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I. INTRODUCTION

The primary purpose of the Office of Research Services (ORS) is to foster an environment which encourages research, scholarly inquiry, and creative activities by the faculty and to assist in the acquisition of extramural funding to support those activities. This includes proposal development, proposal submission, award analysis, execution of award documents, grant transactions and the compliance with sponsoring agency administrative requirements. The ORS serves as the central point of contact for sponsored programs administration, functioning as liaison between funding agencies, the faculty and other university offices.

Objectives of the Office of Research Services

- Ensure university community understanding and knowledge of ORS services and how external funding can assist them in achieving individual and institutional goals.
- Provide services that facilitate and expand access to external funding by the University and enhance our success in acquiring such resources.
- Identify opportunities and sources of extramural financial support for activities compatible with the mission of the University and with the interests of faculty, staff and students.
- Provide assistance with the preparation of proposals and budgets to meet the requirements of the funding agency.
- Negotiate awards and contracts on behalf of the University.
- Provide timely and highly accurate fund management and accounting services for contract and grant funds.
- Provide oversight for the protection of human subjects in research (IRB) and the care and use of laboratory animals (IACUC).
- Ensure continue growth in the capacity of the ORS staff and other University personnel to work effectively to achieve our mission through use of grant and contract resources.
- Contribute to ensuring a University environment that is supportive of research and scholarship and service to the larger community.

OPERATION OF THE OFFICE OF RESEARCH SERVICES

The ORS is an integral part of the University. Its operating policies and procedures conform to those established by the University’s Board of Trustees.

FUNCTIONS OF THE OFFICE OF RESEARCH SERVICES

The ORS provides advice and assistance to faculty, staff, and students in preparing and submitting proposals requesting funds for research and other sponsored programs. There are five areas of responsibility and activity through which this is accomplished.
1. **Liaison** – ORS is the University unit through which federal, state, local, private and other prospective funding agencies channel their requests for assistance utilizing grants and contracts. In addition, it is the agent through which faculty coordinate their efforts in the development of research and other sponsored programs. The ORS assists faculty in making contracts with government and private agency officials; works to stimulate the interests of these agencies in appropriate University programs; and provide a clearing house for information on faculty interests and University capabilities.

2. **Information Services** – Through established contact with governmental agencies, private organizations, professional associations, and special periodicals, the ORS maintains a resource collection of current information about funding sources. Information about sources of program support – both public and private – proposal guidelines, new programs, and funding trends is shared with faculty, staff, administrators, and other persons affiliated with the University or requesting assistance from the University.

3. **Proposal Preparation and Submission** – In most instances, a faculty member initiate proposals for specific program interests that require outside funding. The initial faculty interest, along with the department and college support, is important to successful proposal development. In order to facilitate the preparation of the proposals, the ORS:

   - Assists faculty members in identifying specific funding sources;
   - Provides appropriate guidelines and other program information;
   - Assist with actual proposal document preparation and submission;
   - Reviews proposals for completeness and format;
   - Assist with budget preparation, including coordination of institutional cost sharing, required space, faculty release time and other commitments;
   - Coordinates university review procedures, required assurances and certifications, and transmittal to funding source;
   - Determines whether human subjects and animal care protection compliance are necessary and assists in developing adequate procedures;
   - Monitors the status of pending proposals;
   - Attempts to expedite their review and approval;
   - Negotiates the legal and technical components of research grants and contracts or other agreements on behalf of the University; and
   - Provides general assistance to the University in planning and development stages of new programs and facilities whenever outside funding is a consideration.

4. **Award Administration** – Once a grant or contract is awarded to the University, the ORS maintains and coordinates review procedures necessary to ensure compliance with applicable University and grantor policies and guidelines; provides general administrative services to the PI, including the establishment of accounts and records, general coordination of other fiscal procedures, and general institutional support of the program; provides academic and other administrative units with appropriate reports and current status of all sponsored programs and funded research activities; monitors the compliance with both federal and state regulations; conducts all contract negotiations, including revisions, on behalf of the University; and monitors expenditures to assure compliance with University and funding agencies policies.
5. **Regulatory Compliance** – ORS is responsible for the administration and facilitation of regulatory compliance efforts associated with research activities at the University. This is accomplished through the coordination and monitoring activities of the Institutional Review Board for the Protection of Human Subjects in Research (IRB) and the Institutional Animal Care and Use Committee (IACUC) as well as tracking and oversight of various compliance issues. ORS provides administrative assistance to the IRB and IACUC members. Additionally, ORS is responsible for the University's program for education of faculty, staff, and students regarding compliance regulations and responsibilities of human subjects, animal care, and related issues.

**SERVICES PROVIDED BY THE OFFICE OF RESEARCH SERVICES**

ORS is staffed by a team of professionals who provide the following services;

**Proposal Development and Award Processing**
- Sponsor identification
- Proposal development
- Networking and team building
- Proposal preparation assistance
- Proposal submission and tracking
- Proposal approval and contract negotiations
- Input, maintenance and reporting of information related to grant/contract submission, award and performance
- Management report development and analyses

**Fiscal and Program Management**
- Contract negotiation and modification
- Project management assistance
- Preparation and submission of project amendments
- Preparation and monitoring of subcontracts
- Approval of payments to subcontractors
- Monitoring of compliance with federal/state/private regulations and guidelines

**Grants Accounting Services**
- Internal accounts and budgets establishment within the University's accounting system
- Invoice preparation to funding agencies
➢ Fiscal report preparation to funding sources
➢ Review and approval of payroll authorizations and processing of labor distributions

**Regulatory Compliance**

➢ Administration and facilitation of compliance associated with research activities at the University
➢ Administration of the IRB and IACUC
➢ Education of faculty, staff, and students regarding compliance issues
➢ Monitoring of intellectual property issues related to contract and grants
➢ Coordination of copyright and patent application procedures

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**DIFFERENCE BETWEEN A GIFT AND A GRANT**

Funds awarded to the University are considered a gift when:

- The purpose of the donation is to make a charitable contribution.
- The grantor is not imposing any contractual requirements.
- The donation is irrevocable.
- There are no financial reporting requirements.

Funds awarded to the University are considered sponsored funding when:

- Provisions have been made for awards by or on behalf of the sponsor.
- The sponsor requests technical and financial reports during and/or at the termination of the project.
- Testing or evaluating proprietary products are involved.
- The grantor has specific requirements (terms and conditions) for the research being performed.
- The grantor specifies the period of performance and wishes to be able to terminate the agreement.
- The sponsor wishes to have unexpended funds returned at the end of the period of performance.
- The sponsor has requested patent or licensing rights.

