



**Office of Sponsored Research, Wellesley College
Principal Investigator Handbook
March 2011**

Introduction

This handbook has been prepared by the Office of Sponsored Research and the Controller's Office and is intended to serve as a guide to faculty members who are seeking or have received external support for their research or other projects. It provides information about both pre-award (application) and post-award (grant administration) matters and should help to answer common questions about college policies and procedures as well as federal and other regulations. In addition, many of the policies discussed apply to all faculty research being conducted at Wellesley College, whether externally funded or not.

Most pre-award functions are handled by the Office of Sponsored Research, while most post-award functions are the responsibility of the Associate Controller of Sponsored Research who is located in the Controller's Office. Often the distinctions between these categories are blurred, and the Office of Sponsored Research can advise on many post-award faculty concerns. In general, the Office of Sponsored Research provides information on possible sources of support for a project and individual assistance in identifying appropriate sponsors; helps in preparing a proposal and developing a budget for both primary and sub-awards; oversees the institutional approval process; and transmits the proposal to the funding agency. The Controller's Office provides complete fiscal management of an award; assigns a budget number which allows access to the College accounting system; tracks grant balances; requests payment from funding agencies; assists in interpretation of grant regulations; and files required financial reports.

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FUNDING MECHANISMS

Government and private agencies or organizations support research (or other) projects by using one of several award mechanisms. Most faculty at Wellesley receive research support through grants or fellowships, but other funding mechanisms exist.

A **grant** is an award made to the College to fund activities in which the funding agency has an interest but takes no active part in the conduct of the project. A proposal for a grant typically includes a detailed budget estimate in addition to a project description and always requires the signature of an official representative of the College. Funds awarded through a grant must be spent according to the rules of the agency. Financial reporting is required, the award is subject to external audit, and unexpended funds must be returned to the agency at the conclusion of the project. Projects in the sciences and social sciences are frequently supported by grants. The National Science Foundation (NSF), the National Institutes of Health (NIH), and the National Aeronautics and Space Administration (NASA) are the most common federal granting agencies at Wellesley.

A **fellowship** is an award made directly to an individual and carries with it many fewer restrictions than a grant. A proposal for a fellowship usually does not require as detailed budget information as with a grant application, and (except in certain special instances) does not need any signature other than that of the applicant. A faculty member who receives a fellowship usually has to provide a report on the work completed while supported by the fellowship but ordinarily does not have to provide an accounting for how the fellowship funds were spent. Most of the procedures and regulations described in this handbook do not apply to fellowship applicants, although the Office of Sponsored Research often provides assistance to faculty members seeking fellowship support for their research. Projects in the humanities are most likely to be supported by fellowships. The National Endowment for the Humanities (NEH) is the most common federal agency from which Wellesley faculty receive fellowships; private organizations include American Association of University Women (AAUW), American Council of Learned Societies (ACLS), American Philosophical Society, Bunting Institute, and the Guggenheim Foundation.

A **contract** is similar to a grant, in that it is an award made to the College and therefore requires institutional approval (at the time of submission) and oversight (after the award has been made). It differs in that it is a legal instrument in which the Wellesley project director promises to perform certain designated services. Contracts are very unusual at Wellesley, although in recent years we have received contracts from the Department of Labor, Department of Commerce, Department of Agriculture, and the Jet Propulsion Laboratory. The College has also entered into contracts with corporations or other non-profit organizations such as the Brookings Institution.

A **sub-award or subcontract** is an award or contract that comes to the College from another institution that has been awarded a grant or contract from a funding agency. The rules and conditions described for grants and contracts generally apply to sub-awards and subcontracts. Specific documentation relating to the sub-award or contract must be filled out by the College and the other participating institution.

Funding Sources

Faculty members who wish to seek external funding for their projects should contact the Office of Sponsored Research for help in identifying appropriate sources. Many funding sources are identified on the [Office of Sponsored Research Website](#).

Some non-federal applications are also available, although many private sponsors ask that individual faculty request materials directly from them (sometimes accompanied by a brief project description). Faculty who wish to seek individual research project support from a foundation should first consult with the Office of Sponsored Research to ensure that such a request will not conflict with potential College initiatives at that foundation.

Faculty should also be aware of the many sources of support for research available from the College and described in the Faculty Handbook.

Proposal and Budget Preparation and Submission

A. The Principal Investigator (PI)

The Principal Investigator (or project director) is the individual who has overall responsibility for carrying out the sponsored research project and ensuring that all requirements of the funding agency and Wellesley College are met. The PI conceives the research project, prepares the proposal (with the assistance of the Office of Sponsored Research), manages the day-to-day conduct of the project (including its financial administration), and submits technical progress and final reports as necessary. Some agencies allow two or more individuals to act as co-PIs.

