These are federally required policies and accompanying processes and most are mandatory for research both funded and non-funded at institutions of higher education.
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GONZAGA UNIVERSITY WHISTLEBLOWER/WRONG DOING POLICY

PURPOSE

To provide a disclosure mechanism by which members of the University community can report Wrongdoing; and to provide protection to members of the University community who report Wrongdoing.

POLICY

Any student, faculty, or staff member who has reasonable grounds to believe that another student, faculty, or staff member has committed Wrongdoing is encouraged to make a Protected Disclosure in accordance with this Policy. The Protected Disclosure shall be made within 30 days of discovering the Wrongdoing.

SCOPE

This policy should be known and understood by all faculty and staff PIs.

Confidentiality:
The University will use all reasonable efforts in keeping Protected Disclosures, including the identity of the person making the Protected Disclosure, confidential. Confidentiality will only be limited to conduct an investigation or disciplinary proceeding or as otherwise may be required by law.

Retaliation:
No individual who makes a Protected Disclosure will be subject to Retaliation. Any person who imposes Retaliation or attempts to impose Retaliation against any individual who makes a Protected Disclosure is subject to discipline, up to and including termination, in accordance with University policy and procedures.

Bad Faith Allegations:
Anyone who makes a Protected Disclosure that is frivolous, vexatious, or made in bad faith is subject to discipline, up to and including termination.

Reporting:
The Protected Disclosure Coordinator shall provide an annual report to the Board of Regents of Protected Disclosures made, any investigations undertaken, and any actions taken.

DEFINITIONS

Protected Disclosure is any disclosure made under this Policy concerning an actual or perceived Wrongdoing provided that the disclosure is not frivolous, vexatious, or made in bad faith.
Research Integrity Officer (RIO) is the individual to receive and review Protected Disclosures made in accordance with this Policy.

Retaliation is any adverse action against an individual because she or he has made a Protected Disclosure.

Wrongdoing (i) any violation of federal, provincial, or municipal laws or regulations (ii) a violation of University policy (iii) a breach of University code of conduct (iv) unethical or gross misconduct.
GONZAGA UNIVERSITY WHISTLEBLOWER/WRONG DOING PROCESS

PROCEDURE FOR FILING A PROTECTED DISCLOSURE

1. Any student, staff, or faculty member may make a Protected Disclosure, within 30 days of discovery of the Wrongdoing, to the Research Integrity Officer (RIO).
   Telephone: (509) 313-5870
   Email: waite@gonzaga.edu

2. The Protected Disclosure should include the following information
   a) the parties involved;
   b) the nature of the Wrongdoing;
   c) the date(s) of the Wrongdoing;
   d) any other information necessary to evaluate the matter

3. The RIO will respond in writing to the individual making the Protected Disclosure acknowledging the receipt of the complaint.

4. Within 15 working days of receipt of the Protected Disclosure, the RIO will determine if:
   a) there is a prima facie case of Wrongdoing, and should therefore proceed to Investigation; or
   b) the complaint should be dismissed for being frivolous or vexatious in nature or made in bad faith or whether it should be dismissed for some other valid reason

5. The RIO will immediately inform the individual who made the Protected Disclosure of the decision and the next steps, if any. The RIO will advise the individual who made the Protected Disclosure of the disposition of the matter.

6. If the RIO concludes there is a prima facie case of Wrongdoing, she or he will refer the matter for Investigation in accordance with the applicable university code of conduct, collective agreement, or policy and procedures.

7. The RIO shall monitor the Investigation and any subsequent disciplinary proceedings and will maintain appropriate records as she or he may deem necessary to perform their duties under the Protected Disclosure Policy.
GONZAGA UNIVERSITY RESPONSIBLE CONDUCT OF RESEARCH POLICY

PURPOSE

The purpose of this document is to outline Gonzaga University’s plan for implementing NSF and NIH requirements for instruction in the responsible conduct of research (RCR) and for supporting RCR instruction programs at Gonzaga University.

