

# Sponsored Research at Johns Hopkins University

Johns Hopkins University Research Administration

(Updated December 2016)

## Table of Contents

I.	WHAT IS JHURA .....	2
II.	ROLES AND RESPONSIBILITIES OF JHU OFFICES .....	5
III.	HOW CAN JHURA HELP YOU .....	8
IV.	FUNDING OPPORTUNITIES .....	11
V.	PROPOSAL DEVELOPMENT .....	13
VI.	BUDGET REVIEW .....	21
VII.	MANAGING YOUR SPONSORED RESEARCH .....	27
VIII.	COMPLIANCE .....	31
IX.	AGREEMENT WORK FLOW .....	36
X.	PROJECT MANAGEMENT .....	37
XI.	SUBAWARDS .....	39
XII.	TOP 10 THINGS JHURA WANTS YOU TO KNOW .....	40
XIII.	FREQUENTLY ASKED QUESTIONS .....	42
XIV.	GLOSSARY .....	44
XV.	ACRONYMS .....	48
XVI.	COEUS PROPOSAL TYPES .....	50
XVII.	APPLICATION OF F&A RATES TO SPONSORED PROJECTS .....	52

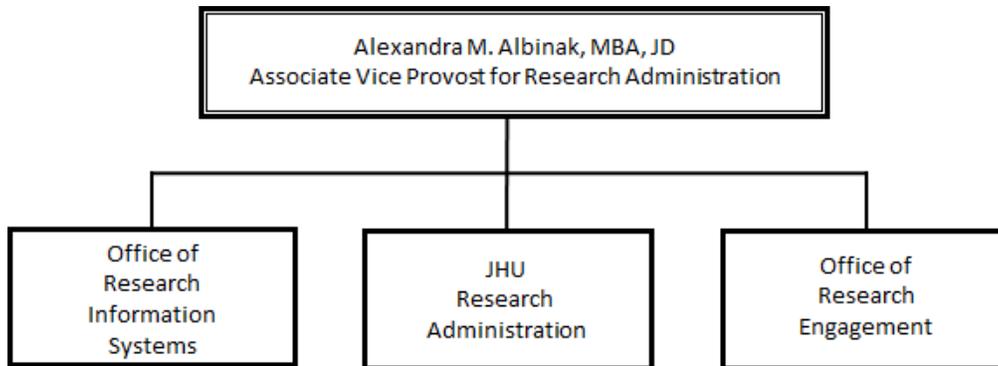


## I. WHAT IS JHURA?

The Johns Hopkins University Research Administration (JHURA) includes the sponsored projects administration offices for the Bloomberg School of Public Health, the Whiting School of Engineering, Jhpiego, School of Education, Carey Business School, Nitze School of Advanced International Studies (SAIS), Peabody Institute, School of Nursing, and all Centers and Institutes that are not associated with the School of Medicine or the Krieger School of Arts and Sciences, and provides top quality support to the campus community's research, creative activity, technology transfer, and outreach/policy initiatives.

JHURA identifies opportunities and partnerships, facilitates the submission of sponsored project proposals on behalf of JHU, negotiates and executes both funded and non-funded agreements, as well as subawards, provides coordinated advice and guidance regarding applicable rules and regulations, and assists faculty, staff, and students in proper stewardship of the University's sponsored projects.

## How is JHURA Organized?



The **Office of Research Information Systems (ORIS)** provides leadership and strategic direction in the design, creation, and deployment of electronic research administration solutions to address cross-functional business issues for the Johns Hopkins Enterprise.

### *Major Functions:*

- Implements and manages COEUS, the University's system of record for proposals;
- Assists in management of other electronic systems; and
- Manages institutional data and reports to senior administration.

**JHU Research Administration (JHURA)** identifies opportunities and partnerships, and provides coordinated advice and guidance regarding applicable rules and regulations. JHURA assists faculty, staff, and students in proper stewardship of the University's sponsored projects.

### *Major Functions:*

- Facilitates the submission of sponsored project proposals on behalf of JHU; and
- Negotiates and executes agreements.

The **Office of Research Engagement** serves as the central office of JHURA from which to implement communication initiatives, including the publicizing and dissemination of JHURA and University programs, events, policies, and guidelines through various means and platforms. The team further assists faculty with limited submission applications, initiates communication with funding agencies and University leadership, as well as collaborates with both internal and external personnel to drive excellence in outreach.

## II. ROLES AND RESPONSIBILITIES OF JHU'S ADMINISTRATIVE OFFICES

JHU Research Administration works closely with many administrative offices within Johns Hopkins University and its various schools. Offices including Financial Operations, Institutional Review Board, Johns Hopkins Technology Ventures (JHTV), and General Counsel are particularly vital to JHURA's everyday workings and success. In this section, we discuss the functions of each office to better describe how it affects our overall process. If you have questions, please feel free to contact us at (443) 997-1922, or find your Contracts/Grants Associate's contact information on our [website](#).

The **Office of Financial Operations/Divisional Business Office** provides accurate and timely accounting and financial services to students, faculty, and staff, and serves as an interface to the University's central administration and external agencies for fiscal matters related to the school.

### *Major Functions:*

- Provides the highest quality of services and support for faculty effectively and efficiently;
- Manages and oversees the University's financial resources in support of its mission;
- Provides information that leadership needs to make strategic financial decisions;
- Reports accurately and transparently the financial condition of the School;
- Leads efforts to promote institutional effectiveness and productivity;
- Promotes responsible conduct of research and other activities to comply with legal and other mandates ;
- Contributes to managing enterprise risks; and
- Supports recruiting, retaining, developing, and rewarding teams of highly qualified financial professionals and staff centrally and throughout the University.

The **Institutional Review Board Office** ensures the protection of the rights, privacy, and welfare of all human participants in research studies conducted by JHU and its associated faculty, staff, and students.

### *Major Functions:*

- Identifies, discusses, and resolves ethical issues that relate to safeguarding the rights and welfare of human subjects;
- Reviews all research and all related activities carried on by faculty, students, and employees that involve human subjects;

- Develops policies and procedures to carry out responsibility to human subjects safety and well-being; and
- Informs faculty, students, and staff of policies and procedures.

The **Office of Communication and Public Affairs** provides strategic planning and integrated marketing services for specific communications initiatives by JHU.

*Major Functions:*

- Provides editorial, photographic, and graphic design services for both Web and print projects for the University, including the Office of the Dean, External Affairs, Student Affairs, departments, centers and institutes, and other divisions; and
- Approves all use of JHU name requests from third parties.

The **Office of Graduate Education and Research** provides services and resources to the faculty, postdoctoral fellows, students, and staff of JHU to foster and maintain excellence in education and research.

*Major Functions:*

- Facilitates adherence to JHU’s policies and procedures for satisfactory degree completion;
- Funds education and research training, and course evaluations; and
- Provides tools and guidance for conducting honest, accurate, and objective research in a manner that is not only ethical, but also compliant with the current guidelines, policies, and regulations.

**Department Administration** provides the first line of assistance for faculty. Before sending proposals or agreements to JHURA, speak with your department administrator.

*Major Functions:*

- Facilitates communication between faculty and JHURA;
- Facilitates communication between JHURA and sponsors;
- Assists in the development of proposals, including budget creation and initial review; and
- Manages sponsored accounts and assists faculty in financial reconciliations.

**Johns Hopkins Technology Ventures (JHTV)** is the University’s intellectual property center, serving Johns Hopkins researchers and inventors as the licensing, patent, and technology commercialization office. JHTV also acts as an active liaison to parties interested in leveraging JHU research or materials for academic or corporate endeavors.

*Major Functions:*

- Encourages the disclosure of new ideas and discoveries;
- Protects and manages the University's intellectual and tangible property;
- Licenses the University's technologies;
- Facilitates collaborations among researchers, companies, and entrepreneurs interested in developing University innovations and returning appropriate revenue to University laboratories;
- Encourages product development; and
- Seeks and nurtures contacts with national and international companies and entrepreneurs that are capable of developing and commercializing University innovations for the public good.

The **Office of the Controller** produces the audited financial statements of the University, and serves as a principal liaison with external agencies on all financial matters. The Controller's Office ensures compliance with University, Trustee, State, and Federal requirements for funds received, spent, and reported. The Controller's Office is organized into the following categories: Accounts Payable, Accounts Receivable, Fixed Assets, HR/Payroll, Inter-Entity, Sponsored Projects, Supply Chain, and Travel.

*Major Functions:*

- Administers post-award sponsored research, including invoicing and submitting financial reports;
- Manages payroll and taxes; and
- Negotiates the University's indirect cost rate and fringe benefits.

The **Office of General Counsel** provides legal counsel and representation to The Johns Hopkins University and all of its schools, divisions, affiliates, and related entities on a broad range of legal matters affecting the University. The General Counsel's Office is also responsible for hiring and managing outside counsel to represent the University.

*Major Functions:*

- Provides the highest quality legal services in a responsible, helpful, and timely manner;
- Protects and promotes the mission and values of the University, including compliance with its obligations, and protection and promotion of its interests;
- Minimizes legal risks and costs; and
- Addresses and resolves legal disputes.

The **Office of Export Controls** develops, monitors, and documents a program that is focused upon preventing the transfer of certain restricted items and information to certain foreign countries or to their citizens.

*Major Functions:*

- Identifies activities throughout the Johns Hopkins Enterprise that are controlled by U.S. export control regulations;
- Communicates with Federal agencies or other regulatory bodies to ensure institutional compliance with export control regulations; and
- Counsels and trains JHU personnel to identify export control issues and to address the issues in cooperation with the ECO.

The **Office of Corporate and Foundation Relations** helps guide organizations in developing a relationship with Johns Hopkins that will meet their objectives, and supports the Johns Hopkins mission of teaching, research, and patient care.

*Major Functions:*

- Helps integrate corporate interests into areas that align with the research and academic objectives of Johns Hopkins; and
- Coordinates the effort to work with foundations from across JHU campuses to connect faculty and researchers to grant opportunities, and to match Johns Hopkins expertise to the philanthropic mission of each foundation.

### III. HOW CAN JHURA HELP YOU?

You should utilize your JHURA contacts as much as possible, and JHURA's [website](#) has reference information that will help you in preparing your proposal and managing your award. You can also sign up for the appropriate training sessions to help you prepare, submit, and manage your proposals successfully. Below are a handful of ways that JHURA can assist you in the management of your sponsored funding.

#### A. Proposal Review and Award Management

##### **Grants Associate (GA)/Contracts Associate (GA)**

Every department has a designated CA and GA within JHURA that works as part of a larger team.

**The Grants team** provides the final review and submission of all grant proposals from the schools and centers for which JHURA has responsibility. Each grants team member works closely with departmental administrators, staff, and faculty, providing guidance and advice to ensure compliance with University and sponsor guidelines, including federal and state regulations, during the proposal development and review period, to ensure a successful submission. The Grants team is also responsible for the review, negotiation, and execution of all grant awards, including, but not limited to, those received from foundations, private/profit companies, and State, Federal, and Foreign Governments.

**The Contracts team** aims to review all contract proposal submissions and negotiate agreement terms and conditions in a way that balances timeliness with the need to remain consistent with the policies and objectives of the University. Each Contracts Associate has a specific portfolio of schools, centers, and units, and negotiates a variety of agreements falling within their purview. Each Associate works closely with departmental administrators, staff, and faculty to ensure that the agreement complies with the intent of those doing the research or work, as well as University policies. Given the complexity, Associates often work closely with other University offices prior to finalizing the agreements. The Contracts Team also reviews and negotiates non-funded agreements, which include:

- Material Transfer Agreements
- Memoranda of Understanding
- Non-Disclosure Agreements
- Data Use Agreements
- Teaming and Pre-Teaming Agreements

#### B. Subcontracting

**The Subawards team** is responsible for drafting, negotiating, and managing outgoing Subagreements. The Subawards team works in conjunction with the department administrator,

the Office of Finance, and the Controller's Office to ensure that the proper agreement is executed with a subrecipient and helps to ensure risk mitigation and proper stewardship of research funds issued to collaborators.

