Welcome from the OSP Director

Dear Colleagues,

With the summer nearly here, it is a good time to revisit the research administration accomplishments of the past year. We now have needed policies in place for proposal submission, subrecipient monitoring, and classified research, among others. University resources have been dedicated to the professional development of unit research administrators through attendance at the NCURA Annual Meeting here in Washington.

While much has been accomplished, much needs to be done. This coming year will see the completion of the NCURA peer review report recommendations and OSP staff visiting faculty and staff in their work environments. As you already know, we have GAR meetings set for June and August. In addition to the normal updates, those meetings will be an opportunity to discuss the new subrecipient and proposal submission policies.

OSP looks forward to working with you to build a stronger and more vibrant research administration infrastructure. As always, thanks must be given to the contributors to each issue of the Newsletter, including Akidah Felder for preparing the Newsletter for publication. This is truly a team effort.

Best regards,

Jim Casey
Office of Sponsored Programs & Grants and Contracts Accounting

Statement of Guiding Values

The Office of Sponsored Programs (OSP) and Grants and Contracts Accounting (GCA), offices that collaboratively support sponsored research administration at American University, serve as stewards and facilitators of the research environment for AU’s internal and external stakeholders.

OSP and GCA are guided by and adhere to the following values:

Collaboration – Working together leads to higher levels of achievement. OSP and GCA are determined to collaboratively work with each other and the entire university community to implement effective research administration business practices at AU.

Professionalism – OSP and GCA are committed to maintaining, nurturing, and demonstrating the highest degree of integrity, responsibility, and ethical practices in interactions with all persons, whether inside or outside AU.

Commitment – OSP and GCA are committed to providing consistent research administration services while being responsive to the needs of the ever-changing and innovative research environment.

Communication – OSP and GCA will work continuously to provide and promote clear, transparent, and timely communication among administrators, faculty, staff, students, local community partners, private foundations, and federal governmental agencies.
The new subrecipient monitoring policy is a very important part of the research administration infrastructure because it implements the provisions of the Uniform Guidance (UG). This policy is critical for AU research administrators to assess and manage risk in the area of subawards.

As has been mentioned at the prior GAR meetings, creating this policy was not an option for AU. We needed to create a policy in accordance with the UG, and like all AU policies is subject to audit by internal or external partners. Your collaboration in ensuring the success of this policy is greatly appreciated.

Best regards,

Jim Casey

University Policy: Subrecipient Monitoring

Policy Category: Grants and Contracts Policies

Subject: Subrecipient Monitoring

Office Responsible for Review of this Policy: Vice Provost for Research and Dean of Graduate Studies

Procedures: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (2 CFR 200)


I. SCOPE

This policy specifies the University’s responsibilities for monitoring the programmatic and financial activities of its subcontractors / subawardees (“subrecipients”) to ensure satisfactory performance and proper stewardship of sponsor funds.
II. POLICY STATEMENT

This policy addresses institutional responsibilities for monitoring the programmatic and financial activities of its sub-recipients to ensure proper stewardship of sponsor funds. The following policy applies to all subawards issued under sponsored programs made to American University (AU or the University), without regard to the primary source of funding. It is designed to assist Principal Investigators (PIs) and project / program administrators to ensure that, in addition to achieving performance goals, subrecipients comply with applicable federal laws and regulations and with the provisions of any sponsored award that governs the subcontract/subaward agreement.

III. DEFINITIONS

Contractor (Vendor) – An organization or individual that provides goods or services within normal business operations. Contractors (vendors) may provide similar goods and services to many different purchasers, operate in a competitive environment, and provide goods or services that are ancillary to the operation of the sponsored project.

Pass-through entity – The Non-federal entity that provides a subaward to a subrecipient to carry out the program; sometimes referred to as the “prime” or “lead” organization.

Prime Recipient – The direct recipient of a sponsored award to support sponsored research, projects, or programs.

Principal Investigator (PI) – A member of the University faculty/staff who is responsible for the overall design, conduct, reporting and management of an externally sponsored project. The PI is the person who is most familiar with the subawardee’s performance through e-mail, telephone conversations, technical meetings, progress reports, or site visits.

Sponsored Award – A funding instrument with terms and conditions in which the University agrees to provide a return benefit to, or agrees to provide a defined deliverable(s) for a sponsor in exchange for funds. The funding instrument may be a grant, contract, cooperative agreement, or similar document.

Subaward (subcontract, subgrant) – Enforceable agreement, issued under a prime sponsored project, between a pass-through entity and a subrecipient for the performance of a substantive portion of the program. It is a written agreement with a third party for the acquisition of services or goods, or for them conduct of prescribed activities or functions under the prime award where the subrecipient has responsibility for programmatic decision making and measurable performance requirements related directly to the prime award. These terms do NOT apply to the procurement of goods or services from a contractor (vendor).

