biweekly staff time certification for the grant.	
NKU Student Research Stipends (Undergraduate or Graduate)	Payroll	Student Stipend Form	

A. **<u>Hiring Faculty</u>**

<u>A current NKU Faculty employee</u>:

Faculty *academic* year release/re-assign time on a grant
If the PI or any other NKU faculty is being paid by the grant or grant match account for **release** or **re-assigned time**, he or she is being released from a percentage of his or her regular teaching duties to work on this grant. As a result, that percentage of the faculty employee's salary and fringe benefits are charged to the grant or grant match account. The charge is a shift in salary funding source only and is transparent on the faculty member's paycheck.

The Office of the Comptroller will setup up all release or re-assign time. No Personnel Action Request (PAR) paperwork is required. Tonya Smiley (ext. 5264 or smileyt@nku.edu) assists the PI with this topic.

The primary documentation associated with faculty academic year release is the *Time and Effort Certification* via myNKU portal. Time and effort reporting is a federal mandate and is a two-step process. The PI and any NKU faculty working (and being paid) on the grant/match during the academic year are required to access the myNKU Employee Self-Service tab to review and certify the correct percentage of time/effort being spent on the grant. Then the certification must be reviewed/approved by the PI or the PI's supervisor thru Manager Self Service.

Websites for Time and Effort Certification:
Office of the Comptroller Time and Effort Reporting Policy:
http://comptroller.nku.edu/grants.html
Quick reference cards for Grant Time and Effort Certification steps:
http://mynkuhelp.nku.edu/tabbased/grants1.html

Faculty *summer* effort on a grant
There are two types of required paperwork associated with faculty summer effort:

First, for a faculty member to initiate summer pay for work on a grant, an electronic *Personnel Action Request form* (PAR) must be completed within SAP.
The faculty member on the grant should contact the Office of the Comptroller Grant Administrator or their departmental Administrative Support for assistance with the PAR, which is currently an electronic process. The completed PAR and any other needed supporting documentation workflows for approval through several channels within SAP including the chair (of the faculty member to be paid), Beth Sweeney (Provost's office), Office of the Comptroller and Human Resources.

Second, for a faculty member to be paid for summer work completed on a grant, the time documentation required is currently a manual process. The Grant Summer Supplemental Pay Time & Effort Certification Form includes a short description of the work performed, the period the work was performed, and the grant number and grant cost center. This form must be signed by the faculty receiving the summer pay and the Principal

Investigator of the grant. If the PI is receiving the summer pay, he or she must sign the time documentation and so must the PI's chair. Faculty members working in the summer on a grant are typically paid on a monthly basis. The form can be found on the Office of the Comptroller's website. The summer time documentation should be submitted to the Office of the Comptroller after the completion of the summer work.

Faculty *supplemental compensation* during academic year on a grant

Recognize that supplemental compensation on a grant is an *unusual* occurrence and must have been detailed in the original grant proposal and approved via the grant contract by the funding sponsor. An employee cannot be paid supplemental compensation on a grant for work done during the time they are already working for and being paid by NKU. If supplemental compensation is approved, there are two types of required paperwork associated with faculty supplemental compensation.

First, when a faculty member is to be paid supplemental compensation during the academic year for grant effort, a *Personnel Action Request form* (PAR) must be prepared. Payment can only be made after the work is completed and time documentation is received by the Office of the Comptroller. The faculty member, the Office of the Comptroller Grant Administrator or the departmental Administrative Support complete the PAR and then submit it (along with any other needed supporting documentation) for approval through several channels within SAP including the chair (of the faculty member to be paid), Beth Sweeney (Provost's office), the Office of the Comptroller, and Human Resources.

Second, because the supplemental compensation is for faculty's time worked *during* the academic year but *outside* of normal class and office hours, very detailed time documentation is required. The documentation must include the day worked and the start and end time of the work, and those hours must have been outside of normal class and office hours, or else he or she cannot be compensated. The documentation must be signed by the faculty employee receiving the extra compensation payment and the Principal Investigator. If the Principal Investigator is the recipient of the supplemental compensation, he or she must sign the time documentation and so must his or her immediate supervisor.

Supplemental compensation can only be paid at the faculty employee's current NKU hourly rate and also includes FICA fringe benefit cost. Staff special compensation also includes KERS.