Any funds received that meet the requirements of being a gift are handled by the Office of Development. Sponsored research funding is managed by the ORS.
II. ADMINISTRATIVE RESPONSIBILITIES

PRINCIPAL INVESTIGATOR

In initializing a sponsored project, the faculty or authorized staff member assumes responsibilities and obligations which begin with the preparation of the proposal and continues throughout the conduct of the project. A final report and other grant or contracts closing documents are essential requirements; therefore the project is not concluded until these responsibilities are fulfilled.

The Principal Investigator/Project Director agrees to the following responsibilities:

- That the project is soundly based; that the primary goal is a significant contribution to knowledge or to the mission of the University, and that all personnel involved are qualified to perform their portions of the task;
- That the budget is adequate to accomplish the project proposed and/or agreed to;
- That the necessary time is available for commitment to the proposed study;
- To be in compliance with the terms and conditions of the grant or contract, including those covering patents, copyrights, fiscal requirements, reports and publications;
- That any requirements for the sources of University financial support (matching funds, cost sharing, or commitment after termination of award) are identified during the University proposal review process and approved by the University administration;
- That safety regulations and University and federal policies related to research involving human subjects, laboratory animals, scheduled substances and radioactive substances are followed and that appropriate clearances for use of the same have been obtained, if necessary; and
- That grant/contract funds are properly expended. No funds will be used for purposes not in accordance with University policy and regulations of the sponsor.

DEPARTMENT CHAIR

In supporting sponsored project by faculty and staff, departments assume certain responsibilities. The department chair’s approval of a proposal certifies the following:

- Compliance with existing University and departmental policies;
- Academic/scholarly considerations and the professional quality of the project;
- Competence of the Principal Investigator in the project area;
- Ability of the Principal Investigator to successfully direct the proposed project;
- Relationship of the project to the objectives of the department, including opportunities to enhance the goals of the department;
- Quality of the proposal;
- Financial, facility and administrative requirements including the proper approval of grant expenditures;
- Capability of the department to provide necessary administrative support (personnel and/or supplies);
- Availability of departmental facilities and equipment to fulfill project needs;
- Adequacy of the budget and the determination of the department to prevent cost overruns;
- Recognition of applicable regulations and the existence of plans for appropriate action to comply with the regulations; and
- To offer the necessary departmental support to successfully accomplish the goals of the project.

**DEAN OF THE COLLEGE OR SCHOOL**

The dean of the appropriate school/college shall review sponsored project proposals for compliance with policies of the University and the potential sponsor with particular attention given to the following:

- That the project contributes to the principal objectives of the University: the education of undergraduate and graduate students, the advancement of knowledge through research and scholarship, the preservation and dissemination of knowledge, the advancement and protection of the public interest and public welfare;
- That the project shall be carried out within a regular department of the University, or through the cooperation of several departments, and be led by a member of the faculty or authorized professional staff;
- That the program shall be directed by University-related rather than external personnel; and
- That free publication of results is assured.

**THE OFFICE OF RESEARCH SERVICES**

The ORS is responsible for the following:

- Educating the University community about the grant application and management process;
- Review all proposals to ensure compliance with instructions and policies of sponsoring agencies and with policies and procedures of the University;
- Administration of grants and contracts between SJU and the sponsoring agencies;
- Assistance in obtaining any special license or agreements needed for the conduct of the project;
- Interaction with sponsoring agencies in order to remain informed on programs, policies and issues relative to grants and contracts;

- Assistance for University personnel in identifying government and private funding sources of funding for research, fellowships, special programs and other activities;

- Collection and dissemination of appropriate information regarding sponsored projects and programs;

- Administrative oversight to institutional committees responsible for the humane care and use of animals and protection of human subjects in research;

- To set up fund numbers for all contracts and grants;

- To execute spending of grant and contract funds;

- To approve all expenses;

- To ensure research compliance;

- To prepare appropriate financial reports; and

- To maintain official files for fiscal audit documentation.
III. PROPOSAL DEVELOPMENT

The Office of Research Services is responsible for planning, organizing, and administrating the University’s grant and contract activities. When a faculty or staff member is interested in submitting a proposal for external funding, they need to contact the ORS to receive proposal preparation assistance, to ensure their proposal is in compliance with agency and University policies, and to secure University approvals prior to submission.

The ORS assists in the proposal development process by:

- Identifying funding sources.
- Obtaining funding agency application and guidelines.
- Assisting in the preparation of proposals to include: reviewing proposals for consistency with the funding announcement as well as providing feedback on proposal language, editing assistance, providing standard wording regarding the University and its policies and assistance with the standard application forms.
- Developing proposal budgets in accordance with University and agency policies by providing data regarding salaries, fringe benefits, facilities and administrative costs.
- Preparing the proposal package for submission to the funding agency in compliance with the agency's requirements, making copies, and forwarding to the funding agency.

PROCEDURES FOR SUBMITTING A PROPOSAL

The procedures outlined here are designed to satisfy informational needs within the University, and to assure that contractual obligations implied in written proposals conform to University policies, practices and capabilities.

All proposals to external organizations must be internally processed and endorsed by the Department Chairperson, Dean or Vice-President, and the Office of Research Services (ORS) before submission.

To gain approval for submission of a research proposal to an off-campus agency:

1. Visit the ORS Website at www.sju.edu/offices/research or send an email to ors@sju.edu for copies of the necessary submission form which include:
   a) **Intent to Submit Proposal Form** – complete the form and send to the ORS with a copy of the RFP or application packet as soon as you determine interest in submitting a proposal.
   b) **SJU Internal Processing Form** – complete and submit to the ORS with the final proposal at least three days prior to the deadline for submission. Incomplete processing forms may cause a delay in the submission of the proposal.
   c) **Approval of Matching Funds/Cost Share** – if matching funds/cost share is required please complete this form and obtain all necessary signatures.

2. Carefully complete the information requested on the Internal Processing Form and on each of the sponsoring agency forms. Activities involving human subjects or vertebrate animals must have approval from the Institutional Review Board for the Protection of Human
Subjects in Research (IRB) or the Institutional Animal Care and Use Committee (IACUC), respectively, before the proposal deadline. Attach a copy of the IRB or IACUC review status. **Funding agencies may reject proposals without verification a protocol has been submitted for review by either committee.**

3. Obtain the endorsements of the Department Chair and Dean on the SJU Internal Processing form, including faculty release time, cost sharing, or matching funds commitments when applicable.