Subrecipient (subcontractor / subawardee) – A non-American University organization that receives subawards from American University to carry out programmatic effort under an AU sponsored project. A subrecipient’s performance is measured against whether the objectives of the sponsored program are met.

IV. POLICY

The University is required by Uniform Guidance, specifically §200.328, to evaluate each subrecipient’s risk of noncompliance. This evaluation consists of monitoring the activities of subrecipient organizations to ensure the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verifying that subrecipients are audited as required by Subpart F of the Uniform Guidance. For non-federal awards, AU may also be required by the sponsor to provide evidence of due diligence in reviewing the ability of a subrecipient to properly meet the objectives of the subaward and account for the sponsor’s funds.

Consistent with federal, state, and local regulations, and to ensure proper stewardship of sponsored projects, the University must undertake certain activities to monitor Subrecipients, including but not limited to Subrecipient prequalification, reporting, site visits, regular contact, and other means to provide reasonable assurance that Subrecipients administer and perform Subawards in compliance with applicable law, regulations, and the provisions of the University’s sponsored projects. Additionally, The University assesses, among other factors, the Subrecipient organization’s financial status and internal controls based on documentation from the Subrecipient and other independent sources, in order to determine whether to proceed with the Subrecipient. Based on that assessment, terms and conditions are established in the Subaward agreement to be consistent with the level of perceived risk and then the University identifies specific monitoring activities.

Failure to adequately monitor the compliance of subrecipients could result in reputational damage to the University and its Units, and jeopardize current and future funding. It is the responsibility of American University, as the prime recipient, to ensure the good stewardship of sponsored funding and ensure that all funds assigned to subrecipient organizations receive the same diligence as sponsored funds that remain at American University.

V. ADMINISTRATION AND MONITORING PROCEDURES

Distinction Between a Subrecipient and a Contractor.

OMB Uniform Guidance also makes a distinction between a subrecipient (substantive work) and a contractor:

- A subrecipient is defined as “a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.”

- A contractor is defined as “an entity that receives a contract,” which is defined as “a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this Part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward”
AU, as the pass-through entity, must make a case-by-case determination regarding each agreement it makes for the disbursement of Federal funds casting the party receiving the funds in the role of a subrecipient or a contractor. Please refer to AU’s Subcontractor vs. Consultants guide for determinations and characteristics which support the classification of the non-Federal entity as a subrecipient in accordance with OMB Uniform Guidance §200.330.

Not all of the characteristics need to be or will be present to determine whether a non-Federal entity is cast as a subrecipient or a contractor, and the Uniform Guidance states that judgment should be used in each case. While an external entity may be classified as a contractor, it is still subject to compliance rules and regulations, including those that govern the usage of human or animal subjects and select agents. For more information on AU relationships with contractors, please refer to AU’s Procurement and Contracts Policies, Procedures & Guidelines.

**Pre-Award Processing**

During the proposal process, OSP Pre-Award will be responsible for:

- Making project role determinations on whether the applicant is a subrecipient or contractor. If a contractor role is assigned, subrecipient information will not be required.
- Obtaining all subrecipient(s) contact information (PI and administrative contact).
- Ensuring the Subrecipient is not debarred.
- Providing a Prequalifying Questionnaire to all potential subrecipients and requesting that the questionnaire be returned at least 2 business days prior to the published proposal deadline if reasonable.
- Reviewing the budget to ensure an approved federally recognized indirect cost rate or a de minimis indirect cost rate is used as outlined in OMB Uniform Guidance §200.331 and §200.414.

**Post-Award Processing**

After the awarding agency has approved the selection of a subrecipient, whether by issuing an award that contains provisions for a subrecipient or by approving the selection of a subrecipient the Post Award administrators will:

- Verify that the Prequalifying Questionnaire has been completed with all required information. Request any missing information from the subrecipient.
- Analyze potential risks in subcontracting with the subrecipient by using the Prequalifying Questionnaire to determine a subrecipient’s risk rating.
- Determine what language is included in the subrecipient agreement based on the risk classification assigned to the subrecipient.
- Maintain the risk rating determination and the decision of subrecipient vs. contractor.
- Initiate the issuance of a subaward based on the Subrecipient entity, the terms and conditions of the Prime Award, and the Prequalifying Questionnaire.
- Provide the Subrecipient with required information as outlined in OMB Uniform Guidance §200.331.
- Outline special monitoring procedures or requirements for subrecipient compliance.
- Send a PDF of the document to the Subrecipient for signature by an authorized institutional official and request the subrecipients to return the signed subaward or a partially-executed PDF of the document.
- After the subaward has been fully executed, forward a fully-executed subaward to the subrecipient and a copy to the appropriate PI, Department, and Unit personnel.
Fixed Amount subawards may be appropriate when awardees are meeting specific requirements of the Federal award and the amount is based on performance and results. Prior written approval from the agency is required. These subawards cannot exceed the simplified acquisition threshold of $150,000. Post Award will notate if this is the funding mechanism.