The PI forwards this documentation to the Office of the Comptroller.

B. Hiring Staff

Hiring a new hire Staff employee (monthly or bi-weekly paid)
The PI works with NKU Human Resources (x6386) to understand University policies for classifying and hiring **new NKU staff** for a grant. Human Resources sets staff wages; therefore, the PI should not promise the new grant-generated role and/or salary to anyone prior to completing the NKU hiring processes.

Different hiring tasks are required depending on duration of the grant personnel position; these tasks are managed by both HR and the PI. These tasks, which take time to complete, may include filling out a Job Analysis Questionnaire (JAQ), posting the position on NKU's online employment site, completing Affirmative Action Hiring forms, completing a New Hire *Personnel Action Request (PAR) form*, completing a Background Check, and more. For more details and forms, see the Manager's Toolkit section of the HR website:
Website: http://hr.nku.edu/toolkit.html

A current monthly-paid Staff employee – Release or Re-assigned time on a grant
The Office of the Comptroller will setup up all release or re-assign time. No PAR paperwork is required for monthly-paid, exempt NKU staff employees who have a percentage of time re-assigned to a grant or grant match. Tonya Smiley (ext. 5264 or smileyt@nku.edu) is the contact for this.

NKU monthly paid, exempt staff must complete their *Time and Effort Certification* via myNKU portal using the Employee Self-Service tab. Time and effort reporting is a federal mandate and is a two-step process. The PI and any NKU staff working (and being paid) on the grant/match during the academic year are required to access myNKU portal, the Employee Self-Service tab to review and certify the correct percentage of time/effort being spent on the grant. Then the certification must be reviewed/approved by the PI or the PI's supervisor thru Manager Self Service.

Websites:
Monthly Absence Record Card: http://hr.nku.edu/payroll/timesheets.html
Comptrollers' Time and Effort Reporting Policy: http://comptroller.nku.edu/grants.html
Quick reference card for Grant Time and Effort Certification steps:
http://mynkuhelp.nku.edu/tabbased/grants1.html

A current bi-weekly paid Staff employee
Typically, current bi-weekly employees are not released or reassigned to an external grant. If this does occur, a PAR is required for this individual. Thereafter, this staff will sign into their myNKU and enter their time through ESS Time Management. At the end of the pay period, the employee will print their time sheet, sign it and give to the grant principal investigator (PI). This is the biweekly staff time certification for the grant.

Reminder: When any non-faculty personnel finish their effort on a grant project, Personnel Action Request (PAR) paperwork must be generated and submitted to reflect this change. This is referred to as a *Terminating PAR*. The PI's Departmental Administrative Support can assist with this PAR, which is currently an electronic process.

Contact NKU Human Resources and the Office of the Comptroller to understand payroll processes and associated time sheets for faculty and staff.

Websites:
See Office of the Comptroller's link for timesheet details "*Time and Effort Reporting Policy*"
http://comptroller.nku.edu/grants.html

Human Resources:
http://hr.nku.edu/

C. **Hiring Students**

The two most common methods of hiring a student (undergraduate or graduate) for a grant are paying an hourly rate salary or offering a research stipend. A stipend is a lump sum of money paid to an NKU student over a set period of time and is used solely with *research* projects or programs.

Hiring an NKU student using an hourly wage
The PI first should contact Student Financial Assistance department (ext. 5145). Further, see the website below for the link to NKU Student Employment Supervisor Manual. This manual will also detail the required new student hire forms.

Website: http://financialaid.nku.edu/studentemployment.html

Hourly student employees must sign into their myNKU and enter their time through ESS Time Management. At the end of the pay period, the student will print their time sheet, sign it and give to the grant principal investigator (PI). This is the student time certification for the grant.

Hiring an NKU student using a research stipend
A student stipend is a lump sum of money paid to an NKU Graduate or Undergraduate student over a set period of time and is used solely with *research* projects or programs. Stipends are paid when the PI can truly document the student's academic activity as result. This is determined by the NKU Payroll office based on IRS guidelines.
Stipend example: Paying a stipend of $1,000 for a student to conduct a start-to-finish scientific project associated with a grant in a research lab over the course of a year. Stipends are used more often in scientific research proposals than in programmatic proposals.

