

# Illinois Wesleyan University

## External Grant Manual for Faculty and Staff

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## Our Vision

Our vision in the Grants and Foundation Relations (GFR) Office is to build a grants office that is an asset to our faculty, students, and staff; helping to attract top- notch faculty, supporting innovative research and teaching, and fostering an inclusive environment.

## What we do

The GFR Office encourages and aids the individual and collective efforts of the faculty and professional staff to obtain funding and external fellowships from federal, state, private, and other external sources for research and scholarship, teaching, professional development, service, and departmental and institutional goals and priorities; and supports the post-award administration of these grants.

## How we do it

The GFR Office provides faculty and professional staff support in developing grants, researching and analyzing foundation prospects, and post-award administration.

## Contact Grants and Foundation Relations Staff

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## Researching and Analyzing Funding Prospects [finding grants]:

The GFR Office role is to:

- A. Learn about individual faculty member's research interests and funding needs;
- B. Research funding agencies and try to find new funding sources;
- C. Maintain a current prospect list for the institution and individual faculty/staff/programs;
- D. Conduct office hours for meeting with faculty re: development of projects, proposals;
- E. Conduct workshops and non-orgs for faculty on seeking grant funding and proposal preparation as well as specific federal agency funding workshops [e.g. National Science Foundation(NSF)];
- F. Develop and maintain relationships with program officers at governmental, corporate and foundation funding sources;
- G. Alert faculty and staff to grant opportunities and program deadlines and provide support throughout application process;
- H. Ensure that prospect information is up to date in advancement database (Advance) system and provide necessary documents to Prospect Manager.

## Supporting Grant Development:

The GFR Office role is to:

- A. Be familiar with application guidelines;
- B. Assist with writing and provide editorial services;
- C. Assist in budget preparation;
- D. Assemble and complete necessary institutional forms (E.g. tax-exempt status, certificate of good standing);
- E. Act as liaison as needed between faculty and staff and the Provost or Vice President of Advancement, or between faculty and staff and funding agencies;
- F. Secure necessary internal permissions and assist in submitting completed proposals;
- G. Ensure the Advance database system contains submitted proposals.

## Procedures for Developing and Submitting External Grant Proposals

Individuals applying for grants that **do not obligate the University in any way** [e.g., the project does not require matching funds (either cash or in-kind), the project does not utilize campus facilities or personnel, the faculty member will not receive a salary, no sub-awards are involved, etc.] are not required to follow these procedures, but as a courtesy, should notify the GFR Office and the Provost as a first step and send the GFR Office a copy of the proposal once it is submitted. If the proposal is funded, the faculty member must send a copy of the award document and related reports to the Provost's Office and the GFR Office.

These procedures are intended for faculty and staff seeking external funding from federal, state or private sources.

1. Contact the GFR Office as soon as the funding announcement is available (at least three weeks) prior to the grant submission date. The GFR Office will notify the Provost/Dean of the Faculty of the faculty or staff member's intent.
2. In situations where the institution can only submit a limited number of proposals (e.g. NSF:MRI, NEH, Faculty Awards), the Provost and Dean of Faculty will create an internal institutional nomination process. This process will be administered by the GFR Office well in advance of the due date. If you have any questions please contact GFR staff.
3. Fill out and obtain the necessary signatures on the [External Grant Proposal Review Form](#) (EGP). Staff members must seek approval from the appropriate Vice President as part of this process. If the project requires release time, the hiring of new personnel, the provision of matching funds (whether cash or in-kind), ongoing maintenance costs or other financial commitments on behalf of the University, or if a sub-award with another institution is involved, the Provost will determine whether the University is able to support the proposal. When proposals include changes to facilities and infrastructure or the reallocation of funds, the Provost will confer with the Vice President for Business and Finance in making this determination. The EGP form must be completed and signed by all parties before the proposal can be submitted.
4. [Resource materials for preparing proposals and budgets](#) are available on the GFR website or through GFR office. See [“Preparing a Successful Proposal”](#), [“Creating a Budget for Your Proposal”](#).
5. Develop, complete and submit the proposal (narrative and budget) with the aid of the GFR Office.
6. Current fringe benefit and indirect cost rates are available from the GFR Office. The rates are revised periodically under a formula set by the government under OMB A-21 and must be approved by the Business Office prior to submission. If fringe benefits are not included in the grant proposal budget, they will be subtracted from salary or wage amounts if/when the proposal is awarded.
7. Monthly summer salaries for faculty and nine-month employees are calculated at 1/9 of the academic-year base salary unless some other terms are negotiated and agreed to by the grantee and grantor.
8. Course releases will be computed using the policy for course releases outlined in the [Faculty Development Handbook](#).
9. Once direct costs are established, indirect costs, if allowable by the funding agency are figured at 45% of the Modified Total Direct Cost, in accordance with OMB Circular A-21 for on campus projects and 15% for off campus. The indirect rate is negotiated with the Department of Health and Human Services with the current IWU agreement expiring 7/31/2017. At that time, a new rate will be negotiated and updated.

10. If the proposal requires a subcontract with another organization, the Project Investigator (PI) and IWU must ensure subcontractor compliance with applicable regulations. Please consult the GFR Office for *Subcontract Checklist*.
11. For federally funded projects, budgets must follow allowable cost principles in OMB Circular A-21, including negotiated F & A (Indirect) percentage rate. The GFR Office will review budgets in consultation with Vice President for Business and Finance for allowable costs prior to submission. [See OMB Circular A-21](#) for full details of allowable costs.
12. If funding is being sought from federal sources, the EGP form requires that the PI certify that he/she will follow regulations and comply with federal guidelines. A [Financial Conflict of Interest Disclosure Form](#) should also be completed at the time the EGP form is signed.
13. Specific information related to federal regulations for compliance with civil rights, sex, and age discrimination, privacy, animal care, safety standards, accessibility for the handicapped, the Drug Free Workplace Act, lobbying restrictions, and accounting requirements under A-21 and A-133 are kept on file in the GFR Office. Illinois Wesleyan University policy requires compliance with such regulations.
14. Complete the certifications for Responsible Conduct of Research if proposal is for federal funding. See [IWU Policy on Responsible Conduct of Research for Federally funded Research](#). This includes the [Financial Conflict of Interest Disclosure Form](#), which should be signed prior to applying for grant funds. This includes a certification that the PI/PD will participate in required training and ensure that students involved in the grant funded research are trained as well.
15. The Department of Health and Human Services (HHS) is the cognizant agency and has the responsibility for the audit of all federal grants under the purview of Illinois Wesleyan University.

## Post-Award Administration of Active Grants

All projects funded from external sources—the government, governmental agencies, foundations, corporations or individuals—with multiple line item budgets and/or time limitations for expenditure of grant funds and/or requirements for financial reports are defined as "sponsored programs" and are subject to the following procedures for administration of grants.

Certain endowed internal funds requiring stewardship reports will be administered in the same manner. These include those funds awarded by the Faculty Development Committee and other inter-institutional projects.

The Faculty Grants Manager in the GFR Office, in collaboration with the IWU Business Office, is responsible for the overall financial administration of all grants to the University and follows standard accounting practices and strictly adheres to all IWU policies and federal regulations. The Faculty Grants Manager will meet with the PI to ensure that all aspects of the grant are properly set up and both the PI and the GFR Office are aware of the specific requirements set forth in the grant. If it is a federal grant, the Faculty Grants Manager will also provide federal compliance training to the PI.

## **GFR Office Responsibilities – Post Award**

The GFR Office role is to:

- A. Receive grant funds and award documents;
- B. Set up accounting codes or fund number with Business Office;
- C. Process grant expenditures and prepare reimbursement requests from sponsoring agencies for grant-funded expenses;
- D. Keep track of grant stewardship reporting requirements and remind faculty and staff of due dates;
- E. Help to prepare and submit narrative and fiscal grant reports;
- F. Assist PI/ Project Directors (PD) in compliance with fiscal responsibilities of awarded grants by: training new PI/PD in grant procedures, maintaining grant expenditure records and authorizing payments, providing the PI/PD. with regular reports on expenditures, etc.
- G. Assist PI in compliance with all grant-related federal regulations and other grant related procedures or questions and manage grant program compliance documentation (e.g. COI, IRB, IACUC, Internal approval process)
- H. Manage GFR Office data management system;
- I. Maintain general ledger for grant, track, and archive PI's verification of expenses;
- J. Assist with close of the grant at the end of the grant period.

