

**BOSTON COLLEGE**  
*Principal Investigator's*  
**HANDBOOK**

*December 2017*

# TABLE OF CONTENTS

INTRODUCTION	4
PREFACE	4
SECTION I: SPONSORED PROJECTS - BASIC CONSIDERATIONS	5
PRINCIPAL INVESTIGATORS	6
ORGANIZATION OF SPONSORED PROJECTS	6
OFFICE FOR SPONSORED PROGRAMS	7

AWARD ADMINISTRATION	20
INTRODUCTION	20
ESTABLISHING A PEOPLESOFT CHART STRING	20
SUBCONTRACTING	20
EXPENDITURE PROCESSING	21
OFFICE FOR SPONSORED PROGRAMS/POST AWARD	21
FACILITIES AND ADMINISTRATIVE (A.K.A. INDIRECT) COSTS (F&A)	21
PAYMENT OF AN EXPENDITURE	21
CONSULTANTS/SERVICE AGREEMENTS	22
TRAVEL POLICY	22
EQUIPMENT	23
PROCUREMENT	23
PROPERTY MANAGEMENT	23
INTERPRETING MONTHLY ACCOUNTING REPORTS	24
PERSONNEL	24
FINANCIAL REPORTS	25
AUDIT	26
ADMINISTRATIVE PROCEDURES	26
PROJECT MANAGEMENT	26
POST-AWARD ADMINISTRATION	26
SECTION IV: MISCELLANEOUS	29
SPONSORED PROJECTS POLICIES AND GUIDELINES	29
SPONSORED PROJECTS POLICIES AND GUIDELINES	29
INTERNAL GRANT PROGRAMS	29
INTERNAL FUNDING OPPORTUNITIES FOR BOSTON COLLEGE FACULTY	30

# INTRODUCTION

## PREFACE

The Office for Sponsored Programs' (OSP) was created to support the research endeavors of the BC

# SECTION I : SPONSORED PROJECTS - BASIC CONSIDERATIONS

Sponsored research is defined as projects funded by an external source to support research, training/instruction, and other types of projects. The award or agreement is between the sponsor and the University and not a department or an individual. It represents an exchange transaction where each party receives commensurate value. Sponsorship may involve funds, materials, other forms of compensation, or exchanges of in-kind efforts from sources external to Boston College under awards or agreements which contain a specific Scope of Work and *any one of the following criteria*:

- A line item budget detailing expenses by major costs categories specifying activity, function, and project period.
- Financial and technical reports are required, both of which are subject to audit.
- The sponsor defines a period of performance during which funds may be used. Depending on the award mechanism and the terms of the award, unused funds may have to be returned to the sponsor.
- The award or agreement provides for the disposition of either tangible or intangible property which may result from the project. Tangible properties include equipment, records, formal activity reports, theses or dissertations. Intangible properties include rights in data, copyrights, or inventions or research related materials

In accordance with OMB's Uniform Guidance – 2 CFR 200 §

## PRINCIPAL INVESTIGATORS

The Principal Investigator (PI) holds a number of responsibilities related to sponsored projects, the core of which is conducting the work for which external funding has been received. In addition to meeting technical requirements on a sponsored project, the PI also has administrative responsibilities such as assuring that expenditures are made for the intended purpose of the project and in accordance with sponsor requirements and University policy. The technical requirements involve submitting timely periodic and final narrative reports on the progress of the project and overseeing others who may contribute to the project, including University employees, consultants, and subcontractors. The PI must ensure individuals paid from their sponsored project are in compliance with the University Time and Effort reporting policy.

As previously stated, sponsored projects are legal agreements between a sponsor and the University. As such, in order for the University to fulfill its responsibilities under sponsored agreements, it is necessary for the PI to have an appropriate appointment at the University. This appointment provides a level of assurance that PI's are acting under the auspices of Boston College.

In July 1993, the following guidelines were established and distributed to provide guidance by which the qualifications for PI status are established.