Ordinarily, a PI must have a faculty appointment at Wellesley during the period of the funded project. A faculty member holding a temporary appointment may apply for a grant with the understanding that the College's commitment to house the research will expire along with his or her contract, and the grant will need to be transferred to the PI's new institution.

B. Collaboration with Colleagues at Other Institutions

Faculty who apply for funding with colleagues at other institutions will normally have to choose whether to submit the proposal through Wellesley or through their collaborator's institution, ordinarily on the basis of where the majority of the project will take place. The two most common scenarios are described below. Any faculty member planning to prepare a proposal with a colleague should consult with the Director of Sponsored Research as early as possible.

1. If the proposal is submitted by Wellesley College, the other PI's expenses may be included as line items on the proposal budget or may be included as a subcontract to the co-PI's home institution. In either case, any inclusion of co-PI summer salary or released time must be approved by the co-PI's home institution.

2. If the proposal is submitted by the other PI's institution, the Wellesley PI's expenses may be treated in either of the two ways already described. Ordinarily, Wellesley's fringe benefits and indirect costs should be included in any subcontract budget.

Occasionally a funding agency will suggest that co-PIs at different institutions submit separate proposals, with identical text but individual budgets, for separate grants to the individual institutions.

C. General Proposal Format

The proposal is a comprehensive description of the project and usually consists of two main parts: a technical or narrative section and a budget. Almost all funding organizations have guidelines which must be followed; most federal agencies supply their own forms, which are available through the particular agency's website.

A proposal usually includes the following sections:

1. **Cover page:** a quick reference sheet containing selected information about the proposal, the PI, and the College. The signature of an authorized organizational representative (Vice President for Finance and Administration) commits the College to carry out the project if funding is received and certifies that statements contained in the proposal are true.

2. **Abstract or project summary.**

3. **Statement of work:** a full and detailed description of the project, including background, goals and objectives, methodology, significance, personnel, etc. Some funding sources specify page limits.

4. **Supplementary materials:** bibliography, curriculum vita(e), resources and facilities, other support, letters of support, appendices (where appropriate).

5. **Budget and budget justification.**

D. Budget

The budget represents the PI's best estimate of the costs of doing the work described in the proposal. The general rule of thumb is that a budget should include all costs necessary to carry out the project in a cost-effective manner. A "padded" budget is usually obvious to reviewers, who themselves have an idea of the approximate cost of doing the proposed research. An artificially small budget may seem to indicate a PI who doesn't have enough knowledge to know what resources will be necessary to complete the work.

Direct costs are costs that can be specifically identified with a particular project. They include items such as salaries, fringe benefits, equipment, supplies, travel, and publication charges. Indirect costs are costs that can not be directly associated with a particular project. They include general operating costs such as library services, maintenance, etc. All direct

costs should be explained in the Budget Narrative, which is a separate document that typically accompanies the budget.

Indirect costs: Justification of indirect costs is not necessary in each proposal, since the appropriate rate is negotiated with the federal government or is determined by the [guidelines of the funding agency](#).

The Office of Sponsored Research can help with preparation of an accurate budget. Keep in mind that projects lasting more than one year usually require a budget request for each year in addition to an overall total. Multiyear budgets should provide for inflation.

Often, a funding agency will notify an applicant that an award will be made at a reduced level of funding. The PI may then be asked to submit a revised budget and narrative, which should be drawn up according to the same agency and College guidelines used to construct the original proposal budget. The Office of Sponsored Research can also help with the preparation and submission of a revised budget and budget narrative.

Common budget categories include:

1. **Salaries and wages.** Salaries and wages for all personnel who will be working on the project should be included. Internal Revenue Service regulations require that anyone contributing effort to the project must be considered a temporary employee of the College, unless the person being paid is in a business which normally provides the services being performed.

For each person, indicate the time to be spent on the project (e.g. full-time 12 months, ten hours/week for academic year, etc.) and the amount to be paid by the funding agency. Where appropriate, indicate the base salary and the method used to arrive at the requested amount. Include estimates of salary increases and explain in the budget justification.

- PI academic year salary (released time): ordinarily the amount budgeted is calculated so that % of salary equals the % of release (e.g. 25% of salary is included for a 1/4 reduction in teaching load). Typically, released time should not exceed one course unit per year.

- PI summer salary: this amount is typically limited to 2/9 of the nine-month contract salary.