POLICY

All members of the GU community are expected to adhere to the highest ethical and professional standards as they pursue research and scholarly activities. In doing so, GU requires the vigilance of all members engaged in research and scholarly endeavors to comply with the legal, regulatory, and ethical requirements established by the University, regulatory agencies, funding sources and professional organizations. The Office of Research Integrity (ORI), organized under the U.S. Department of Health and Human Services, the Office of the Secretary of Health and Human Services (OS), and the Office of Public Health and Science (OPHS), is the federal agency charged with the responsibility of oversight in the responsible conduct of research. ORI encourages researchers and institutions to make a special effort to understand, discuss, and teach others the responsible conduct of research. It is understood that RCR can be taught and learned in many ways, and that principles can vary from discipline to discipline. For this reason, it is the intent of the GU Plan for RCR instruction to provide flexibility in its content and delivery methods in such a way that it addresses the specific needs, issues, and concerns of various target audiences among numerous disciplines.

SCOPE

All University students, staff, faculty, and employees.

DEFINITION

For the purpose of this Plan, responsible conduct of research (RCR) is defined as “the practice of scientific investigation with integrity.” It involves the awareness and application of established professional norms and ethical principles in the performance of all activities related to research.”
1. **Format:** Substantial face-to-face discussions among the participating trainees/fellows/scholars/participants, including and specifically undergraduate students at Gonzaga University with the faculty mentor; a combination of didactic and small-group discussions (e.g. case studies); and participation of research training faculty members in instruction in responsible conduct of research will provide information and lectures.

   a. **Sponsored Research and Programs Office:** The (Director of SRP or the xxx OF RESEARCH) is available to teach a tuition free course on RCR and will maintain the records of students attending RCR training in the Research office.

2. **Subject Matter:** While there are no specific curricular requirements for instruction in responsible conduct of research, the following topics have been incorporated into plans for such instruction:
   a. conflict of interest – personal, professional, and financial
   b. policies regarding human subjects, live vertebrate animal subjects in research, and safe laboratory practices
   c. mentor/mentee responsibilities and relationships
   d. collaborative research including collaborations with industry
   e. peer review
   f. data acquisition and laboratory tools; management, sharing and ownership
   g. research misconduct and policies for handling misconduct
   h. responsible authorship and publication
   i. the scientist as a responsible member of society, contemporary ethical issues in biomedical research, and the environmental and societal impacts of scientific research

3. **Faculty Participation:** Training faculty and sponsors/mentors are highly encouraged to contribute both to formal and informal instruction in responsible conduct of research. Informal instruction occurs in the course of laboratory interactions and in other informal situations throughout the year.

4. **Duration of Instruction:** Instruction should involve substantive contact hours between the trainees/fellows/scholars/participants and the participating faculty. Acceptable programs generally involve at least eight contact hours.

5. **Frequency of Instruction required by federal funding agencies:** Reflection on responsible conduct of research should recur throughout a scientist’s career: at the undergraduate, post-baccalaureate, pre-doctoral, postdoctoral, and faculty levels. Instruction must be undertaken at least once during each career stage, and at a frequency of no less than once every four years. Individuals at the early career investigator level must receive instruction in responsible conduct of research at least once during this career stage.
GONZAGA UNIVERSITY MISCONDUCT IN RESEARCH POLICY

PURPOSE

Research is the gateway to enhancing knowledge and truth. The highest standards of integrity and intellectual honesty are uncompromising criteria for scholarly and research activities. Actions that impede, undermine or misrepresent the scholarly work of academics and researchers or their conclusions and findings violates the tenet of the pursuit of truth, brings harm to others, and tarnishes the reputation of the academy. Such misconduct, although rare, is unacceptable and cannot be tolerated.

Allegations of misconduct within the Gonzaga University community must be investigated in a serious, timely, and formal manner that ensures fairness and the rights of all parties.

POLICY

The term "Misconduct in Research and Scholarship" covers all serious deviations from professional practices in conducting and reporting research and scholarship. Specifically, "Misconduct" or "Misconduct in Science" means fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting, or reporting research. Also included is misappropriation and deliberate violation of federal, state, or university regulations relating to the conduct of research and scholarship and management of funding. It does not include honest error or honest differences in interpretations or judgments of data. Principal investigators have a special responsibility to assure the integrity of work conducted under their supervision, but all authors in a group effort share responsibility for the published result.

This policy applies to all employees and students engaged in supervised research for Gonzaga University.

SCOPE

This policy should be known and understood by all faculty and staff PIs.