- a. Regular term faculty of the following ranks: Professor, Associate Professor, Assistant Professor and Instructor.
- b. Full-time research staff in research institutes or departments as may be specifically approved in writing by the appropriate Dean or academic administrator to whom they report.
- c. Retired, adjunct and visiting faculty and others on an exceptional basis, provided that space is available and each sponsored project is approved in writing by the Department Chair, Dean, and Provost.
- d. Individuals whose appointments fall within category "c" above may serve as Co-Principal Investigators (Co-PI) with the approval of the appropriate 4.283 0 Td [(P)15(c)(t)4.1(4[s9)4.1(h)-40 Td ( )



## Institutional Review Board (IRB)

This body is also known as the "Human Subjects Committee." The IRB office facilitates the review of protocols in accordance with federal, state and local regulations, university policies, and ethical standards. The committee is composed of faculty members from various departments. Its prime responsibility is to review and approve protocols submitted by faculty who intend to use humans as subjects in their research, and to provide guidance regarding human subject protection requirements. The IRB has authority to review and approve or disapprove research activities involving human subjects conducted by faculty, staff or students. Protocols can be submitted electronically through Cyber IRB.

Policies and Procedures: <http://www.bc.edu/research/office-for-research-protections/policy.html>

Cyber IRB: <http://www.bc.edu/research/office-for-research-protections/cyberirb.html>

You can contact the Office for Research Protections at 2-4778 for further information.

## **OFFICE FOR RESEARCH INTEGRITY AND COMPLIANCE**

Research Scholarship and Integrity Program

This program is responsible for the training of all PhD and Masters level students in the responsible conduct



control laws, regulations and policies do not apply to sponsored projects only. They apply to everyone in the BC community. For sponsored projects, the PI needs to submit a Pre-award Export Control Checklist with your proposals in order to permit OSP and/or ORIC time to screen equipment and technology and foreign collaborators and contractors to determine whether or not an Export Control License is required.

## **OFFICE OF TECHNOLOGY TRANSFER AND LICENSING**

In the course of their work, Boston College's faculty, researchers, and students may develop new technologies or make new discoveries. These discoveries may be intellectual property. When this is the case, patents, copyrights or trademarks can be used to protect the inventor's/discoverer's findings and Boston College's interest in them. The mission of the Office of Technology Transfer and Licensing (OTTL) is to also assist faculty and students in moving innovative ideas from the university into the marketplace for the benefit of society. It aids in the protection of intellectual property discovered and created by members of the BC community, supports faculty and students in commercializing their inventions and promotes innovation, entrepreneurship and industry collaboration.

The assignment of rights to intellectual property developed under sponsored projects is governed by the University's [Intellectual Property Policy](#). Patents, copyrights, and the sharing of royalties accrued from patents and certain copyrights are covered by the *Intellectual Property Policy*.

Boston College is required by federal law and regulation to obtain the written agreement to its patent policy of all those individuals working on federally funded sponsored projects. Like most universities, Boston College has decided to require such an agreement on all sponsored projects irrespective of funding source. There are two reasons for that decision.



*Bill & Melinda Gates Foundation*

*The William and Flora Hewlett Foundation*

*Robert Wood Johnson Foundation*

*W.K. Kellogg Foundation*

*Lilly Endowment*

*Henry Luce Foundation*

*MacArthur Foundation*

*Gordon and Betty Moore Foundation*

*Charles Stewart Mott Foundation*

*Oak Foundation*

*Open Society Foundations*

*Porticus North America*

*The Rockefeller Foundation*

*Alfred P. Sloan Foundation*

*Spencer Foundation*

*John Templeton Foundation*



Once these guidelines are understood, faculty should feel free to contact funding officers directly to discuss the scope of individual projects. In this way faculty can ask potential sponsors the kind of questions that will assist them in submitting the most competitive proposal possible. The sponsors' officers can, in turn, give

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## **PROPOSAL GUIDELINES**

In preparing proposals for submission to external sponsors, faculty, staff, Postdocs, and graduate students should pay careful attention to the directions and information available in the program application materials provided by the sponsor. These application packages are often referred to by one of the following:

*RFP -- Request for Proposals*

*RFA -- Request for Application*

*FOA --Funding Opportunity Announcement*

The sponsor guidelines/instructions should be carefully followed. Page limits, typeface size and other restrictions are taken seriously by sponsoring organizations. Often sponsors request a letter of intent, or a preliminary or shorter proposal (3-5 pages) before asking for a complete final proposal. Take the same care and effort with pre-proposals as you would with the final proposal. The OSP Pre-award staff will assist in proposal review and explanation of proposal preparation requirements. They should be contacted as soon as



sharing before writing or submitting a proposal requiring this kind of commitment from the University.

*Miscellaneous Proposal Information*

**Information Technology Support**—All sponsored project proposals with a significant information technology component are to be reviewed



## **SIGNATURE AND AUTHORIZATIONS**

Proposals must be accompanied by OSP's Proposal Transmittal Form (PTF). That form is routed electronically and can be accessed at

[https://psfnawp.bc.edu/psp/FINPRD/EMPLOYEE/ERP/c/BC\\_CUSTOM.BC\\_PROPOSAL.GBL?Folder](https://psfnawp.bc.edu/psp/FINPRD/EMPLOYEE/ERP/c/BC_CUSTOM.BC_PROPOSAL.GBL?Folder).

The PTF specifies the approval requirements for a number of items, some of which are:

- faculty buy-out (release time)
- additional space for the project
- use of animals in the project
- use of human subjects in the project
- use of hazardous materials
- cost-sharing (allocation of University funds)
- export controls

The Transmittal Form also requires general information regarding the proposal, such as type of project, Principal Investigator's name, Principal Investigator's department, title of project, agency, period of project and anticipated costs (both direct and indirect) of the project. The Principal Investigator needs to have routed this electronic f



## **AWARD ACCEPTANCE**

When an award document is received, OSP immediately informs the Principal Investigator (PI) of the award. The PI plays a significant role in the negotiations of a sponsored project. OSP will advise the PI that the award document is being reviewed to assure that the required terms and conditions are in accordance with University policies and procedures. OSP seeks the input of the PI concerning any troublesome provisions. In reviewing the terms and conditions of an award, OSP is concerned with protecting academic freedom, the rights of the PI and the University, and assuring the feasibility of administering the award and conducting the research.

Some major concerns in reviewing the terms and conditions include: rebudgeting restrictions, mandatory prior approval of certain costs, and substantial (40%) cost sharing requirements. (p) 70-0.8(i)1, (s) 1.3(e)7.8(r)-7.5r mo

# SECTION III: POST -AWARD ACTIVITIES

## AWARD ADMINISTRATION

### **INTRODUCTION**

OSP in collaboration with the PI is responsible for administering all sponsored projects awarded to the

To establish and modify existing subcontracts, the PI in concert with his grant administrator need to submit forms to OSP to initiate the process. The forms and guidance c

The Office for Sponsored Programs/Post Award will review all expenditures over \$1,000 as well as perform a monthly sampling of expenses charged to sponsored projects to determine the allowable costs within sponsor guidelines, as well as to verify that sufficient funds are available and that the budget per line item is maintained. However, it is the responsibility of the PI to ensure that purchases are allowable within the grant guidelines. The Office for Sponsored Programs/Post Award also reviews invoices over \$1,000 and a monthly sampling of expenses in accordance with the sponsor's cost policies (e.g., the cost principles found in OMB Uniform Guidance (2 CFR 200). .1(i)-4.2

## **EQUIPMENT**

Equipment purchased with sponsored project funds is defined as having a unit cost of \$5,000 or more and a useful life of greater than one year. Title to all equipment purchased using grant funds rests with BC.

Equipment to be purchased with Federal funds must be approved by the sponsor in advance and listed in the proposal. If you wish to purchase equipment not listed in the proposal, you must receive prior approval through the Office for Sponsored Programs, Pre-award.