- Salaries for other key personnel or support personnel (e.g. faculty collaborator, postdoc, technician, research assistant, interviewer): salary included should be adequate to cover the current average compensation for the level of expertise and the degree of experience required for the position. Amounts can be estimated by consulting with colleagues at Wellesley and other Boston-area institutions and the Human Resources Office. Allowance for appropriate annual increases should be made.

- Student assistants paid hourly wages: use the student wage scale published annually by the [Student Employment Office](#). Note that the scale includes three levels of wages, depending on

the skill required, and that student wages are \$1.00 per hour higher during January and the summer.

- Summer stipends for student research assistants: the amount of the stipend is generally pegged to that recommended by NSF in its Research Experiences for Undergraduates (REU) program and covers ten weeks of full-time work. Check with the Science Center Office (Ext. 3000) for the current amount, as well as the amount required for on-campus housing and supplies, when appropriate.

2. **Fringe benefits.** Fringe benefits are calculated as a percentage of salaries and wages and include all benefits: retirement, health and life insurance, Social Security, etc. The fringe benefit rate is negotiated periodically with the Department of Health and Human Services (DHHS) and is subject to change. The current rate can be obtained by clicking [here](#).

Wages of (a) employees not eligible for full benefits and (b) students working on an hourly basis during the summer are subject to Social Security, unemployment insurance and worker's compensation benefits. The reduced fringe benefit rate can be obtained by clicking [here](#).

Student wages earned during the academic year and student summer stipends are not subject to fringe benefits.

3. **Equipment.** The federal government defines permanent equipment as property with a purchase price of \$500 or more and a useful life of two or more years. Equipment purchased under a grant must be necessary to the research and not available or easily accessible. It is the PI's responsibility to determine the lack of availability or accessibility before including an equipment request in the budget. An inventory of equipment purchased with federal funds since June 1990 is available from the Associate Controller of Sponsored Research.

Each item of equipment requested should be listed separately (with as much specific information about name, model number and manufacturer as possible) and justified in the budget justification. The costs of shipping, installation, and maintenance should also be included.

Ordinarily, the purchase of general purpose equipment (e.g. office furniture, data processing equipment, word processors, etc.) is not allowed.

4. **Travel.** Domestic and foreign travel are listed separately. The budget justification should indicate who will travel, where, and why, estimated air fare (or other cost of transportation), cost of meals and lodging, meeting registration fees, etc. Unless further restricted by federal regulations, all travel is subject to general College policy, which is described in a separate travel memo issued by the [Controller's Office](#). In addition, all foreign travel funded by federal agencies is subject to the Fly America Act.

5. **Materials and supplies.** Materials and supplies include consumable items (e.g. chemicals, laboratory breakables, stationery, printer ribbons, etc.) required for the project.

The amount requested should be supported by descriptions of the items included and estimates of their costs in the accompanying budget narrative.

6. Publication costs. Publication costs include journal charges, cost of illustrations, and costs of preparing and reproducing reports required by the agency. They should be itemized in the budget, and detailed in the budget narrative.

7. Other. Other allowable expenses include such items as postage, telephone, photocopying, animal care, printing, publications, and subscriptions to periodicals that are directly related to the proposed project. These expenses should be itemized in the budget, and detailed in the budget narrative.

8. Consultant Services and Sub-Awards. Less frequently used budget categories include consultant services and sub-awards with collaborating colleges and universities. PIs including such items in the budget should consult the Office of Sponsored Research for help preparing the required documentation. Examples of such documentation include commitment letters, sub-award budgets and sub-award budget narratives.

9. Indirect costs. Indirect costs are expenses that are related to the conduct of research but that can not be directly attributable to a particular project. The indirect cost rate used by Wellesley College is negotiated periodically with the Department of Health and Human Services (DHHS) in accordance with federal regulations. The rate we use is the result of that negotiation and represents the portion of the College's indirect costs that the government agrees to bear.

The current indirect cost rate can be obtained by clicking [here](#). It is expressed as a percentage of salaries and wages found in the budget. Only wages of College faculty and employees are included in total salaries and wages when calculating the amount of indirect costs. Student wages and stipends are not counted as part of this base number.

Non-federal sponsors frequently do not allow full recovery of indirect costs. In all cases, application guidelines should be consulted. If there are no guidelines or if you have any questions about indirect costs, please contact the Office of Sponsored Research.

E. Processing a Proposal for Submission

Before a proposal or revised budget can be submitted to the funding agency, it must be circulated for internal review with a [pink Wellesley College Proposal Summary \(“Internal Routing”\) sheet](#). If the project requires matching funds, the [green Project Summary \(“Matching Funds/Cost Sharing”\) sheet](#) should be used. PIs should allow 2 - 3 working days for this internal review.