### C. Resources

#### *JHURA Website*

To learn more about the JHURA and the services it provides for faculty, staff, and students, be sure to bookmark JHURA's website link at <https://jhura.jhu.edu>.

JHURA's website links to:

- Electronic Submission resources
- Policies
- Forms
- Connections to federal and private funding agencies
- Information about JHU policies and procedures

In addition, you can:

- Access Coeus and NIH Commons
- Link to agency-specific sites
- Access sample agency forms

#### *Social Media*

Keep up with the latest information from JHURA, sponsors, and the research community by checking out our blog, or subscribe to our Facebook or Twitter feed:

Blog: <http://www.bloggingora.com/>

Twitter: [@JHU\\_JHURA](https://twitter.com/JHU_JHURA)

Facebook: <https://www.facebook.com/JHURearchAdmin/>

## IV. FUNDING OPPORTUNITIES

There are several resources managed by the Vice Provost for Research (VPR) that research can utilize to learn of funding opportunities, which are offered by the U.S. federal government, foundations, non-profit institutions, corporations, and foreign governments. In identifying potential sponsors, faculty and staff are encouraged to network with other faculty at other institutions, industry representatives, and government agency personnel.

Searching and identifying funding announcements and opportunities can be challenging, but the following resources can serve as guide to help navigate the process for identifying opportunities.

### **Limited Submission Opportunities**

Limited Submissions are funding opportunities in which federal and private sponsors limit the number of proposals from an institution. An internal competition is held in order to select the most competitive proposal on behalf of the University. These opportunities are dispersed to the community in a weekly digest and accessible [online](#).

**If you have reason to believe a funding opportunity you are interested in is limited, and you do not see it on this list**, please contact the Vice Provost for Research Office at [resapp@jhu.edu](mailto:resapp@jhu.edu). This process is critical, as extra submissions can result in the rejection by the sponsor of *all* submissions from Johns Hopkins.

### **Early Career Opportunities**

These funding opportunities are continuously updated, and the VPR [website](#) contains a repository of 330+ federal and private funding opportunities that are intended for late postdoctoral investigators and early-career faculty, usually those at or below the rank of assistant professor. Some opportunities may also be open to mid-career faculty; this has been designated in the eligibility requirements. The opportunities are pre-sorted chronologically and alphabetically, and can be searched by funding amount and subject matter.

Although every effort has been made to ensure accuracy, please refer to the sponsor's funding announcement for complete details on each opportunity.

## **Internal Opportunities**

The VPR maintains a listing of internal funding opportunities that have been submitted from centers and institutes across the nine divisions of Johns Hopkins University. These opportunities are dispersed to the community in a monthly digest, and are further accessible [online](#).

## **Postdoctoral Opportunities**

The VPR hosts a continuously updated repository of 175+ federal and private funding opportunities that are intended for postdoctoral investigators. The opportunities are pre-sorted chronologically and alphabetically, and can be searched by funding amount and subject matter. Additional information on funding opportunities and contact information for adding an opportunity can be further explored on the VPR's [website](#).

In addition to federal funding resources such as Grants.gov and the National Science Foundation, Johns Hopkins employees, staff, and students have access to online databases of federal, foundation, and corporate funding opportunities. Additional funding resources are listed below:

### **Grants.gov**

Grants.gov is a central hub for grant programs that offers billions of dollars in annual awards. To navigate the list of federal grant programs, available funding can be found at [Search Grants](#) within Grants.gov. Faculty and staff can search grants.gov for funding opportunities, as well as [sign up](#) for funding alerts.

The following are links to websites for major federal sponsors:

- [Department of Health and Human Services](#)
- [National Institutes of Health](#)
- [National Science Foundation](#)
- [Department of Commerce](#)
- [Department of Defense](#)
- [Department of Education](#)
- [Department of Energy](#)
- [Environmental Protection Agency](#)
- [National Aeronautics and Space Administration](#)
- [National Endowment for the Humanities](#)
- [Office of Naval Research](#)

## **Community of Science**

Enrolling in Community of Science (COS) allows you to receive automatic funding alerts and network with other scholars. Community of Science has more than 25,000 records representing over \$33 billion in funding. Subscribers can enroll for COS funding alerts [here](#).

## **FedBiz Opps**

All federal government procurement opportunities can be found via FedBizOpps, where you can [search](#) by agency, subject matter, or solicitation number.

## **Collexis**

Collexis facilitates faculty research and project collaboration. Collexis is a subscription tool for internal and public users to use to identify JHMI faculty biomedical experts and their publications by area of expertise, based on published output indexed in the PubMed biomedical literature citation database. Homewood Campus and Applied Physics Laboratory (APL) biomedical faculty may be added to the JHU Collexis account in the near future.

Although every effort has been made to ensure accuracy, please refer to the sponsor's funding announcement for complete details on each opportunity.

## V. Proposal Development

In this section, you will find information and resources that can help guide you in the development of a proposal, including JHU policies, checklists, school specific forms, institutional data, and sponsor information. **All proposals must be received by JHURA within three days of the sponsor deadline**, and are reviewed, approved, and submitted by JHURA on behalf of Johns Hopkins University. JHURA closely interacts with both faculty and department administration to assure smooth and timely processing of proposals.

*Faculty must submit all proposals and awards through JHURA, and proposals must be routed and submitted to JHURA through Coeus. Approval of the proposal is demonstrated by JHURA's approval of the electronic application, and submission to Grants.gov if applicable.*

### A. General Principles

JHURA reviews each proposal in light of the related funding opportunity notice for accuracy, completeness, and compliance with University and sponsor policies and procedures. Complex proposals, such as those that involve the use of human subjects, animals, subrecipients, or pose a possible conflict of interest, should be started well in advance of the agency deadline. Departments should forward the program announcement, Request for Proposal (RFP), Broad Agency Announcement (BAA), or other guidelines to JHURA as soon as they are available to expedite review.

### B. Principal Investigator Roles & Responsibilities

#### *Proposal Development Duties*

1. Identify funding opportunities. Be sure you are applying to funding opportunities that are current and have not expired and are most appropriate for the type of research you are conducting. You should always feel free to reach out to your Departmental Chair, Administrator, or other deans and faculty for advice and direction when thinking of applying to a sponsor.
2. After you have identified the appropriate agency or sponsor, it is sometimes acceptable to speak with the assigned Program Officer at the agency about the appropriateness of your proposal, the availability and likelihood of funding, and any other program specific questions you might have before submitting your proposal.
3. Read the program announcement and any subsequent notices, revisions, or updates.

Please pay attention to:

- Due Date;
- Budget limitations/Requirements (reduced F&A rate, cost sharing, Limits or Caps on direct & indirect cost amounts);
- Formatting and Text requirements, including page limitations;
- Allowable costs;
- Method of Submission;
- Human subjects/Animal requirements;
- Specific access to agency/sponsor websites;
- Information provided by collaborators; and
- Other representations & certifications, and documents requiring institutional review and signature.

4. Inform your Department Administrator and/or Research Service Analyst responsible for your proposal with your intention to submit. Please be aware of your department's internal deadline for proposal submission, and remember that JHURA requires that a FULL proposal arrive to our office no later than **three (3) business days** before the agency/sponsor deadline.

5. As Principal Investigator you are responsible for meeting with your Departmental Administrator/RSA to discuss your proposal, including budgetary information, obtaining any departmental/school approvals, and to help clarify any questions specific to the program announcement.

6. If you have Subawards on your proposal, you are responsible for obtaining all of the required documentation for submission to your Departmental Admin/RSA for review.

7. You must complete ALL required JHU training (see Section VIII, Compliance), and complete and certify the COEUS Research Compliance Questions, Yes/No questions, Subaward determination form (if applicable), and all other certifications required of the submission.

8. Provide the full proposal to your Department Admin/RSA for submission to JHURA. Remember, you are ultimately responsible for meeting your departmental, JHURA, and sponsor deadline, as well as adhering to University and sponsor specific requirements.

9. After JHURA's submission to the Agency/Sponsor, you are responsible for going into the sponsor specific system (e.g. NIH Commons, NSF Fastlane) and viewing your proposal to ensure that the application was received correctly.

10. If you have been notified that your proposal will not be funded, please inform your Department Admin/RSA so that the status can be updated in the COEUS record.

## C. Research Service Analyst Roles & Responsibilities

### *Proposal Development Duties*

1. Reading and interpreting the program announcement and answering any questions the Principal Investigator might have. If clarification is needed, search for any updates, FAQs, and/or notices associated with the announcement. Feel free to contact JHURA if you are unable to find your answer, and we will do our best to assist you.
2. Meeting with the PI to discuss the proposal, including, but not limited to, budgetary information, responsibility for document collection, and timelines for submission of final proposal documents to the department.
3. As documents are being received by the PI, you are responsible for reviewing the contents of the document for adherence to agency/sponsor guidelines, department and University policies, and all other required criteria. Ultimately the PI, RSA, and Department are responsible for the contents of the application.
4. Gathering all the appropriate documents in order to create and upload to the COEUS record, including ensuring the Principal Investigator has reviewed, completed, and certified COEUS Research Compliance Questions, Yes/No questions, Subaward determination form (if applicable), and all other certifications required of the submission.
5. Providing the PI a final review of the proposal before routing to JHURA for review

### *Proposal Submission Duties*

1. Submitting the FINAL version of the proposal, including a completed COEUS record, at least three (3) business days before the submission due date.
2. Informs JHURA that the completed proposal is ready for final review. **Please remember that JHURA will not submit your proposal until a completed COEUS record is done.**
3. Works with JHURA to make any changes or updates that are needed to bring the proposal into compliance before submission to the sponsor.
4. JHURA will inform you when the proposal has been submitted to the sponsor, and if any corrections or errors need to be addressed. JHURA will provide you with all communication that is provided by sponsor during the transmission of your proposal.
5. You are expected to be readily available or provide an additional contact during the time of your proposal submission in case JHURA needs additional information. If you are not readily available to answer questions or provide additional information, JHURA will use its best

judgement in order to proceed with the submission. Regardless of the outcome, you, the Department Admin, and PI are responsible for a successful submission to the sponsor.

6. After JHURAs submission to the Agency/Sponsor, you are responsible for going into the sponsor specific system (e.g. NIH Commons, NSF Fastlane) with your PI and viewing the proposal to ensure that the application was received correctly.

7. If you have been notified that your proposal will not be funded, please inform your JHURA contact so the status can be updated in the COEUS record

#### **D. JHURA Roles & Responsibilities**

##### *Proposal Development Duties*

1. JHURA reviews each proposal in light of the related funding opportunity for accuracy, completeness, and compliance with University and sponsor policies and procedures, as well as to provide any guidance to department and faculty inquires.

2. JHURA should acknowledge receipt of email from the Department Administrator and/or Research Service Analyst regarding new proposals or other proposal communication.

3. During the review process, JHURA should notify the Admin/RSA when required items are missing, if there is non-compliance with sponsor and/or University policy, and other potential problems that could prevent a successful submission. JHURA should follow up accordingly with the Admin/RSA in order to meet the sponsor deadline.

##### *Proposal Submission Duties*

1. JHURA should submit the proposal to the sponsor/agency if applicable (i.e. system-to-system). If the PI is capable of submitting to the sponsor directly, communicate to the Admin/RSA that the proposal must be first reviewed then approved in COEUS *before* the PI can submit on their own.