RESEARCH INTEGRITY OFFICER

Allegations of misconduct in research should be reported to the Research Integrity Officer (RIO). The RIO will be responsible for coordinating the implementation of this policy. When the RIO has a real or disqualifying conflict of interest in a particular case, the Academic Vice President will appoint someone else to serve in this capacity for the duration of the case to assure that it is handled in a fair and impartial manner.
GONZAGA UNIVERSITY MISCONDUCT IN RESEARCH PROCESS

ALLEGATION OF MISCONDUCT

Any person who has reason to believe that misconduct in research, as defined in this policy, has taken place shall submit such an allegation in writing to the RIO.

The RIO and Corporation Counsel will inform the individual of the procedures to be followed. If the individual decides to make a formal allegation, he or she will submit the allegation in writing to the RIO, who will initiate a preliminary inquiry. Even if the individual decides not to make a formal allegation, the RIO may initiate a preliminary inquiry if in his or her own judgment sufficient cause exists to warrant one.

Some concerns reported to the RIO may fall outside the scope of this policy. In such a case, the RIO will advise the person reporting the concern about other policies or procedures that may pertain.

PRELIMINARY INQUIRY

When an inquiry is initiated, the RIO will immediately notify the person suspected of misconduct and the appropriate Dean and/or supervisor of the allegation and of the process that will follow. If federal funds are involved, the RIO will simultaneously alert the Controller of the University to take appropriate interim administrative actions to protect federal funds and ensure that the purposes of the federal financial assistance are being carried out.

In the case of alleged misconduct related to research supported by any government agency, the appropriate University official will be notified. After consultation with the appropriate University official, the RIO will ascertain whether federal laws and regulations and/or agency guidelines stipulate that the federal agency be advised of the alleged misconduct and the plan to initiate a preliminary inquiry. If such action is required, the appropriate University official will be directed to communicate that information to the agency representatives concerned.

In the event of possible danger to humans or animals, the Academic Vice President will take appropriate action to protect those at risk. The Academic Vice President may take action to secure any evidence that might otherwise be concealed or destroyed.

Within 15 days after the initial allegation of misconduct, the RIO will also appoint a committee of three University employees who will conduct a prompt and thorough inquiry into the alleged misconduct. Members of the committee should be free of any disqualifying interest and should have appropriate backgrounds for judging the issues at stake. The purpose of the preliminary inquiry will be to gather and review factual information to determine whether a formal investigation is warranted. In the case of a government agency, if the University plans to terminate an inquiry for any reason without completing all relevant agency requirements, a report of such planned termination, including a description of the reasons for such termination, shall be made to the agency.
The committee will submit a written report to the RIO within 60 calendar days of its appointment unless circumstances clearly warrant a longer period. If the inquiry takes longer than 60 days to complete, the committee will provide the RIO written documentation of the reasons for exceeding this limit.

The report of the committee will state what evidence was reviewed, summarize relevant interviews, and include the conclusions of the committee. The person against whom the allegation was made will receive a copy of this report and have the opportunity to comment on it as part of the record.

If the committee determines that the allegation is frivolous, that it cannot be substantiated, or that there is insufficient evidence to justify further investigation, all proceedings will be terminated. If it determines that sufficient evidence exists, the RIO will initiate a formal investigation within 30 days of receiving the report.

If required by a federal granting agency, such as NSF, the Director of Sponsored Research will notify the agency of the University's need to commence a formal investigation. In addition, the Director of Sponsored Research will keep the agency apprised on the investigation's progress.

Records of inquiries will include sufficient documentation to justify the decision to terminate proceedings or to initiate a formal investigation. The RIO will maintain these records in a secure manner for at least three years after completion of the inquiry.

PROCEDURES FOR FORMAL INVESTIGATION

If it is determined that a formal investigation should be conducted in response to an allegation of misconduct, the following procedure will apply.

1. Formal investigation of allegations of misconduct in research and/or scholarship shall be conducted by a special committee appointed for that purpose by the AVP in consultation with the RIO. This committee shall consist of no less than five (5) members of the full-time faculty of Gonzaga University, at least three (3) of whom shall hold the rank of professor and at least one (1) shall belong to the faculty of a school or division other than that in which the misconduct is alleged to have occurred. Selections must reflect the necessary and appropriate expertise for the investigation, while avoiding any real or apparent conflicts of interest. The committee will be chaired by the RIO. The subject of the allegation has the right to challenge any member of the committee for cause.

