



# University of New Hampshire

## QUICK GUIDE for Principal Investigators & Project Directors (PIs/PDs) at UNH

This Quick Guide is intended to provide answers to common questions about grant and contract administration. While this Guide is designed to assist you in managing your sponsored projects, please note it is neither comprehensive nor exhaustive. For specific questions, please review the applicable policy in its entirety, and contact the appropriate offices as needed.

### PROPOSALS & SUBMISSIONS

*“The PI/PD has primary responsibility for developing the proposal and securing institutional approval.”*

- Notify your GCA of your intention to submit a proposal as soon as possible...
- Make sure the proposal meets the sponsor’s submission specifications, including length limitations, margins, font size, etc.
- Make sure budgets are correctly calculated and meet sponsor guidelines for allowable costs and limits, and are an adequate and accurate reflection of the proposed project needs.
- Obtain a scope of work, budget, and endorsement letter from any collaborating institutions.
- Obtain the approval of your chair and dean/institute director prior to submission.
- Submit the non-scientific parts of the application to your GCA at least three (3) days in advance of the sponsor’s submission deadline

Sponsored Programs Administration  
Proposals & Submissions.

[www.unh.edu/research/proposals-submissions](http://www.unh.edu/research/proposals-submissions)

### FINANCIAL MANAGEMENT

*“The PI/PD is responsible for regular financial oversight including documenting approval of costs to awards and reviewing of monthly*

*budget to actual financial reports.”*

Costs charged to a sponsored project must be:

- Allocable, i.e., a cost is allocable if the goods or services are chargeable or assignable to the award in accordance with the benefits received or if the cost benefits more than one award, it must be allocated in realistic proportion to the benefit received.
- Allowable, i.e., categories of costs that are allowable as a charge on an award as determined by the terms and condition of the award and cost principles.
- Reasonable, i.e., goods or services acquired and the amounts involved should reflect actions of a “prudent person.”
- Costs may be incurred up to 90 days prior to the start of a project if pre-award costs are permitted and any necessary sponsor approvals are obtained.
- Prior written approval from the sponsor may be required or advisable for certain special/unusual cost.

Costs charged to sponsored projects must **NOT**:

- Include costs normally included in the F&A rate charged to a federal grant, e.g., utilities or office supplies.
- Be assigned solely based on fund availability, award expiration date or other inappropriate criteria.
- Exceed overall project award.

**At the end of a project:**

- You may generally carry over unexpended funds at the end of a non-competitive project segment, and from one competitive segment of a project to the next. Check with SPA to determine whether unexpended funds will carry over automatically or if sponsor approval is required.
- Residual supplies, purchased on a federal award, having an aggregate value in excess of \$5,000, must be dedicated to another federal award or disposed of in a manner that compensates the federal government for its share.
- Costs associated with publication and sharing of research results may be charged to the project, but must be recorded as an expense within 90 days of the end date of the award.
- You may not “spend down” remaining funds by charging expenses that are not otherwise appropriately

charged to the project.

- Final progress, financial and other reports are due no later than 90/120 calendar days after the end of the project period.
- Any remaining overdraft at the end of a project must be covered from non-sponsored sources.
- You may not attempt to cover an overdraft on a sponsored project by shifting expenses to another sponsored project.

#### **Cost Transfers: (This process is usually completed by the BSC with PI approval and knowledge)**

- Cost transfers should not be used as a means for managing project funds and should only be used to:
  - Correct an error.
  - Properly allocate an expenditure benefiting more than one sponsored project.
- All cost distributions and corrections of errors should be processed within 90 days, however only transfers to Federal awards are considered **cost transfers**, which are deemed "late cost transfers" when processed over 90 days after the end of the month of the original charge. Late cost transfers require exceptions to the policy which are rare.
- Supporting documentation that provides sufficient information to allow for a clear audit trail.
- Cost transfers to remove incorrect charges from a sponsored project must always be processed, regardless of when they are discovered.
- Cost transfers are highly scrutinized by auditors.

Sponsored Programs Administration  
Managing Awards

<http://www.unh.edu/research/managing-awards>

## **EFFORT REPORTING**

*"Federal regulations require that the effort devoted to sponsored projects is appropriately documented, including an annual certification that the salaries charged are reasonable in relation to the effort devoted to those projects."*

- Complete the Effort Reporting Policy Training.
- Monitor your effort throughout the year, and certify your effort annually

each fall.

- Monitor the effort of postdocs, graduate students, and staff funded by your sponsored projects.
- The amount of salary charged to a sponsored project should generally be consistent with the amount of effort expended on that project.
- The proportion of salary charged to a project may not exceed the amount of effort expended; however, the amount of effort expended on a project may exceed the proportion of salary charged. (You cannot overcharge the sponsor, but the sponsor can receive more effort than it pays for.)
- Significant variances between projected effort and actual effort of key personnel require sponsor notification.
- Short term fluctuations of effort, such as month-to-month variations, do not require salary adjustment or sponsor notification.
- Teaching, administration, and writing new funding proposals (unless specifically allowed by the sponsor) may not be charged to a sponsored project.

Sponsored Programs Administration

Effort Reporting and Certification

<http://www.unh.edu/research/effort-reporting-and-certification-0>

## **RESEARCH INVOLVING HUMANS, VERTEBRATE ANIMALS or BIOHAZARDOUS MATERIALS**

**Research with Human Subjects:**

- All human subjects' research must be approved by the Institutional Review Board (IRB) prior to commencing, and conducted in accordance with IRB requirements.
- Awareness of the regulatory definitions of research and human subjects will facilitate understanding of which activities require IRB review.
- Investigative activities with humans that include only surveys, observation or other non-invasive research methods must still be approved by the IRB if the definitions of research and human subjects are met.
- The determination as to whether human subject's research requires IRB review can only be made by the IRB.