The purchase of general purpose equipment (for example, office equipment and furnishings, reproduction and printing equipment, or computers) is allowable only if the equipment is primarily used to carry out project activities and the purchase has been approved by the sponsor.

## **PROCUREMENT**

When purchasing any individual items (goods or services) with a unit cost of \$5,000 or more, the Principal Investigator needs to provide written bidding or sole source documentation to the Procurement Department. This documentation must be received and considered by Procurement prior to commitment of an order.

The Procurement Department is responsible for managing the bidding process for most of the goods and services required by University departments. ~~With the~~ scope of operation, Procurement rvi7.8(s)-6n2(e)7.j EMC 30

- Manufacturer
- Cost
- Building and room location
- Model and serial numbers
- Workstation number if applicable
- Acquisition date

## **INTERPRETING MONTHLY ACCOUNTING REPORTS**

It is the responsibility of the PI/Departmental Administrator (DA)/Service Center (SC) to review awarded funds on a monthly basis and confirm that expenses charged to that fund are allocable to the project and allowable by the sponsor. Additionally, the PI/DA/SC are responsible for reviewing the rate of expenditure on the fund and confirming it is appropriate for the awarded budget. Monthly monitoring by the OSP/Post Award team members is meant to reinforce, not replace the review and management responsibilities of the PI/DA/SC.

The following BUDGET, INQUIRY AND REPORTS are available to assist you with monthly review:

[Grant Balance Summary Report](#)

[ACR Report for Grants](#)

[TDR Report for Grants](#)

Please visit the OSP website (<http://www.bc.edu/research/osp.html>) for further information on these reports and how to run them, or contact your post award team member.

## **PERSONNEL**

Hiring procedures and necessary forms can be found on the Human Resource website at <http://www.bc.edu/offices/hr/resources/docs/hiringdocs-mgr.html> - Hiring Instructions for Managers. If you need to change the project or move personnel to an operating account Employee change requests must be created and approved 3-4 days prior to the payroll deadline. Payroll deadlines can be found on the Human Resource website at <http://www.bc.edu/offices/hr/resources/campusinfo/payrolldeadlines.html>.

Often faculty will receive “summer salary” in their award budget. Summer salary represents payment for research performed on a grant during the summer months of June, July and August. If a faculty member received a summer salary in the past, a turnaround ECR, for the SMR PROF RES-



Faculty Buyouts are also written into proposals for grants to allow teaching time to be used for research. Please read the One-Sixth Rule for calculating the buyout at [http://www.bc.edu/content/dam/files/research/osp/One\\_Sixth\\_Rule-Sept08.pdf](http://www.bc.edu/content/dam/files/research/osp/One_Sixth_Rule-Sept08.pdf) . Faculty Buyout requests are processed through the Provosts' office via an ECR which is routed to OSP for approval. Please note that distributions are calculated over the 9 month academic salary year (vs. the 12 month cycle used by the University).

## COST TRANSFERS

Cost transfers are occasionally needed to correct errors in original charges. Most cost transfers could be avoided simply by reviewing expenses on your grants on a monthly basis to ensure that the charges were properly incurred. Directly charging the appropriate project at the onset normally result in fewer cost transfer requests.

There is the potential of audit disallowance on cost transfers which are poorly documented and/or not completed in a timely fashion. Recent audit reports raise serious questions concerning cost transfers within externally funded programs. Some of the problems with cost transfers (as noted in those reports) are:

- They are not done in timely fashion (in some cases months after the original charges have been recorded in the grantee's accounting records).
- They are not supported by documentation which adequately explains why the transfers were made.
- They are not certified by the principal investigator, project director, or other responsible program official of the grantee organization.