**Amendment Processing**

When an amendment to a subaward is needed, Post Award will:

- Review the subaward modification request. Common reasons for amending a subaward include providing additional funding, extending the period of performance, or modifying the reporting schedule. If an increase to the subaward is being requested, it is necessary to verify that the correlating budget is available, and that the Statement of Work and Budget Justification support the need for an increase.
- Request prior approval from the funding agency if needed (e.g., change in scope, change in PI, or transferring the subaward to a new institution).
- Prepare and submit the subcontract amendment to the subrecipient.
- After the amendment has been fully executed, forward a fully-executed subaward modification to the subrecipient and a copy to the appropriate PI, Department, and Unit personnel.

**Evaluating Subrecipient Risk Levels**

The Office of Sponsored Programs (OSP) and Grants and Contracts Accounting (GCA) at AU will use each subrecipient’s Prequalifying Questionnaire along with their prior experience working with the same or similar subawards, and the results of previous audits to determine which risk level to assign to each subrecipient. Subrecipients assigned a risk level of medium or above will be notified of the decision and the reasons for the decision in writing.

**Monitoring Process**

Individual monitoring plans for each subrecipient will be based on the risk rating assigned to each subrecipient during the risk evaluation process.

**Subaward Termination**

If it is decided that the subaward will not be renewed or will be terminated, AU will:

- Ensure that the final invoice and appropriate final reports (including technical reports) have been received from the subrecipient on time.
- Amend the subagreement to reduce the time and/or funding of the subrecipient in order to end the project (if necessary). This amendment must be fully executed prior to reallocating any possible remaining funds from the subrecipient.

**Foreign Subrecipients**

Even though Single Audits do not apply to foreign subrecipients, foreign subrecipients will still be required to complete a Prequalifying Questionnaire and provide documentation and certification that applicable compliance requirements are in place sufficient to comply with federal regulations.
Advance Payment of Funds to Subrecipients

In general, it is the University’s policy to deny advance payments to Subcontractors, due to the liability it creates for the University. However, in exceptional circumstances, it may be necessary to advance funds to subcontractors in developing countries if not doing so would jeopardize the performance of the project. The agreement between the University and the subcontractor must include specific language in the payment section stating the terms for advance payments and will be discussed at the outset of subcontract negotiations.

Please refer to AU’s Guidelines on Advance Payments to Domestic and Foreign Subcontracts for processing directions and approval requirements.

VI. ROLES AND RESPONSIBILITIES

**Principal Investigators (PI’s)**

- Confirm the statement of work and review any non-standard terms and conditions of the subaward during the subaward agreement negotiation process.
- Monitor programmatic progress and the ability of the subrecipient to meet objectives of the subaward.
- Verify that the performance goals set forth in the Subaward scope of work are being met in a timely manner.
- Monitor costs and activities of Subrecipients to confirm that expenditures charged to Subaward agreements are consistent with the budget and scope of work of the Subawards, and ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and terms and conditions of the subaward. This includes:
  - Reviewing financial and programmatic reports required to be submitted to AU on no less than a quarterly basis.
  - Following-up and ensuring that the subrecipients take timely and appropriate action on all deficiencies detected during on-site reviews.
  - Review the invoice to determine that the amount being requested for payment is consistent with the accomplishments of the subawardee during the billing period.
  - If there are problems with the invoice, such as equipment purchased without any required prior approval, do not approve the invoice for payment. Rather, PI should consult with your department administrator and the Office of Sponsored Projects to resolve these issues.
  - Final invoices are only to be approved and signed off for payment when the subawardee has completed its performance under the award, submitted all required reports and/or other deliverables, and that the costs incurred are appropriate for that performance.
- Monitor each subaward throughout the period of performance and escalate concerns to OSP and GCA for further action.
- Provide subrecipients with training and technical assistance on program-related matters (if needed).
- Perform on-site reviews of the subrecipients’ program operations (based on the assigned risk level).
- Provide documentation of department level monitoring efforts (based on subrecipient risk levels).
- Request the final invoice and the appropriate final financial / technical reports.
Departmental (college/school grant or finance) Administrators

- Work with PIs to resolve issues on subawards as they arise.
- Ensure invoices received from subrecipients provide a reasonable assurance of the work performed.
- Identify and follow-up on questionable expenditures
- Process subrecipient invoices for payment.
- When notified, stop processing invoices for subrecipients with elevated risk assessments due to noncompliance.
- Maintain subrecipient invoicing documentation.
- Ensure the final invoice and appropriate final reports (including technical reports) have been received from the subrecipient.