To setup a student stipend associated with a research grant, the PI should:

1. Develop a brief written role description detailing the research effort to be performed by the student.
2. Contact the Payroll Office with any questions in regards to student stipends (ext. 6326). The Payroll Office will provide the *Undergraduate Stipend Award* form for completion by the PI.
3. Complete the required new student hire forms which are detailed in the NKU Student Employment Supervisor Manual.

   Website: http://financialaid.nku.edu/studentemployment.html

Fringes Benefit Expenses for Student Employees

There are no social security charges on all student payroll (including student stipends) during the summer if the student is taking 3 or more credit hours for the summer term. .

There are no social security charges on all student payroll (including student stipends) during the fall or spring term if the student is taking 6 or more credit hours during the applicable term.

There are social security charges on all student payroll (including student stipends) during spring break and Christmas break

Hiring external individuals (external contractor, honorarium)

External Contractor

The Principal Investigator (PI) contacts NKU's Procurement Services office when he or she intends to hire an external contractor (sometimes referred to as a vendor or a consultant) to assist with the awarded grant initiative.

Procurement Services (ext. 6605) assists the PI in determining which procurement processes and documentation are required so that contractors can be evaluated, hired, and paid in a timely way through the NKU SAP system. Key points to note:

- Some required procurement forms take several days to process; therefore, **the PI should contact Procurement Services early**. Moreover, *certain* contracts with external vendors must be submitted to the Kentucky State contacts in Frankfort prior to the start of work -- this step can take up to six weeks.
- The PI must contact Procurement Services *before* issuing any agreement (verbal or written) to an external contractor or firm to perform service/work under the grant award.
- Service/work cannot begin until all contract documentation is finalized. External contractors will not be paid for work performed *before* the NKU paperwork is approved.

Procurement Services offers a dedicated website regarding *Personal Services Contracts.* This website details general information about PSCs as well as the required forms.
Website: http://procurement.nku.edu/Personalservicecontracts.html

Honorarium

An honorarium is a one-time payment for a service provided by an individual, and it is used when it is difficult to set a price on services rendered. Typically honoraria are paid to guest lecturers/speakers or experts for brief appearances at NKU. NKU university employees **cannot** receive an honorarium. At NKU, if the payment is a flat rate of $1,000 or less *and* does not include reimbursables (such as travel), then an honorarium is used. Otherwise, a *Personal Services Contract* is used. Again, Procurement Services can assist with Honorarium questions.

The steps to process an honorarium are:

1. The honoree (individual receiving honorarium) sends an invoice (e.g., a file memo) to the PI that details his/her name, address, purpose of payment (e.g., what is the work performed), amount of honorarium, and date of the service. The invoice must be signed by the honorarium recipient.
2. The PI ensures completion of a *New Vendor Setup form* if needed (see Note below).
3. The PI, the Office of the Comptroller Grant Administrator or the PI department's Administrative Support enters a requisition into SAP for payment processing.

Note: If the external contractor or honorarium recipient is not a vendor within NKU's SAP system, then the PI follows procedures to complete the *Vendor Setup* form so that payment can be made.
Website: http://procurement.nku.edu/forms.html

Managing travel

The Principal Investigator:

1. Adheres to original awarded contract that details the travel plans.
2. Adheres to funding sponsor and NKU travel policies plus ensures that grant project members who intend to travel are also familiar with travel policies. The NKU policies provide information about employee and student travel. Remember, no travel expense will be reimbursed unless travel was authorized five (5) days in advance of the trip.