2. A thorough and appropriately detailed review of the evidence shall be undertaken by the committee by whatever means they consider fair and objective. Normally the investigation will include examination of all documentation, including but not limited to relevant research data, proposals, publications, correspondence, and memoranda of telephone calls. The committee will make every effort to interview all individuals who have made the allegation, been the subject of the allegation, or possess information regarding important aspects of it. Complete summaries of these interviews should be prepared, given to the interviewed party for comment or revision, and included as part of the investigatory file.
3. If a hearing is held, it will comport with the requirements of due process in a private setting. Elements of the hearing will be:
   a. adequate notice;
   b. an unbiased decision;
   c. the recording of all proceedings;
   d. the right to counsel;
   e. the right to presentation of evidence; and
   f. the right to refute contrary evidence by cross-examination.

4. Appropriate facilities and support services shall be furnished by the office of the Academic Vice President to enable the committee to complete its work in a timely manner.

5. If, in the course of its work, the committee discovers additional information which, in its judgment, justifies broadening the scope of the investigation beyond the initial allegation, the committee shall so inform the RIO and the person whose conduct is under investigation.

6. The committee shall prepare and submit a written report to the Academic Vice President at the conclusion of its investigation, which must be completed in 60 days. If the committee determines it will be unable to meet this deadline, it must submit to the Academic Vice President a written request for an extension that includes an explanation for the delay, an interim report on the progress to date, and an estimated date of completion. In cases involving alleged misconduct related to federally funded research, the sponsoring agency may impose other deadlines and/or reporting requirements. In such instances, the Committee Chair shall consult with the Academic Vice President and appropriate University official to determine applicable guidelines, and will inform the members of the committee and the subject of the investigation of any agency requirements/restrictions that may affect their activities.

7. The committee's report shall be composed of:
   a. a concise statement of the allegation;
   b. all records compiled or raised by the committee in its investigation and/or hearing, including submittals by the person complained about; (For a government agency, the committee must prepare and maintain documentation to substantiate an investigation's findings. This documentation must be made available to the agency director, as required.)
   c. the committee's findings of fact and conclusions; and
   d. the committee's proposal for the sanction, if any, to be imposed.

The RIO will compile the committee’s recommendation and any action taken by the Academic Vice President and will provide the appropriate funding agency a copy of the final report of the investigation. In the event the University plans to terminate an investigation for any reason without completing all relevant agency requirements, a report of such planned termination, including a description of the reasons for such termination, shall be made to the agency.

SANCTIONS
Any sanction imposed will be subject to review pursuant to the Faculty or Staff Handbook. If a proposed sanction is involuntary termination for cause the Faculty or Staff Handbook shall be followed.

Pending final disposition of a case, the Academic Vice President may take interim action to protect federal or sponsoring agency funds, the health and safety of research subjects, or the interests of the University.

**PROTECTION OF RIGHTS**

Individuals against whom allegations of misconduct in research are made will be afforded confidential treatment to the maximum extent possible, a prompt and thorough inquiry and investigation if warranted, and an opportunity to comment on allegations and findings of any inquiry and investigation. When allegations are not substantiated by a preponderance of evidence, all proceedings shall be discontinued. The investigative file shall be closed and no reference to it shall appear in individual's personnel records. Additionally, this finding shall be made known to all those who had previously been informed of the allegation. Moreover, the University will make diligent efforts to restore the reputation of the accused.

The University will also make diligent efforts to protect the privacy, reputations, and positions of those who in good faith report apparent misconduct. Allegations that are determined to be frivolous and/or malicious in their origin, however, may provide the basis for subsequent disciplinary action. See the Gonzaga University Whistleblower Policy.

**NOTIFICATION OF SPONSORS**

External sponsors have a right to expect that the integrity of research for which they provide funding will be maintained. If the University determines after a preliminary inquiry to proceed with a formal investigation of misconduct in any research project supported by external funds, the RIO and Director of Sponsored Research shall so notify the sponsoring agency on or before the date the investigation begins. The final report of the investigating committee and the findings of the Academic Vice President shall be submitted to the sponsoring agency within sixty (60) days following the submission of the investigating committee's report. When government agencies or other sponsors require reporting procedures, the University will comply.

In instances where misconduct is determined to have occurred, depending upon its nature, the University will notify research collaborators, editors of journals in which the research was published, professional licensing boards, other institutions with which the individual has been affiliated, criminal authorities, or other persons or organizations with a material interest in the matter.