Office for Sponsored Programs (OSP)

- Maintain the decision of subrecipient vs. contractor.
- Prepare, negotiate, and/or revise Subrecipient awarding agreements and amendments.
- Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the necessary information.
- Advise Subrecipients of federal, state or local requirements, terms and conditions of the prime award, and University requirements that apply to the Subaward.
- Ensure subrecipient budgets are itemized by major cost categories e.g., salary, fringe benefits, equipment, travel, etc. and include sufficient justification and basis for each cost element such as established rates or vendor quotes.
- Request Subrecipient Prequalifying Questionnaire and assess potential subrecipient organizations for programmatic suitability for determining a programmatic subrecipient risk rating.
- Issue a management decision letter pertaining to the Federal award provided to the subrecipient on behalf of AU as required by OMB Uniform Guidance § 200.521 Management decision.
- Maintain subrecipient awarding information and the risk rating determination.
- Process subaward amendments as necessary.
- Incorporate additional terms into subawards based on information from the PI, department/local unit, and the risk assessment of the subrecipient organization.
- Inform schools, departments, and PIs when issues are identified with a subrecipient organization with whom they have an active subaward.
- Consider taking enforcement action against noncompliant subrecipients.
Grants and Contracts Accounting (GCA)

- Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate financial management risk rating and subsequent subrecipient monitoring activities.
- Verify that Subrecipients are audited as required by Federal Guidance.
- Consider whether the results of the Subrecipient's audits, on-site reviews, or other monitoring activities necessitate adjustment of the University’s records, such as budget modifications or reallocation of resources, repayment from the Subrecipient, or other measures.
- Render a management decision for financial management pertaining to the Federal award and work with OSP to set the appropriate risk level.
- Inform OSP when issues relating to financial management are identified with a subrecipient organization with whom AU has an active subaward.

VII. EFFECTIVE DATE(S)

This policy was effective April 1, 2016

VIII. SIGNATURE, TITLE AND DATE OF APPROVAL

Scott A. Bass, Provost Signed: April 12, 2016
Douglas Kudravetz, CFO, Vice President and Treasurer Signed: April 12, 2016
**Educating Newbies on the NIH Grants Process**

Each year, the NIH Office of Extramural Research (OER) hosts NIH Regional Seminars on Program Funding and Grants Administration. Over 60 NIH extramural staff from across NIH ICs and NIH OD, as well as HHS staff, present to new investigators, research administrators, trainees, post-docs and more at the seminar. This year we are offering the seminars in the following locations:

**Chicago, IL**  **October 26-28, 2016**

For more information please visit:

http://regionalseminars.od.nih.gov/baltimore2016/

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**OSP Welcomes**

**NEW OSP STAFF MEMBER:**

Ms. Cristina Corvo, Grant & Contract Manager

Cristina Corvo joined OSP in March 2016 as a Grant and Contract Manager. Prior to joining the OSP, Cristina worked in the Office of Sponsored Programs at Stanford University. Cristina has a M.Sc. in Public Affairs, International Relations, from the University of Massachusetts, Boston, and a B.A. in English and Cultural Anthropology from Northeastern University.
Let’s face it – all who engage in sponsored research activity by submitting proposals would like to have his or her project funded. One takes time and puts his or her best foot forward to develop the best proposal and hope for the best. In developing the budget or proposal, one would strive to develop what is deemed to be the most attractive possible. For example, one would charge only a portion of time to the project but may work more than what is budgeted or may state that another department will provide support but that support is not accounted for in the budget. Such examples are types of cost share. Cost share is defined as the portion of research costs that are not provided by the sponsor. In other words, cost sharing are costs institutions provide in research and sponsored projects.

This article provides an overview of cost sharing and how it applies to research and sponsored projects.

Cost sharing may consist of allowable direct or indirect cost resources and must be approved by the appropriate unit’s Dean’s Office. The following are typical cost share expenditures that may be used for cost sharing.

**Direct Costs** – Faculty or Staff support (fringe benefits included); equipment (if the award is contingent upon cost-sharing such as equipment or instrumentation grants); travel expenses; supplies

**Indirect Costs** – When direct costs are cost shared, the indirect costs associated with the direct costs are automatically cost shared. Indirect costs do not disappear because a sponsor refuses to pay them. When the University is not reimbursed, it has to pay these costs.

There are different types of cost sharing: mandatory; voluntary committed; and voluntary uncommitted. Mandatory cost sharing is the University contribution that is required by the sponsor. If not included in the proposal, sponsors will not consider the proposal submitted by the University. One will find the mandatory cost share within the sponsor’s guidelines; it will be clearly stated. It is important to note that almost all federal solicitations do not require a mandatory cost share; however, some foundations may have the cost share requirement.

It is important to read the guidelines to determine whether or not this requirement has to be met. Voluntary cost sharing derives as a result of cost sharing amounts that were included in the proposal and/or budget that was submitted to and approved by the sponsor with the intention of the University providing funding for these costs. For example, if an investigator proposes to devote 30% effort to a project but only requests 20%, the additional 10% effort that will be supported by the University is voluntary committed cost sharing. This type of cost share must have prior approval by the investigator’s unit.
Voluntary uncommitted cost sharing is defined as university faculty (including senior researchers) effort that is over and above that which is committed and budgeted for in a sponsored agreement. This type of cost share allows voluntary effort to be contributed on a sponsored project without requiring the effort to be documented. For example, if an investigator proposes and charges 30% effort but actually devotes 40% effort, the additional 10% effort that was not originally promised is voluntary uncommitted cost share.