## **GFR Office Procedures for New Grant set-up**

The GFR Office must receive documentation of an award for a grant to be set up in the appropriate database systems (Banner and Advance). Normally this documentation consists of the original grant award letter along with a copy of the approved grant proposal and budget.

Upon receipt of notification of award, copies of the award letter (including notification by e-mail or other paperless means) should be sent to the Provost's office and to the Grants office. The Provost's office will publicly announce the award to the Illinois Wesleyan community, if applicable. The Grants Office will forward the information to the President, the Vice President for Business and Finance and the Vice President for Advancement.

When the GFR Office receives notice of an award and/or receives grant funds, they will proceed by using the "Post-Award Checklist" to complete the following:

- A) Scan and upload the award letter, copy of check (or payment when arrives) and approved budget. Place in GFR department Google drive, Grants Management, folder by funding source. Place original documents in hard copy file with printed label, GFR department files.
- B) Complete "Grant Transmittal Form (GTF):
  - a. Search for funding source as "entity" in Advance system to see if a current fund number exists. If so, enter this number into the GTF. If not, follow instructions below to get new fund number. Enter Entity # and Proposal # from Advance on GTF.

- C) If a new fund number is needed, send an email (attaching GTF and award and budget documents) to Assistant Controller, Business Office (Linda Tuttle). Business Office will generate a new fund number and expenditure accounts (based on grant budget). Business Office will send new fund number and account information back to GFR Office.
- D) Email completed “Grant Transmittal Form” back to Assistant Controller, Business Office (Linda Tuttle) and Gift Information Specialist, Advancement (Kara Mehrkens) with award documents attached. Advancement will enter the grant in the Advance system as a grant expectancy. When the check arrives, copy and place electronic and hard copy in respective files, turn in to Gift Information Specialist for deposit and recording as grant payment.
- E) Where required, an acceptance of the award should be sent to the funding source in accordance with their instructions. The grantor may require an acknowledgment from the President, Provost, or the Vice President for Business and Finance. The Faculty Grants Manager will obtain the necessary signatures and ensure that an acknowledgement letter is prepared, sent and saved in Advance as well as electronic and hard files by the President, Advancement or GFR Office.
- F) Send notification/congratulatory email to President, Provost, Director of Communications, VP for Business & Finance, Controller, Prospect Manager, Department Chair, and ‘cc’ the P.I.
- G) The GFR Office will review the award to make certain there are no unexpected terms and conditions in the award documents. Reporting and other deadlines will be noted on master calendar and discussed with PI.
- H) Set up a meeting with the PI to go over reporting, processing expenditures, post-grant administration processes.
- I) Sign off on award expenditures as allowable prior to submitting to IWU Business Office.

The Business Office will:

1. Assign a new Fund/Org number in Banner
2. Set up a budget based on either the proposed budget or (if there have been modifications during the award process) the modified budget
3. Send monthly and/or quarterly grant expenditure reports to PI or PD and the GFR Office (queries should be run from the start date of the grant to the present day of running the report).

## **Responsibilities of the Principal Investigator/Project Director**

PI and PD have overall responsibility for the programmatic, technical and fiscal management of the award. This includes compliance management of the project for student interns, research assistants and employees and sub-awardees. The PI responsibilities include:

- A) Forwarding all original award documents and checks to the GFR Office.
- B) Ensuring that the project stays within the scope and objectives of the original proposal.

- C) Monitoring expenses for compliance and limiting expenditures to the total dollar amount awarded.
- D) Submitting all required reports on time - Final reports will be prepared by the PI/PD. A copy of the report should be sent to the GFR Office. Reports to certain external private funding agencies may require to be approved by the President's Office prior to submission.
- E) Initiating requests for payment from grant funds.
- F) Submitting time and effort reporting in order to have wages and benefits charged to the grant, and monitoring them for accuracy.
- G) Notification of the GFR office when significant conditions related to the project status change.
- H) Providing the GFR Office with copies of all reports and grant-related correspondence.
- I) Compliance with all terms and conditions of the grant and all IWU policies (financial and academic).
- J) Requesting approval from the GFR Office for any changes to approved budgets or other terms of the grant.
- K) Ensuring that all faculty and students engaged in federally funded research are educated in the responsible conduct of researchers and the *IWU Responsible Conduct of Research Policy*. Compliance with regulations regarding responsible research, mitigate risk of injury, mistreatment, inaccurate findings, misstatements, conflicts of interest, compliance and other forms of misconduct. Faculty PI's have the responsibility for training students engaged in their funded research. See [Training plan for Student Researchers](#). Completion is required within the semester or summer that the student begins work on the funded research.
- L) Conflict of Interest: It is the responsibility of the PI/ PD to make sure each member of the project team has read [the Financial Conflict of Interest and Disclosure Policy for federally funded research](#) and disclosed any real or potential conflicts of interest by completing [the IWU Financial Conflict of Interest Disclosure Form](#).
- M) In addition to following the policies of the [IWU's Faculty Handbook](#) outlining the responsibilities of the [Institutional Review Board](#)(IRB) and the [Institutional Animal Care and Use Committee](#)(IACUC), the PI must verify sponsor requirements as sponsors may require approved protocols, acknowledgement of submission to the IRB, IACUC, etc. Travel, particularly international, and collaborative partnerships, subcontracts are also areas to check requirements.
- N) Misconduct in Research: Responding to accusations of fabrication, falsification, plagiarism will be handled in the manner prescribed in the [IWU Faculty Handbook](#).

- O) Time and Effort Reporting: If a faculty member, professional staff or student's salary in part or in whole is paid directly from a grant, they must complete and submit time and effort certification reports. The Time and Effort certification forms are distributed by the GFR office quarterly and must be returned within 30 days. Time and Effort (OMB Circular A21) definitions are: time is the amount of time you worked; effort is what you did for that time. See [Time and Effort Reporting Policies and Procedures](#) and [Employee Effort Certification Report](#).

## Process for Grant Expenditures

Each Grant is set up with its own unique accounting fund number. The Faculty Grants Manager will also work with the Business Office to set up any applicable indirect cost or interest allocations associated with the grant. The Grants Office has the responsibility for the Illinois Wesleyan Organizational Prior Approval System (OPAS) to ensure that expenditures meet federal requirements, and will proceed as follows:

1. Provide the PD/PI with initial training for processing expenditures, as needed;
2. Provide a supply of reimbursement and payment request forms as needed;
3. Maintain expenditure records on an accrual basis (general ledger);
4. Provide the PD/PI with online access to expenditure tracking; and
5. Provide the PD/PI with guidance on allowable changes and assistance in securing approval of amendments/modifications.

### Allowable Grant Expenditures

The PI/PD is the sole "budget administrator" for the grant and authorizes all expenditures posted to the grant. Only the PI/PD's signature will constitute approval for a payment request. Illinois Wesleyan University's travel and reimbursement policies apply to all grants and contracts. The University's payroll and reimbursement deadlines and schedules apply to all grants and contracts.

All expenses charged to a grant must be **necessary** to achieve the objectives of the approved grant, **allocable** to that particular project, and **allowable** under the terms of the grant.

1. PD/PI initiates a request for payment. Requests may be in the form of: a supplier's invoice, IWU travel expense voucher, or IWU request for non-invoice payment. Documentation and other receipts as appropriate must support all requests for payment. Requests to pay faculty stipends, consultant fees, honoraria may be made via email to the Faculty Grants Manager. Stipends must be paid within the standard payroll dates falling into the timeline of the project work or research.
2. If the payee or supplier is new to IWU (IWU has never paid before) the GFR Office will coordinate their completion of a form W-9 and ensure it is on file with Business Office before payment is made.
3. The GFR Office reviews the request to see that there are funds available in the grant fund and that the expenditure is allowable under the grant/contract terms and conditions ( for federally funded awards, [see OMB Circular A-21](#) for full details of allowability). The

GFR Office then signs the request to authorize payment, fills in appropriate accounting codes for the grant fund and forwards to Provost for final approval.