2. JHURA should notify Admin/RSA of submission, and forward any confirmation emails from the sponsor during the submission process. Let them know if the agency has identified any errors (if applicable, system-to-system). Work with the Admin/RSA to correct any errors or omissions and resubmit the proposal.

3. JHURA reiterates to the Admin/RSA and/or PI that they are expected to check the application if it was submitted through a system to ensure it is correct. For example, in eRA Commons, the PI can see the entire transmitted application and review for completeness.

4. JHURA should send any additional information about the proposal submission to the

Admin/RSA and/or PI in a timely manner.

#### **E. Minimum Requirements for a Proposal**

JHURA reads the funding opportunity to determine all required components of a proposal. Where there are no sponsor guidelines, JHURA requires all of the following:

1. Budget – Minimum of direct and indirect amount fields completed. A Coeus Budget is not required unless it is a system-to-system submission. An uploaded Excel spreadsheet is required when budget was not entered directly in Coeus;
2. Budget Justification – Include documentation of sponsor F&A rate if other than our NICRA rate (published sponsor policy or email from a Grants Officer). Cost share documentation is required, if applicable;
3. Scope of Work/Narrative/Project Summary;
4. Coeus Compliance Questionnaire signed by PI, either electronically or on paper and uploaded (one per record);
5. Certification questions must be completed by everyone listed on investigator tab and key personnel tab. It is highly recommend that investigators complete electronically. Otherwise, each investigator must answer the 5 certification questions and sign, and each form uploaded;
6. Subaward information (Subrecipient Determination Form, budget, budget justification and statement of work) if subrecipient(s) are listed on the budget; and
7. Any forms requiring signatures. If there are contract terms included, JHURA will review all of the terms, and may need to include an exception letter with the proposal.

#### **F. Electronic Submissions**

***JHURA must review all proposals prior to any submission through an electronic system.*** Most agencies are accepting proposal submissions electronically, and many require it. Read your agency guidelines carefully and, if you have to submit your proposal electronically, contact your department administrator as soon as possible. Some electronic submission systems continually evolve. Staying in close contact with JHURA helps us to make sure your proposal is submitted correctly and on time.

The Office of Research Information Systems (ORIS) provides training for Coeus, and JHURA is here to support your department in ensuring a successful submission. Most electronic systems, such as eRA commons and Fastlane, require the PI to create accounts to use the system. You can request an account for these systems by contacting the JHURA Grants Team. Refresher sessions for the Coeus system are offered by JHURA by request. Questions about using electronic systems can be directed to your GA. Information about electronic submission systems can be found on JHURA's [website](#).

#### **G. Agency Guidelines/Forms**

In a Request for Quote (RFQ), Request for Proposal (RFP), Broad Agency Announcement (BAA), or Funding Opportunity Announcement, guidelines can be very detailed with specific forms to accompany proposal text. Often, there are limitations for page length, type size, title length, and supporting documents. Where there are no sponsor guidelines, JHURA has minimum requirements for ALL proposals. For a full list of the requirements, please see [Minimum Requirements for a Proposal Development Record in COEUS](#). If a proposal requires system to system submission, JHURA submits electronically directly to the sponsor through Coeus. All paper submissions are approved by JHURA and mailed by the department.

#### **H. General Rules of Thumb When No Guidelines or Forms are Provided**

A *COVER PAGE* should always accompany your proposal. It should include the PI and JHU Authorized Official signatures, and contain items such as proposal title, PI name, submitting department(s) or center, total funds requested, and a period of performance.

*PAGE NUMBERS* are essential, and a *TABLE OF CONTENTS* helps the reviewers.

An *ABSTRACT* accompanying the proposal should be both concise and complete. Agencies often use abstracts in their annual reports.

The *PROPOSAL CONTENTS* should include:

- Summary Page (statement of the project goals & objectives);
- Project Description with defined deliverables, if applicable;
- References;
- Biographical Sketch;
- Budget;
- Budget Justification; and
- Current & Pending Support.

The Budget Justification should include all supporting information for all budget categories, including an explanation of the need for unusual or large expenses such as equipment, travel, use of facilities, or subcontractors.

Each department has policies on proposal approvals before arriving at JHURA. Check with your department administrator for more information. For additional information on the proposal review and submission policy, please view the most recent version on our [website](#).

*NOTE: Award review or contract negotiations will not commence until a Coeus proposal has been reviewed and accepted by JHURA.*

## VI. BUDGET REVIEW

Every proposal to a sponsor should include a type of budget outlining the intended use of the funds. The total cost of the project should be made up of direct and indirect cost. Direct costs are those costs directly associated with, and essential to the completion of, the project. Indirect costs are not necessarily directly attributable to a specific project, but rather are included to address general administrative, personnel, and facilities-related expenditures related to the project. For budgets submitted to Federal sponsors, Uniform Guidance (UG) establishes principals for determining costs applicable to grants, contracts, and other agreements with intuitions of higher education. The link for a Uniform Guidance quick guide is available on our [website](#).

**JHURA supports the review of the department budgets at the proposal stage to ensure compliance with sponsor and University requirements.**

### **Budget Considerations**

Things to consider when developing your budget:

*SALARIES* are established by the University. Multiple year budgets should include estimated salary increases. A 1.5-3% increase may be projected unless the sponsor specifies salary inflation rates. PIs are required to include at least 1% effort on every proposal. All effort expended by a PI and not covered by the sponsor will be charged to a discretionary account as cost sharing. For more information, see the University's [policy](#).

*GRADUATE ASSISTANT STIPENDS* are set by the departments.

*FRINGE BENEFITS* are applicable to all University salaries and wages. The University has negotiated a fringe benefit rate with the Department of Health and Human Services (DHHS). When preparing a sponsored project proposal budget in Coeus, calculations for the sponsor's contribution to employee fringe benefits should be computed using the fringe benefit rate found on the general budget form.

*FACILITIES AND ADMINISTRATIVE COSTS (F&A)*, also known as Indirect Costs, are the expenses incurred for general University operations while conducting a sponsored project. F&A rates are expressed as a percentage of direct costs. The University negotiates the rates approved for use with Federal grants, contracts, and other agreements with the DHHS acting on behalf of all federal agencies. The applicable rate to use on a sponsored project is determined by several factors, including activity type, on/off campus location, and sponsor requirements. Federal F&A costs are calculated based on the project's Modified Total Direct Costs (MTDC).

## Calculating Modified Total Direct Costs

MTDC = Total Direct Costs minus the following:

- Equipment;
- Capital expenditures (includes alterations and renovations);
- Patient Care;
- Student Tuition remission;
- Rental costs of off-site facilities;
- The portion of individual subawards over \$25,000; and
- Scholarships and Fellowships.

F&A rates for non-federal sponsors vary widely. **F&A costs for private awards should be calculated on Total Direct Costs (TDC)** unless the sponsor has written policies exempting certain line items from F&A. See Section XVII, Application of F&A Rates to Sponsored Projects, for more information.

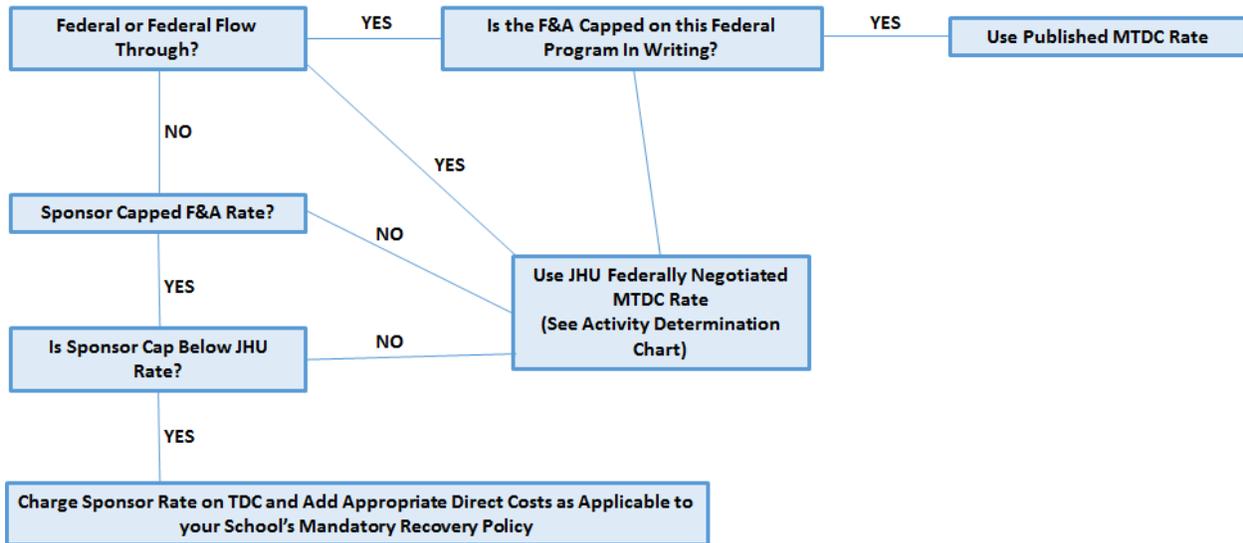
**University F&A Rates for FY2015 – FY2019 are available [here](#).**

*FOR NIH MODULAR APPLICATIONS*, the applicant is not required to submit detailed budget information in the application. In lieu of the standard budget forms, the applicant requests total direct costs for each year of support requested. The request must be accompanied by a budget narrative for all personnel (by position, title, and level of effort), including consultants and “to be appointed” positions, and, when applicable, for consortium/contractual costs. NIH will request additional budget information in exceptional circumstances only. Other support information will be requested only for modular applications likely to result in an award. An internal, line-item budget must be uploaded into Coeus.

### Just-in-Time Procedures

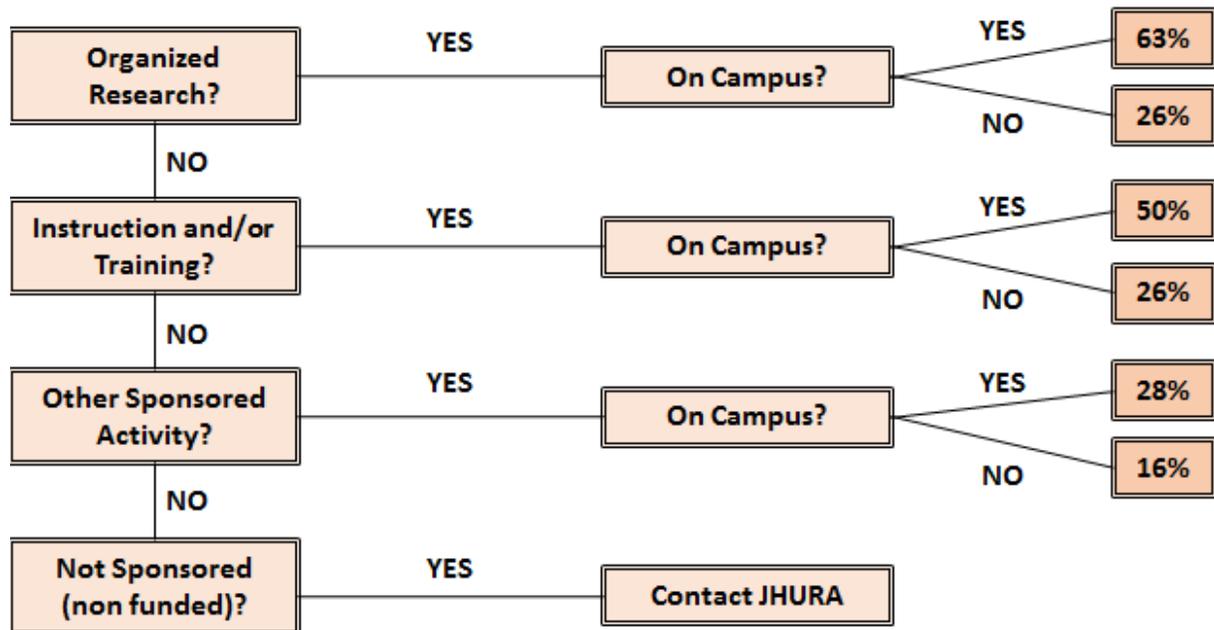
NIH uses Just-In-Time procedures for certain programs and award mechanisms. These procedures call for limited information (e.g. a budget justification and a biographical sketch) to be submitted with investigator-initiated applications, and allow for a possible NIH request for additional information, including information concerning other support, when the application is under consideration for funding. Just-in-Time procedures also allow an applicant to defer certification of IRB approval of the project’s proposed use of human subjects, verification of IACUC approval of the project’s proposed use of human subjects, and evidence of compliance with the education in the protection of human research participants requirement until after completion of the peer review and just prior to funding. (Applications in response to RFAs also may be subject to these procedures. The RFA will specify the timing and nature of required submissions.)