**COMPLIANCE WITH FEDERAL REGULATIONS**

Gonzaga University will comply with all federal regulations pertaining to misconduct in research.
GONZAGA UNIVERSITY RESEARCH INTEGRITY POLICY

PURPOSE

Gonzaga University aims to foster Research Integrity through policies and procedures that promote responsible conduct of research, research training, and any activities related to that research or research training including Whistleblower Protection, Responsible Conduct of Research, an Administrative Research Integrity Officer, and a Misconduct of Research process. The Research Integrity Officer (RIO) receives and manages Allegations of Misconduct in Research within the GU community. Research Misconduct includes Plagiarism, Fabrication, Falsification, and other research activities that seriously deviate from accepted practices in the research community.

POLICY

Safeguarding the integrity of research and creative activities is fundamental to the mission of Gonzaga University. We owe no less to the communities which sustain institutions like ours and to the governmental agencies and private entities which sponsor the research enterprise. All members of the University community share responsibility to assure that misconduct or fraud in research and creative activity is dealt with effectively and that the University’s high standards for scholarly integrity are preserved.

Moreover, the University has explicit obligations to federal agencies to safeguard research integrity. In seeking funds from these agencies, the University is required to establish and abide by uniform policies and procedures for investigating and reporting instances of alleged or apparent misconduct involving research and related activities.

This University policy on integrity in research and creative works prescribes procedures for impartial fact-finding and fair adjudication of allegations of research misconduct. University Personnel assure quality and integrity in their research and publications primarily by self-regulating, by adherence to individual and professional standards. A variety of informal practices exist within the University for addressing questions and controversies that may arise concerning the conduct of scholarly activities. Most problems are and should be handled by reasoned discussion or informal mediation at the level of University organization closest to the persons involved. It is nevertheless incumbent upon a university both to articulate its policies on academic integrity and to provide effective procedures for institutional treatment of incidents of research misconduct that cannot be handled satisfactorily by informal or mediation procedures.

These procedures are promulgated to deal with allegations of research misconduct, including research fraud, at the University. It is the intent of these procedures to insure a rapid, fair, thorough and confidential review of any allegations of misconduct. It is also the intent of these processes to protect the positions and reputations of good faith complainants, witnesses and committee members and protect them from retaliation by respondents and other institutional members. The University will seek to provide confidentiality to all respondents, complainants, and research subjects identifiable from research records or evidence. These guidelines are intended further to assist the University in administering and enforcing any administrative
actions by the Department of Health and Human Services (“DHHS”); and to actively assure the University’s compliance with all rules and regulations set forth by the DHHS, the NSF, and other federal and funding agencies.

The procedures call for two levels of investigation of allegations: a preliminary inquiry to determine the need for a formal investigation and, if necessary, a separate formal investigation. In addition, the procedures specifically call for the appropriate notification of any entity outside the University whose relationship to the research or other activity in question might reasonably require such notification.

Although these policies focus upon deterring unacceptable conduct, its purpose is to promote compliance with the highest scholarly standards.

**SCOPE**

This policy should be known and understood by all faculty, staff, students, and administrators.
GONZAGA UNIVERSITY RESEARCH INTEGRITY PROCESS

1. The RIO will ensure all policies and procedures at the University are aligned with federal regulations as well as other University policy.

2. Annually the RIO will review the Whistleblower Protection, Responsible Conduct of Research, Misconduct of Research and all other research related policies to ensure compliance.

3. When necessary the RIO will collaborate with Deans to improve these research policies to stay current and remain competitive in the ever-changing research landscape of funded research and creative activities.

4. The RIO will provide an annual report to the AVP outlining any research policy or process changes and work within University procedures for policy and process updates.
GONZAGA UNIVERSITY FINANCIAL CONFLICT OF INTEREST POLICY

PURPOSE

The highest standards of conduct and honesty are expected of all employees of Gonzaga University. It is the obligation of all personnel to avoid involvement in activities which conflict or might appear to conflict, with institutional responsibilities. The financial conflict of interest guidelines contained in this document are intended to help employees avoid involvement in actual or apparent conflicts of interest, and to protect both the employee and the University from potential legal liability, damage to its reputation and financial loss. All potential Conflicts of Interest require disclosure, evaluation and either management or elimination under this Policy.

While it is useful to provide basic guidelines to assist employees in assessing potential conflict situations, no list can be so exhaustive as to provide direction for all the variable circumstances which may arise. The personal good judgment of employees is indispensable.