4. Once the request is signed by the Provost, it is returned to the GFR office and copied, with originals turned in to the Business Office.
5. Copies of the request and documentation are kept on file in the GFR Office, hard copy file for the grant.
6. All grant expenditures are entered on the general ledger for that grant by the Faculty Grants Manager; the ledger document is shared with the PI at all times.

This process is designed to prevent cost overruns and the need for internal transfers. In the event that the need for transfer is identified (coding error, etc.) the Business or Grants office will complete transfer documents and the Provost will approve. In the case of over-expending an award, the Provost will determine the course of action.

### **Purchasing Procedures**

When the University is awarded funds to purchase a piece of equipment or services that are equal to or more than \$300,000, we default to competitive bidding process as outlined by Federal Regulations ([OMB Circular A-21](#)). The competitive bidding process will document the 1) basis for vendor selection 2) justification for lack of competition when competitive bids are not obtained and 3) the basis for the final award cost or price.

### **Effort Reporting System Requirements**

IWU is required by Federal Regulations ([OMB Circular A-21](#)) to maintain an Effort Reporting System which assures salaries and wages charged to sponsored research awards for a specific period accurately reflect the time devoted to the project. IWU uses an after-the- fact activity records approach to certify the effort of all salaries and wages paid to all faculties, professional and non-professional employees. Time and Effort reporting is required by federal funding sources. When faculty members are receiving pay for work done on a federally funded project, an [Employee Effort Certification Report](#) must be completed within 30 days of the end of the quarter in which the work was done. The GFR Office will monitor completion of these reports and maintain as part of the grant file.

### **Hiring Employees or Students**

Illinois Wesleyan University's employment policies apply to all grants and contracts. Employees are anyone (including students) hired to work on grants administered by IWU as employees. Hiring and all other actions relating to their employment must be coordinated by the Human Resources Department (or the Dean of Faculty in the case of faculty) and handled in the same manner as for other employees. Salaries and wages are determined in consultation with Human Resources (or Dean of Faculty) based on the job description, not necessarily by the amount in the approved award budget. Please see the [Policies and Procedures for Summer Research Assistants](#) and the [Summer Research Assistant Authorization \(SRAA\) form](#) when hiring student research assistants or providing student fellowships.

### **Facilities & Administration - Indirect Costs**

The Faculty Grants Manager is responsible for recording, as grant expenses, the approved Facilities and Administration (F&A) costs (Indirect Costs). F&A charges are calculated based on the specifics of the grant budget approved by the funding source and are posted on a quarterly basis. The Grants Office will initiate an internal transfer of indirect funds, with Provost's approval. The F&A costs are typically calculated as a percentage of Modified Total Direct Cost. Indirect costs are then distributed as follows:

- A. Indirect Cost *Matching* Fund – 75% of total indirect to IWU (for matching grants and associated costs, at the discretion of the Provost).
- B. Indirect Cost *Sharing* fund – 12.5% of indirect to PI (used at PI discretion) C. 12.5% to department (used at discretion of department chair or Director of Program).

### **Grant Matches**

Grant matches are handled in a variety of ways, depending on the specific circumstances of the grant. When required by a funding agency, the Provost may determine the amount and source of institutional funds to be used as matching funds.

### **Monitoring Expenses and Managing the Grant**

The PI/PD is responsible for monitoring all expenses charged to the grant. The PI/PD reviews transactions on the grant general ledger maintained by the GFR Office for compliance with the award budget. If an error is noticed within IWU's fiscal year, it can be corrected by the GFR Office submitting a Transfer Form to the Business office. Transfers should be the exception, not the routine. Transfers may suggest non-compliance or poor management of the grant, especially if large transfers are done at the end of the grant period.

### **Budget Changes**

The GFR Office must authorize changes to approved budgets or other grant terms (in accordance with sponsoring agency policy). No changes or transfers between line items can be made in the approved award budget without prior approval of the Provost and the GFR Office.

1. Any changes in the budget regarding the obligation of time and use of University facilities must be approved by a person authorized to obligate the University — the President, the Provost, or the Vice President for Business and Finance.
2. As soon as the need for a revision to the budget becomes known, the PI should contact the GFR Office. The request for budget revision, containing an explanation should be made in writing by the PI/PD and will be reviewed by the GFR office for compliance with funder regulations. The requests will then go to the Provost, who will review and approve or deny as well as determine the means of contact with the sponsoring agency.
3. Once the revision is approved by the sponsoring agency, changes will be made to internal tracking spreadsheet to reflect the revised budget.

### **Reporting Requirements**

The Faculty Grants Manager (in conjunction with the Business Office) will prepare various financial reports required by the sponsoring agency. Do not provide any financial information to a sponsor without verification by the Faculty Grants Manager. The PI/PD is responsible for all narrative or

technical reports. Many sponsoring agencies require annual progress reports; check the specific grant terms and conditions. Copies of all narrative reports and correspondence related to grants should be forwarded to the GFR Office.

## **Procedures for Submitting Interim and Final Grant Reports to External Funding Agencies**

These guidelines are intended for faculty and staff who have obtained a funded external grant and must submit interim and final reports to the agency or organization.

Reports to certain external private funding agencies must be approved by the Provost's or President's office prior to submission. Please check with the GFR Office for more details.

It is the responsibility of the principal investigator/project director (PI/PD) to prepare interim and final reports in accordance with the goals and objectives set forth in the grant and letter of award. If the PI/PD desires the assistance of the GFR Office in preparing and submitting narrative reports, he/she should contact the GFR Office (at least seven days) prior to the report's due date.

Once the report is submitted to the funding agency, the PI/PD should send a copy of it to the GFR Office.

### **No-Cost Extensions**

Some sponsoring agencies allow the grant termination date to be extended, if more time is necessary to finish the project. Many federal grants allow "no-cost extensions." In all cases, such extensions must be requested well in advance of the approved termination date. Contact the GFR Office for the appropriate procedures.

### **Close-Out of Grant**

After final reports are submitted and the funds are expended, the grant will be closed-out by the GFR Office. Grant documents (including reports) will be kept on file in the GFR Office for a period of 5 years or the grantor's retention period, whichever is longer. Certain institutional grant documents may also be archived within the university's archive.

## **Policies, Forms and Additional Information**

## **Policy on Responsible Conduct of Research for Federally Funded Research at Illinois Wesleyan University**

To promote objectivity in research and foster compliance with federal regulations, it is the policy of Illinois Wesleyan University to ensure that all faculty and students engaged in federally funded research are compliant in the following Responsible Conduct of Research Policy. This policy fulfills the requirements of grantee institutions as set forth in the National Institutes of Health guidelines<sup>1</sup> and The National Science Foundation's policies<sup>2</sup>. Faculty and staff supported by federal funding to conduct research or supervise student researchers (paid or volunteer) are responsible for ensuring that all work is done in compliance with the IWU Responsible Conduct of Research Policy and governmental regulations.

### **Contents:**

- A. Regulations for RCR Applicable to NSF**
- B. Regulations for RCR Applicable to NIH**
- C. Required RCR Topics & Training Plan**
  - 1. Financial Conflict of Interest**
  - 2. Protection of Human Research Subjects**
  - 3. Research with Vertebrate Animals**
  - 4. Research Misconduct**
- D. Additional Resources**

### **A. Regulations for Responsible Conduct of Research Applicable to National Science Foundation:**

Pursuant to the America COMPETES Act, Section 7009, August 20, 2009, "The Institution receiving NSF grant funds in which undergraduate, graduate students or post docs are listed as research personnel must provide RCR training to those individuals." The NSF adopted a certification requirement that became effective 1/4/2010. It reads, "The Institution certifies at time of application that it has a plan in place to provide appropriate training and oversight on the Responsible Conduct of Research to NSF-supported undergrads, grad students and postdoctoral researchers; has designated an individual to oversee compliance; and is able to verify the delivery of the training." NSF may request this plan at any time and may audit compliance.