4. Proposal involving faculty and/or staff for more than one department must be endorsed by all involved Chairs and Deans as outlined in the above procedure.

5. Attach the original proposal to the Internal Processing Form and submit to the ORS. The staff will need to examine in detail the budget and be satisfied that the fiscal details of the proposal are in accordance with the policies of the University and the granting agency.

6. Additional requirements for electronic submission of proposals through Grants.gov, NSF Fastlane or other federal electronic systems are available from the ORS.

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**TYPES OF UNIVERSITY/SPONSOR RELATIONSHIPS**

There are, in general, two types of university/sponsor relationships: grants and contracts. Both are binding legal agreements between a sponsor and a university on behalf of the Principal Investigator.

1. **Grants** are generally reflective of an agreement for the investigator to perform a specified activity within a specified time period, but containing minimum or limiting conditions. Grants, as opposed to contracts, do not require the procurement of goods or services. They do imply, however, some legally binding conditions (e.g., cost sharing requirements, budgetary restrictions, reporting requirements, etc.).

2. **Contracts** set out a promise of services or materials which must be forthcoming or redress under law may be sought. There are two types of contracts:
   
   a. **Fixed-Price contracts** provide for the delivery of goods or services for a designated amount of money. Generally, these contracts are used when performance requirements can be specified and costs can be estimated with reasonable accuracy.

   b. **Cost reimbursement contracts** provide for payments to the contractor for allowable costs incurred during the performance of the contract.

3. **Subcontract or Subaward** are those grant proposals in which another institution will act as the prime contractor. Saint Joseph’s University will perform work under the grant but will be under the direction of the submitting institution.

4. **Continuation** proposals seek continuing funding for a research project which has previously been funded.
5. **Collaborative** proposals are those in which a group of universities are working together to perform the same project. Each institution will either submit a separate proposal for their portion of the work, or one proposal will be submitted by the lead university with each institution providing a statement of work and budget.
Before applying for a grant or contract, the applicant should be familiar with the agency’s program guidelines and how closely the proposed project will align with agency goals and objectives. The proposal should indicate that research has been done to show that what is proposed is both feasible and attainable.

An articulate, well organized and concise proposal will create a favorable impression and guide the reviewer’s judgment in a single direction: the acceptance of the proposed project. In preparing a proposal, it is desirable for the proposal draft to be reviewed and edited by a person knowledgeable in the same field or discipline to assure clarity and completeness.

Although most federal agencies and other organizations that sponsor projects require the submission of proposals in a prescribed manner, most call for similar basic information. The following is a discussion of each major part of a proposal.

**TITLE OR APPLICATION FACE PAGE**

Most sponsoring agencies specify the format for the title page. In most cases it includes the project title, name and title of the Principal Investigator, name of the agency to which the program is proposed, starting date, budget period, total funds requested, name and address of the university unit submitting, date and authorized signature(s).

The project title should be brief, yet indicate the nature of the proposed work. The agency guidelines should be consulted for any specific title requirements and title page format.

**ABSTRACT**

The abstract should be no more than approximately 250 words in length, and is usually presented on the first page following the title page. The abstract is the proposal condensed to its basic components and is often the most important part of the entire presentation. It should give a clear statement of the objectives and scope of the project including anticipated results and their significance in such a manner that the reader can easily determine the essential points of the proposal. It should engage the reader and encourage further reading. It is important to state any novelty in the project itself or in the methodology.

Although it appears first, the abstract should be prepared last. It is worthwhile to spend extra time in preparing the abstract to be sure that it is a thorough but concise introduction to the proposal. In many cases, the final readers will give cursory review to other sections of the proposal, but the abstract will usually receive a careful and complete evaluation.

**TABLE OF CONTENTS**

Brief proposals with only a few sections ordinarily do not need a table of contents. The guiding consideration in determining the desirability of a table of contents is the reviewer’s convenience. Long and detailed proposals may require, in addition, a list of illustration or figures and a list of tables. If all of these are included, they should follow the order mentioned, and each should be numbered.
The table of contents should list all major parts and divisions (including the abstract, even though, in most cases, it precedes the table of contents page). Subdivisions usually need not be listed.

INTRODUCTION AND BACKGROUND

The introduction of a proposal should normally begin with a precise description, with appropriate references, for the proposed area of research or program. It should note the importance of the project to the mission of the potential sponsor. It should also define its scope and intent, display the investigator’s understanding of the problems that make up the basis of the proposed project and show confidence in the author’s ability to solve these problems. Presented properly, this section will demonstrate the proposer’s familiarity with the research or program area and will provide an outline of the setting into which the expected results will fit.

It is important to distinguish between research project proposals and institutional program proposals. More extensive and detailed background about the University should be included in institutional training or service program proposals. Historical data on the institution or community to be served as well as estimates or projections for the future will be helpful to the sponsoring agency receiving the proposal.

Remember, however, that the main objective of the introduction is to introduce the subject to the reader. Do not assume that the reader is familiar with the subject. Administrators in sponsoring agencies often want to get a general idea of the proposed work before passing the proposal to reviewers who can judge its technical merit. Thus, the introduction should be clear to an informed layperson. It should give enough background to place the particular project in context of common knowledge and should show how the work will advance the field or be important for some other work. In doing this, do not overstate, but rather state specifically the importance of the project.

In introducing a research problem, it is often helpful to say what it is not, especially if it could easily be confused with related work. It may also be necessary to explain the underlying assumption of the research or the hypothesis to be used.

For a research proposal, a discussion of work done by others should lead the reader to a clear impression of how the Principal Investigator will be building upon what has already been done and how this new work differs from the previous efforts. (It is important to establish what is original in the approach, what circumstances have changed since related work was done, or what is unique about the time and place of the proposed research.)

Literature reviews should be selective and critical. Reviewers do not want to read through a voluminous working bibliography. They want to know the especially pertinent works and the project director’s evaluation of them. A simple list of works contributes almost nothing to a proposal.

If detailed explanation of the proposed project is complex, the introduction may well end by specifying the order and arrangement of the remaining proposal sections. This type of preview often helps a reader begin with an orderly impression of the proposal.
NEEDS ASSESSMENT

A Needs Assessment may be important to support a proposal to engage in educational activities or services. State clearly why there is a need to do the project. Discuss how the needs were assessed. Provide analysis of data that supports an assertion of need to do the project.