## F&A Rate Decision Tree



Uniform Guidance describes the three different types of activities that may take place on a sponsored award: Organized Research, Instruction & Training, or Other Sponsored Activities. Each activity type has its own associated F&A rate. Rates change frequently, so check the most recent [Negotiated Indirect Cost Rate Agreement](#) (NICRA) for the most recent rate.

## IDC Rate Determination Decision Tree (FY17 Rates)



## Organized Research

Organized Research is described as all research and development activities that are sponsored by Federal and non-Federal agencies and organizations, and that are separately budgeted and accounted for. This generally means that there is a scope of work, a specific time frame, and deliverables (whether technical or financial) that the University is obligated to deliver, a specific budget, and indirect cost recoveries. This term also includes activities involving the training of individuals in research techniques (commonly called research training) where such activities utilize the same facilities as other research and development activities, and where such activities are not included in the Instruction function. Research activities include the rigorous inquiry, experiment, or investigation to increase the scholarly understanding of the involved discipline.

Examples of Organized Research include:

- Awards to JHU faculty to support research activities, such as literature surveys, investigations on efficacy of new vaccines, and disease prevention or therapeutics;
- External funding to maintain facilities or equipment and/or operation of a center facility that will be used for research;
- External support for the writing of books, when the purpose of the writing is to publish research results;
- Research data collection and evaluation, and/or analysis; and
- Corporate drug development/clinical trials.

## Instruction and Training

Sponsored Instruction is defined as teaching and training activities at JHU funded by grants and contracts from Federal or non-Federal sponsors. Sponsored Instruction includes agreements that support curriculum development, as well as all types of teaching/training activities, whether offered for credit toward a degree or certificate, on a non-credit basis, or through regular academic departments or by separate divisions, summer school, or external division.

Examples of Instruction and Training include:

- Any project for which the purpose is to instruct any student at any location; recipients of his/her instruction may be JHU students or staff;
- Curriculum development projects at any level, including projects that involve evaluation of curriculum or teaching methods. Note that such evaluation may be considered “research” when the preponderance of activity is data collection, evaluation and reporting;
- Projects that involve JHU students in community service activities for which they are receiving academic credit;
- Activities funded by awards to departments or schools for the support of students;

- Fellowship support for pre-doctoral and post-doctoral training activities, which may include grants to fund dissertation work and travel in relation to a dissertation; and
- General support for the writing of textbooks or reference books, video or software to be used as instructional materials.

### Other Sponsored Activities

Other Sponsored Activities means programs and projects financed by Federal and non-Federal agencies and organizations that involve the performance of work other than Instruction and Organized Research. Since most projects in this category do not directly involve students and gain little, if any, benefit from libraries, the F&A rate applicable to Other Sponsored Activities is less than the rate for Organized Research or Sponsored Instruction.

Examples of Other Sponsored Activities include:

- Consultancy projects;
- Social and/or community service, or health services projects;
- Travel grants;
- Support for conferences, seminars or workshops;
- Support for student participation in community service projects that do not result in academic credit ;
- Support for projects pertaining to library collections, acquisitions, bibliographies or cataloging; and
- Programs to enhance institutional resources, including computer enhancements

### Determining On v. Off Campus

In order for a project to be considered off campus, all three of the following qualifications must be met:

1. The PI will be away from his or her campus facilities (i.e. office and laboratory) for a minimum of three consecutive months;
2. The on-campus facilities will be made available for use by other faculty and/or students during the PI's absence; and
3. The PI will be performing work in accordance with the statement of work of the proposed and funded project while at the off-campus location.

These qualifications are a fiscal determination based upon space utilization, and it is not simply dependent on where some of the project work is being performed. If one University employee meets the above standards but the entire project does not, it may be acceptable to split the budget into on and off campus accounts. Contact JHURA for a determination.

Off campus rates can only be used relative to the University's effort expended on a project. Performance of work on a project by non-University personnel are handled via a subcontract to another institution, which takes on-campus F&A for the first \$25,000, or a consulting agreement, which takes full F&A for the entire amount.

## VII. MANAGING YOUR SPONSORED RESEARCH

### A. Award Negotiation & Acceptance

Awards are accepted by JHU on behalf of the Principal Investigator (PI). While the PI assumes the responsibility for financial oversight and completion of the work, the University remains legally responsible for the award. Therefore, all awards must conform to Department and University policies and procedures.

JHURA reviews all awards and agreements. In any agreement or award, the following elements are considered essential:

- The award is to the correct corporate entity, namely, “The Johns Hopkins University on behalf of its (insert name of Center, Department, Division)”;
- Clear definitions of work scope, award period, and responsibilities are provided in the agreement itself or by reference to the proposal or protocol;
- Total costs or fees and budgets are correct, and rebudgeting restrictions are not excessive ;
- Payment terms are fair to the cash flow of the University;
- Progress and financial reporting requirements are reasonable;
- Confidentiality and publication requirements do not violate School or University policy, and patent, licensing, and copyright provisions comply with The Johns Hopkins University [Intellectual Property Guidelines](#);
- General provisions refer to and comply with University policy, as well as with current laws and regulations; and
- University approval is required prior to the use of its name, or any abbreviation thereof, or the name of the Principal Investigator(s), expressly or by implication, in any news, publicity release, advertisement, or other public disclosure by the sponsor.

You can help by offering a potential sponsor JHU agreement templates when initially discussing opportunities. Templates for a variety of situations are available [here](#).

Agreements that require written acceptance may be signed only by the appropriate authorized University official, not by the PI nor other Departmental representative. However, PIs may sign as a secondary signatory in acknowledgement of the terms of an agreement in addition to the authorized University signatory.

Acceptance and set-up of an award requires a number of steps:

1. Coeus proposal development record (PD) is entered and approved, creating an institution proposal (IP) record and initiating award review process.

2. JHURA receives award notification or draft agreement via [JHURA\\_JAWS@jhu.edu](mailto:JHURA_JAWS@jhu.edu) with completed intake sheet.
3. JHURA reviews the terms and conditions; for some Request for Proposals (RFPs), the process may begin during the proposal stage.
4. Sponsor-initiated pre-award negotiations require JHURA to verify budget details and confirm all rates quoted in the proposal.
5. JHURA enters into formal negotiations with the sponsor, including reviewing and negotiating terms such as copyrights, patents, indemnification, default and termination clauses, deliverable schedule, invoicing, and data rights.
6. After all parties agree on the terms of the contract, JHURA accepts the award.
7. Once all terms are negotiated and mutually acceptable, signatures are obtained from the sponsor and JHURA, and only then is the account setup process initiated.
8. The award must be processed through the appropriate DBO if applicable, and workflowed to SPSS via Oculus for account set up.

#### **B. External Consulting**

If a faculty member is being paid by an external sponsor for consulting and would like that funding to come through JHU, it must be set up as a sponsored account.

Funding for consulting can only be deposited in a discretionary account if all of the following are true:

1. It is for advisory board participation providing advice only;
2. There are no required deliverables; and
3. It requires less than 1% PI effort.

#### **C. Start Date**

You are not authorized to spend funds prior to the official start date listed in the agreement, unless pre-award spending is allowed. This start date is predicated upon acceptance of all terms of the award by both parties. Effective dates for grants are usually set by the sponsor in the award. Contracts are not as predictable, as, in some cases, the start date is specific, and, in others, it is determined by the final signature date. The final signatory may be the University or the sponsor, depending on the contract. Faculty members have access to the funds as soon as the account number is issued by SPSS in the Controller's Office.

#### **D. Expenditures**

SPSS prepares and submits standard financial reports or invoices to the sponsor as required. The Billings Unit of the Office of Accounts Receivable Shared Services in the Controller's Office (AR) prepares all sponsored invoicing unless an award is designated as department billing. SPSS

is also responsible for sponsored invoicing for cost-reimbursable billings, as well as the monthly, quarterly, and semi-annual manual billings. Some sponsors have granted universities expanded authorities (e.g. DOE, EPA, NIH, NASA, NSF, USDA). In these cases, the PI can request pre-award costs, travel costs, and no-cost extensions, and JHURA can approve these requests.

***Pre-award accounts*** may be granted prior to an award's acceptance when there is a solid commitment from the sponsor. The PI's department assumes all risk in covering expenditures in advance of official sponsor unilateral notification of receipt of the award, or in advance of a fully executed agreement between the sponsor and JHU. If you would like a pre-award account, work with your department administrator to submit the request to JHURA.

#### **E. General Post-Award Responsibilities**

Department administration works with the PI to manage award funds, and initiate and monitor all expenditures. The University assumes legal responsibility for funded projects that are properly reviewed and executed in accordance with University policies.

Faculty Responsibilities:

- Management and conduct of research activities, including technical reporting activities;
- All technical reports and project deliverables; and
- Review of subrecipient invoices and preparation for Department Administrative approval.

Department Administrator Responsibilities:

- Initiate budgetary charges;
- Request, through JHURA, administrative changes to awards; and
- Review and approve subrecipient invoices.

The PI, in conjunction with his/her departmental administration, is responsible for the financial and administrative activity under each sponsored project. Therefore, it is extremely important that each investigator work closely with his/her departmental administration to ensure accuracy and compliance in these areas. Questions about policies and procedures within your academic department should be directed to your administrator and/or Chair.

The PI is also responsible for managing program staff and supervising students. HR's Supervisory Training Program may be useful to that end, including classes such as Basic Supervision, Essentials of Communicating with Tact and Finesse, or Success for Supervisors.

## F. Freedom of Information Act (FOIA) Request

You may get a letter from a sponsor indicating that an individual or group is seeking access to one of our contracts or agreements under the Freedom of Information Act (FOIA). By law, FOIA requests must be honored. If the document contains some confidential information that qualifies as exempt from disclosure, the entire document is not exempt. The FOIA requires release of segregable portions of the document after *authorized* deletions are made.

### Procedure

- If you receive a FOIA request, please send it over to JHURA as soon as possible as there is a deadline for responding.
- JHURA will review the document with the Team Leader/Project Director to determine what, if anything, we can request be redacted. (NOTE: The final determination is made by the agency/sponsor.) Typically, JHURA will request an extension to the initial response deadline.
- JHURA will prepare the response letter, to be signed by JHURA, attaching our proposed redactions and setting forth our rationale for doing so, which must be specific. We may seek concurrence from the General Counsel's Office prior to sending. If we request items be withheld/redacted, we must certify in our letter that, to the best of our knowledge, information, and belief, the information is, in fact, confidential information that has not been disclosed to the public.
- PIs and departments are not permitted to directly contact the sponsor or agency that made the FOIA request. **All communications must go through JHURA.**

## VIII. COMPLIANCE

JHURA works closely with other departments within the Division of Research and the Office of the Controller. Each has a specific role to play in sponsored research administration. Familiarize yourself with their functions and policies. Faculty should be familiar with the following key University research policies.