   Within the Office of the Comptroller's website can be found various regulations, forms, and details (mileage reimbursement, per diem rates, travel expense reports, and more).
   Website: http://comptroller.nku.edu/travel.html
3. Works with the Office of the Comptroller Grant Administrator or the PI's Administrative Support to submit a Travel Request at least five (5) days in advance for the grant-funded trip. Travel Request must be submitted through the workflow approval process in SAP. Use the Travel Request to estimate an amount sufficient to cover the entire trip.
4. Saves and retains all original detailed receipts that are used for travel reimbursement. Distributes copies to travel recipients.
5. Completes the Travel Reimbursement process immediately after a trip so that the committed grant-related funds are reconciled and released within SAP and the employee reimbursement can be processed.
6. Contacts Office of the Comptroller/Accounts Payable Manager (ext. 6328) for questions related to domestic travel associated with a grant award.
7. Understands that foreign travel associated with a grant must be preapproved by the sponsor. For these travel questions, contact Office of the Comptroller/Accounts Payable Manager (ext. 6328). NKU travelers traveling on funds provided by a federally funded grant or contract, must use a U.S. flag carrier, regardless of cost or convenience. A U.S. flag carrier is an airline owned by an American company. However, there are times when a foreign carrier can be used through code sharing, open skies agreements, or time restrictive exceptions. See link below for the Fly American Act federal regulations. http://www.gsa.gov/portal/content/103191
   For more details on *Out of country travel regulations*, go to link below:
   Website: http://comptroller.nku.edu/travel.html

Creating sub-award contracts (such as with other universities)

A sub-award (also referred to as a *sub-contract*) is a legally binding agreement between NKU and an outside organization (such as a university, high school, or non-profit) for collaboration on a grant project. It obligates NKU to reimburse that organization (also referred to as the *sub-awardee*) for expenses incurred during the project collaboration period. If the Principal Investigator's grant proposal and the final grant award includes a sub-award(s) for collaboration on the project with outside organizations, this contract development should be completed by the Office of Research, Grants & Contracts (RG&C). RG&C is well versed in generating tailored contracts, outlining the scope of work and budget.

The Principal Investigator (PI) should allow ample time to finalize the contract negotiations and obtain signatures of both parties (e.g., NKU and the sub-awardee).

Once the funding sponsor awards funds:

1. The PI contacts the RG&C for assistance with the related sub-award(s). During these meetings with the RG&C, the PI is asked for information about the project and the terms that he or she would recommend for the contract. A Scope of Work is developed and the budget for the contract is finalized. It may take several meetings and several rewrites before the contract is complete, depending on its complexity and size. RG&C assumes the responsibility to involve the NKU Office of Legal Affairs and General Counsel as needed.
2. Once a version of the sub-award is agreed upon internally, RG&C forwards the contract to the appropriate sub-awardee for review and signature.
3. It is not unusual for the sub-award terms to be subject to negotiations between NKU and the sub-awardee. When this happens, RG&C works with the PI and sub-awardee in the negotiations. If negotiations result in substantive changes to a contract that has already been internally reviewed, then those portions that are changed are subject to another internal review.
4. NKU and the NKU Research Foundation authorize the Director of the RG&C to enter into contracts on behalf of the University and its faculty. A PI should *never* sign a contract as he/she are not authorized to sign. By signing, the PI risks being personally liable for the contract.
5. Once there is agreement to the terms of a sub-award, RG&C arranges for the contract to be signed by the appropriate representatives. RG&C also ensures that the contract is signed by the sub-awardee and that copies are provided to the appropriate offices.
6. Once the sub-award is completed, the PI, the Office of the Comptroller Grant Administrator or the PI's Administrative Support will need to enter a requisition into SAP for the full award amount. When invoices are received from the sub-awardee, the Office of the Comptroller will forward a copy to the PI for review. If the invoice expenditures are accurate and the PI has been receiving progress reports or other data from the sub-awardee as requested, the PI will send approval to the Office of the Comptroller that the payment can be processed.
7. The PI is responsible for monitoring the work of the outside party and assuring all deliverables listed in the sub-award are supplied.
8. Should any changes need to be made to the sub-award after it has been fully executed, the PI and sub-awardee should work with the Office of RG&C.

Managing NKU student tuition payments

The Principal Investigator:

Must follow additional procedures to manage payments if student tuition was included and approved within the grant award.

Resource contacts for this procedure are the Office of the Comptroller (x6456) and Student Financial Assistance (x6435).

See the Office of the Comptroller website for *"Tuition Charges on Grants"* document link
Website: http://comptroller.nku.edu/grants.html

Compensating Human Research Participants

There are occasions when a Principal Investigator's grant project involves compensating human research participants to *participate* in specific funded research. For example, the Principal Investigator (PI) seeks to identify 25 individuals to complete a survey, and the PI will offer a $20 cash award to each individual who completes the survey. This research and payment must be approved in the original grant award.