PROJECT DESCRIPTION

This part of the proposal is a primary interest to the technical reviewers. Although content may vary depending upon the size of the project and whether it is research, training, or service program, the description should contain several sections describing the work being proposed, previous experience, facilities available, how the work will be accomplished and why it is significant. Sections of the project description often include the following items described in detail below.

A. STATEMENT OF WORK

Describe any preliminary investigations or past experiences that led to the propose study or project. If a thesis, dissertation or publication has been completed as a result of the investigator’s earlier work in this area, it should be referred to and/or attached as an appendix. If the proposal being written is for renewal of support for an existing project, a brief report of the past year’s activities and reference to the final report (either completed or forthcoming) should be provided.

B. STATEMENT OF PROPOSED WORK

Describe the problems that have been suggested by past work in as much detail as possible and where appropriate, refer to the work of others who have suggested these problems. If the novelty of the research or program lies in the subject itself, it should be so indicated. Consider the following:

- Be realistic in designing the program of work. Overly optimistic notions of what the project can accomplish in one, two or three years or of its effects on the world will only detract from the proposal’s chances of being approved. A comment made frequently by reviewers is that the project plans should be scaled down to a more specific and manageable project that will permit the approach to be evaluated and that, if successful, will form a sound basis for further work. In other words, the proposal should distinguish clearly between long-range goals and the short-term objectives for which funding is being sought. Short-term objectives should be stated in measurable terms for the project evaluation.

- Be clear about the focus of the project; in defining its limits, especially exploratory investigations.

- Be as detailed as possible about the schedule of the proposed work. When will the first step be completed? When can subsequent steps be started? Sponsors appreciate the evidence that the investigator knows how to proceed in a step-by-step fashion. Project timelines or milestone charts are an effective means on conveying work schedules.

- Be specific about the means of evaluating the data or the conclusions. Try to imagine the questions or objectives a critic might have and show that the research or program plan anticipates them.
• Be certain that the connection between the project objectives and method to be employed is evident. If a reviewer fails to see this connection, the proposal will probably not receive further consideration.

C. METHOD OF APPROACH

Describe in detail the approach to be used in studying the proposed problems or carrying out the program. Although detailed information may be limited at this stage, it is important to describe as thoroughly as possible the organization for at least the initial stages of the program. This information will enable those reviewing the proposal to assess the investigator's capability as well as the project's technical merit. If the novelty of the project lies in the approach, make the point with clarity and enthusiasm. Do not hesitate to use figures or tables to clarify a point.

D. HUMAN SUBJECTS AND ANIMAL WELFARE

When research involves human subjects or animals, assurances must be provided that the rights of the individuals are being protected and that animals are cared for and used humanely. Protocol approval from the IRB or IACUC is required prior to submitting the proposal to the sponsoring agency.

E. USE OF SCHEDULED SUBSTANCES

For certain controlled substances, such as drugs, specific clearance is required. Therefore, if your proposal involves drugs, the ORS should be contacted to ascertain which substances the University is licensed to purchase and maintain. Clearance for additional substances can take up to six months.

F. SIGNIFICANCE AND OBJECTIVES

State, where possible, how the anticipated results will contribute to the body of knowledge in the area and why the contribution is important to the reviewer. Although it may sound commercial, this is the technical "self" of the proposal. It is important because it helps the prospective sponsoring agency rationalize the support.

RESOURCES AND FACILITIES

The nature of this section depends on the project, but in general it details resources available and, if possible, shows why the sponsor should wish to choose this University and the faculty involved in this particular project. Some relevant points may be the institution's demonstrated competency in the area, its special facilities or support services, or its association with other agencies.

REFERENCES

Unless specified in the application guidelines, each discipline should follow its usual procedure for presentation of references.
PERSONNEL

This section of the proposal usually consists of two parts: an explanation of the proposed personnel arrangements and the biographical data sheets for each of the main contributors to the project.

The explanation should specify how many persons, at what percentage of time, and in what academic categories will be participating in the project. Student participation, paid or unpaid, should also be mentioned. It must be stated if any persons must be hired for the project and, if so, an explanation of why they must be hired and a description of the qualifications desired must be included.

The biographical data sheets should immediately follow the explanatory text of the personnel section, unless the agency guidelines specify a different format. For a major program proposal with eight or more staff members, the data sheets may be given separately in an appendix. All biographical data sheets within the proposal should be in a common format.

BUDGET

Most program sponsors specify how budgets should be presented. This is done usually through a preformatted budget form. Because of periodic changes in fiscal policies of potential sponsors as well as periodic changes in indirect cost allowances and staff benefits, the Office of Research Services (ORS) should be consulted early in the budget planning.

This proposal budget checklist will reduce the possibility of omitting budgetary items.

Salaries and Wages

- Academic and research personnel
- Technicians
- Student research assistants
- Secretaries
- Hourly help
- Salary increases of 4% for each year of the grant
- Tuition, fees and other stipends

Note: The fringe benefit rate of 27.8% should be used on all grants. The fringe rate for part-time employees is 7.65% for all proposals.

Consultant Services

- Consulting fees
- Travel and lodging for consultant
- Per diem
**Equipment**

- Research and/or instructional equipment
- Equipment installation
- Freight
- Maintenance Agreements
- Equipment repair
- Leases or rentals

*Note: Computer hardware, such as a desktop or notebook, is considered an expendable supply and should be considered as such.*

**Expendable Supplies**

- Chemicals and glassware
- Animals and supplies
- Printing, photo duplication, copy costs, illustrations, etc.
- Books and other publications
- Office supplies
- Research supplies
- Computer hardware and software
- Postage

**Travel**

- Air or rail charges
- Ground transportation costs
- Lodging
- Meals

**Indirect Costs**

a) The approved rate is 42.5%. *(Please refer to the section “Determining Indirect Cost” for additional information.)*
Cost Sharing (if required)

b) Some sponsors require that project costs be shared by the University. If cost sharing is required the Matching Funds/Cost Sharing Form needs to be completed and approval from the Dean and Provost is necessary. Cost sharing should be listed separately.

Matching Funds

c) Some sponsors require that the University provide a match for the proposal if it should be awarded. Matching funds can either be actual cash or in-kind. Either way matching funds must be kept separate from the University's unrestricted funds. If matching funds are required the Matching Funds/Cost Sharing Form needs to be completed and approval from the Dean, and the Provost.