In order to be circulated, the proposal should be complete. In unusual circumstances, signatures can be obtained if all financial information is in its final form and the project description provided is a near-final draft. The review process is as follows:

1. The PI completes and signs the proposal, summarizes the required information on the pink (or green) sheet, and signs the sheet. In addition, for projects in the Science Center, he or she makes sure that the project's space needs can be accommodated by submitting the Science Center [Space Use Form](#). The PI is responsible for circulating the proposal to the Department or Program Chair and to the Office of Sponsored Research.
2. The signature of the Department or Program Chair reflects the Chair's knowledge that the proposal is being submitted and approval of requests for released time or financial commitments.
3. The signature of the Director of the Office of Sponsored Research implies review of the budget for accuracy, compliance with College policy and agency and federal requirements, and approval of Science Center space use. The Office of Sponsored Research is responsible for circulating the proposal to the Dean of the College and the Vice President for Finance and Administration.
4. The Dean of the College reviews the proposal to see that it is consistent with general College policies and goals.
5. The Vice President for Finance and Administration is the person who signs the proposal for the College. The Vice President is authorized by the Board of Trustees to commit the College to the performance of a project and to accept funding on behalf of the College and its faculty.

F. Submitting the Proposal

Once the proposal has been signed, the Office of Sponsored Research will submit the proposal to the funding agency. Typically, these submissions are done electronically through either grants.gov or nsf.fastlane.gov. Once the Office of Sponsored Research has received confirmation from the funding agency that the proposal has been submitted and accepted by the funding agency, they will notify the PI of this status.

Faculty members submitting fellowship proposals or applications for other grants which do not require institutional review and signature should submit their grant applications according to the guidelines of the funding agency or foundation. Faculty members should not forward copies of such applications to the Office of Sponsored Research at the time of submission.

Related Policies and Federal Regulations

A. Space Use (for projects in the Science Center)

Research proposals for projects being conducted in the Science Center must be approved by the Science Center Space Use Committee before being submitted. As soon as they decide to submit a grant proposal, PIs should complete the [Space Use Form](#) and return it to the

Administrative Director of the Science Center. In most instances, where space needs are not expected to increase, such approval can be granted without consulting the full committee.

B. Human Subjects

Any research conducted by Wellesley College faculty, staff and students and involving human subjects (whether externally funded or not) must be approved by the Institutional Review Board for the Protection of Human Subjects (IRB). The IRB is responsible for protecting the rights and welfare of individuals who serve as subjects or participants in research. Approval must be renewed annually.

Both unfunded and funded research must be approved before faculty, staff or students can begin collecting data. Please see the College [human subjects/IRB guidelines](#) for information on what must be approved, and the circumstances under which individual departments may approve research without IRB consultation.

For funded research by faculty, a request for IRB approval of procedures for research with human subjects should be submitted to the IRB for approval once funding is granted, unless the funder requires approval at the proposal stage.

Wellesley College has a Federal Wide Assurance number (FWA) with the Office for Human Research Protections (OHRP), U.S. Department of Health and Human Services (DHHS). The FWA is required for all federally-funded projects. The Office of Sponsored Research will assist PIs in completing this process, once they have received IRB approval of their research.

Questions concerning protocols for the protection of human subjects should be addressed to the Chair of the IRB, Nancy Marshall (nmarshall@wellesley.edu) or x2551. More information on federal regulations, the IRB committee and forms are located in the IRB First Class conference (Wellesley Conferences > Committees > IRB).

C. Animal Welfare

As required by the Public Health Service (PHS), Wellesley College has established an Institutional Animal Care and Use Committee (IACUC) to ensure the humane care and use of live vertebrate animals involved in research activities. The names of current members of the IACUC may be obtained by clicking [here](#).

PIs whose projects use vertebrate animals (whether externally funded or not) should complete the protocol form, available by clicking [here](#), and return it to the Administrative Director of the Science Center. Full committee review normally takes two weeks.

Wellesley's Animal Welfare Assurance number, filed with NIH's Office for Protection of Research Risks, is #A3840-01.

D. Recombinant DNA

All research involving recombinant DNA techniques (whether externally funded or not) must be approved by the Wellesley College Institutional Biosafety Committee (IBC), which has been established according to NIH guidelines. The names of current members of the IBC, as well as the rules which apply to this research, may be obtained by clicking [here](#).

PIs who use this technology may obtain a protocol form by clicking [here](#). The IBC normally meets twice each year, in May and December. Approval must be updated annually.