### **1. Background**

The responsible and ethical conduct of research (RCR) is critical for excellence, as well as public trust, in science and engineering. Consequently, education in RCR is considered essential in the preparation of future scientists and engineers. Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act (42 U.S.C. 1862o-1) requires that "each institution that applies for financial assistance from the Foundation for science and engineering research or education describe in its grant proposal a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project."

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<sup>1</sup> [www.grants.nih.gov/grants/policy](http://www.grants.nih.gov/grants/policy)

<sup>2</sup> <http://www.nsf.gov/pubs/policydocs/pappguide/nsf13001/index.jsp>

The language specified below provides NSF's implementation of Section 7009.

## **2. Institutional Responsibilities**

- a. An institution must have a plan in place to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research. As noted in GPG Chapter II.C.1e, institutional certification to this effect is required for each proposal.
- b. While training plans are not required to be included in proposals submitted to NSF, institutions are advised that they are subject to review, upon request.
- c. An institution must designate one or more persons to oversee compliance with the RCR training requirement.
- d. Institutions are responsible for verifying that undergraduate students, graduate students, and postdoctoral researchers supported by NSF to conduct research have received training in the responsible and ethical conduct of research.

## **B. Regulations for Responsible Conduct of Research Applicable to National Institute of Health**

### **1. Background**

Nov. 24, 2009 NIH published "An Update on the Requirements for Instruction in Responsible Conduct in Research" NIH requires that any and all trainees, fellows, participants, and scholars receiving support through NIH training, career development, research education, dissertation grant or award must receive RCR training.

### **2. Institutional Responsibility**

Training must occur no less than every four years for faculty. It is expected that course attendance is monitored and that a certificate or documentation of participation is available upon course completion. NIH does not require certification of compliance or submission of documentation, but expects institutions to maintain records sufficient to demonstrate that NIH-supported trainees, fellows and scholars have received the required instruction.

Plans to meet the RCR requirement must now be included in most NIH proposal applications. That plan requires information on format, subject matter, faculty participation, duration and frequency. The GFR Office will assist the PI to ensure all requirements are met by the training plan. At the time the External Grant Proposal Review form is submitted for approval, the PI must sign to indicate agreement to include training plan regarding RCR in the proposal and implement with participating faculty and/or students.

### **C. Required RCR Topics and Training Plan:**

Faculty PI's have the primary responsibility for training student researchers. At the time the External Grant Proposal Review form is submitted for approval, the PI must sign to indicate agreement to include

training to participating students in appropriate RCR. The GFR Office will provide compliance oversight and record retention, with guidance from the Provost when necessary.

#### **All Federally Funded Research Awards:**

1. RCR training appropriate to the research and discipline is required for all students receiving wages (stipend or work study) working as volunteers or receiving academic credit for participating in funded research. Completion of training is required within the semester or summer that the student begins work on the funded research.
  - a. Completion of student researcher training plan;
    - i. Online modules: FCOI, Human Subjects, Animal Subjects, Research Misconduct, others as research dictates via National Ethics Center, [www.nationalethicscenter.org](http://www.nationalethicscenter.org) using IWU Grants group log in.
  - b. Log in and password for accessing the online account is located on the student researcher training plan form, which contains;
    - i. PI Certification (signature) that student has received RCR training appropriate to the research, discipline and level of involvement for each student and has
    - ii. Completed the *Financial Conflict of Interest for Federally Funded Grants* policy and the *FCOI Disclosure Form*.
2. PI's are required to maintain a current listing of student(s) participating in research. GFR Office will maintain records of completed training in each grant's respective file.

#### **NIH Awards:**

Certain topics are required (in **bold**) and the additional topics are encouraged and have been incorporated into acceptable plans of instruction:

- **Conflict of interest** – personal, professional and **financial**
- Policies regarding **human subjects\***, **live vertebrate animals\*** in research and safe laboratory practices
- Mentor-mentee responsibilities and relationships
- Collaborative research, including collaborations with industry
- Peer review
- Data acquisition and laboratory tools; management, sharing and ownership
- **Research misconduct and policies for handling misconduct**
- Responsible authorship and publication
- The scientist as a responsible member of society, contemporary ethical issues in biomedical research, and the environmental and societal impacts of scientific research.

\*When applicable to research

#### **Financial Conflict Of Interest**

Faculty and Students conducting research under NIH supported projects must complete the [online tutorial in Financial Conflict of Interest](#).

Once completed, each participant should print a certificate of completion and forward to the Grants office, where it will be filed with grant documents.

In addition to Illinois Wesleyan University's Conflict of Interest Policy, PI/PD's and students working on federally-funded research must also be educated on the *Financial Conflict of Interest for Federally Funded Grants* policy in Faculty Grants Manual and sign the *FCOI Disclosure Form* on an annual basis or when indicated by a change in circumstance. The regulation covers all financial interests that have monetary value, whether or not the value is readily ascertainable. Please see the *Financial Conflict of Interest for Federally Funded Grants Policy* in the Faculty Grants Manual. The Grants office will maintain signed forms and supporting documentation in each grant file.

#### **Protecting Human Research Participants/Protection of Human Subjects:**

In addition to policies and procedures outlined in Illinois Wesleyan University's Faculty manual *Policies Regarding Use of Human Subjects in Research at Illinois Wesleyan University*, NIH requires education on the protection of human research participants for all individuals identified in applications as senior/key personnel who will be involved in the design or the conduct of human subjects research, before funds are awarded for applications or contract proposals involving human subjects.

The education requirement does not apply to awards that do not involve human subjects. But it is important for all investigators, even those working with tissues or specimens derived from human sources to understand when proposed research triggers regulatory and policy requirements. Research using human specimens, tissues, or data that are unidentifiable may not be considered human subjects research. NIH provides [Guidance on Research Involving Coded Private Information or Biological Specimens](#) to assist in determining. Investigators who conduct studies with human specimens, tissues, or data that are determined not to involve human subjects are not required to receive the required education.

Grantees must certify that an education program in the protection of human subjects has been completed (when required). NIH's Office of Extramural Research provides the online tutorial [PHRP – Protecting Human Research Participants](#), which provides a certificate upon completion.

Once completed, each participant should print a certificate of completion and forward to the GFR Office, where it will be filed with grant documents.

#### **Research With Vertebrate Animals:**

In addition to following the IWU Faculty Handbook's *Policy for the Humane Care and Use of Laboratory Animals*, PI's conducting NIH funded research with vertebrate animals must follow the PHS Policy on [Humane Care and Use of Laboratory Animals, 2002](#) and the [Guide for the Care and Use of Laboratory Animals, 8th Edition](#). The GFR office will ensure that an approved Animal Welfare Assurance is on file with the Office of Laboratory Animal Welfare (OLAW) prior to funded research with vertebrate animals. An online tutorial [PHS Policy on Humane Care and Use of Laboratory Animals by the Office of Animal Laboratory Welfare \(OLAW\)](#) must be completed by researchers (faculty and student) prior to the expenditure of any grant funds. Once completed, each participant should print a certificate of completion and forward to the GFR Office, where it will be filed with grant documents regarding compliance.

#### **Research Misconduct:**

Illinois Wesleyan University seeks to prevent any instance of research misconduct and take seriously the need to investigate possible instances, while protecting the positions and reputations of those who file complaints in good faith, any witnesses and those asked to serve on committees so that any necessary investigations can proceed without fear or favor.

Research Misconduct is defined as: “fabrication, falsification or plagiarism in proposing, performing or reviewing research, or in reporting research results. Fabrication is making up data or results and recording or reporting them. Falsification is manipulating research materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented in the research record. Plagiarism is the appropriation of another person’s ideas, processes, results or words without giving appropriate credit. Research misconduct does not include honest error or differences of opinion.

Cases of alleged research misconduct will be handled in the manner outlined in the IWU Faculty Handbook; *Policy Statements on Research, Process for Disclosure, Process for Adjudication of Complaints Stemming from Disclosure, Disciplinary Actions* and the *IWU Whistleblower Policy*.