Research Integrity Services (RIS) Human

Subjects [www.unh.edu/research/human-subjects](http://www.unh.edu/research/human-subjects)

#### Research with Vertebrate Animals:

- At UNH, all activities proposed to involve the care and use of live vertebrate animals must be reviewed and receive written, unconditional approval from the Institutional Animal Care and Use Committee (IACUC) before commencing.

Research Integrity Services (RIS)

Animal Care and Use

[www.unh.edu/research/animal-care-use](http://www.unh.edu/research/animal-care-use)

#### Research involving Biohazardous Materials:

- At UNH, all activities proposed to involve the use of biohazardous materials must be reviewed and approved by the Institutional Biosafety Committee.

Institutional Biosafety Committee (IBC)

<http://www.unh.edu/research/institutional-biosafety-committee-ibc>

### EXPORT CONTROLS

“UNH intends to comply fully and completely with all U.S. export control laws and regulations, including those implemented by the U.S. Department of Commerce through its Export Administration Regulations (EAR) and the U.S. Department of State through its International Traffic in Arms Regulations (ITAR) as well as those used by the U.S. Treasury Department through its Office of Foreign Assets Control (OFAC).”

- Consult with the Export Controls Office:
  - When information or items are being transferred outside of the United States.
  - If project involves travel outside of the United States or collaboration with an international partner(s).
  - If information is being transferred to a non-U.S. person in the United States.
- The tangible results of fundamental research, such as prototypes, materials, and samples are subject to U.S. export controls and may require authorization to ship outside of the United States.

Sponsored Programs Administration

Export Controls

[www.unh.edu/research/export-controls](http://www.unh.edu/research/export-controls)

### FINANCIAL CONFLICT OF INTEREST IN RESEARCH

*“The intent of this policy is to identify and eliminate or manage any possible threat to research objectivity at the University. It is not meant to discourage, but rather to safeguard the pursuit and dissemination of knowledge.”*

- A conflict of interest is a situation in which the conduct of research could be compromised, or appear to be compromised, by a related financial interest on the part of the PI or other investigators.
- University policy requires investigators to:
  - Disclose their financial interests and the interests of their spouse/domestic partner and dependent children on the appropriate disclosure form(s).
  - Provide updates as the amount or nature of interest changes during the period of performance of supported research.

This process is intended to protect investigators, their sponsored research and other educational and professional activities in which they are engaged, and the university.

Financial Conflict of Interest in Research

<http://www.unh.edu/research/conflicts-interest-commitment>

### OVERALL PI/PD RESPONSIBILITIES

*“The administrative, fiscal and scientific responsibility for the management of a sponsored project reside with the Principal Investigator/ Project Director named in the award.”*

- The Principal Investigator is responsible for assuring that all key personnel, including themselves, researchers, staff, students, and postdocs, have completed all required trainings.
- Ensures that all information in the proposal is complete, accurate and developed according to commonly accepted practices.

- Ensures that all required UNH forms and certifications are completed on time.
- Knows and follows the terms and conditions of the award.
- Conducts the work according to the research protocol, statement of work and any subsequent modifications.
- Ensures that all work meets the highest ethical standards and is conducted without real or apparent conflicts of interest.
- Ensures that all work is conducted in compliance with federal, state and local laws.
- Ensures that the project is managed in compliance with UNH policies.
- Manages the budget in order to spend correctly, follows sponsor restrictions and avoids overdrafts.
- Allocates salary and expenses to projects based on benefit, and reviews expense reports for accuracy
- Discloses promptly all inventions/innovations to the UNH Innovations Office.
- Ensures that financial records and reports are accurate and auditable.
- Ensures that cost sharing obligations are fulfilled and documented.
- Monitors the activities of subrecipients and approves all invoices.
- Notifies the sponsor when significant conditions relating to your project status change (e.g. change in key personnel or significant change in PI effort) through SPA.
- Submits reports on time and according to the sponsor's requirements.
- Completes the formal closeout of the project within 90 days of the project's end date or earlier if required in the award agreement.
- BSC maintains financial records, supporting documents, statistical records, and all other records pertinent to an award must be retained for a period of three years from the date of submission of the final expenditure report.

## QUESTIONS

- **Senior Vice Provost for Research Office**
- Louise Griffin, Senior Director for Research & Sponsored Programs  
603-862-0152  
[louise.griffin@unh.edu](mailto:louise.griffin@unh.edu)
- **Research Administration**  
Karen Jensen, *Manager*  
603-862-2172  
[karen.jensen@unh.edu](mailto:karen.jensen@unh.edu)
- **Accounting and Financial Compliance**  
Susan Zipkin, *Manager*  
603-862-0609  
[susan.zipkin@unh.edu](mailto:susan.zipkin@unh.edu)
- **Research Integrity Services**  
Julie Simpson, *Director*  
603-862-2003  
[julie.simpson@unh.edu](mailto:julie.simpson@unh.edu)
- **Export Controls**  
Victor Sosa, *Director*  
603-862-2001  
[victor.sosa@unh.edu](mailto:victor.sosa@unh.edu)
- **Environmental Health and Safety**  
Brad Manning, *Director*  
603-862-2571  
[brad.manning@unh.edu](mailto:brad.manning@unh.edu)
- **UNH Innovation**  
Marc Sedam, *Managing Director*  
603-862-4130  
[marc.sedam@unh.edu](mailto:marc.sedam@unh.edu)