### **Effort Reporting Training**

Training must be completed prior to Principal Investigators submitting sponsored projects proposals and/or certifying effort. The Effort Reporting System is the web-based interface that JHU uses to certify effort. All personnel who are required to certify their effort must use this system in order to do so, and training can be done through [myLearning](#).

### **Animal Care and Use**

The JHU program is designed to assure that it is in compliance with the Animal Welfare Act regulations and Public Health Service (PHS) Policy. JHU has an approved PHS Assurance that describes the conduct of our animal care and use program. JHU also maintains accreditation of our program by the private Association for the Assessment and Accreditation of Laboratory Animal Care (AAALAC) International. Our overarching goals are to ensure that laboratory animals at JHU receive the highest quality care, and to protect the health of people who work with and around animals at JHU. We believe that excellence in research and teaching requires excellence in our animal care and use program.

For all Animal Policies and frequently asked questions, please visit the Animal Use and Care Committee [website](#).

### **Biosafety Compliance**

If your research involves the use of any of the materials listed on the Biosafety Compliance [website](#), you will need to register these items with the Biosafety Office. Please note that Institutional Biosafety Committee (IBC) approval may also be required. Simple possession of materials qualifies, even if the materials are not in active use. Consequently, if you have items from a previous lab experience or research project that are sitting in a refrigerator or freezer pending a potential future use or disposal, these materials need to be registered.

### **Classified Research**

JHU endorses faculty participation in research in the national interest. At the same time, however, the University's commitment to openness in documentation and dissemination of research results prohibits conducting classified research activities, or using classified

information on its academic campuses. Consequently, the Applied Physics Laboratory, which is not an academic division, is a suitable location for conducting classified research projects.

For more information, please view the Classified Research [Policy](#).

### **Conflict of Interest**

JHU maintains maximum principles of integrity in research and the well-being of patients. There are various probable hazards to research integrity, as well as authentic and apparent financial conflicts of interest and/or commitments, which require specific awareness by every member in the research community at JHU.

A list of initiatives as well as access to policies and training is available at the Compliance [website](#).

### **Export Control**

In coordination with JHURA, the Export Compliance Officer and the PI should conduct a thorough review of the research project and contract provisions to determine whether and, if so how, a particular research project is impacted by the regulations. The University will assist PIs in assessing the application of such regulations, but primary compliance responsibility rests with the PI of the research. Principal Investigators have the following responsibilities:

- Prior to commencing any research, to review and cooperate with JHURA and the Export Compliance Officer to determine whether your research is impacted by the controls or requirements contained within export regulations;
- To re-evaluate that determination before changing the scope, or adding new staff to the project to determine if such changes alter the initial determination;
- To make export determinations far enough in advance to obtain a license, should one be required; and
- To understand the severe consequences of non-compliance with export control laws (fine and/or jail).

Please see the Export Control [Website](#) for more information.

### **Human Subjects (IRB)**

A “human subject” means a living individual about whom an investigator (whether professional or student) conducting research obtains (1) data through intervention or interaction with the individual, or (2) identifiable private information. Note: This can include secondary data analysis, as well as research involving direct contact with human participants.

If your research potentially includes the involvement of human subjects, it is important for your activities to be reviewed by your division's Institutional Review Board (IRB). The term "human subjects research" is broadly defined to include any activity about or involving living humans that seeks to test a hypothesis, answer a scientific question, or otherwise contribute to generalizable knowledge.

IRB approval is required if the data collected or the data analysis will be shared publicly, for example, through a journal publication or conference presentation. An IRB determination is needed even if the analysis will contain no identifiable information about participants in the study.

An IRB application must be submitted and approved before the research activity begins. Each division's IRB policies can be viewed on our [website](#).

### **Responsible Conduct of Research (RCR) Education**

A number of avenues exist at JHU for formal learning about ethical conduct of research and the standards within this research community. Education has long been required for individuals participating in human subject research and animal research at JHU. Research ethics is addressed through a course on Research Ethics that expands on the responsibility of research and rights of human subjects.

Typically, RCR education addresses the following topics:

- Data Acquisition and Management - collection, accuracy, security, access;
- Authorship and Publication;
- Peer Review;
- Mentor / Trainee Responsibilities;
- Collaboration;
- Conflict of Interest;
- Research Misconduct;
- Human Subject Research; and
- Use of Animals in Research.

Both NIH and NSF have specific time regulations for faculty and student training. On August 20, 2009, the **National Science Foundation (NSF)** published a new [requirement](#) for RCR education. For proposals submitted on or after January 4, 2010, and subsequently awarded, institutions are responsible for verifying for undergraduate students, graduate students, and postdoctoral researchers supported by NSF to conduct research have received RCR training.

The **National Institutes of Health (NIH)** also requires RCR education for certain types of awards, including Institutional Research Training Grants, Individual Fellowship Awards, Career Development Awards (Institutional and Individual), Research Education Grants, Dissertation

Research Grants, and other grant programs with a training component that require instruction in responsible conduct of research. The recently updated NIH [Policy](#) on Responsible Conduct of Research Education took effect with all new and renewal applications submitted on or after January 25, 2010, and for all continuation (Type 5) applications with deadlines on or after January 1, 2011.

### **Good Clinical Practice Training**

The NIH has issued a policy requiring all NIH-funded investigators and their research staff who are involved in the conduct of clinical trials, as defined by the NIH, to complete Good Clinical Practice (“GCP”) training. Effective January 1, 2017, it applies to both new applications, and on-going programs. The NIH definition of a clinical trial is “A research study in which one or more human subjects are prospectively assigned to one or more interventions (which may include placebo or other control) to evaluate the effects of those interventions on health-related biomedical or behavioral outcomes.” This definition also encompasses trials that do not involve drugs or devices, and investigators should review the NIH [definition](#) for more detail.

Although GCP training is typically associated with FDA regulated drug or device studies, the training requirement also applies to ***NIH funded studies that are only studying behavioral interventions***. In addition, ***all members of the research team*** who may be engaged in the research must complete the training.

In order to comply with the NIH GCP training requirement, JHU investigators and their research staff who may be subject to this NIH requirement should complete the CITI GCP training module, which is available through [myLearning](#), or may demonstrate compliance through providing a certificate of other acceptable GCP training to ORA and/or the JHM IRB.

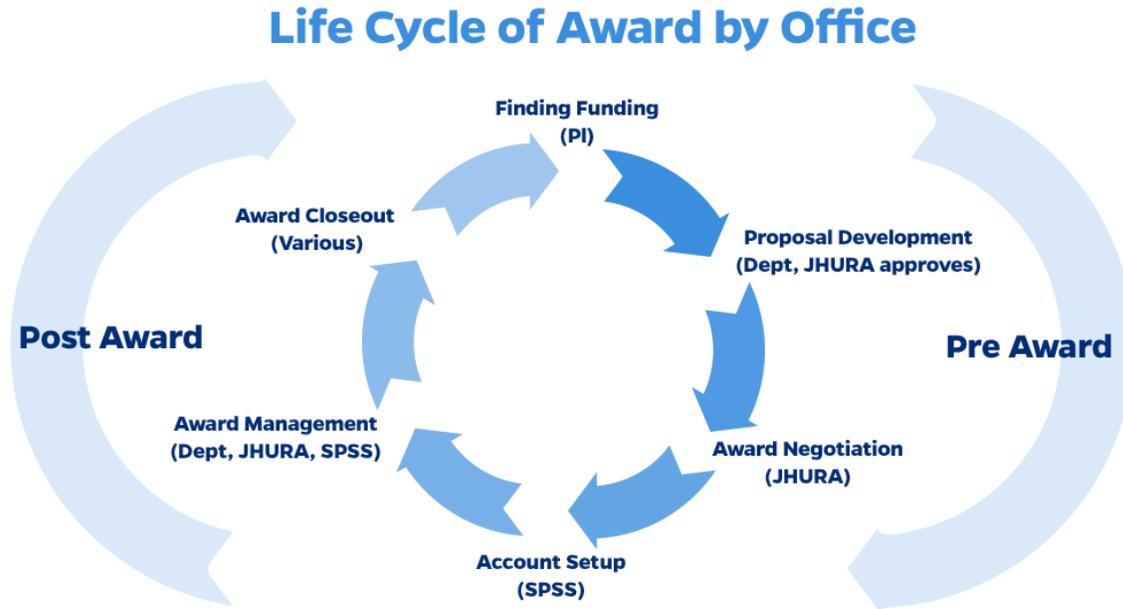
For Bloomberg School of Public Health investigators, training may be accessed through that school’s CITI [training account](#). When you log into the CITI site (selecting Johns Hopkins Bloomberg School of Public Health as your institution), select “Add a Course,” then, under “Question 2,” select the first Learner Group that offers GCP training. For currently funded School of Medicine studies subject to the requirement, investigators should consult the JHM IRB to document their training.

### **Research Misconduct**

JHU considers any fabrication, falsification, plagiarism, or forgery in proposing, performing, reviewing, or reporting results in any sponsored project to be research misconduct. In addition, the University maintains research misconduct as failing to comply with federal and state laws, refusing to follow rules or regulations, disregarding policies or relevant procedures, or ignoring any academic or professional standards.

Procedures for dealing with misconduct may be viewed [online](#).

## IX. AGREEMENT WORK FLOW



### Award Review and Acceptance

Awards are made to, and accepted by, JHU. Once a sponsor confirms that a proposal has been awarded, JHURA reviews the terms and conditions. If necessary, JHURA negotiates the terms and conditions with the sponsor. Once all terms are satisfactory, the Grants Associate (GA) or Contract Associate (CA) gives the award file to the Sponsored Project Specialist (SPS) for processing. The SPS reviews the file and follows up with the department on any outstanding issues, such as cost center verification or IRB and IACUC protocols.

### JAWS

The [JHURA Agreement Workflow System \(JAWS\)](#) is JHURA's centralized on-line database for tracking and managing all sponsored agreements, including negotiation, workflow, and document storage. Once a record is created for a particular grant or contract, it is used by the associated Grants or Contracts Associate to follow his/her progress towards bringing that agreement to signature. This includes the tracking of important dates through each step of the process, the uploading of key related documents, and the ability to transfer a record among JHURA personnel to facilitate review and signature. For agreements requiring account setup or modification, JAWS allows for the creation of the award packet for ease of submittal to SPSS or, for Bloomberg School of Public Health awards, BSPH's Finance Office.

JAWS also furthers JHURA's commitment to transparency, as it provides faculty and department personnel read-only access to designated records to facilitate their knowledge of the status of agreements throughout the process.

### **General Process for Grants and Contracts\***

JHURA will workflow the award its full execution. The award is workflowed to SPSS, who then creates the account in JHU's accounting system, SAP. SPSS notifies the Department Administrator and JHURA of the SAP grant number via email. For contract awards, additional time may be required for negotiation. PIs are notified of the receipt of the agreement prior to the beginning of negotiation, and award processing occurs when all terms and conditions are acceptable.

### **JHSPH Only Process for Grants and Contracts\***

JHURA will initiate the award process. The award is then workflowed to the Finance Office. The Financial Analyst reviews the award file and follows up with the department on any budgetary issues. The award is the scanned and workflowed to SPSS for processing. SPSS processes the award and sends a notification to the department's designated point of contact, JHURA, and the BSPH Finance Office that the award processing is complete.

\*This process could take several weeks after your award is accepted, depending on the resolution of compliance issues and the volume at JHURA and SPSS. If an account is needed immediately, discuss the option of a pre-award account with your CA or GA. In many instances, with a backup departmental discretionary account, a sponsored account can be established before completion of award negotiations.