E. Radiation Safety

Researchers who plan to use any kind of radioactive material must contact the Radiation Safety Officer, who monitors the use of all radioisotopes to ensure that safety and licensing requirements are satisfied. The name of the current Radiation Safety Officer may be obtained from the Science Center Office.

F. Federal Assurances

In recent years, the federal government has increased the number of assurances that Wellesley College must file in order to receive federal support. Thus, in addition to long-standing Civil Rights, Handicapped Individuals, and Sex Discrimination assurances, the College must now provide certification regarding Delinquent Federal Debt, Debarment and Suspension, Lobbying, Drug-Free Workplace, and Misconduct in Science.

The assurances of particular concern to faculty PIs are:

1. Drug-Free Workplace. In compliance with the Drug-Free Workplace Act of 1988, the College must certify that it has adopted a policy on the possession and use of alcohol and illegal drugs on College property. That policy follows: Illegal or improper use of alcohol will not be tolerated and may result in disciplinary action, up to and including termination of employment. The unlawful manufacture, distribution, dispensation, possession or use of illegal drugs by any person on the property of Wellesley College is prohibited. Such action shall result in disciplinary action, up to and including termination of employment.

2. Misconduct in Science. In 2008, as required by federal law, the College revised a set of procedures for dealing with and reporting possible misconduct in science. A copy of these procedures can be obtained by clicking [here](#).

3. Responsible Conduct of Research – The National Science Foundation implemented Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act. This section of the Act requires “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.” Detailed information can be found [here](#).

Congratulations: You've been funded

As the recipient of sponsored funding, the PI has overall responsibility -- fiscal and programmatic -- for the conduct of the project described in the proposal. This means ensuring that all funds spent under the grant are necessary to the research conducted. The Controller's Office and the Office of Sponsored Research are available to help with interpreting guidelines, but it is ultimately the responsibility of the PI to become familiar with and to comply with the regulations of the particular funding agency. The College's grant activity is audited on an annual basis. **The failure of PIs to adhere to accepted practices for the management of grant funds jeopardizes the College's eligibility for future awards.**

A. From Pre-Award to Post-Award

When notice of funding is received by the College, the Office of Sponsored Research sends a summary of the terms of the grant and full budgetary information to the Associate Controller, who is responsible for financial administration of sponsored projects, as well as a copy to the PI.

PIs should allow one to two weeks for the assignment of the budget number. Awards which require matching funds from the College will take longer to process, since the source of the match must be identified before a number can be assigned.

Many federal agencies permit grantee organizations to incur pre-award costs up to ninety days before the effective date of the grant. For information about requesting authorization for pre-award spending, consult section V, D, "Changes in the Project" in this handbook.

B. PI Responsibility for Project Administration

The PI has overall responsibility for the conduct of the project described in the proposal. He or she must monitor the budget to ensure that over-expenditure of grant funds does not occur. This means keeping track of items charged to the project and reconciling the monthly budget statement issued by the Controller's Office in much the same way that people reconcile monthly bank statements for their checking accounts. Except as described below, PIs are expected to spend their project funds according to the categories specified in the approved grant budget and within the time frame defined in the award. PIs are also responsible for ensuring that anyone performing work supported by the grant also understands the relevant guidelines. The other primary PI responsibility is the filing of interim and final project reports as required by the funding agency.

Since sponsor funds are provided to PIs only for the advancement of their research projects, personal expenses should never be charged to a grant, even if it is the intention of the PI to reimburse the grant. Nor should grant funds be borrowed and paid back.

PIs are encouraged to meet with the Associate Controller and/or the Science Center Grants Accountant to discuss ways to make oversight of the grant budget easier to accomplish. In

general, the Office of Sponsored Research and the Associate Controller can help PIs understand and interpret federal or other regulations concerning allowable expenses.

1. Financial responsibilities of PIs

In general, expenses are charged to a grant in one of five ways: (1) salary charges are authorized by the Deans Office (for faculty salary) or by the Human Resources Office (for other salaries except students); student salaries during the academic year are charged by submission of time cards or transmittal sheets by the PI to the Controller's Office; (2) a check request form is submitted to the Controller's Office, accompanied by documentation that makes it clear that the item or service being reimbursed appears in the grant budget or has been approved through the Organizational Prior Approval System (OPAS) system (described below); in addition to reimbursements, summer student stipends are also normally paid by check request; (3) a purchase order or Science Center requisition is submitted to the appropriate purchasing office; (4) a bill for the purchase of an item or service is submitted to the Controller's Office for payment; or (5) on-campus services (such as Copy Center or Post Office charges) are charged directly by the office that provides the service. **PIs should be aware that any salary charges to the grant will automatically trigger fringe benefit and indirect cost charges when the grant budget includes those items.**