The budget should reflect the actual anticipated costs of the described program and should be neither over nor understated. Proposal reviewers generally use the budget as one criterion to determine whether the investigator or project director is actually aware of the needs of the proposed project.

DIRECT AND INDIRECT COSTS

The total cost of a sponsored project is the combined direct and indirect costs. Direct costs are those expenditures readily identifiable with a particular project, and include such items as salaries, equipment, supplies, travel, and publication costs. Indirect costs represent a pre-determined share of other costs that are incurred by the university to support and service sponsored projects, including the expense of providing building space, utilities, janitorial service, library facilities, administration and other items. Indirect costs, then, are expenditures which result from the conduct of an activity but are not attributable directly to that activity. Both direct and indirect costs are incurred for all projects, and together constitute the total cost of the project. **Indirect cost cannot be used to cover unforeseen direct costs.**

Indirect cost rates are established by federal negotiation, not by the University. Contact the ORS for the University's current negotiated cost rate and for assistance with this part of the budget.

Elements of Direct Cost

(1) Salary and Wages – The portion of any University employee's time that is actually devoted to a sponsored project is an allowable direct charge for that project. The work involved obviously must be in furtherance of project objectives. Such charges must be made at the same rate of pay as for other University work even though the project budget may show sufficient funds to pay a higher rate. **Note: 4% of the current year salary should be added for each proposed year of grant funding to absorb normal salary increments.**

(2) Academic Year Release Time – Commitments of faculty time to perform work funded by extramural grants or contracts will be permitted if approved in advance by the Department Chair, and the Dean of the school or college. In most cases the grant or contract should fully reimburse the University for that portion of a faculty member’s time that is being released. Summer compensation at a rate of 1/10th of the 10-month contract salary, per summer month, is routinely approved, provided that no other employment is assumed during that period. Faculty members are expected to request reimbursement for time allocated to
research projects funded by grants or contracts, even though the percentage of time allocated may not call for a further reduction of course load.

(3) Overload, Consulting (OMB Circular A-21, Section J8) – During the academic year faculty may not be paid extra compensation above the base salary for work performed on contracts and grants. This principle applies to all members of the faculty at an institution. Since intra-university consulting is assumed to be undertaken as a university obligation requiring no compensation in addition to the full-time base salary, the principle also applies to faculty members who function as consultants or otherwise contribute to a sponsored agreement by another faculty member of the same institution. However, in unusual cases where consultation is across departmental lines or involves a separate or remote operation, and the work performed by the consultant is in addition to his/her regular departmental load, and charges for such work representing extra compensation above the base salary are allowable provided that such consulting arrangements are specifically provided for in the agreement or approved in writing by the sponsoring agency.

(4) Summer Compensation – For compensation purposes, summer is normally defined as beginning the Monday after the last day of the academic year contract. Most faculty salaries are based on an academic year (10-month) appointments and the monthly rate of the summer compensation is computed as 1/10th of the total salary.

(5) Student Employment: Undergraduate Students – Grant supported employment for students should be initiated through the Human Resources Department. Student positions should be listed in the budget, the same as faculty or staff positions, with the percentage of time and rate of pay indicated for each position. Student salaries should follow a scale consistent with the regular University practices. Work Study students are not student employees and cannot be paid from a sponsored project.

(6) Fringe Benefits – Includes salary and wage tax, health coverage, retirement, etc. It does not include tuition remission. The rate of 27.8% should be charged for all full time employees. The rate of 7.65% should be charged for all part-time employees including students and graduate assistants, and for faculty summer support.

(7) Expendable Supplies and Materials – The type of supplies and materials that are required should be indicated with estimated costs. If substantial funds are requested, there should be a breakdown of these items by general classification and justification in the proposal. Note: 4% of the current year budget should be added for each proposed year of grant funding to absorb normal inflationary increments.

(8) Capital Equipment – Each major item of equipment should be described in the budget in addition to the justification provided in the proposal. Allowable pieces of equipment are normally limited to those not already available at the University. If freight and installation are to be billed on the same invoice as the equipment they should be included in the purchase price of the equipment. Maintenance, lease and rental contracts, equipment repair and fabrication should be budgeted separately. Capital equipment is any equipment over the cost of $5,000.

(9) Travel – The type and extent of domestic travel and its relationship to the project should be specified in the budget. Allowance for air travel will not normally exceed round-trip economy accommodations. In general, only people participating directly in the project may
travel on grant funds. If foreign travel is contemplated in connection with the project, the proposal should include countries to be visited along with considerable justification as to why the foreign travel is necessary. **Note: Please refer to the Travel Policy concerning restriction on foreign travel when using grant funds.**

(10) Publication Costs – Include the costs of printing, distribution, promotion, mailing and general handling.

(11) Consultant Services – External consultants or lectures, along with their fees, travel and lodging in the local area while on grant business, should be included in the budget. Consultants who are federal employees cannot be paid from a federal grant.

## DETERMINING THE INDIRECT COST RATE

Indirect cost rates, also known as Facilities and Administrative (F&A) costs, are established by federal negotiation, not by the University. The negotiated rate must be charged to all grants and contracts. Deviations must be stated in writing by the sponsor or waived in writing by the University administration. Indirect costs provide for the recovery of only those costs that are actually incurred for common or joint objectives and therefore cannot be identified with a particular sponsored project or institutional activity. The University's indirect cost rate is 42.5% of modified total direct cost (MTDC) for on campus projects and 21% for off campus projects.

The base amount used in determining the indirect cost is the MTDC consisting of salary and wages, fringe benefits, materials and supplies, services, travel, and the first $25,000 of subawards. The base cost does not include capital expenditures, patient care, rental and maintenance of offsite activities, student tuition, and student support costs.