POLICY

No research or sponsored program occurring at Gonzaga University shall be adversely affected by the financial interests related to the research or sponsored program of University personnel carrying out those activities. Prior to participating in a research or sponsored program, University personnel having a potential financial conflict of interest shall disclose the details to the University.

This policy sets forth procedures and guidelines that are to be followed in resolving actual and potential employee financial conflicts of interest and commitment pertaining to sponsored projects. This policy applies to all sponsored projects funded by (A) commercial sponsors; (B) those federal and private agencies having specific conflict of interest requirements; and (C) Purchase Orders and subcontracts issued by Gonzaga University under its sponsored projects irrespective of the source of funds.

SCOPE

All University students, staff, faculty, and employees.

DEFINITION

A financial conflict of interest is considered to exist if an employee’s actions or activities on behalf of the University result in preferential treatment or an improper gain or advantage to the employee, the individual’s family or business associates, or conversely, has a detrimental effect on the University’s interests. It can include an instance in which an employee fails to exercise due care, skill, and judgment on behalf of the University in the performance of the individual’s duties because of a conflict of interest.

BACKGROUND

The University and its employees often benefit from participation in both public and private outside activities. While the University recognizes that employees may have legitimate outside
interests, it is important to ensure that their outside obligations, financial interests, and activities do not conflict or interfere with their commitment to the University. This obligation pertains to both full-time and part-time employees.

In those circumstances in which the University is engaged in or intends to engage in a sponsored project with a commercial organization, or has subcontracted or intends to subcontract to an external organization under one of the University's sponsored projects, a financial conflict of interest may occur when an employee’s affiliation with the external organization meets any one of the following criteria:

a. The employee is an officer, director, partner, trustee, employee, advisory board member, or agent of an external organization or corporation either funding a sponsored project or providing goods and services under a sponsored project on which the employee is participating in any capacity.

b. The employee is the actual or beneficial owner of more than five percent (5%) of the voting stock or controlling interest of such organization or corporation.

c. The employee has dealings with such organization or corporation from which he or she derives income of more than $5,000 per year, exclusive of dividends and interest.

d. The employee's immediate family (spouse, parents, parents-in-law, siblings, children, or other relatives living at the same address as the faculty member) meet any of the criteria stated in (a)-(c) above.
GONZAGA UNIVERSITY FINANCIAL CONFLICT OF INTEREST PROCESS

Each employee participating in a sponsored project is covered by this policy must disclose any external affiliations that may constitute a financial conflict of interest stated in paragraphs (a)-(d) in the Financial Conflict of Interest Policy. A disclosure form must be completed prior to the University's acceptance of the sponsored project. The disclosure form is to be sent to the Sponsored Research and Programs Office via the employee's department supervisor, chair or dean. Disclosures will be reviewed by a Financial Conflict Review Committee convened by the Director of Sponsored Research and Programs when needed. The Committee shall consist of at least two of the following individuals: the Academic Vice President or designee, the chair of the Patent Committee, the Vice President for Finance or designee, the President of the Faculty Senate, the Director of Sponsored Research and Programs, and the Corporation Counsel (as ex officio member).

Confidentiality: All disclosures will be kept confidential and disclosed only on a need-to-know basis as required to perform the review and evaluation required by this Policy.

In reviewing the disclosures, the Financial Conflict Review Committee will be guided by the following practices and apply them as may be appropriate:

a. Assure adherence to relevant University policies.
b. Consider the nature and extent of the financial interest in the relationship of employee and the external organization.
c. Give special consideration to the terms and conditions of sponsored project agreements that may mitigate or complicate the given situation.
d. Consult with and obtain additional information from the employee that the Financial Conflict Review Committee determines may be helpful in resolving actual or potential conflicts.
e. Act in a timely manner so as not to delay unduly the conduct of the sponsored project.
f. Conclude that the University may take one of the following actions:
   1. Accept the sponsored project award.
   2. Not accept the sponsored project award.
   3. Accept the sponsored project subject to suitable modification in either the sponsored project award document or the external organization affiliation(s) of the employee or employee’s family.

If the employee is dissatisfied with the Financial Conflict Review Committee's conclusion, the employee may appeal to the Academic Vice President who will consult with the employee and Financial Conflict Review Committee and others as the Academic Vice President deems necessary and appropriate to the particular circumstance. The decision of the Academic Vice President shall be final.