It is important to note that the significance of the distinction between the two types of voluntary cost sharing is that voluntary uncommitted cost sharing is not included in the project budget and not included in the university’s base for computing the indirect cost rate.

A few items to remember:

- It is AU’s policy to minimize institutional and third party cost sharing on sponsored projects. It is the university’s policy not to approve cost sharing on a voluntary basis. Exceptions to this policy must be approved in advance by the Vice Provost of Graduate Studies and Research.
- Approval for cost share must be in writing and be included in routing the proposal documents.
- Funds from another federal project may not be used as cost share.
- Funds from non-federal awards may be used as cost share but only when specifically allowed by both parties.
- Investigators may not offer a cost-share commitment, even if one feels that it is desirable to free up funds for other projects. Such action would charge the department or school budget for effort one would devote to the sponsor’s work as well as impact the indirect cost rate.
- If it is determined that there is cost sharing at the time of award, the cost share obligation must be met within the project period. If the cost share obligation is not met, the sponsor may reduce the award.

For more information about cost sharing in sponsored projects, here is a useful resource:

When developing a budget, many researchers think about the direct costs of the research projects. What may be thoroughly considered are supplies, personnel, and funds for travel. Once these cost categories have a figure allocated to them, one may pat himself or herself on the back and mark that off the box on the project development checklist. Not so fast – all of the direct charges have been thought of but what about the costs for copies made, telephone calls placed, lights used, lab space, etc.? What is forgotten but paramount to all research projects is the application of indirect costs. Researchers, whether new or experienced, seem to have a question about indirect costs – What is it? Do we need it? What do I get from it? “Perhaps no other category of funding for the research enterprise is more misunderstood, maligned, and generally resented than indirect costs.”

It is reported that the federal government invests approximately $15 billion annually in science and technology at research academic institutions. Furthermore, about 75 percent of the funds support direct costs, whereas about 25 percent funds indirect costs.

This article will provide depth into an important – but oftentimes forgotten – component of budget development: indirect costs.

**What are indirect costs?**

Indirect costs, also known as facilities and administrative costs, 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.” Indirect costs generally include the central university, college and departmental research administration infrastructure, depreciation on both the space in buildings that is used for sponsored research and on research equipment, maintenance and utility costs for space used for sponsored research, research infrastructure support, and the portion of library costs that can be attributed to the existence of sponsored research on campus.

Think back to when you were getting ready to enter college. You were excited, ready to start your next journey in life! Whether or not you received some type of financial aid or paid out of pocket, you had to either get in line or go online to pay tuition. As time passed, assignments were given to you so you had to burn the midnight oil. Computer labs were open for you to finish up that research paper. Your class held events throughout the year to bring everyone together. You even may have had a live mascot to see whenever you’d like and would be ecstatic to see on game days! Now, what you may not have realized is that maintenance for the computers as well as the lights in the lab costs money.
The class officers could not hold events without funding. The mascot has to be proper care as well. All of these costs are included in tuition; in other words, the indirect costs of your education at your prestigious institution of higher learning. See? Indirect costs are already applied in life (not just in research) and you may not even realized it!

**How are indirect cost rates determined?**
To determine an institution’s indirect cost rate, a proposal must be submitted and audited by a cognizant agency and then negotiated between the cognizant agency and institution. Typical indirect cost rates range from 29.8% to 69% of the direct cost of research.

**What is American University’s indirect cost rate?**
American University’s indirect cost rate is 43% on-campus and 19% off-campus. This amount is multiplied by the modified total direct costs to get the monetary amount that will be applied to the research project. According to American University’s Negotiated Indirect Cost Rate Agreement (NICRA), the off-campus rate is applied to all activities that are carried out at facilities that are not owned by AU (where rent is allocated to the project) as well as for projects that are performed off-campus for more than 50% of the project duration.

**How is the indirect cost rate calculated?**
Calculating the cost of federally sponsored research can be a convoluted procedure. The Office of Management and Budget (OMB) initiated the process of calculating costs while the Cost Principles for Educational Institutions (OMB Circular A-21) enforces the policies and procedures. Please note that OMB Circular A-21 has been relocated to Title 2 in the Code of Federal Regulations (2 CFR), subtitle A, chapter II, part 220 and provides a good foundation for streamlining and simplifying the policy framework for grants and agreements.

Although scholarly research has benefits, it is important to note a disadvantage: the ways in which indirect costs are calculated and allocated vary among institutions. Some institutions have a negotiated rate of indirect costs by using salaries and wages, while others use modified total direct costs (MTDC) or total direct costs minus exclusions.