The items that follow address common concerns of PIs or areas where particular attention to detail is required:

Federal regulations require that faculty collecting any salary from a federal grant be sure that their effort on the sponsored project corresponds to the salary being paid. Faculty members will be asked to sign a statement that certifies that they expect to expend a month's worth of full-time effort on the project for every month of salary paid. In addition to this prospective certification, faculty must confirm retrospectively that they in fact expended the effort for which they were paid. The Associate Controller will contact faculty members twice per year with respect to such time and effort reporting.

a. Faculty salary - summer salary. Ordinarily, summer salary is limited to 2/9 of the nine-month contract salary. Faculty whose grant budgets include summer salary will receive a memo during May, asking for the amount of summer salary (either a dollar amount or a fraction of academic year salary) to be paid from the grant. PIs may choose to have summer salary paid monthly or in one lump sum during June, July, and/or August. Once the memo is returned, payment of summer salary is authorized by the Deans Office. Retroactive requests for payment of summer salary cannot be accepted. PIs who do not receive the summer salary memo and who believe that they may collect summer salary from their grants should contact the Deans Office.

b. Faculty salary - released time. PIs whose grant budgets include academic year (released time) salary should inform their Department or Program Chair as soon as an award is made so that the Chair can make the necessary staffing arrangements. If the awarded budget is not sufficient to fully fund the released time originally requested, the PI may have to take a smaller amount of released time. The PI should speak to the Department or Program Chair

and the Dean or an Associate Dean to discuss how much release is possible. Once all such questions have been resolved, the Deans Office will notify the Controller's Office about what portion of the PI's salary should be charged to the grant.

c. Faculty salary - sabbatical/early leave. Faculty whose grant budgets include salary in partial or full support of a sabbatical or early leave should inform the Dean or an Associate Dean so that the proper arrangements for charging leave salary to the grant can be made. The same confirmation of agreement between salary paid and effort expended on federally-sponsored projects will be required.

d. Postdoctoral fellows. Arrangements for hiring a postdoctoral fellow whose salary is included in the grant budget may be made by contacting the Deans Office.

e. Other personnel. If the project requires hiring new personnel, the PI should prepare a position description as soon as possible and submit it to the Human Resources Office, which will classify the position and assign a pay grade. Working closely with the Human Resources Office will ensure an appropriate classification for the position. Staff working for the project must complete the same certification as faculty relating effort to salary.

Employees working under sponsored research agreements are entitled to the same benefits as other College employees. A performance evaluation should be completed for the employee annually, and salary may be adjusted either on July 1 or on the anniversary date of the grant. All employees who work at least 17 1/2 hours per week, 39 weeks per year, are entitled to vacation after one year of employment. Vacation will be charged to the grant, so it is advisable that employees take vacation during the regular term of the grant. The PI is responsible for maintaining records of vacation and personal days taken.

f. Student salaries. Any student may be hired provided she has a Social Security number. Rates of pay for student employees are established by the Student Employment Office. For students hired on a regular basis, the Controller's Office should be notified; the PI will receive a transmittal sheet on which to record hours worked twice a month. For students who work occasionally, time cards may be obtained from the Controller's Office. Students receiving internships or stipends are normally paid by the submission of a check request form, which may be obtained from the PI's department administrative assistant or from the Controller's Office and which should be submitted to the Controller's Office, Attn: Student Payroll.

PIs should be aware that their grants will be charged for the fringe benefits paid on wages for students working on an hourly basis during the summer.

g. Purchasing. The Purchasing Department and the Science Center Buyer assist faculty and staff in the acquisition of goods and services. Any item purchased must be included in the authorized grant budget or must have been approved by the OPAS system. Purchases from grant funds must comply with College regulations. A copy of the College Purchasing Manual is available by clicking [here](#).

h. Equipment. Equipment purchased must be necessary to the performance of the project supported by the grant. Since it is difficult to show that equipment acquired within the final months of an award is necessary to the performance of the project, PIs should purchase any necessary equipment early in the grant period. PIs contemplating the purchase of equipment within the last three months of the grant must request approval from the Associate Controller. The written request should list the equipment to be purchased and state how the equipment is necessary to the research.

Federal regulations require that equipment purchased with federal funds be made available for use on other projects as long as this will not interfere with the work on the project for which the equipment was originally acquired. After the end of the grant period, it is expected that equipment will continue to be used for the original project; if the project is not continuing, the equipment should be made available for other federally-funded projects.