Below is a sample budget and method used in determining indirect cost:

<table>
<thead>
<tr>
<th>Personnel:</th>
<th>Calculating the Indirect Cost:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principal Investigator $25,000</td>
<td>$67,000 (Salary) + $16,208 (Fringe Benefits) + $10,000 (Consulting) - $6,000 (Student Support) - $20,000 Capital Equipment + $5,000 (Supplies) + $2,000 (Computer) + $25,000 (the first $25K of the total subawards) = $99,208</td>
</tr>
<tr>
<td>Technician $30,000</td>
<td></td>
</tr>
<tr>
<td>Graduate Assistant $12,000</td>
<td></td>
</tr>
<tr>
<td><strong>Total Salary</strong> $67,000</td>
<td><strong>$99,208 x 42.5% = $42,163 – Total Indirect Cost</strong></td>
</tr>
<tr>
<td>Fringe Benefits (PI + Technician x 27.8% + Graduate Assistant x 7.65%) $16,208</td>
<td></td>
</tr>
<tr>
<td>Consulting Services $10,000</td>
<td>Direct Cost = $176,208</td>
</tr>
<tr>
<td>Student Support $6,000</td>
<td>Indirect Cost = $42,163</td>
</tr>
<tr>
<td>Capital Equipment $20,000</td>
<td>Total Budget = $218,371</td>
</tr>
<tr>
<td>Supplies $5,000</td>
<td></td>
</tr>
<tr>
<td>Computer $2,000</td>
<td></td>
</tr>
<tr>
<td>Subawards $5,000</td>
<td></td>
</tr>
<tr>
<td><strong>Total Direct Costs</strong> $176,208</td>
<td></td>
</tr>
</tbody>
</table>
ENDORSEMENTS

An endorsement page is generally required by sponsors. Typically, it will carry the signature of the authorized institutional official. The endorsement page must identify the proposal for which the endorsements are sought. If a community agency or another university is involved in the project, the endorsement from a responsible member or officer of the organization must also be included. In most cases the Director of the ORS is the authorized official for Saint Joseph's University concerning sponsored funding.

INTERNAL PROCESSING FORM

The University requires that all proposals include the Internal Processing Form. The completed form, together with an original copy of the proposal, should be submitted to the ORS for institutional approval. Under no circumstances should proposals be submitted without authorization and approval by the ORS.
After a grant application is approved for funding, a grant award letter or notice is ordinarily issued by the sponsor to the Principal Investigator. At the time an award is received, the following procedures are to be followed:

1. Upon receiving the award letter from the agency, the Principal Investigator is responsible to immediately provide the Office of Research Services (ORS) with a complete set of all award documents, including any agreements or contracts that need official University signatures.

2. The ORS will carefully review the documents; execute any accompanying contracts or agreements; complete a formal Notification of Award, summarizing the terms and conditions of the award; and code the agency approved budget for execution in the Banner Financial System. With the endorsement of the ORS Director, the Notification of Award authorizes the establishment of an SJU grant fund. A copy of the notification will be forwarded to the PI, the PI’s department chair and dean via email.

3. When the approved budget has been entered into the University financial system, the PI will be responsible for the following:
   a) Executing the project in a timely manner that assures completion of the grant supported activity and related spending by the award termination date.
   b) Preparing all technical reports to meet deadlines prescribe by the sponsor, and provide the ORS with copies of all submitted reports.
   c) Requesting no cost extensions. Request to the sponsor for a no-cost extension of the award period should be processed through the ORS in accordance with sponsor guidelines and no less than eight weeks prior to the award termination date.

The Office of Research Services will be responsible for the following:

1. Implementing procedures for monitoring grant fiscal activity to ensure all grant spending is in keeping with the approved budget and the terms and conditions of the award.

2. Expediting invoicing/billing, fiscal and other reporting in accordance with OMB standards of fiscal accountability and in compliance with terms and conditions of funding.

3. Preparing and maintaining quarterly time and effort reports for each grant funded salary.

INCURRING ALLOWABLE COST

It is the responsibility of the Principal Investigator to monitor all expenditures to assure compliance with the award notification. As a double measure of protection the Office of Research Services also has the ultimate responsibility of assuring compliance with the grant award.
It is the policy of the university that all expenditures of grant funds must meet the following standards:

1. Must be for official university business only.
2. Are reasonable under the guidelines of the specific program or project.
3. Must contribute to the objectives of the specific program or project which they are being charged.

**UNALLOWABLE COST**

1. Any item for personal use.
2. Personal gifts of any kind.
3. Fees for any sporting event.
4. Political contributions.
5. Contributions to charitable organizations.
6. Donations to attend an event.
7. Membership or dues to a society, association, or organization unless specifically serving the need of the program or project.
8. Alcoholic beverages.

**COST SHARING AND MATCHING FUNDS**

Many of the federal programs involving educational institutions will require contributions from non-federal sources. This is known as “matching” or “cost sharing”. The most important source of information about how non-federal cost shares are to be treated is **OMB Circular A-110**.

The Principal Investigator must report to the Office of Research Services, with accompanying documentation, all cost sharing or in-kind matching obligated to the grant. Authorization for institutional matching must be documented on the Routing Form at the time the proposal is submitted for review by the ORS. The Approval for Matching Funds/Cost Share Form with original signatures must be on file in the ORS. All matching and cost sharing resources must meet the following criteria:

1. They must be verifiable from the recipient’s accounting records;
2. They may not be included as contributions for any other federally assisted project or program in either the current or any prior period;
3. They must be necessary and reasonable for proper and efficient accomplishment of project or program objectives;
4. They must be allowable under the applicable cost principles (OMB Circular A-21). This is true even if the asset is derived from a third party contribution. Therefore, a matching contribution must be for something which the organization or institution could have spent federal funds;

5. They may not be paid by the federal government under another award except when authorized by the federal agency; and

6. They must be designated in an approved federal budget.

Types of cost sharing/matching funds

a) **Cost sharing and matching with cash outlays** is fairly simple. The University must be able to show that outlay from non-federal sources benefited the funded project, and that funds used were not from federal sources.

b) **Third party in-kind contribution** is more complicated. The rule associated with in-kind contribution is that the University may assert a value based on the current fair market of the service or asset provided. The following are some standard in-kind contributions:
   - Volunteer service
   - Donated supplies
   - Donated equipment
   - Donated space

Because of the potential audit vulnerability that an institution faces in the area of cost sharing and matching, it is critical that effective documentation be maintained.

**PROGRAM INCOME**

Program income can be defined as “income that is directly generated by an award.” Program income can include the following:

A. Income from fees and services performed;

B. The use or rental of real or personal property acquired under federally funded projects;

C. The sale of commodities or items fabricated under an award;

D. License fees and royalties on patents and copyrights; and

E. Interest on loans made with award funds.

The federal government has had a long standing policy that program income constitutes grant assets. Therefore, program income is to be used in accordance with the terms and conditions of the award. There are three options available for the use of program income:

1. Expand the scope of the project over and above the approved project budget.

2. Meet the requirements of cost sharing or matching.

3. Used to reduce the federal share of the project. Known as the deductive alternative.
The federal government prefers the deductive alternative, but most institutions prefer to expand the scope of the project. There are limits to the amount of income that can be used to add to the budget of the project. The federal government allows a maximum of $25,000 to be added to the project budget. Income over the $25,000 limit must be used to reduce the federal share of the project.