Four causes have been identified as reasons for the variations in indirect cost rates at institutions: 1) differences in university structure, including the university’s mix of research and teaching and its institutional incentives to recognize and recover indirect cost; 2) differences in the price of elements supporting research activities, such as space and power; 3) differences in university policy—primarily accounting policies that determine the treatment of particular costs as direct or indirect; and 4) differences in treatment by the various cognizant agencies due to the negotiation process.

To calculate the indirect cost rate at American University, the indirect costs are divided by the institution’s total direct costs excluding capital expenditures (building, individual items of equipment, alterations and renovations) and that portion of each subaward in excess of $25,000.

**Can the indirect cost rate be applied at a different rate?**
If a funder has a different rate in which indirect costs can be applied, then the university applies the rate set by the funder. If the funder has an indirect cost policy, then the Office of Sponsored Programs must be able to access this policy on the funder’s website or have a letter from the funder on its letterhead.
How are indirect costs allocated at American University?
It is important to note that the institution bears costs of doing research. In addition, there are some institutions that do not have an indirect cost allocation plan – which is viewed as a barrier of researchers to engage in sponsored research activity. American University, in accordance with the Overhead Recovery and Revenue Distribution Policy, distributes indirect costs recovered from all externally grants and contracts on an annual basis. The funds are allocated in the following ways:

50% to the Office of the Provost for research support including distribution to the academic units whose faculty conducted the sponsored program

50% to central university funds to support the university’s operating budget

This means that an added benefit of indirect costs is that it is a reinvestment tool! This is how there is a strong support staff as it relates to sponsored research endeavors – why our doors are opened to serve!

Simply put, the more researchers engage in sponsored research activity, the more the probability of awards will increase. The more revenue generated from indirect cost portion of external sponsored research activity, the greater the reward for those involved in the process! Therefore, the next time a novel idea is thought and you would like to submit your proposal application, do not forget those indirect costs!

Where can one find more information on indirect costs?
For more information about indirect costs, here are some helpful resources:

University Policy: Facilities and Administrative (F&A) Costs on Sponsored Projects: http://www.american.edu/loader.cfm?csModule=security/getfile&pageid=4116869


Departmental Research Administrators: Each unit has research administrators who are willing and able to assist in budget development. If unsure of who to contact, be sure to check with your Dean or department chair.

References


Ashley J. Alexander, PhD, is the Assistant Director in the Office of Sponsored Programs at American University.

Ashley can be reached at ashleya@american.edu.

A link to the abstract of Ashley’s dissertation, Faculty Member Perceptions of Sponsored Research at Historically Black Colleges and Universities, can be found on ProQuest: http://search.proquest.com/docview/1679279166/abstract?accountid=8285

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Research Administrator Certification Graduation (RAC)

Reminders:

Complete Quizzes for sessions 1-8

Remember the quiz submission deadline is May 10, 2016 at 5pm

Current Participants:

If your questions are specific to the following sessions, please contact:

Sessions 1-4 & 8 Afelder@american.edu

Sessions 5-7 contact GCA@american.edu

RAC Graduation

will occur on

May 19, 2016 at Noon

Location: OSP, 4200 Wisconsin Ave NW Rm. 302

To RSVP please contact Afelder@american.edu
College of Arts and Sciences
Anthropology
PI: Dolores Koenig
Title: Dynamics of Change after Forced Resettlement: Long-term Outcomes at Manantali, Mali
Sponsor: National Science Foundation
Award: $230,783.00

Biology
PI: Jeffrey Kaplan
Title: Antibiofilm compounds from marine bacteria
Sponsor: Kappa Biofilm, LLC
Award: $130,436.00

School of Public Affairs - Public Administration and Policy
PI: Seth Gershenson
Title: A Law School Instructor Like Me: Gender, Race, and Ethnicity Dynamics in Law School Classrooms
Sponsor: Association for Institutional Research
Award: $49,126.00
Funding Opportunities Organized by School/Department

Note: Please note that these offerings are a sampling of what is available via our search funding tools and serve as examples for you to consider. If you have not attended a “search funding tool” training session, we encourage you to do so. Performing an individualized search, tailored to your unit or specific research interests will provide the most exhaustive means of locating resources. Please contact Afelder@american.edu with any questions related to our search funding tools.

College of Arts and Sciences

United States Department of State (DOS) - FY 2015 On-Demand Youth Leadership Program

The On-Demand Youth Leadership Program provides three- to four-week exchanges in the United States for high school youth ages 15-18 and adult educators from countries and regions identified as Department priorities. Exchange acts will focus on civic education, community service, and youth leadership development. Secondary themes on issues of global relevance may be added. Applicants must indicate their capacity to program an exchange at varying points during the award period. Participants will engage in a variety of activities such as workshops on leadership and service, community site visits related to the program themes and subthemes, interactive training and discussion groups, presentations, visits to high schools, local cultural activities, homestays, and other activities designed to achieve the program’s stated goals.