### **E. Resources for Training**

PI’s may utilize resources available on [NIH’s Office of Extramural Research Financial Conflict of Interest web page](#) and [Protecting Human Research Participants \(PHRP\)](#) to satisfy some of the training requirements. However, IWU’s GFR Office will also provide additional training regarding Investigator’s responsibilities for disclosure of Significant Financial Interests and of the IWU policy on financial conflicts of interests for federally funded research. This training will occur with PI’s prior to expenditure of any funds.

[Office of Research Integrity \(ORI\) of the DHHS has RCR resources](#) from different disciplines, appropriate to different levels of student involvement. Also check the [ORI Introduction to the Responsible Conduct of Research](#) for appropriate material.

[Tools and Resources for National Science Foundation \(NSF\) requirements for Responsible Conduct of Research \(RCR\)](#) is a searchable resource database for articles, training and more information by discipline, audience and topic area.

*I hereby certify that I have read, understand and will follow the Responsible Conduct of Research Policy in the Illinois Wesleyan University Faculty Grants Manual for all federally funded proposals and grant awards submitted through IWU.*

---

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Signature

Printed name

Date

## Responsible Conduct of Research Training Plan for Student Researchers (Federally Funded Student Researchers at Illinois Wesleyan University)

**Step 1:** Complete on line training modules for Responsible Conduct of Research (all NSF or NIH grants)

Training is provided through completion of online modules at the National Ethics Center website, [www.nationalethicscenter.org](http://www.nationalethicscenter.org) Log in ID = iwugrants Password = TommyTitan

\_\_\_\_\_Module 1 Approx. 35-40 minutes

\_\_\_\_\_Module 2 Approx. 30 min

\_\_\_\_\_Module 3 Approx. 20-30 min

Illinois Wesleyan Grant researchers are set up as a group. Register with your name and email address. The Grants office will monitor completion and notify PI of student participation.

**Step 2:** for NIH grants:

\_\_\_\_\_Complete online training for Financial Conflict of Interest, print certificate of completion <http://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm>

**Step 3:** Read and Sign off on following IWU policies (all federally funded grants):

\_\_\_\_\_IWU Responsible Conduct of Research policy

\_\_\_\_\_Financial Conflict of Interest policy and disclosure form

\_\_\_\_\_Protection of Human Research Subjects (if applicable)

General Resources are also available at <http://ori.dhhs.gov/sites/default/files/rcrintro.pdf>

Please check off each step as you complete the training. Sign and date below and return form to the Grants Office, 200 Holmes Hall.

---

Student Name

Student Signature

Date

---

PI Name

PI Signature

Date

Grants Office: Funding Source \_\_\_\_\_ Grant ID# \_\_\_\_\_ Rec'd \_\_\_\_\_

## Financial Conflict of Interest and Disclosure Policy for Federally Funded Research at IWU

The federal government requires that the institution establish and administer a financial conflict of interest and disclosure policy for investigators who conduct research funded by federal grants. The requirements for such policies depend on the funding agency and are outlined below.

### NSF Regulation: (Reference: NSF Award and Administration Guide)

- 1) NSF requires each grantee organization employing more than fifty persons to maintain an appropriate written and enforced policy on conflict of interest and that all conflicts of interest for each award be managed, reduced or eliminated prior to the expenditure of the award funds. If the organization carries out agency-funded research through subawardees, contractors, or collaborators, the organization must take reasonable steps to ensure that:
  - a) the entity has its own policies in place that meet the requirements of this policy;
  - b) or investigators working for such entities follow the policies of the primary organization.
- 2) An organizational conflict of interest policy should require that each investigator disclose to a responsible representative of the organization all significant financial interests of the investigator (including those of the investigator's spouse and dependent children):
  - a) that would reasonably appear to be affected by the research or educational activities funded or proposed for funding by NSF; or
  - b) in entities whose financial interests would reasonably appear to be affected by such activities.
- 3) The term "investigator" means the principal investigator, co-principal investigators/co-project directors, and any other person at the organization who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by NSF.
- 4) The term "significant financial interest" means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interest (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights).

The term does not include:

- a. salary, royalties or other remuneration from the applicant organization;
- b. any ownership interests in the organization, if the organization is an applicant under the Small Business Innovation Research Program or Small Business Technology Transfer Program;
- c. income from seminars, lectures, or teaching engagements sponsored by public or non-profit entities;
- d. income from service on advisory committees or review panels for public or nonprofit entities;
- e. an equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, meets both of the following tests: **does not exceed \$10,000** in value as determined through reference to public prices or other reasonable measures of fair market value, and

**does not represent more than a 5% ownership interest in any single entity; or**

- f. salary, royalties or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children, are not expected to exceed \$10,000 during the twelve-month period.
- 5) An organizational policy must ensure that investigators have provided all required financial disclosures at the time the proposal is submitted to NSF. It must also require that those financial disclosures are updated during the period of the award, either on an annual basis, or as new reportable significant financial interests are obtained.
- 6) An organizational policy must designate one or more persons to review financial disclosures, determine whether a conflict of interest exists, and determine what conditions or restrictions, if any, should be imposed by the organization to manage, reduce or eliminate such conflict of interest. A conflict of interest exists when the reviewer(s) reasonably determines that a significant financial interest could directly and significantly affect the design, conduct, or reporting of NSF-funded research or educational activities.
- 7) Examples of conditions or restrictions that might be imposed to manage, reduce or eliminate conflicts of interest include, but are not limited to:
  - a. public disclosure of significant financial interests;
  - b. monitoring of research by independent reviewers;
  - c. modification of the research plan;
  - d. disqualification from participation in the portion of the NSF-funded research that would be affected by significant financial interests;
  - e. divestiture of significant financial interests; or
  - f. severance of relationships that create conflicts.
- 8) If the reviewer(s) determines that imposing conditions or restrictions would be either ineffective or inequitable, and that the potential negative impacts that may arise from a significant financial interest are outweighed by interests of scientific progress, technology transfer, or the public health and welfare, then the reviewer(s) may allow the research to go forward without imposing such conditions or restrictions.
- 9) The organizational policy must include adequate enforcement mechanisms, and provide for sanctions where appropriate.
- 10) The organizational policy must include arrangements for keeping NSF's Office of the General Counsel appropriately informed if the institution finds that it is unable to satisfactorily manage a conflict of interest.
- 11) When OGC is notified of an unmanageable conflict of interest by an awardee, OGC will conduct the following review:
  - a) Examine a copy of the organization's conflict of interest policy to ascertain if the policy includes procedures for addressing unmanageable conflicts.

- b) Contact the awardee organization’s representative to determine what actions the organization plans/has taken with respect to the reported unmanageable conflict of interest, ensuring consistency with their conflict of interest policy.
- (c) Request confirmation from the awardee when proposed actions have been accomplished.

12) Organizations must maintain records of all financial disclosures and of all actions taken to resolve conflicts of interest for at least three years beyond the termination or completion of the grant to which they relate, or until the resolution of any NSF action involving those records, whichever is longer.

**PHS/NIH Regulation (Reference: 42 CFR Part 50, Subpart F)**

”Responsibility of Applicants for Promoting Objectivity in Research for which PHS funding is sought.” (PHS/NIH regulations are more restrictive than NSF – have a \$5,000 de minimis reporting requirement, require training, differing definition of reportable financial interests and more onerous reporting requirements.)

When applying for funding, by checking the “I Agree” box on the NIH’s SF424 (R&R) Cover component, the Authorizing Organization Representative certifies compliance with the requirements of 42 CFR part 50, Subpart F, including that:

1. There is in effect at the organization a written and enforced administrative process to identify and manage, reduce or eliminate conflicting financial interests with respect to research projects for which NIH funding is sought.
2. Prior to the expenditure of any NIH fund awarded under a new award, the organization will inform NIH of the existence of any conflicting financial interests of the type covered by 42 CFR 50.605 and assure that the interest has been managed, reduced or eliminated in accordance with the regulations.
3. The institution will continue to make similar reports on subsequently identified conflicts within 60 days of identification.
4. When the institution determines that a financial conflict of interest exists (see #2 and # 3 above), the Institution must notify NIH through the FCOI module in the eRA Commons of its existence and provide the following info.
  - a. Grant number and Principal investigator
  - b. Name of investigator with FCOI; and
  - c. Distinguish which method was used to protect the PHS funded research from bias (e.g, managed, reduced, eliminated).
5. When requested, the Institution will make information available to NIH regarding all identified conflicting interests and how these interests have been managed, reduced, or eliminated to protect the research from bias.