## X. PROJECT MANAGEMENT

### A. Subagreements

Once an award is active in the University's accounting system, the Subagreement process can begin. The department is responsible for completing the [Subagreement Checklist Form](#), and for providing all necessary documents to JHURA. See Section XI, Subawards, for more information.

### B. Capital Equipment Purchases

As indicated in Uniform Guidance (§ 200.33 Equipment), equipment is defined as “tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.” For sponsors that require prior approval for equipment purchases (primarily contracts) or, if applicable, the rebudgeting of funds, requisitions must be routed through JHURA.

### C. Inventory Reporting

Records of equipment that can be inventoried are maintained by the Department of Cost Analysis, a section of the Controller's Office. Although individual equipment records are maintained for each grant or contract by the PI, it is important that Cost Analysis is notified of any changes to the equipment, such as transfers between departments or to other institutions. All changes in status must be documented by the completion of a JHU Transfer Disposal Form (Form C824). Instructions for the C824 may be found on the JHU Fixed Assets [website](#). Other instances where Cost Analysis must be notified include the fabrication of equipment from component parts, and transfers of government-owned equipment to the University. In these instances, an Equipment Fabrication Notification Form C825 should be completed and sent to Cost Analysis.

### D. Post Award Changes

After an award has been made, changes affecting the scope of work, budget, award period, or other administrative details are sometimes necessary. Regulations regarding post award changes vary among agencies. Particularly, changes in some items may require prior approval, such as travel, extensions (cost and no-cost), non-competing renewal, RPPR, PI absences, vehicles, pharmaceuticals, supplemental funds, rebudgeting, or changes of PI. JHURA will work with the sponsor to make such changes.

### E. Audits

All sponsors reserve the right to conduct an audit of the expenditures incurred on a research project. Sponsors may determine that certain expenditures may be disallowed if the letter and

spirit of their regulations are not followed. In this case, JHU may be required to refund to the sponsor all disallowed expenditures. If a sponsor contacts you or your department regarding an audit, immediately contact the Office of Financial Research Compliance.

#### **F. Reporting Requirements and Award Closeout**

Most grant and contract agreements require interim and/or final reports, such as equipment, patent, financial, and/or technical. Most of these reports are required to be submitted on an annual basis; however, some sponsors may require more frequent reporting. Final reports are required at the close of the award, usually within 90 days of the expiration of the final project funding period.

It is important that all reporting responsibilities be fulfilled, as failure to do so may jeopardize future funding to the entire University. While it is the PI's responsibility to ensure all requirements of the award are met, JHURA can assist by coordinating reporting compliance.

The following are the standard reports that arise during the course of a sponsored award, as well as the individual and/or office responsible for preparing them.

- **Technical reports** – The PI is responsible for preparing and submitting all technical reports
- **Patent reports** – JHTV prepares all annual and final reports on inventions. JHURA prepares negative reports.
- **Equipment Reports** – The department of Fixed Assets in the Office of the Controller works with the department to prepare and submit all required annual and final equipment reports.
- **Financial Reports** – SPSS is responsible for preparing all financial reports. For foreign projects, ad hoc reports are often requested. It is not possible for SPSS to prepare these reports, as SAP cannot capture much of this information, so they must be compiled using offline information. Therefore, the reports are generally developed by a financial analyst, approved by a manager, and sent directly to the sponsor.
- **Closeouts**- In most instances, the sponsor will issue closeout documentation that requires JHU to attest that all the administrative actions have been completed, including submission of the final technical and financial reports, all payments received, and inventions/patent/property disclosed. JHURA is responsible for signing off on this documentation and sending back to the sponsor.

## XI. SUBAWARDS

Sponsored project awards made to Johns Hopkins University are generally conducted within the physical boundaries of JHU by University faculty and staff. Occasionally, however, a significant portion of the required work may need to be provided outside the University by a third party. The third party is made responsible for a discrete portion of the project award, providing the leadership and direction of a responsible investigator and the resources necessary to conduct that portion of the work. Costs associated with this work may include personnel costs, supplies, equipment, travel, and overhead. Such an arrangement is carried out through the issuance of a subaward.

JHURA has a dedicated Subawards team for drafting, negotiating, tracking, and managing these subagreements. The team works in conjunction with JHU faculty, department administrators, financial analysts, the Office of Finance, the Controller's Office, IT, and the General Counsel's office to ensure that, in the most efficient way possible, the proper subagreement is executed for each unique situation.

More information regarding Subawards, including how to request an agreement, as well as our standard policies and procedures, can be found on our [website](#).

## **XII. Top Ten Things JHURA wants you to know**

### **1. We are here to help!**

While the role of JHURA includes ensuring that each proposal or agreement maintains compliance with JHU policies, legal requirements, and applicable regulations, we are here to help you in the administration of your research projects. Our goal is to provide you with consistently excellent service. Our success depends on your success!

### **2. Communication is key!**

Be sure to utilize the people and resources available to you. Identify the players within JHU central administration and when you need to contact each of them. The earlier you get in contact, the better!

Talk to your department administration about budget and payment issues before going to the sponsor. You want to make sure costs are adequately covered, and that the risks and milestones are reasonable.

Before writing a proposal, contact the sponsor's program officer. They can often provide tips on what they are looking for or even refer you to a more appropriate program.

Always write a clear and concise statement of work.

PIs should communicate with JHURA and not directly with the sponsor's contracts office. JHURA does the negotiating on behalf of JHU. The PI should never negotiate with the sponsor and then bring a "negotiated" agreement to JHURA.

Do not tell a subrecipient to start work until the Subagreement is fully executed.

### **3. A grant or contract is awarded to the institution, not to the individual. A PI should never sign a proposal or award.**

Only certain officers have been authorized by the Board of Trustees to bind the University. If someone other than those authorized sign, the proposal or award is not considered valid.

### **4. Timing is everything.**

JHURA needs adequate time to review a proposal and an award. There are many steps in this process, so it is important to get your proposal in early.

Both your department administration and JHURA will have a deadline to meet, so be sure to check what your department and sponsor requirements are.

**5. Each School has specific titles that enable a faculty member to act as a PI.**

Not all positions are created equal. Contact JHURA with any questions regarding eligibility to act as a PI.

**6. Any changes to a contract must be in writing and signed by authorized signatories.**

Be aware of the sponsor's "scope creep." Extra work means you will need extra money! That's why it's important to have a clear SOW, so that both parties are on the same page.

**7. We cannot agree to waive or reduce F&A arbitrarily.**

In most cases, Uniform Guidance and University policy require the use of a specific Indirect Cost Rate. See Section XVII, Application of F&A Rates to Sponsored Projects, for more information.

**8. You must go to IRB or IACUC if you are working with human subjects or animals.**

The JHURA can't issue an account number until either/both protocols have been approved. Even if you think your research is exempt, only the IRB and/or IACUC can make that determination.

**9. An agreement is not a done deal until an award is received, reviewed, approved, and signed by both parties.**

The program officer at the sponsor does not make final decisions. They can't make a commitment on the part of the sponsor, just as the PI cannot commit to the University.

**10. JHURA, department staff, and the PI are a team.**

We all have the same objective – to facilitate research. It may seem that policies, required forms, and deadlines are arbitrary or onerous, but they are in place so that we can ensure compliance with laws, effectively collect and manage the money we need to conduct the research, and keep everyone out of jail.

**If you have a question, don't hesitate to call or email.  
We are happy to help, all you have to do is ask!**

## XIII. Frequently Asked Questions

For more FAQs, see our [website](#).

### How do I . . .

- *Transfer my grant?*
  - Awards are granted to the University and not the individual PI. In order for an award to be transferred from one institution to another, the agency, Department chair, and JHURA must be notified.
- *Get my proposal routed through the University?*
  - Reviewed and approved by the department first, a proposal must be submitted through Coeus. A proposal must have the endorsement of campus officials, and therefore requires signatures of an authorized University official, which is delegated to JHURA.
- *Begin my research prior to the award date?*
  - A Preaward Authorization form (via paper for JHSPH or [webform](#) for all other divisions) must be completed and submitted to JHURA. (Contact ORIS for any questions regarding any issues with a webform submission.) This form must be approved by your Department Administrator, who shall provide a default non-sponsored account number.
- *Apply F&A costs?*
  - More information about applying F&A rates can be found in Section XVII, Application of F&A Rates for Sponsored Projects.
- *Find out how much money is left on my grant?*
  - Authorized users can access this information via SAP Business Warehouse (BW).
- *Find my CA/GA?*
  - Each department is assigned a Contract Associate and a Grant Associate in the JHURA. To determine your contract Associate's name and contact info, see the JHURA directory on our [website](#).

### Am I an eligible PI?

- All tenured/tenure-track faculty and research scientists can be Principal Investigators. Employees or appointees affiliated with Johns Hopkins University may be PIs provided they have the endorsement of the department chairperson and Dean. Part-time Associates cannot be a PI.

### Do I need to get IRB approval?

- The Institutional Review Board (IRB) must review research involving human subjects. The purpose of the review is to help assure the protection of the rights and welfare of human subjects.

### **What is cost sharing and how do I deal with it?**

- Cost sharing is the commitment of the University's resources to a sponsored project. Cost sharing may be included in the proposal only when required by the sponsor in writing, and must be approved by your divisional business office.

### **My funder has publication restrictions – is this allowable?**

- No. It is the policy of Johns Hopkins University that instruction, research, and services be accomplished openly and without prohibitions on the publication and dissemination of the results of academic and research activities. For more information, you can consult Johns Hopkins University [Classified Research Policy](#). If you have questions, please contact your Contracts Associate.

### **What is involved in subcontracting?**

- There are a number of procedures to be followed by JHURA in the preparation and administration of University-issued sponsored project subagreements. These subagreements are issued by JHURA when an award from a prime sponsor incorporates work to be performed by a subcontractor. Each department is responsible for initiating this process. For more information, see Section XI, Subawards.

### **What is Intellectual Property?**

- Intellectual property is any new and useful process, machine, composition of matter, life form, article of manufacture, software, trademark, copyrighted work, or tangible research property. Examples include new or improved devices, circuits, chemical compounds, drugs, genetically engineered biological organisms, antibodies, clones, cell lines, data sets, software, Web-based tools, musical processes, or unique and novel uses of existing inventions.
- JHU strives to support its faculty and employees in securing commercial development of intellectual and other property resulting from their research so that the benefits of that research may reach society at the earliest opportunity. This is consistent with the University's mission of developing new knowledge and facilitating the practical application of such knowledge to the benefit of the public. The University has developed policies and guidelines that provide incentives for its researchers while protecting the integrity of research emanating from this institution. Johns Hopkins Technology Ventures (JHTV) provides an array of administrative services to its Inventors to assist them in protecting rights to University Intellectual Property and fostering commercial development. Visit the [JHTV website](#) to learn more about Intellectual Property.