In most instances, title to equipment purchased with federal funds vests in the College; occasionally, title to equipment may vest in the granting agency.

i. Travel. The Controller's Office has issued a separate [travel memo](#) and, unless further restricted by federal regulations, all travel is subject to general College policy. Original receipts, including airline tickets, must be submitted when requesting reimbursement for travel expenses.

Additional restrictions apply to travel supported by a federal grant. First class travel is not allowed. Foreign travel must be on a U.S.-flag air carrier if "available." Federal regulations state that favorable differences in price or convenience are not considered sufficient justification for travelling on a foreign carrier. **No alcoholic beverages of any kind may be charged to a federal grant.**

j. Telephones. To arrange for the installation of telephone or telephone lines and jacks, especially for computer equipment, contact Telecommunications at Ext. 3215.

k. Consultants. In general, an individual will be paid as a consultant only if he or she is in a business which normally provides the services being performed. All consulting charges should be carefully documented, including the nature of the services and their relevance to the grant-supported activities, the period of service, the basis for calculating the fee paid, and the amount paid. PIs charging consultant services to a grant need to be aware that NSF sets a [maximum allowable rate](#). HHS (which includes NIH) does not have a specific dollar guideline. Payment for consulting services is accomplished by submission of a check request form, which must include the recipient's Social Security number.

l. Subcontracts/sub-awards. If the project includes a subcontract or sub-award to another institution, arrangements should be made with the Director of Sponsored Research to draft and execute the necessary documents BEFORE the application is submitted.

2. Reporting responsibilities of PIs

a. **Interim Reports.** Many agencies require annual (or semi-annual) technical progress reports. The award document identifies the due dates of such reports. The Associate Controller can answer questions about the format of progress reports.

In some instances, the progress report is required before the agency will award the second or later year of funding. For NSF grants awarded as continuing grants (with specified future fiscal year funding), the progress report must be received by NSF at least three months before the end of the current grant period in order to ensure continuity of funding; NSF does not notify PIs when this report is due. Many multi-year NIH grants have a formal application process for noncompeting continuation, which includes the progress report and budget; NIH does send notice when this application is due.

b. **Final Reports.** Almost all agencies require final technical reports. The award document identifies the due date of the report, usually 30 to 90 days after the termination date of the project. The Associate Controller can answer questions about the format of the final report; in some instances, the agency provides a special form. Final progress or technical reports normally include: a summary of the progress made toward the goals stated in the proposal; a description of significant results; a list (and sometimes copies) of publications or theses resulting from work on the project; disclosure of patents or inventions resulting from the project.

Failure to file a final report when due may jeopardize the PI's and the College's eligibility for future funding from the agency.

3. Intellectual Property

PIs who believe that their research may lead to material which is eligible for a patent or copyright should discuss the matter with the Vice President for Finance and Administration as early as possible, to work out details of submitting the appropriate application(s).

C. Controller's Office Responsibility for Grant Administration

The Controller's Office has overall responsibility for maintaining financial records for the grant, posting charges as they are incurred, and sending monthly budget reports to the PI. In addition, the Controller's Office requests payment from federal agencies as appropriate, files financial reports, and serves as a link between the PI and the grants management section of the funding agency. The PI can expect to be contacted by the Associate Controller at least three times: (1) when the grant is awarded, a budget number is assigned, and the grant budget is entered into the College accounting system; (2) three months before the end of the grant budget period, as a reminder that the grant is ending, that remaining funds may need to be returned to the agency, and that a no-cost extension may be requested from the College or the agency (see discussion below); and (3) when the grant is closed and the final financial report is filed.

Specific items handled by the Controller's Office include:

1. Fringe benefits and indirect costs.

When the grant budget includes fringe benefits and/or indirect costs, the Associate Controller charges these items to the grant on a quarterly basis. For most grants, indirect costs are billed as a percentage of salaries and wages; for a few grants, indirect costs are based on modified total direct costs (MTDC).

2. Financial reporting.

The Associate Controller files interim and final financial reports with the agency as required in the grant award.

3. Equipment inventory.

The Associate Controller maintains a record of all equipment purchased with project funds. Every year an inventory is taken to identify the current location, use, and condition of all equipment purchased with federal funds.

4. Institutional audit.

The Associate Controller maintains a continuous record of all financial transactions associated with a project. Under federal regulations (OMB Circular A133), the records for all federally funded projects are subject to audit each year by the College's auditors, who must submit a report to the government biannually.

5. Agency audit.

Authorized government personnel have access to all records pertaining to a project. Federal regulations require that all records be kept for three years or until such time as an audit is completed.