When requesting a Cost Transfer through the Office for Sponsored Programs, a Cost Transfer Form <http://www.bc.edu/content/dam/files/research/osp/CostTransferForm.pdf> signed by the PI must be provided. The form should document the reason for the transfer, the account originally charged, as well as the purchase order or check requisition number. All cost transfers that take place more than 90 days after the original charge must be supported by written justification for the lateness of the transfer which includes:

- A description of the expenses being transferred, including why and when the original charge(s) occurred along with a journal entry;
- The reason why the receiving account was not originally charged and the reason for delay in initiating cost transfer;
- A description of why it is appropriate to charge the receiving account and how the expense is allocable to that account as well as the documentation discussed above; and
- Any other supporting documentation.

## FINANCIAL REPORTS

Financial reports (including final financial close-out reports) which are required by the sponsor on sponsored programs are the responsibility of the Office for Sponsored Programs/Post Award. The objective of the Office for Sponsored Programs/Post Award is to ensure that the financial reports submitted by Boston College to sponsors are presented fairly, timely, and contain complete and reliable information. Financial reports are generally due within 90 calendar days of the end of each budget period. It is the responsibility of the PI and their Grant Administrator ensure that all transactions for the budget period are completed and expensed against the sponsored project account by the end of each budget period. Any balance not obligated

on a sponsored program will be returned to the sponsor unless the sponsor has authorized that the unexpended funds may be retained by the University or carried over for use in continuing years of the project.

## **AUDIT**

Federal awards are subject to annual audits by the University's independent auditors as dictated by the Uniform Guidance (2 CFR 200). This audit is performed to ensure that the University is managing its Federal awards in compliance with applicable laws and regulations. The audit includes tests of internal control systems affecting all Federal awards as well as tests of individual transactions. The results of the audit are reported to the Federal Government and become a searchable record in the Federal Audit Clearinghouse.

In addition to the annual audit, the University is occasionally subject to audits of individual awards. These audits are typically conducted by the sponsoring agency. If you are ever contacted by a sponsor for an audit/visit, you should contact your OSP representative immediately as OSP manages all audits related to sponsored research.

## **ADMINISTRATIVE PROCEDURES**

### **PROJECT MANAGEMENT**

Project management involves maintaining accountability for post-award transactions as well as assuring compliance with applicable sponsor rules, regulations and/or terms and conditions of award. Sponsored project Chart Strings are set up in accordance with the budget approved by the sponsor. The statement of work must be carried out in accordance with the approved proposal. Varying degrees of flexibility are provided by the sponsor7.9(h)-9(o)-1.5(u)1.9( a)7(re-7.8( a)-15(r)1)-0.7( o)-0(p)-2.1(o)-1.5(n).8( a)-oT a2(P).4(p)7.8

authority. In all instances, regardless of whether or not the approval may be obtained within the University, approvals should be obtained by the PI **before** the actual expenditure is incurred. Questions about particular transactions should be directed to OSP.

### Rebudgeting

Many sponsors place restrictions on the use of project funds. In this regard, some budget revisions (i.e., transfer of funds from one budget category to another) require the prior approval from the sponsor. Requests for these budget revisions should be submitted to OSP Pre-award with proper justification well in advance of when they are needed-C 0.310.8(re)8(0-.7(n)7)TP11.1(h)-soa.1(h)-aln al tdo OSoffh(b)-2.(o)-1(o.1(h)-(b)-2(a)-Pr2

submitted with a detailed justification to OSP Pre-award to be forwarded to the sponsor. Requests for foreign travel should be made PRIOR to taking the trip

## SECTION IV : MISCELLANEOUS

# INTERNAL FUNDING OPPORTUNITIES FOR BOSTON COLLEGE FACULTY

GRANT	ELIGIBILITY	DEADLINE	DESCRIPTION
<a href="#">Ignite</a>	Full-time faculty	September & May	To assist BC faculty in competing for increasingly limited pools of external funding
<a href="#">Research Expense Grants (REG)</a>	Full-time tenure-track and tenured faculty	September	To defray the smaller expenses of scholarly research
<a href="#">Research Incentive Grants (RIG)</a>	Full-time tenure-track and tenured faculty	October	To encourage research projects initiated during the summer months