Each Investigator (as defined by the regulation), including sub-recipient Investigator(s), must complete training prior to engaging in NIH-funded research and at least every four years, and immediately under the designated circumstances:

1. Institutional Financial Conflict of Interest policies change in a manner that affects Investigator requirements
2. An Investigator is new to an Institution
3. An Institution finds that an Investigator is not in compliance with the Institution's Financial Conflict of Interest policy or management plan.

This regulation covers all financial interests that have monetary value, whether or not the value is readily ascertainable.

**The 2011 revised regulation defines a “*Significant Financial Interest*” as follows:**

“(1) A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities:

- (i) With regard to any publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
- (ii) With regard to any non-publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
- (iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

(2) Investigators also must disclose the occurrence of any reimbursed or sponsored travel (e.g. that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. The Institution's FCOI policy will specify the details of this disclosure, which will include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. In accordance with the Institution's FCOI policy, the institutional official(s) will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI with the PHS-funded research.

(3) The term *significant financial interest* does not include the following types of financial interests: salary, royalties, or other remuneration paid by the Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights; any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency,

an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or income from service on advisory committees or review panels for a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.”

Investigators are required to **disclose** their Significant Financial Interests (and those of the Investigator’s spouse and dependent children) that reasonably appear to be related to the Investigator’s institutional responsibilities:

1. no later than at the time of application for NIH-funded research;
2. within thirty days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new Significant Financial Interest; and
3. at least annually, in accordance with the specific time period prescribed by the Institution, during the period of award.

IWU’s Grants and Foundation Relations Office must review all financial disclosures by Investigators and determine whether any Significant Financial Interest is related to NIH-funded research and a Financial Conflict of Interests exists by making a reasonable determination that the Significant Financial Interest: could be affected by the NIH-funded research or is in an entity whose financial interest could be affected by the research. The GFR Office may involve the Investigator to determine whether the Significant Financial Interest is related to the NIH-funded research. Final determination will be made by the Provost/Dean of Faculty and/or the Vice-President for Business and Finance.

When determination is made that FCOI exists, IWU’s GFR Office will provide to the NIH, prior to the expenditure of any funds under a NIH-funded research project, an FCOI Initial Report regarding any Investigator Significant Financial Interest found by the University to be a Financial Conflict of Interest in accordance with the regulation. IWU will also provide an FCOI report whenever an Investigator does not timely disclose a Significant Financial Interest or whenever the University, for whatever reason, does not review a disclosed Significant Financial Interest and then determines that a Financial Conflict of Interest exists. For any Financial Conflict of Interest previously reported by the University, the GFR Office of IWU shall provide an annual FCOI report that addresses the status of the financial interest and any changes to the management plan.

**Illinois Wesleyan University Implementation:** The IWU Faculty member must complete a *Financial Conflict of Interest Disclosure Form* along with the External Grant Proposal Review Form when proposal will be to a federal funding source. When funding is awarded for research under NSF, NIH or other federal entities, the *Financial Conflict of Interest Disclosure Form* should be completed either on an annual basis, or as new reportable significant financial interests are obtained. The IWU policy will apply to sub-awardees, contractors or collaborators, unless their institutional policy meets regulation requirements.

**Enforcement:** The designated official who will review and make determination is the Provost and Dean of Faculty and/or the Vice-President for Business and Finance. In the event that a determination is made that a FCOI exists for a federally funded award, they will also determine the management plan for the FCOI to be in compliance with regulations. In the event of an unmanageable FCOI for an NSF award, the University shall submit appropriate reporting to NSF/OGC. For any identified FCOI involving an

NIH funded award, reports shall be submitted as outlined in Appendix A, “*Submission of Initial and Annual FCOI reports during an Ongoing NIH-funded Research Project.*”

**Sanctions:** In the event that this policy is not followed, the Provost and Dean of Faculty shall determine the sanctions imposed in accordance with the [IWU Faculty Handbook](#).

**Records:** The University shall maintain records within the GFR Office of all financial disclosures and of all actions taken to resolve Financial Conflicts of Interest for at least three years beyond the termination or completion of the grant to which they relate, or until the resolution of any action involving those records, whichever occurs later.

## Illinois Wesleyan University Financial Conflict of Interest Disclosure Form for Federally Funded Research

Please send a signed .pdf copy of this FCOI disclosure statement to the Grants and Foundation Relations Office at [grants@iwu.edu](mailto:grants@iwu.edu) BEFORE the proposal submission.

(To be completed pre-proposal and annually and/or within 30 days of acquisition of potential new disclosures post-award)

Investigator Name:

Project Name:

Source of Funds:

Status:  Current  Pending

Role in Project:  PI  Co-PI  Senior/Key Personnel  Consultant  Unpaid Collaborator  Other Investigator

In making the following certification and representations, please remember that all the following must be *included* as significant financial interests:

- All financial interests pertaining to you personally;
- All pertaining to your spouse or registered domestic partner;
- All pertaining to a dependent child.

The following types of financial interests are *excluded* and should not be reported on this form as significant financial interests:

- Salary, royalties, or other remuneration from IWU;
- Income from investment vehicles such as mutual funds or retirement accounts, as long as you do not directly control the investment decisions made in these vehicles;
- Income from seminars, lectures, or teaching engagements sponsored by, or service on advisory committees or review panels for, or travel sponsored or reimbursed by any or all of the following (U.S.-based entities only):
  - Federal, State or local government agencies
  - Institutions of higher education
  - Academic teaching hospitals
  - Medical centers
  - Research institutes affiliated with institutions of higher education.

Check one of the following statements:

***I hereby certify that I have read the Financial Conflict of Interest Policy in the Illinois Wesleyan University Faculty Grants Manual for all federally funded proposals submitted through IWU. I certify to the best of my knowledge that neither I, nor my spouse, partner, or dependents hold any significant financial interests that would reasonably appear to be related to my research, teaching and service responsibilities to Illinois Wesleyan University.***

OR:

***I have the following relationships, affiliations, activities, or interests which constitute significant financial interests under the Illinois Wesleyan University Financial Conflict of Interest policy (see following pages):***

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed name

\_\_\_\_\_  
Date

## Publicly Traded Entities

*Instructions: Copy as many times as needed for all publicly-traded entities. Do not include any company for which subtotal of all financial interests < \$5,000*

Company Name and Stock Market Abbreviation	Interests Pertaining to (check all that apply):  <input type="checkbox"/> Self <input type="checkbox"/> Spouse / Partner <input type="checkbox"/> Dependent Child	Type of Interest  <input type="checkbox"/> Equity	Value of Interest		
			# Shares	Current Market Value	Total Value
		<input type="checkbox"/> Compensation (total over last 12 calendar months)	Total Value		
			Description of Relationship:		
<b>Subtotal (Total Equity Value + Compensation over last 12 months)</b>					

## Non-Publicly Traded Entities (Equity Interests)

*Instructions: List all non-publicly traded entities in which you, your spouse/partner and/or your dependent child hold an equity interest, regardless of dollar value. Add rows if needed. Estimated \$ value and % ownership columns are optional, but IWU reserves the right to request this information during the Conflict of Interest determination process if these are left blank.*

Entity Name	Interests Pertaining to (check all that apply):	Entity Business Type	Estimated \$ Value	% Ownership
	<input type="checkbox"/> Self <input type="checkbox"/> Spouse / Partner <input type="checkbox"/> Dependent Child			
	<input type="checkbox"/> Self <input type="checkbox"/> Spouse / Partner <input type="checkbox"/> Dependent Child			

## Non-Publicly Traded Entities (Compensation)

*Instructions: List all non-publicly traded entities from which you, your spouse/partner and/or dependent child have received compensation of \$5,000 or more in the last 12 calendar months. All columns must be completed in full. Add rows if necessary.*