Deadline: May 29, 2016

The Kenneth B. and Mamie P. Clark Fund,

This fund supports research and demonstration activities that promote the understanding of the relationship between self-identity and academic achievement with an emphasis on children in grade levels K-8. This grant will alternate every other year between an early career psychologist and a graduate student. The 2016 grant will support an early career psychologist. The Kenneth B. and Mamie P. Clark Fund was established in 2003 to honor the Clarks and to perpetuate their work as pioneers in understanding the psychological underpinnings of race relations and in addressing social issues such as segregation and injustice.

Deadline: June 15

LIMITED SUBMISSION: The Morris & Gwendolyn Cafritz Foundation

The Morris & Gwendolyn Cafritz Foundation supports IRS-registered, tax-exempt, 501(c)(3) organizations with a public charity status of 509(a)(1) or 509(a)(2) only. These organizations must serve residents in the District of Columbia, Prince George's and Montgomery Counties in Maryland, Arlington and Fairfax Counties, and the cities of Alexandria and Falls Church in Virginia. Grants are made in four program areas: Arts and Humanities, Community Services, Education and Health & Environment.

Deadline: July 1

*Broad funding area, open to other units/colleges.
### Funding Opportunities Organized by School/Department

*Note: Please note that these offerings are a sampling of what is available via our search funding tools and serve as examples for you to consider. If you have not attended a “search funding tool” training session, we encourage you to do so. Performing an individualized search, tailored to your unit or specific research interests will provide the most exhaustive means of locating resources. Please contact Afelder@american.edu with any questions related to our search funding tools.*

#### Kogod School of Business

**United States Department of Education (ED) - Special Education Research Programs - Special Education Policy, Finance, and Systems**

The Special Education Policy, Finance, and Systems (Policy/Systems) topic supports research that contributes to the improvement of education for students with or at risk for disabilities from kindergarten through Grade 1… more »211. Intervention and education for students with disabilities typically require the coordination of a variety of programs and services. Little rigorous research has examined either direct causal relations or indirect associations between student outcomes and various systemic or organizational strategies. Through the Policy/Systems program, the Institute supports research to improve outcomes for students with disabilities or at risk for disabilities by identifying systemic processes, procedures, and programs that may be directly or indirectly linked to student outcomes.

**Deadline: May 21, 2016**

**The Coca-Cola Foundation– Community Action Grants**

The Coca-Cola Company, its global philanthropic arm, The Coca-Cola Foundation, and its regional foundations strive daily to be responsive to the citizenship priorities in the global communities where we live and work. Learn more about our regional foundations. At The Coca-Cola Company, we recognize that we cannot have a healthy and growing business unless the communities we serve are healthy and sustainable. As a global beverage company, we have committed ourselves to improving the quality of life in the communities where we do business. Our community investment priorities reflect the global and local nature of our business and focuses on those global pillars where The Coca-Cola Company can make a unique and sustainable difference: water stewardship, active healthy living, community recycling, and education. All requests for community support in the form of grants or sponsorships for consideration by The Coca-Cola Company, The Coca-Cola Foundation or any of its affiliated regional foundations must be submitted through our online application system. Those proposals meeting specific guidelines, and further our strategic goals and objectives, will be considered for funding.

**Deadline: Continuous**
Funding Opportunities Organized by School/Department

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School of Communication

Academy of Motion Picture Arts and Sciences - Student Academy Awards (SAA)
The Student Academy Awards (SAA) recognizes and honors student filmmakers who demonstrate excellence in the creation of motion pictures. By awarding these outstanding achievements, the Academy strives to support and... more » inspire emerging filmmakers and to foster growth and education in the art and science of motion pictures. Entries must have been made in a teacher-student relationship within the curricular structure of the teaching institution

Deadline: June 1, 2016

American Council on Germany (ACG) - ACG McCloy Fellowships in Journalism
These fellowships provide print, broadcast, and new-media journalists, in relatively early stages of their careers, with the opportunity to travel to Europe or the United States for up to three weeks to conduct on-site... more » research and interviews and pursue stories of their own design. Time spent reporting abroad has the potential to transform young journalists’ modes of thinking and broaden their professional horizons. Though the current global political landscapes is a rapid flux and offers exciting subjects for young journalists to confront, funding for foreign correspondence at many newspaper and other media organizations remains low.

Deadline: June 1, 2016

National Foundation for the Arts and the Humanities - Digital Projects for the Public
Digital Projects for the Public grants support projects that significantly contribute to the public’s engagement with the humanities. Digital platforms--such as websites, mobile applications and tours, interactive touch screens and kiosks, games, and virtual environments--can reach diverse audiences and bring the humanities to life for the American people. The program offers three levels of support for digital projects: grants for Discovery projects (early-stage planning work), Prototyping projects (proof-of-concept development work), and Production projects (end-stage production and distribution work). While projects can take many forms, shapes, and sizes, your request should be for an exclusively digital project or for a digital component of a larger project.