## XIV. Glossary

- **Audit** – A formal examination of an organizations’ or individual’s accounts or financial situation. An audit may also include examination of compliance with applicable terms, laws and regulations.
- **Award** – Funds that have been obligated by a funding agency for a particular project.
- **Background Intellectual Property** – All intellectual property owned by University and rights therein in existence as of the date of execution of a sponsored research agreement and which may be needed to practice the new technology to be developed.
- **Broad Agency Announcement** – An announcement of a federal agency’s general research interests that invites proposals and specifies the general terms and conditions under which an award may be made.
- **Close Out** – The act of completing all internal procedures and sponsor requirements to terminate or complete a research project.
- **Contract** – A mechanism for procurement of a product or service with specific obligations for both sponsor and recipient. Typically, a research topic and the methods for conducting the research are specified in detail by the sponsor, although some sponsors award contracts in response to unsolicited proposals.
- **Cooperative Agreement** – An award similar to a grant, but in which the sponsor’s staff may be actively involved in proposal preparation, and anticipates having substantial involvement in research activities once the award has been made.
- **Copyrights** – Protected works of authorship, such as writings, music, software, and works of art that have been tangibly expressed. The Library of Congress registers copyrights, which last for the life of the author plus 70 years.
- **Cost Reimbursement** – A contract/grant for which the sponsor reimburses the University for the Full Costs incurred in the conduct of the work up to an agreed-upon amount.
- **Cost Sharing** – A general term, used as a noun or adjective, that can describe virtually any type of arrangement where more than one party supports research, equipment acquisition, demonstration projects, programs, OR institutions.
- **Derivative Work** – Under copyright law, a work based upon one or more preexisting works, such as translation, musical arrangement, dramatization, fictionalization, motion picture version, sound recording, art reproduction, abridgment, condensation or any other form in which a work may be recast, transformed, or adapted. A work consisting of editorial revisions, annotations, elaborations or other modifications, which, as a whole, represent an original work of authorship, is a “derivative work.”
- **Direct Costs** – Clearly identifiable costs related to a specific project. General categories of direct costs include, but are not limited to, salaries and wages, fringe benefits, supplies, contractual services, travel and communication, equipment, and computer use.
- **Facilities and Administrative Costs** – Costs that are incurred for common or joint objectives and, therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity. F&A costs are synonymous with Indirect Costs and are usually expressed as a percentage of the direct costs.

- **Fixed Price** – A contract/grant for which one party pays the other party a predetermined price, regardless of actual costs, for services rendered.
- **Foreground Intellectual Property** – All intellectual property owned by the University and rights therein resulting from a sponsored research agreement.
- **Gifts** – Awards given with few or no conditions specified. Gifts may be provided to establish an endowment or to provide direct support for existing programs. Frequently, gifts are used to support developing programs for which other funding is not available.
- **Grant** – A type of financial assistance awarded to an organization for the conduct of research or other program as specified in an approved proposal. A grant, as opposed to a cooperative agreement, is used whenever the awarding office anticipates no substantial programmatic involvement with the recipient during the performance of the activities.
- **Grants.gov** – The federal government’s primary source to find and apply for Federal government grants.
- **Incremental Funding** – A method of funding contracts that provides specific spending limits below the total estimated costs. These limits may be exceeded only at the contractor’s own risk. Each increment is, in essence, a funding action.
- **Indefinite delivery, indefinite quantity (IDIQ)** – Contract type also called a Master agreement, under which Task Orders are the mechanisms by which money is obligated.
- **Indirect Cost Rate** – The rate expressed as a percentage of a base amount established by negotiation with the cognizant federal agency on the basis of the institution’s projected costs for the year, and distributed as prescribed in the Uniform Guidance. Indirect costs are applied to salary and wages (S&W) or the modified total direct cost (MTDC) base. The indirect cost rate is charged on a set of direct costs known as an indirect cost base.
- **Indirect Costs** – Costs related to expenses incurred in conducting or supporting research or other externally-funded activities but not directly attributable to a specific project. General categories of indirect costs include general administration (accounting, payroll, purchasing, etc.), sponsored project administration, plant operation and maintenance, library expenses, departmental administration expenses, depreciation or use allowance for building and equipment, and student administration and services.
- **In Kind Contributions** – Assistance in a form other than money. Equipment, materials, or services of recognized value that are offered in lieu of cash. Contributions must be documented in entirety to be used on an award.
- **Intellectual Property** – Creations of the mind – creative works or ideas embodied in a form that can be shared or can enable others to recreate, emulate, or manufacture them. Can be any writing or discovery that is a new and useful process, machine, composition of matter, life form, article of manufacture, software, trademark, trade secret, copyrighted work, or tangible research property. There are four ways to protect intellectual property: patents, trademarks, copyrights, and trade secrets.
- **Invention** – Any art or process (way of doing or making things), machine, manufacture, design, or composition of matter, or any new and useful improvement thereof, or any variety of plant, that is or may be patentable under the patent laws of the United States.

- **Key Personnel** – The personnel considered to be of primary importance who contribute to the scientific development or execution of a project. The term usually applies to the senior members of the project staff.
- **License** – A permit to do that which would otherwise be unlawful. Licenses are contracts that deal with the rights, permissions, and restrictions related to the use of information assets and intellectual property, and with contractual and other obligations associated with the exchange in which these rights, permissions, or restrictions are transferred.
- **Material Transfer Agreement** – A contract that governs the transfer of tangible research materials between two organizations, when the recipient intends to use it for his or her own research purposes.
- **Modification** – An award document that modifies any aspect of an existing award. Examples include carryover approvals, adding or deleting special terms and conditions, changes in funding levels (including NSF’s research experience for undergraduates, NIH’s minority supplement, DOD’s ASSERT programs), administrative changes initiated by the agency, extensions that include changes in terms, change of principal investigator, etc.
- **Modified Total Direct Costs** – The basic indirect costs are calculated on a subset of direct costs, normally excluding among other costs, equipment, patient care, space rental, alterations and renovations, and subaward costs in excess of the first \$25,000.
- **No Cost Extension** – An extension of the period of performance beyond the expiration date, at no additional cost, to allow the principal investigator to finish a project.
- **Notice of Grant Award** – The legally binding document that serves as a notification to the recipient and others that a grant or cooperative agreement has been made, contains or references all terms of the award, and documents the obligation of funds.
- **Patent** – A property right granted by the U.S. Government to an inventor to exclude others from making, using, offering for sale, or selling the invention throughout the United States or importing the invention into the United States for a limited time in exchange for public disclosure of the invention when the patent is granted.
- **Period of Performance** – The total time for which support of a project has been programmatically approved. A project period may consist of one or more budget periods.
- **Prime Award** – A governing agreement between the recipient and the awarding agency.
- **Principal Investigator** – The individual responsible for the conduct of research or other activity described in a proposal for an award.
- **Program Announcement** – Describes existence of a research opportunity. It may describe new or expanded interest in a particular extramural program, or be a reminder of a continuing interest in an extramural program.
- **Proposal** – An application for funding that contains all information necessary to describe project plans, staff capabilities, and funds requested. Formal proposals are officially approved and submitted by the organization in the name of a principal investigator.
- **Request for Proposal** – Announcements that specify a topic of research, methods to be used, product to be delivered, and appropriate applicants sought. Proposals submitted in response to RFPs generally result in the award of a contract. Notices of federal RFPs are published in the Commerce Business Daily.

- **Revision** – A modified and resubmitted request for funding for a project that was previously not funded either because it was denied by the sponsor or withdrawn by the PI.
- **Scope of Work** – The description of the work to be performed and completed on a project.
- **Small Business Innovative Research** – Agency administered programs supported by earmarked federal funds, making grants to small business entities
- **Sole Source** – A situation in the marketplace where there is clearly and legitimately a single source of supply that meets the necessary requirements. A sole source justification implies that any attempt to obtain bids would result in only one option.
- **Sponsor** – The organization that funds a research project.
- **Subcontract, Subgrant or Subagreement** – A document written under the authority of and consistent with the terms and conditions of an award (a grant, contract or cooperative agreement) that transfers a portion of the research or substantive effort of the prime award to another institution or organization.
- **Subcontractor, Subrecipient** – The recipient of a subaward awarded to a foreign or domestic organization (either a non-profit, educational institution, state or local government, or private industry) for the performance of a portion of the work statement covered by a prime agreement that is funded either directly or indirectly with sponsored funds. It does not include agreements with individuals for consulting services or purchase orders for equipment, materials or other services. A subrecipient receives an award of assistance from a pass-through entity and conducts its own scope of work. Also referred to as subawardee, subgrantee or lower-tier institution.
- **Subject Invention** – Any invention conceived or first reduced to practice in the University's performance of work under a federal grant or contract.
- **Task Order** – A legally binding document authorizing work and appropriating funds as a supplement to a master agreement/IDIQ.
- **Teaming Agreement** – An agreement between two or more parties to participate in a research project or teaching activity
- **Trade Secret** – The Uniform Trade Secrets Act defines trade secrets as information, including a formula, pattern, compilation, program, device, method, technique, or process, that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure, and is the subject of efforts that are reasonable under the circumstance to maintain its secrecy.
- **Uniform Guidance** – Regulations codified in 2 CFR Part 200, et seq., published by the federal Office of Management and Budget (OMB) that establish the principles for determining the administrative requirements, cost principles, and audit requirements applicable to grants, contracts, and other government agreements.
- **Work Made For Hire** – Under copyright law, a work prepared by an employee within the scope of his or her employment; or a work specially ordered or commissioned for use as a contribution to a collective work, if the parties expressly agree in a written instrument signed by them that the work shall be considered a work made for hire. *JHU typically does not engage in work made for hire agreements, as they are in direct conflict with the University's publication policy.*

## XV. Acronyms

- **BAA** – Broad Agency Announcement
- **CA** – Contract Associate
- **CAS** – Cost Accounting Standards federally mandated accounting, standards intended to ensure uniformity in budgeting and spending funds
- **CDA** – Confidentiality Agreement (aka NDA)
- **CFDA** – Catalog of Federal Domestic Assistance
- **CFR** – Code of Federal Regulations
- **CR** – Cost Reimbursement
- **CRADA** – Cooperative Research and Development Agreement
- **CTA** – Clinical Trial Agreement
- **DUA** – Data Use Agreement
- **DUNS** – Data Universal Numbering System
- **EIN** – Employer Identification Number (aka TIN)
- **F&A** – Facilities and Administrative Costs (aka IDC)
- **FDP** – Federal Demonstration Partnership
- **FP** – Fixed Price
- **FWA** – Federal Wide Assurance
- **GA**-Grants Associate
- **IACUC** – Institutional Animal Care and Use Committee
- **IDC** – Indirect Costs (aka F&A)
- **IDIQ** – Indefinite Delivery, Indefinite Quantity type contract (aka IQC)
- **IHE** – Institute of Higher Education
- **I/O** – Internal Order
- **IP** – Institution Proposal record (in Coeus) or Intellectual Property
- **IQC** – Indefinite Quantity Contract (aka IDIQ)
- **IRB** – Institutional Review Board
- **MOU** – Memorandum of Understanding
- **MTA** – Material Transfer Agreement
- **MTDC** – Modified Total Direct Costs
- **NCE** – No-Cost Extension
- **NDA** – Nondisclosure Agreement (aka CDA)
- **NGA** – Notice of Grant Award
- **NOA** – Notice of Award
- **OMB** – Office of Management and Budget
- **PD** – Proposal Development record (in Coeus) or Project Director
- **PI** – Principal Investigator
- **POP** – Period of Performance
- **PTE** – Pass Through Entity
- **RFP** – Request for Proposal
- **RFQ** – Request for Quote
- **SBIR** – Small Business Innovative Research

- **SOW** – Scope/Statement of Work
- **SPS** – Sponsored Projects Specialist
- **SPSS** – Sponsored Projects-Shared Services
- **S2S** – System to system
- **TIN** – Tax Identification Number (aka EIN)
- **TDC** – Total Direct Costs
- **TO** – Task Order
- **UG** – Uniform Guidance

## XVI. Coeus Proposal Types

**New** – Application submitted for the first time. Also used for changed/corrected applications. (If submitting a grants.gov S2S submission, you must use this proposal type. In the Grants.gov submission details window, mark the submission type as pre-application.)

**Administrative Action** – Revised budget in continuation periods, de-obligation.

**Continuation** – Progress reports or incremental funding. All continuation years must be listed in original “New” PD.

**Internal Application** – Application submitted for internal competitions. Usually go through internal committee for peer review or a pre-proposal submitted to a sponsor.

**Renewal** – Competitive proposal that requests additional funding to continue a previously funded project. If awarded, will have a new SAP grant number and the new IP number should be used.