Entity Name	Interests Pertaining to (check all that apply):	Position or Relationship	Entity Business Type	Total Compensation in \$
	<input type="checkbox"/> Self <input type="checkbox"/> Spouse / Partner <input type="checkbox"/> Dependent Child			
	<input type="checkbox"/> Self <input type="checkbox"/> Spouse / Partner			

	<input type="checkbox"/> Dependent Child			
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### Compensation for Intellectual Property Rights

*Instructions: List all entities other than Illinois Wesleyan University from which you, your spouse/partner and/or your dependent child have received payment for intellectual property rights (e.g. royalties, licensing fees, etc.) in the last 12 calendar months. Add rows if necessary.*

Entity Name	Interests Pertaining to (check all that apply):	Description of Intellectual Property	Total Compensation in \$
	<input type="checkbox"/> Self <input type="checkbox"/> Spouse / Partner <input type="checkbox"/> Dependent Child		
	<input type="checkbox"/> Self <input type="checkbox"/> Spouse / Partner <input type="checkbox"/> Dependent Child		

### Sponsored or Reimbursed Travel

*Instructions: List any instance of travel from the last 12 calendar months which was either sponsored or reimbursed by an entity other than IWU other than those types of entities excluded on page 1. Add rows if needed. Estimated cost column is optional, but IWU reserves the right to request this information from you or the sponsor during the Conflict of Interest determination process if this space is left blank.*

Traveler (check all that apply)	Destination	Dates of Travel	Purpose of Travel	Sponsor Name or Reimbursement Source	Estimated costs in \$
<input type="checkbox"/> Self <input type="checkbox"/> Spouse / Partner <input type="checkbox"/> Dependent Child					
<input type="checkbox"/> Self <input type="checkbox"/> Spouse / Partner <input type="checkbox"/> Dependent Child					

Reviewer Signature

Printed name/Title

Date

Plan of Action: \_\_\_\_\_

## Submission of Initial and Annual FCOI reports during an Ongoing NIH-funded Research Project:

When determination is made that FCOI exists, the Institution must provide to the NIH, prior to the Institution's expenditure of any funds under a NIH-funded research project, an *Initial FCOI Report* regarding any Investigator Significant Financial Interest found by the Institution to be a Financial Conflict of Interest in accordance with the regulation. The Institution must also provide an FCOI report whenever an Investigator does not timely disclose a Significant Financial Interest or whenever the Institution, for whatever reason, does not review a disclosed Significant Financial Interest and the Institution then determines that a Financial Conflict of Interest exists. For any Financial Conflict of Interest previously reported by the Institution, the Institution shall provide an *Annual FCOI report* that addresses the status of the financial interest and any changes to the management plan.

- A. The Institution must submit an FCOI report within sixty (60) days after its determination that an FCOI exists for an Investigator who is newly participating in the project or for an existing Investigator who discloses a new Significant Financial Interest to the Institution during the period of award.
- B. *Whenever* an Investigator does not disclose timely a previously existing Significant Financial Interest or the Institution fails to review a previously existing Significant Financial Interest during an ongoing NIH-funded project, the Institution's designated official(s) shall, within sixty (60) days: review the Significant Financial Interest; determine whether it is related to the NIH-funded research; determine whether a Financial Conflict of Interest exists. If so, the Institution must implement, on at least an interim basis, a management plan that shall specify the actions that have been, or will be, taken to manage such Financial Conflict of Interest going forward and submit an FCOI report to the NIH.

In addition to the FCOI report, the Institution must, within 120 days of the Institution's determination of noncompliance, complete a retrospective review of the Investigator's research activities and the NIH-funded research project to determine whether any NIH-funded research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct or reporting of such research.

Based on the results of the retrospective review, if appropriate, update the previously submitted FCOI report, specifying the actions that will be taken to manage the Financial Conflict of Interest going forward.

If bias is found, notify the NIH promptly and submit a mitigation report that includes the key elements documented in the retrospective review and a description of the impact of the bias on the research project and the Institution's plan of action or actions taken to eliminate or mitigate the effects of the bias. Thereafter the Institution will submit FCOI reports annually.

Annual FCOI Report: For any Financial Conflict of Interest previously reported by the Institution, the Institution shall provide an annual FCOI report that addresses the status of the financial interest and any changes to the management plan. Annual FCOI reports shall specify whether the Financial Conflict of Interest is still being managed or explain why the Financial Conflict of Interest no longer exists. Annual FCOI reports must be submitted to the NIH (e.g., through the eRA Commons for grants and cooperative agreements) for the duration of the project period (including extensions with or without funds) at the same time as when the Institution is required to submit the annual progress report (e.g. two months prior to the start date or 45 days prior to the start date of the noncompeting continuation award), including a multi-year funded progress report, or at the time of the extension (e.g., submission of an extension notification in the eRA Commons or submission of a NIH prior approval request, whichever is applicable.) Please note that the annual FCOI report is not to be submitted as part of the annual progress report. The annual FCOI report is submitted to NIH separately through the eRA Commons FCOI Module. There is no requirement for recipient institutions to submit negative FCOI reports to NIH.

## **Policy and Procedures for Summer Student Research Assistants: For Externally Grant-funded Student Researcher Positions at IWU**

These positions meet the following criteria:

- An intensive and well-defined research experience (at least 20 hours per week)
- A meaningful collaborative effort with a faculty mentor
- Opportunities to enhance traditional academic experiences with more in-depth study and further development of research skills over a period of time. The primary objective of these positions is the educational development of the student the secondary objective is furthering the research interests of the faculty mentor. These positions vary according to the nature and location of the work involved. Some may be maintained entirely on- campus; others may involve fieldwork or take place entirely off-campus.

Because the nature of most research necessitates extended and/or unusual hours, Summer Research Assistantships will receive stipends and will be considered salaried, exempt positions. They will, therefore, not be subject to overtime pay. Summer Research positions will be based on a 40-, 30- or 20-hour week and receive bi-weekly stipends, following the bi-weekly payroll schedule established by the Business Office.

Policies and Procedures:

1. All mentored faculty-student collaborative research positions will be paid on a stipend basis and can be prorated appropriately for 20, 30, or 40 hours per week. (See SRAA form for stipend details).
2. A Summer Research Assistant Authorization (SRAA) Form needs to be completed and submitted to Carlo Robustelli, Director of Grants and Foundation Relations, or Shireen Schrock, 200 Holmes Hall, April 15 deadline.
3. Payment of stipends is handled by Shireen Schrock, Faculty Grants Manager, Holmes Hall 200, 556-3902, [sschrock@iwu.edu](mailto:sschrock@iwu.edu). Therefore, if there is any deviation or required change from the amount of time a student assistant will be spending on research from that information provided on the signed SRAA Form, it is the responsibility of the faculty mentor to provide any change in payment schedules to the Grants and Foundation Relations Office so that payment requests are processed in a timely and accurate fashion.
4. All students must provide the required documentation for student employment prior to receiving their stipends. This can be done with the Student Employment Coordinator, Cindy Langert, Financial Aid Office, Holmes Hall basement, [clangert@iwu.edu](mailto:clangert@iwu.edu), 556-3299. FICA will be paid out of grant funds, calculated at 7.65%.
5. Students in these positions are eligible for on-campus housing. Housing requests are negotiated between the faculty mentor and the Provost and Dean of the Faculty.
6. PI's are responsible for ensuring that student researchers receive Responsible Conduct of Research training according to federal regulations if research is funded by federal grant. If you have questions regarding Responsible Conduct of Research Training, contact Shireen Schrock, Faculty Grants Manager, Holmes Hall 200, 556-3902, [sschrock@iwu.edu](mailto:sschrock@iwu.edu).



## **Time and Effort Reporting Policies for Federally Funded Research Awards at Illinois Wesleyan University**

The federal government, as required by Section J10 of [Federal OMB Circular A-21](#) requires effort certification on federally-sponsored research activity. In order to receive and maintain eligibility for funding, sponsoring agencies require accurate and reasonable documentation to support that labor costs charged to sponsored accounting units are consistent with the effort expended. This certification is reviewed to verify that the percentage of effort placed on a federal award is not less than the percentage of salary charged to the accounting unit. This Effort Policy is intended to meet this federal requirement.