The PI must follow the approved NKU process to use the awarded grant funds for this participation. Further, the PI must also safeguard the rights and welfare of the human subjects involved in this research, which involves the Institutional Review Board (IRB) processes.
If questions about IRB, contact the RGC compliance manager (ext. 5168).

The process for these payments will be discussed and the required paperwork distributed by the Office of the Comptroller during the PI's post-award grant meeting.

See the Office of the Comptroller website for "*Paying Human Subjects Policy*" document link
Website: http://comptroller.nku.edu/grants.html

Note: Recognize that this situation is different from those students who have been hired as student employees and are being paid by either an hourly wage or by a research stipend. The students hired as employees are managed by the PI and paid via the NKU Human Resources payroll process. See the *Hiring, paying, managing NKU personnel (faculty, staff, and student)* section of this manual for details on hiring students for a grant.

Submitting reports (progress, financial, others)

The Principal Investigator (PI):

1. Understands the reporting requirements as outlined in the award contract and submits all reports on time. Depending on the funding sponsor, multiple types of reporting may be required; for example, a periodic **progress** report (to be completed by the PI) and a **financial** report (to be completed by the Office of the Comptroller).
2. Understands that any financial reporting required by the funding sponsor *must* be completed by the Office of the Comptroller. The Office of the Comptroller typically submits the financial report directly to the funding sponsor or through the sponsor's financial reporting system.
3. Completes all close-out reports following funding sponsor's guidelines and timelines. If financial details are required within the report, the PI should communicate with the Office of the Comptroller *well in advance of target deadlines.*
4. Utilizes resources such as NKU's Institutional Research department, which is the source of official information about the university. For example, the PI may be required to report institutional data such as student enrollment or graduation rates. This data can be found at: **Website**: http://ppb.nku.edu/research.html

5. Sends a copy of the:
   - Periodic, annual progress or technical reports to the RG&C Liaison.
   - Final Invention/Patent reports to the RG&C Liaison and the Office of the Comptroller.
   - Final progress/technical reports to the Office of the Comptroller and RG&C which enables final close out of this grant award.

Changing and adding key personnel roles

It is often necessary to change or add key personnel roles on an awarded grant or contract, e.g., sabbatical, illness, leaving the university, and more. The key personnel roles can be the Principal Investigator or contributors including Co-Principal Investigators or other senior personnel.

The tasks required to change or add roles will vary by funding sponsor and by circumstance. Often these tasks can be complex and time-consuming, especially if the grant award/contract involves subcontracts, cost sharing, or students. Most federal funding sponsors require the grantee to notify them prior to any personnel changes. Importantly, the Principal Investigator should discuss this topic with his/her RG&C liaison, given that the liaison may need to negotiate terms with the funding sponsor, execute tasks within NKU's SAP system, and/or execute tasks within the funding sponsor's system so that the change can take effect.

It is advised that all personnel change or add topics be addressed at least 30 days before needed.

The Office of RG&C website details the tasks and questions associated with *Changing and adding key personnel roles on a grant award*.

Website: http://rgc.nku.edu/ (Select General Policies, Procedures & Forms)

Keeping proper grant records

The Principal Investigator:

1. Understands that each funding sponsor varies in their records management requirements.
2. Assures the integrity and safekeeping of all files related to the research or project.
   The PI must retain original files/data after the close of the effort for the time period stated in the funding sponsor's policies. This information should be filed and kept by the PI in a secure location.
3. Recognizes that if he or she leaves NKU, then the complete grant file should be given to the chair of the department. The grant is still subject to an audit, even after the PI has left.
4. Adheres to the grant records management instructions as set forth in the Office of the Comptroller "Notice of Grant Expiration" memo distributed to the PI. Approximately 90 days before the grant end date, the Office of the Comptroller sends a memo to the PI that details topics including records management. *"All grant records (credit card receipts, PARs, progress reports, etc.) must be kept by the PI and be available for audit through [a date will be listed]."*

Training on SAP grant functions

The Principal Investigator:

1. Understands that there is a set-up process associated with the PI gaining needed access to the NKU SAP system. To initiate this process, the RG&C liaison will communicate information to the NKU Information Technology contact about the PI and the new grant account.
2. Communicates with chair/immediate supervisor and the department Administrative Support to understand what SAP support role the Administrative Support will provide related to grant management.
3. Attends training to learn how to use the NKU SAP system, and tools to track grant budgets and spending.