REPORTING

Generally all sponsors require an annual report at the one year anniversary date of the grant award and a final, comprehensive report on completion of the project. The annual report is simply the status on the progress of the project most agencies will not send payment until the annual report is received. It is imperative reporting deadlines are met. Most sponsoring agencies will require a final report prior to sending the final payment. Therefore, undue delay in submission of the final report may cause the University’s image with the sponsor to be damaged and threaten any chance of receiving future funding. The PI is responsible for the technical aspect of the final report, while the ORS is responsible for all financial aspects.

CLOSE OUT

Prior to the termination of the grant the Principal Investigator should review the grant for available funds, deficit balances, accuracy of the expenditures and outstanding encumbrances. Outstanding requisitions should be for worked performed before the final date. Most funding agencies will allow up to 90 days making final adjustments and paying outstanding invoices.
V. POLICIES AND PROCEDURES

UNIVERSITY POLICY ON RESEARCH INVOLVING HUMAN SUBJECTS

In accordance with its abiding concern for human dignity, individual freedom and integrity, and the civil rights of all citizens, Saint Joseph’s University has adopted a policy that controls procedures that may be used in research involving the participation of human respondents or subjects. Human research is defined as any investigative activity involving interviews, questionnaires, or treatments of any kind requiring the participation of human subjects or respondents, whether conducted on or off campus, as a classroom or research exercise, with or without the intent to publish. This policy insures the health, safety, privacy and dignity of all persons participating in research under the auspices of the University. Specifically, it requires that the responsible investigator determine and be prepared to demonstrate:

1. that all methods and procedures to be employed are safe and involve no undue risk to life, health, safety or well-being of subjects;
2. that the risks to the subjects are clearly outweighed by the potential benefits to him or to her, or by the importance of the knowledge to be gained;
3. that the methods and procedures reflect respect for the feelings and dignity of respondents or subjects and avoid unwarranted invasion of privacy or disregard for anonymity in any way;
4. that participation is informed and completely voluntary, and that procedures for obtaining such consent are adequate and appropriate;
5. that data be used only for the purposes for which such consent was obtained and then appropriately destroyed; and that methods of data collection, analysis, storage and reporting are consistent with these principles;
6. that proposed recruitment materials, i.e., fliers, brochures, advertisements, e-mail, have received the approval of the Institutional Review Board for the Protection of Human Subjects in Research (IRB) before posting.

Any faculty member or student preparing proposals for research or class projects involving human respondents or subjects should arrange to have their proposal or class project protocol reviewed by the IRB prior to initiation of the project.

For the detail policy for using human subjects in research please refer to the IRB Handbook.
UNIVERSITY POLICY ON THE HUMANE CARE AND USE OF ANIMALS IN RESEARCH

Saint Joseph’s University is committed to the judicious, humane use of animals in research, testing and teaching. In support of this commitment, the University has given assurance (Assurance # A4224-01) that will comply with the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals.

This assurance is applicable to all teaching, research, training, experimentation, biological testing and related activities involving live, vertebrate animals conducted at Saint Joseph’s University, or at another institution as a consequence of the subgranting or subcontracting of a PHS-conducted or supported activity by this institution.

A. Saint Joseph's University will comply with all applicable provisions of the Animal Welfare Act and other federal statutes and regulations relating to animals.

B. This institution is guided by the U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training.

C. The institution has established and will continue to maintain a program for activities involving animals in accordance with the Guide for the Care and Use of Laboratory Animals.

D. This institution has an Institutional Animal Care and Use Committee (IACUC) appointed by the Vice President for External Affairs of the University and qualified through the experience and expertise of its members to oversee the Institution’s animal program, facilities and procedures. The IACUC will:

- Review at least once every six months the Institution’s program for humane care and use of animals, using the PHS Guide as a basis for evaluation.
- Inspect at least once every six months all of the Institution’s animal facilities using the PHS Guide as the basis for evaluation.
- Prepare reports of the IACUC evaluations as set forth in the PHS Policy and make written recommendations regarding any aspect of the Institution’s animal programs, facilities, or personnel training to Vice President for External Affairs.
- Review concerns involving the care and use of animals in the University.
- Review and approve require modifications in or withhold approval of applications and proposals for activities related to the care and use of animals, and propose significant changes in previously approved activities, as set forth in the PHS Policy.
- Determine that the activity conforms with the Institution’s Assurance.
- Shall notify Investigators and the University in writing of its decision to approve or withhold approval of those sections of applications or proposals related to the care and use of animals, or of modifications required to secure IACUC approval.
- Shall conduct continuing review of applications and proposals covered by the PHS Policy not less than annually.
• Have authority to suspend a previously approved activity if it determines that the activity is not being conducted in accordance with the approved protocol or with applicable provisions of the Animal Welfare Act, the Guide, the University Assurance, or as set forth in the PHS Policy.

For further information please refer to the IACUC Handbook available at the ORS Web site.

**Changes in research protocols involving human or animal subjects must be approved by the Institutional Review Board for the Protection of Human Subjects in Research (IRB) or the Institutional Animal Care and Use Committee (IACUC).**
EFFORT REPORTING

It is the policy of Saint Joseph’s University that payroll charges to sponsored awards must be reasonable for the work performed. A responsible person with suitable means of verification of the work performed (usually the Principal Investigator) must confirm the reasonableness of such charges through the Effort Report. This policy has been established to ensure compliance with OMB Circular A-21.

Effort reporting is the formal verification of the reasonableness of the distribution of payroll charges to sponsored awards. It is done on an individual basis and applies to PIs, administrators, and graduate students. The following must be certified.

- The allocation of effort is appropriate and reasonable.
- The distribution of effort is consistent with what was proposed.
- The work was performed.

Web entry for hourly time by staff and student employees qualify as records of payroll charges to the sponsored award in lieu of an Effort Report.

REPORT PREPARATION AND DISTRIBUTION

The ORS will generate the Effort Reports from the Banner Labor Distribution Inquiry form for each semester (December 31st for fall, May 31st for spring, and August 31st for summer). Reports will be distributed to the Principal Investigator for review and approval within 30 days from the end of the reporting period.

Effort Reports should be returned to the ORS within 60 days of distribution. Reminders will be sent to the PI and their department chair for any outstanding Effort Report.