Illinois Wesleyan University uses an “after-the-fact effort reporting” system to comply with the federal effort certification requirement. Under this system, the distribution of salaries for employees working on federally funded projects will be supported by Time and Effort Reports.

Salary charges to grants are made initially on the basis of estimates made before the services are performed. Time and Effort Reports will reflect the percentage distribution of salaries of employees. If significant (>5%) differences between the estimated charges and actual distribution of effort exist, the charges will be promptly adjusted to reflect actual effort.

### **A. Time and Effort Reports**

Time and Effort Reports will reflect the percentage distribution of effort by IWU faculty, professional staff and students charged to federally funded projects. Each PI/PD is responsible for confirming, by their signature on the Time and Effort Report, the percentages of effort allocated to federally funded projects.

Effort is not determined based on a 40 hour week, but rather on total hours worked. It is based on 100% of activities for which employees are being compensated, including sponsored and non-sponsored activities, for a given time period. Effort is expressed as a percentage of total compensation. Effort reported on reporting form must total 100%.

Time and Effort Reports do not need to be completed by clerical staff or students who fill out a bi-weekly time sheet.

To confirm that distribution of activity represents a reasonable estimate of the work performed by the employee during the period, the record for each employee must include the signature of the PI/PD or of a person having direct knowledge of the work, confirming that the record of activities allocable as direct costs of the award is appropriate.

Time and Effort Reports are required annually. They will be distributed to all applicable PI/PD's approximately 15 days from the close of a reporting period. Completed reports must be submitted to the Faculty Grants Manager no later than 30 days after the distribution of the Time and Effort Reports. Completed Time and Effort Reports will be filed in the GFR Office.

## B. Other Items of Note

1. When a PI/PD is absent in excess of 90 days from his/her project, pre-approval must be obtained from the sponsoring agency.
2. When a PI/PD reduces his/her effort by 25% or more in a grant year, pre-approval must be obtained from the sponsoring agency.
3. Under federal regulations on effort reporting, 100% effort is an employee's total hours actually spent on work within the scope of his or her employment regardless of how many or how few hours an employee works and regardless of the percent FTE listed on the appointment.
4. Effort certification must reflect actual work performed.
5. Just as an employee's total effort is not defined by regular business hours of the employer or by the percent FTE of the appointment, research effort does not necessarily take place only in the research facility/lab or only on university premises. Research effort can occur at home, at a conference or in off-site research-related meetings, etc. If these types of hours are included in calculating research effort, they must also be included in the calculation of total effort.
6. PI/PD's should maintain documentation that supports research contributions - in research content and in time/percentage of effort (calendars, correspondence, work products, etc.).
7. A request for reclassification or adjustment to time and effort reporting can be processed with a Letter of Justification (LOJ) from the PI/PD that clearly sets forth why previous effort was erroneously certified, and why the requested change is more appropriate within the context of law, federal requirements, or IWU policies and procedures.
8. In preparing the letter of justification, please include the following information:
  - a. Name of faculty/employee/student
  - b. Effort reporting period
  - c. Grant number(s) affected by the change
  - d. Statement of justification explaining the following:
    1. The appropriateness of the charge to the Grant
    2. How the work being performed benefited the grant being charged
    3. A brief description of the duties performed on the project
    4. Explanation of how the error occurred and how it was discovered
    5. Signature of Principal Investigator (PI) or Project Director (PD) and date.
9. LOJs are submitted to the GFR Office who will submit to the Provost/Dean of Faculty. Retroactive adjustments requested via a LOJ must occur within 90 days of recording the expenditure for which a reclassification is requested, as federal requirements generally allow up to 90 days after the project period end date for final reporting. Final effort reporting and any retroactive adjustments must be completed before the final reporting deadline for the award.

## Illinois Wesleyan University Employee Effort Certification Report

In order to comply with federal guidelines, this form must be completed and returned to the Grants and Foundation Relations Office within 30 days of the end of the annual reporting period by every faculty member, professional staff or student working on an externally funded project

Name: \_\_\_\_\_ IWU ID#: \_\_\_\_\_

Department: \_\_\_\_\_

Annual Reporting Period: May 1- July 31, 20\_\_\_\_

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Please provide a breakdown of your activities for the reporting period:					
Federally sponsored activities - the percentage should reflect all effort expended on an activity even if not paid by the grant					
Name of Research Project	Funding agency grant no.	IWU Fund no.	Are you the P.I.? Y/N	% Compensation charged to grant	% Distribution of Total Effort
Curricular and other activities					
Instructional (teaching and teaching-related activities)					
Administrative (faculty committees, department chair, etc.)					
Other activities (public service, other research, etc.)					
<b>Total</b>					<b>100%</b>

I certify that the percentages stated above are an accurate reflection of the work performed for the period indicated.

Signature of Employee: \_\_\_\_\_ Date: \_\_\_\_\_

\*\*Please return completed reports to the Office of Sponsored Programs and Foundation Relations,  
Holmes Hall 200\*\*

**ILLINOIS WESLEYAN UNIVERSITY**  
**External Grant Proposal Review Form**

\*\*\*NOTE: Please submit form to Grants Office THREE WEEKS before proposal is due.\*\*\*

Faculty/Department(s): \_\_\_\_\_

Project Title: \_\_\_\_\_

Funding Agency/Program Announcement #: \_\_\_\_\_

Proposal Due: \_\_\_/\_\_\_/\_\_\_ Amount Requested: \$\_\_\_\_\_ Project/Budget Period \_\_\_\_\_

If the project involves a collaboration or subcontract, please note name of co-PI and contact info for his/her institution's grants office:

\_\_\_\_\_

<b>IMPACT ON RESOURCES:</b>	Y	N	N/A	If Yes, please have approved by:	Signature:
If the project involves human subjects research (including surveys), have you submitted proposal for review? (Instructions at: <a href="http://www.iwu.edu/irb/proposals.html">http://www.iwu.edu/irb/proposals.html</a> )				Frank Boyd, Associate Provost	
If the project involves live, vertebrate animals, have you <a href="#">submitted to IACUC</a> for review?					
Does the project involve additional computer and/or IT resources?				Trey Short, ITS	
Will the project have a noticeable impact on the use of utilities?				James Blumberg, Physical Plant	
Does the project include a reallocation of space?					
Does the project require renovation of existing space or any other construction issues, such as rewiring, temperature control, vibration isolation, blackout, soundproofing, hazardous materials, or emergency power?					
Does the project include payment to any individuals other than IWU students or faculty participating in the grant? (Includes other IWU instructional staff, faculty at other institutions, IWU staff, consultants, or other individuals not currently on IWU's payroll.)				John Bryant, Business Office	
Does the project include the purchase/lease of an automobile or heavy equipment, e.g compressors, generators, forklifts?					
Does the project include bringing people to campus from the community or other campuses?					
Does the project include travel by IWU faculty, staff or students to other countries?					
Does the project involve the lease of premises?					
Does the project have special insurance requirements?					
Does the project commit the College to providing matching funds, cost-share, or any in-kind support? If yes, please attach document listing amount and source of funds				Jonathan Green, Provost	
Does the project require release time from normal teaching duties?					
Beyond the grant period, will any further funds be required to sustain the project? If yes, please attach an outline of proposed continued funding:					

As Principal Investigator, (and co-investigator, if indicated) I accept responsibility for this proposal and certify compliance with grantor and institutional requirements. In the case that I am applying for Federal funding, I agree to comply with all applicable regulations and policies including the Responsible Conduct of Research.

P.I. \_\_\_\_\_ Date \_\_\_/\_\_\_/\_\_\_ Co-P.I. \_\_\_\_\_ Date \_\_\_/\_\_\_/\_\_\_

**REVIEWED BY:**

Grants & Foundation Relations \_\_\_\_\_ Date \_\_\_/\_\_\_/\_\_\_ FCOI Policy/Form (for NSF/NIH) \_\_\_\_\_

Provost's Office \_\_\_\_\_ Date \_\_\_/\_\_\_/\_\_\_