   All new PI's are required to attend these trainings:

   FI 202 Grants Management Overview & Reporting: In this training, Grant Principal Investigators will learn about the policies governing post award external grant administration. Additionally, the course will empower participants in completing myNKU functions associated with post award management of a grant. Topics covered include: grant overview, policies, budgeting, approvals, accessing and working with the grant management report.

   Pro-Card Training: If PI decides to request an NKU-issued Procurement Card (Pro-Card) there are training requirements before the pro-card will be issued.

   Optional training that may be beneficial to the PI includes:

   - **INT 100 Introduction to myNKU & SAP GUI -***Basic SAP Navigation* (this is an online course)
   - **FI 203 Travel**
   - **FI 200 Requisitioning/Parked Vendor Invoices – Part I**
   - **FI 201 Requisitioning/Parked Vendor Invoices – Part II**
   - **HR 201 MSS – Personnel Action Requests**

Refer to the NKU Information Technology website

Website: http://pod.nku.edu/podreg/allevents.asp?sort=date for dates/time of training sessions

Website: http://mynkuhelp.nku.edu/tabbased/grants1.html for the convenience of Principal Investigators this website is a one-stop resource for links to information, instructions, and tutorials on the business and reporting functions related to grant management

Questions about SAP grant-related training should be directed to the Office of the Comptroller (x5264)

Closing the grant

The Principal Investigator:

1. Receives from the Office of the Comptroller (typically sent 90 days before the grant end date) a “Notice of Grant Expiration” letter, which is a reminder including:
   a. upcoming grant project end date
   b. progress and/or final reports due
   c. purchase requisition/credit card expenditure reminders
   d. time and effort documentation requirements
   e. grant record management requirements
2. At least three months prior to the end date of the grant, completes an SAP budget and labor distribution report review to accurately forecast expenses and manage any needed adjustments. (The expectation is the PI performs this SAP review task monthly, regardless of pending close-out.)
3. Initiates a “no cost extension”, if appropriate. If the PI wishes to extend the end date of the award period so that the original scope of work can be achieved using available funds, then a no-cost extension should be considered. A no-cost extension should *not* be requested just to spend down remaining project funds

   See “*Managing the grant award budget – maintaining and authorizing general expenses*” section of this manual for details on executing a no-cost extension.

Appendix I – NKU grant-related websites & key contacts

NKU Department & main website address	Department key contacts
Office of the Comptroller: Grant Accounting Staff http://comptroller.nku.edu/grants.html	Barb Smith (Research FDN Accounting & Grant Administration) Kimmy Hempfling (Purchase requisitions, Pro-Card, Travel) Tonya Smiley (PAR review, All Payroll expense issues) Kyle Jacobson (Grant Administrator, SAP transactional support) Lisa Burson (Grants & Contracts Manager)
Office of the Comptroller: Accounts Payable, Travel staff http://comptroller.nku.edu/travel.html	Chris Nicolaus (Accounts Payable Manager) Lisa Wolf (Travel, PVI) Melody Sumner (Invoice processing for purchase orders)
Human Resources http://hr.nku.edu/	Diane Hunley (Associate Director) Josie Kroger (Compensation & Classification) Lauren Franzen (Other HR Issues)
Payroll http://hr.nku.edu/payroll.html	Cathy Wisher (Manager, Payroll & Taxes)
Procurement Services http://procurement.nku.edu/	Jeff Strunk (Contracts) Holly Vasquez (Purchasing, Pro-Card)
Office of Research, Grants & Contracts http://rgsrs.nku.edu/research/rgc.html	William (Bill) Thompson (Director) Phil Godel (Grants & Contracts Administrator) Renee Brossart(Grants & Contracts Administrator) Chris Rivello (Grants & Contracts Administrator) Audrey Ostendorf (Coordinator, Research Compliance)
Student Financial Assistance http://financialaid.nku.edu/contactus.html	Penny Parsons (Associate Director) Brian Schultz (Student Payroll Issues) Raye Wright (Tuition Issues)