CONFIRMATION

The Effort Report represents all payroll charges in percentages and dollar amounts for each semester. The PI should review the information and confirm that it represents a reasonable distribution of payroll charges for the work performed in each sponsor award.

If the distribution appears inconsistent with the actual work performed, please notify the ORS immediately. If necessary the ORS will prepare a cost transfer.
USE OF CONSULTANTS

A consultant is an individual hired to give professional advice or services for a fee. The use of paid consultants may be necessary when the project calls for expertise. Consultants are generally not employees of the University and should be employed only for tasks where on-campus expertise does not exist or is not readily available.

Consultants may be reimbursed for fees, travel, and/or subsistence costs. Some sponsors require prior approval for consultant use and, in some cases, restrict or limit the rate of reimbursement. Any such restrictions are specified in the sponsor's guidelines or the award notice. Questions concerning the allowability of consultant use should be directed to the Office of Research Services.

If a University employee has agreed to act as a consultant for a sponsored project, the grant budget should include the portion of the employee's salary that corresponds to the percent effort the employee will contribute to the project. Charges representing extra compensation (i.e., compensation above the salaried base) for consulting or lecture work are allowable only in unusual cases and only when all of the following conditions exist:

- The consultant is specifically provided for in the award document or approved in writing by the sponsor.
- The consultation is across departmental lines or involves separate or remote locations.
- The work performed is beyond the scope of the individual's regular departmental workload.

If a University employee is proposed as a consultant, the individual should be included in the salary and wages section of the budget.

Payment for Consultants

Consultants should be paid only for work that is already completed and supported by a consulting agreement and invoice signed by the consultant. The invoice should specifically include the following:

- Name of consultant or company consultant works for
- Federal Tax ID number of social security number
- Nature of services rendered
- Rate of pay
- Period of service
- Total amount of the fee

Consulting Agreement

A consulting agreement is recommended in most cases and is always required by a federal sponsor. To be considered a legally binding agreement between the University and the consultant, all such agreements must be signed by the Director, Office of Research Services.
BUDGET TRANSFERS

Transfer of funds between account lines within the same category can generally be done without prior approval from the funding agency. Transfer between restricted categories, such as personnel, usually requires the approval of the funding agency. Please note funding agencies have different regulations concerning the movement of funds between account categories. If in doubt please contact the ORS.

Budget transfers can be completed using Banner Web by the Principal Investigator or any person designated by the PI. Budget transfers will not post until approved by the ORS.

COST TRANSFERS

Cost transfers should be processed as soon as possible after the original transaction, but no later than 90 days after the end of the month of the original transaction. Transfers made after this period of time raises questions with funding agencies and auditors concerning the appropriateness of the transfer.

Typically, cost transfers are appropriate when they are allowable direct costs of the sponsored project, and their purpose is to:

- correct errors in processing the original charges;
- move costs between grant budgets for closely related work (as defined by the project scope) that is supported by more than one funding source.
- transfer pre-award costs in accordance with the provisions of OMB Circular A-110, Section C.25.

Inappropriate circumstances for cost transfers include, but are not limited to the following:

- when the transfer is solely for the purpose of utilizing unexpended funds of a sponsored award;
- when the transfer is for the purpose of avoiding a cost overrun by charging another, unrelated sponsored award;
- when the transfer circumvents pre-and / or post-award restrictions.
Any travel associated with a sponsored program and being paid by a grant or contract **must** be made through the University Travel Office. Charges for travel will not be reimbursed if arrangements were made through other sources besides the Travel Office, including Internet travel sites such as Orbitz, Expedia, Priceline, Travelocity, etc.

If travel involves leaving the United States federal law requires that any travel involving air be made using a carrier of the United States. Only if no US carrier is available through a certain city then a foreign air carrier can be used.

Reimbursement for ground transportation, such as gas, tolls, and parking, does not have to go through the Travel Office. Send receipts associated with these costs to the Office of Research Services for endorsement.
Consistent with federal regulations to promote objectivity in research, Saint Joseph's University establishes this Conflict of Interest Policy for all faculty and staff engaged in the design, conduct or reporting of sponsored research and educational activities, including consulting work. Under this policy Principal Investigators are prohibited from using their positions for purposes inconsistent with objectivity in research and professional integrity. This statement is intended to inform investigators of the regulations, the University's policy, and the investigator's obligations to disclose significant financial interest. Once such interest is disclosed, the University must decide whether the disclosed financial interests create a conflict of interest that could bias the design, conduct or reporting of sponsored projects. If so, the University must manage, reduce, or eliminate the conflict prior to the expenditure of any funds under an award.

Definitions

1. **Investigators** – are principal investigators and “any person responsible for the design, conduct, or reporting” of projects funded or proposed for funding. Investigators may include faculty members, administrators, staff members and in certain cases, students. For purpose of disclosing financial interests, *Investigators* includes the investigator’s spouse and dependent children.

2. **Significant Financial Interests** – means anything of monetary value, including but not limited to:
   - Salary or other payments for services, e.g., consulting fees or honoraria (when aggregated for the investigator, spouse and dependent children) expected to exceed $10,000 in the next twelve months.
   - Any equity interest, e.g., stock, stock option, other ownership interests (when aggregated for the investigator, spouse and dependent children) with a fair market value of over $10,000 or which represents more than 5% ownership in any single entity.
   - Intellectual property rights (e.g., patents, copyrights, and royalties from the rights).

The following are NOT considered “significant financial interests” for purposes of required disclosure:

- Salary or stipends from Saint Joseph’s University other than research funding.
- Income from seminars, lectures, or teaching sponsored by public or nonprofit institutions.
- Income from service or advisory committees or review panels for public or nonprofit institutions.
- Any ownership interest in an institution applying for funding under the Small Business Innovation Research (SBIR) Program
3. A **Conflict of Interest** exists when the University designated officials reasonably determine that a significant financial interest could directly and significantly affect the design, conduct, or reporting of the sponsored project.
## VI. CONTACTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Telephone Number</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thomas Kaeo</td>
<td>Director</td>
<td>(610) 660-1206</td>
<td><a href="mailto:tkaeo@sju.edu">tkaeo@sju.edu</a></td>
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<td>(610) 660-1271</td>
<td><a href="mailto:drathore@sju.edu">drathore@sju.edu</a></td>
</tr>
</tbody>
</table>

For general information please call (610) 660-1205 or email ors@sju.edu.