D. Changes in the Project

Events or problems may require changes in the project. Most of these changes will be minor (a transfer of funds among budget lines, different travel plans, or the purchase of equipment other than that included in the approved budget) and are easily accomplished. Major changes, such as a change in PI or a new objective, may also be made but usually require approval by the funding agency. The Office of Sponsored Research or Associate Controller can provide information about whether an anticipated change is considered minor or major.

1. Pre-award spending.

Many federal agencies permit grantee organizations to incur pre-award costs up to ninety days before the effective date of the grant. PIs who receive verbal notification that an award will be made may request approval of pre-award spending by completing the Organizational Prior Approval System (OPAS) form available by clicking [here](#). The form, which must be signed by the PI, the Department or Program Chair, and the Dean of the College, is then forwarded to the Associate Controller, along with budgetary information about the expected award. Once pre-award spending is approved, a budget number is assigned and the PI notified as described above. Occasionally, limits may be placed on the amount of spending allowed before the written notice of award is received by the College.

2. Budget changes.

PIs are expected to spend grant money according to the budget approved by the funding agency. Most agencies, however, permit the transfer of funds from one category to another and allow the grantee organization to authorize these minor changes. The rules governing such transfers vary from agency to agency. In general, the College is authorized to approve most changes but is required to maintain documentation which indicates proper oversight of federal money.

To this end, an Organization Prior Approval System (OPAS) is in place for NSF and HHS (NIH) grants. Transferring funds from one category to another requires completing an [OPAS form](#) (indicating and justifying the budget change desired) having it signed by the PI's department or program chair, and submitting it to the Associate Controller, who will approve the request and notify the PI.

PIs should be aware that the budgeting guidelines described in section III, D, "Budget," of this handbook apply to rebudgeting as well. In particular, equipment must be necessary to the research and not available or easily accessible. Ordinarily, the purchase of general purpose equipment is not allowed. In addition, increasing or reducing the amount budgeted for salaries and wages will increase or reduce the fringe benefit and indirect cost charges to the grant. If there is a reduction in salaries and wages and associated fringe benefits and overhead, the funds thus freed up may be used for other direct costs of the project.

Adjusting money among budget line items may be done without OPAS approval if (a) there is money budgeted both in the category from which money is to be taken and in the category into which money is to be moved, and (b) the change in either category does not exceed 10% of the original budget for that line.

PIs with grants from an agency other than NSF and HHS should contact either the Office of Sponsored Research or the Associate Controller for information about how to accomplish rebudgeting.

3. Changes in the project period - extension of time.

If the project cannot be completed on schedule, the College may have the authority to grant a no-cost time extension (see below for specific granting agencies). To apply for a no-cost extension, an [OPAS form](#), explaining the need for the extension, should be completed and submitted to the Associate Controller at least 30 days prior to the end of the budget period. This will allow time for the College to approve the request and notify the agency. Note that the fact that funds may remain at the expiration of an award is not in itself sufficient justification for an extension.

In general, requests for extensions longer than the College can authorize (or for extensions beyond expiration dates already extended) must be submitted to the funding agency and should be discussed with the Office of Sponsored Research at least three months prior to the original closing date of the grant for information about how to submit such a request.

No-cost extension rules for specific federal agencies appear below. Grants from other agencies or organizations have rules which are defined in their grant documents.

- NSF: NSF grants are awarded with a 6 month "unfunded flexibility period." The College can extend the project period for an additional 6 months.

- HHS: HHS rules permit the College to grant up to a one-year no-cost extension.

- NASA: For most grants, NASA rules permit the College to grant up to a one-year no-cost extension.

4. Changes in PI or PI's level of effort.

A PI who plans either a short-term or long-term absence from the project or who anticipates devoting substantially more or less effort to the work than outlined in the proposal should contact the Office of Sponsored Research as soon as possible. Such a change would be considered a major change and might result in the naming of a replacement PI. In any case, agency notification and/or approval will be required.

5. Institution change.

A PI who is leaving Wellesley for another institution should contact the Associate Controller and the Director of Sponsored Research as soon as possible. In most cases the grant can be transferred to the new institution without problems, but early planning is essential since the process can be quite lengthy.

6. Changes in objectives or scope.

A PI who wants to change the phenomena under study or the objectives of the project as stated in the proposal will have to get approval for such changes from the funding agency. The Office of Sponsored Research can provide information about the mechanism for

requesting such major changes. Neither the pursuit of "interesting and important leads" which arise during the course of research nor the adoption of an "alternative approach" which appears to be more promising constitutes a change in objectives or scope, but significant changes in methods or procedures do.