Deadline: June 8, 2016
Funding Opportunities Organized by School/Department

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School of International Service

Maryland Department of Planning - Management Plan Development Grants

Heritage Area management entities may receive matching Maryland Heritage Areas Authority (MHAA) grant funds for the development or updating of Heritage Area Management Plans. The purpose of a Heritage Area Management Plan is threefold: to provide a strategic action blueprint for coordinating the many collaborative efforts to develop a successful heritage area; to enable key stakeholders to reach consensus on the roles each will play in implementation of the management plan; and to determine the optimum investment of public resources necessary to trigger the significant private commitments of funds, energy, and programmatic support that will make the heritage area sustainable over time.

Deadline: Continuous

The Pacific Foundation, Inc. - The Pacific Foundation Grants

The Pacific Foundation envisions a more fair society that can leverage the power of new and innovative technology, ideas and global communication to identify and seek solutions to long-standing problems facing the poor, vulnerable, and disenfranchised. Pacific Foundation was founded in 2006 to address issues of social justice, the environment, arts and technology.

Deadline: Continuous
Funding Opportunities Organized by School/Department

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School of Public Affairs

Patient-Centered Outcomes Research Institute (PCORI) - PCORI Funding Announcement: Addressing Disparities

PCORI invites applications for clinical comparative effectiveness research (CER) designed to evaluate and compare interventions intended to reduce or eliminate disparities in health and health care. Patients, caregivers, and clinicians often lack the appropriate evidence required to make the best choices regarding prevention, screening, diagnosis, monitoring, or treatment. Applications to the Addressing Disparities Program should focus on overcoming barriers that may disproportionately affect health outcomes or focus on identifying best practices for reducing disparities in target populations (racial and ethnic minority groups; low-income groups; residents of rural areas; individuals with special healthcare needs, including individuals with disabilities; patients with low health literacy/numeracy and/or limited English proficiency; and lesbian, gay, bisexual, and transgender [LGBT] persons).

Deadline: June 6, 2016

Scherman Foundation - Core Fund Strengthening NY Communities

In response to these challenges and opportunities, the Foundation’s Core Fund Strengthening New York Communities Program (SNYC) focuses on strengthening New York City’s low-income communities, which, despite challenges and hardships, are a consistent source of the city’s vitality, resilience, and success. The Foundation believes that organized and active neighborhood residents are in the best position to identify problems and solutions, and to create long-term social justice outcomes. The Foundation therefore funds efforts that mobilize residents to identify and advocate for community-initiated solutions and policy changes. These efforts can address changes on multiple levels, from local and citywide, to state and federal.

Deadline: Continuous

Robert Wood Johnson Foundation - Changes in Health Care Financing and Organization (HCFO)

This program will provide funds to support policy analysis, research, evaluation and demonstration projects that provide policy leaders timely information on healthcare policy and financing issues. Funding will support projects that: Examine significant issues and interventions related to healthcare financing and organization and their effects on healthcare costs, quality and access. Explore or test major new ways to finance and organize healthcare that have the potential to improve access to more affordable and higher quality health services.

Deadline: Continuous
Funding Opportunities Organized by School/Department

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Washington College of Law

United States Department of Justice (DOJ) - BJA FY 15 Tribal Civil and Criminal Legal Assistance Grants, Training, and Technical Assistance

The goals of TCCLA are to 1) enhance the operations of tribal justice systems and improve access to those systems, and 2) provide TTA for development and enhancement of tribal justice systems. Related objectives are to provide quality technical and legal assistance and to encourage collaboration among grantees, Indian tribes, and tribal justice communities to enhance the provision of legal services in tribal justice systems. Grantee objectives have included providing procedural justice and enhancing due process in tribal civil and criminal legal procedures, legal infrastructure enhancements, public education, and TTA for the development and enhancement of tribal justice systems.

Deadline: June 9, 2016

Grants to Tribal Domestic Violence and Sexual Assault Coalitions Program supports the development and operation of nonprofit, nongovernmental tribal domestic violence and sexual assault coalitions. Tribal coalitions provide education, support, and technical assistance to member Indian service providers and tribes to enhance their response to victims of domestic violence, dating violence, sexual assault, and stalking. Eligible applicants must meet the statutory definition of a “tribal coalition.”

Deadline: May 23, 2016

STOP Violence Against Women Formula Grant Program, awarded to states and territories, enhances the capacity of local communities to develop and strengthen effective law enforcement and prosecution strategies to combat violent crimes against women and to develop and strengthen victim services in cases involving violent crimes against women. Each state and territory must allocate 25 percent for law enforcement, 25 percent for prosecutors, 30 percent for victim services (of which at least 10 percent must be distributed to culturally specific community-based organizations), 5 percent to state and local courts, and 15 percent for discretionary distribution.

Deadline: May 26, 2016
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  Directory Online (Professional version)?

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  munications Manager, Ms. Akidah Felder via e-mail
  Afelder@american.edu

What to expect in next month’s OSP Monthly:
  - Funding Opportunities
  - Staffing Updates
  - Upcoming GAR Date: June 23rd

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