**Resubmission** – Second or third attempt at getting a proposal funded.

**Revision** – Sponsor reviews proposal and requests that JHU submit a proposal with changes to the SOW and/or budget. Used only before account is established.

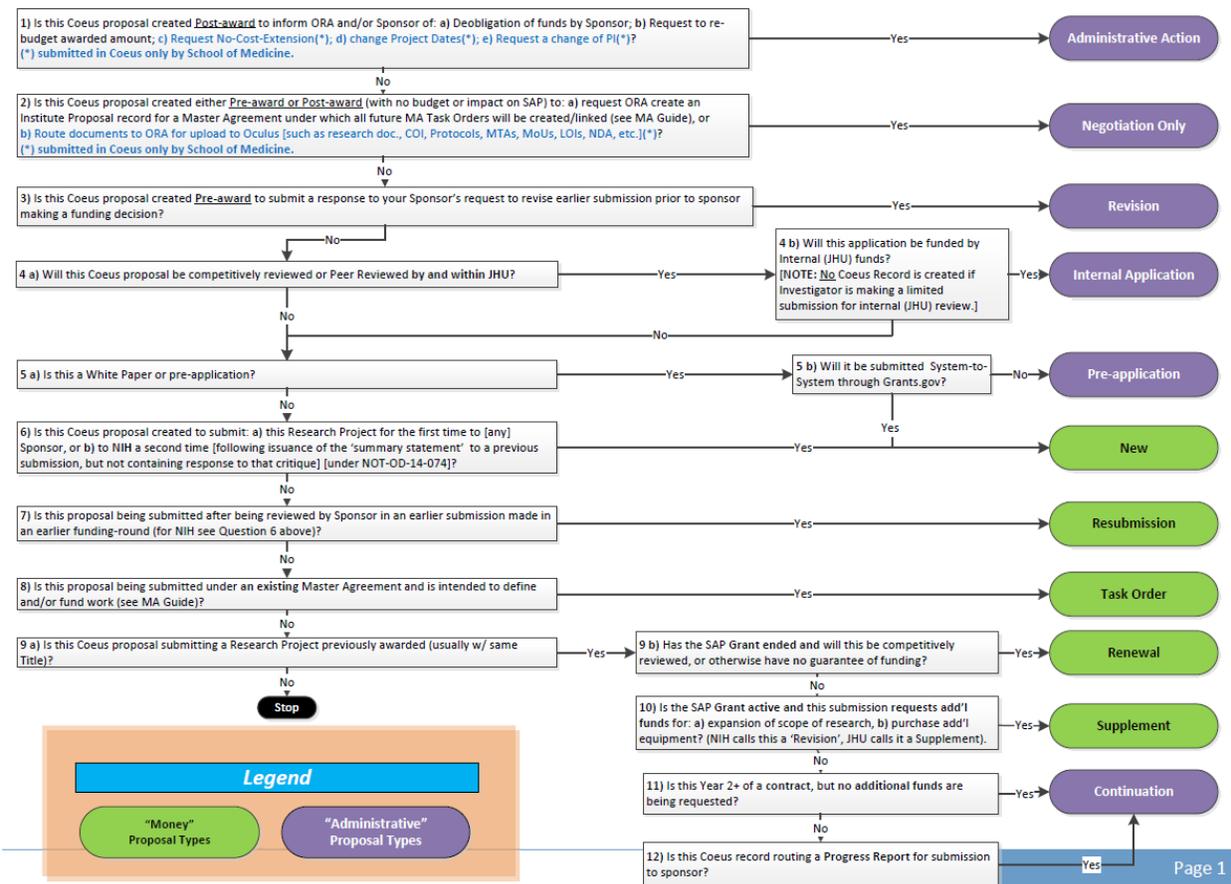
**Supplement** – Proposal that requests additional funding for new or supplemental scope of work, or subsequent years that were not originally proposed in “New” PD.

**Task Order** – A proposal that requests new funds under an IDIQ contract or Master agreement.

# Proposal Type Determination Flow Chart

August 30, 2016

## Proposal Type Decision Chart



## **XVII. APPLICATION OF F&A RATES TO SPONSORED PROJECTS**

August 7, 2009

### **I. Facilities and Administrative Costs (F & A)**

Facilities and Administrative (F&A) costs, a known as Indirect Costs, are the expenses incurred for general University operations while conducting a sponsored project. F&A costs are calculated as a percentage of direct costs and are set by the Federal Government.

F&A costs are divided into seven components:

- Use allowance or depreciation on buildings and campus improvements;
- Depreciation of fixed and movable equipment;
- Physical plant (buildings and grounds) operations and maintenance;
- General administration (University);
- Department administration (includes department and college);
- Sponsored projects administration; and
- Libraries

The Federal Government provides rules (Uniform Guidance 2 CFR Part 200, Subpart E – Cost Principles) governing the calculation of F&A cost rates and periodically audits the costs supporting the rates we have negotiated. A rate is calculated for each of the above components based on prescribed methods. The final rate is determined by negotiation with and approval by the University's Cognizant Audit Agency, Department of Health and Human Services. This rate calculation and negotiation process assures that universities are fairly and equitably reimbursed for their F&A costs incurred when conducting sponsored projects.

F&A cost rates may vary according to the type or location of the research project and are applicable to all sponsored projects funded by federal, state or private sponsors, including grants, contracts, cooperative agreements, subgrants, and subcontracts. The application of these rates allows JHU to recover costs associated with externally funded activities that, although they are true costs that are incurred, cannot be identified specifically with a particular project or activity.

The first step in determining the proper F&A cost rate is to read the sponsor program guidelines. The program guidelines or announcement may list a rate or base that should be used. If the guidelines do not mention F&A or indicate that something other than the applicable federally-negotiated rate should be used, the appropriate full rate should be used. Deviations from the full rate should be considered and documented in accordance with the JHSPH Cost Recovery for Mandatory F&A Waivers policy.

## II. Application of F&A Rates Based on Activity Type

The second step in determining the appropriate rate is to establish what type of project will be conducted. The Uniform Guidance 2 CFR Part 200, Appendix III, describes the different functions of Institutions of Higher Education (IHE) – Organized Research, Instruction & Training or Other Sponsored Activities.

### Organized Research

Organized Research is described as all research and development activities that are sponsored by Federal and non-Federal agencies and organizations and which are separately budgeted and accounted for. This generally means there is a scope of work, a specific time frame, and deliverables (whether technical or financial) that the University is obligated to deliver, a specific budget and indirect cost recoveries. This term includes activities involving the training of individuals in research techniques (commonly called research training) where such activities utilize the same facilities as other research and development activities and where such activities are not included in the Instruction function. Research activities include the rigorous inquiry, experiment or investigation to increase the scholarly understanding of the involved discipline.

Examples of Organized Research include:

- Awards to JHU faculty to support research activities, such as literature surveys, investigations on efficacy of new vaccines, disease prevention or therapeutics;
- External funding to maintain facilities or equipment and/or operation of a center facility which will be used for research;
- External support for writing of books, when the purpose of the writing is to publish research results;
- Research data collection and evaluation, and/or analysis; and
- Corporate drug development/clinical trials

### Instruction and Training

Sponsored Instruction is defined as teaching and training activities at JHU funded by grants and contracts from Federal or non-Federal sponsors. Sponsored Instruction includes agreements which support curriculum development as well as all types of teaching/training activities, whether offered for credit toward a degree or certificate, on a non-credit basis, or through regular academic departments or by separate divisions, summer school or external division.

Sponsored Instruction & Training includes:

- Any project for which the purpose is to instruct any student at any location; recipients of his/her instruction may be JHU students or staff;

- Curriculum development projects at any level, including projects which involve evaluation of curriculum or teaching methods. Note that such evaluation may be considered “research” when the preponderance of activity is data collection, evaluation and reporting;
- Projects which involve JHU students in community service activities for which they are receiving academic credit;
- Activities funded by awards to departments or schools for the support of students;
- Fellowship support for pre-doctoral and post-doctoral training activities, which may include grants to fund dissertation work and travel in relation to a dissertation; and
- General support for the writing of textbooks or reference books, video or software to be used as instructional materials.

### Other Sponsored Activities

Other Sponsored Activities means programs and projects financed by Federal and non-Federal agencies and organizations which involve the performance of work other than Instruction and Organized Research. Since most projects in this category do not directly involve students and gain little, if any, benefit from libraries, the F&A rate applicable to Other Sponsored Activities is less than the rate for Organized Research or Sponsored Instruction.

Examples of Other Sponsored Activities include:

- Consultancy projects;
- Social and/or community service, or health services projects;
- Travel grants;
- Support for conferences, seminars or workshops;
- Support for University public events such as “lively arts”;
- Support for student participation in community service projects which do not result in academic credit;
- Support for projects pertaining to library collections, acquisitions, bibliographies or cataloging; and
- Programs to enhance institutional resources, including computer enhancements, etc.

### **III. Application of F&A Rates Based on Location**

The next step in setting the appropriate rate is to determine if the project is to be considered on or off campus.

The on-campus F&A rate is applied to sponsored projects that require utilization of space owned or leased by the University. Therefore, on-campus F&A rate will apply to most sponsored projects.

The off-campus rate is lower because it includes only the administrative components of the F&A rate. The reduced rate is applied to those projects that are conducted predominantly in facilities not owned, leased or rented by the University.

In order for a project to be considered off campus, all three of the following qualifications must be met:

- The employee will be away from his or her campus facilities (i.e. office and laboratory) for a minimum of three consecutive months;
- The on campus facilities will be made available for use by other faculty and/or students during the employee's absence; and
- The employee will be performing work in accordance with the statement of work of the proposed and funded project while at the off campus location.

These qualifications are a fiscal determination based upon space utilization and it is not simply a definition of where some of the project work is being performed.

If one University employee meets the above standards but the entire project does not, it may be acceptable to split the budget into on and off campus accounts. Contact JHURA to discuss such a situation.

Off campus rates can only be used relative to the University's effort expended on a project. The University must bear a responsibility for the work and a JHU employee must be responsible to JHU for the integrity of the work performed as the initial requisite of an off campus account. Performance of work on project by non-University personnel are handled via a subagreement to another institution, which takes on campus F&A for the first \$25,000, or a consulting agreement, which takes full F&A for the entire amount.

For animal or lab based studies, use the on-campus research rate.

#### **IV. Identification of the Appropriate F&A Rate**

Once the project type and location are determined, the proper federally-negotiated rate should be applied. Consult the JHURA [website](#) for current rates.

Federal rates should also be used with state and private sponsors, and must be used if JHU will be a subcontractor on a Federal prime award. Questions can be directed to your JHURA contact.

#### **V. Application of F&A Rates Using MTDC or TDC**

The final step in the application of the F&A rate is to identify the base upon which to calculate the rate. The Modified Total Direct Costs (MTDC) base shall be used when a Federal sponsor's

published F&A rate is less than or equal to the current full DHHS-negotiated rate, but does not specify a base. Using this base entails excluding some items, such as capital equipment and tuition/stipends, from the F & A cost calculation. The following direct cost items should be deducted prior to calculating F&A: Equipment exceeding \$5,000 or component parts less than \$5,000; Subcontracts in excess of \$25,000; Tuition; Patient Care Costs; Rental of off-site facilities; Capital Expenditures; and Fellowships and Scholarships.

The Total Direct Costs (TDC) base shall be used with non-Federal sponsors.

In such cases where a non-Federal sponsor pays less than the full DHHS-negotiated rate, other costs, such as space, IRB costs and sponsored projects costs, shall also be applied in accordance with the JHSPH Cost Recovery for Mandatory F&A Waivers policy.

Please contact your JHURA representative if you have any questions regarding the proper application of rates to a particular project.