VIOLATIONS

Violations of this policy, such as willful concealment of financial interests, may result in sanctions being imposed upon the violating individual. The Financial Conflict Review Committee will
review allegations of violations and will make recommendations regarding the imposition of sanctions to the Academic Vice President. The decision of the Academic Vice President with regard to the imposition of sanctions shall be final.

The Sponsored Research and Programs Office shall maintain the records pertaining to each disclosure. Access to such records will be limited to the faculty member, the Financial Conflict Review Committee, the Academic Vice President, and others who have a legal right to review the records.

Certain sponsors, particularly federal agencies, may have requirements that differ from this policy with regard to the timing and frequency of faculty disclosures and other conflict of interest considerations as well. In the case of such discrepancies, those requirements that are the more restrictive will apply.

References and Resources:

Gonzaga University Faculty Handbook, Policies & Procedures 404.00 Conflict of Interest

Gonzaga University Faculty Handbook, Appendix 400A, Conflict of Interest Policy Pertaining to Sponsored Projects
GONZAGA UNIVERSITY ADDITIONAL COMPENSATION POLICY

PURPOSE

These guidelines are provided specifically for the payment of additional compensation from contracts and grants (projects) for work in excess of the established FTE for the position and to comply with federal and state regulations regarding compensation, to allow personnel to be compensated appropriately for approved additional work, to prevent over-compensation on contract and grant project accounts, and to provide a mechanism for processing extra compensation efficiently. This policy is consistent with the OMB Uniform Guidance 200.43.

POLICY

FACULTY

Salary rates for academic year

Charges for work performed on sponsored agreements by faculty members during the academic year will be based on the individual faculty member's regular compensation for the continuous period which, under the policy of the University, constitutes the basis of the faculty member’s salary. Charges for work performed on sponsored agreements during all or any portion of such period are allowable at the base salary rate. In no event will charges to sponsored agreements, irrespective of the basis of computation, exceed the proportionate share of the base salary for that period. This principle applies to all members of the faculty at the University. However, in unusual cases where consultation is across departmental lines or involves a separate or remote operation, and the work performed by the consultant is in addition to his regular departmental load, any charges for such work representing extra compensation above the base salary are allowable provided that such consulting arrangements are specifically provided for in the agreement or approved in writing by the sponsoring agency.

Salary rates outside the academic year

Charges for work performed by faculty members on sponsored agreements during the summer months or other period not included in the base salary period will be determined for each faculty member at a rate not in excess of the base salary divided by the period to which the base salary relates, and will be limited to charges made in accordance with other parts of this section. The base salary period used in computing charges for work performed during the summer months will be the number of months covered by the faculty member's official academic year appointment.

Part time or adjunct faculty

Charges for work performed on sponsored agreements by faculty members having only part time appointments will be determined at a rate not in excess of that regularly paid for the part time assignments. For example, an institution pays $5,000 to a faculty member for half time teaching during the academic year. He devoted one half of his remaining time to a sponsored agreement. Thus, his additional compensation, chargeable by the institution to the agreement, would be one half of $5,000, or $2,500.
STAFF

There is no specified treatment in OMB Circular for the payment of extra-compensation to non-faculty. GU interprets non-faculty extra-compensation to be different from faculty extra-compensation in that there is no required cross-departmental component that must be met. To be eligible for non-faculty extra-compensation, the requestor must demonstrate that the activities to be performed by the non-faculty member are unrelated to the duties of their primary appointment and that the terms are specifically provided for in the agreement or have been approved in writing by the sponsoring agency.

Additional compensation for staff will be based on the sponsored project duties. If the tasks of the sponsored project are similar to the regular staff member duties the sponsored salaries will be based on the staff member’s base salary.

If the scope of the work for the staff member is beyond the regular duties of the staff member an appropriate wage for the time dedicated to the employees participation in the sponsored project will be determined. All employees’ payments will meet federal minimum wage requirements.

SCOPE

This policy applies to all University employees, faculty, staff, and students.
GONZAGA UNIVERSITY ADDITIONAL COMPENSATION PROCESS

FACULTY AND STAFF

1. At the pre-award stage the Office of Sponsored Research and Programs will assist the PI in creating the project budget. The SRP staff will obtain actual salary information and calculate the sponsored salary/wage payments based on accurate calculations of the work and time performed. Post award wage payments on Sponsored projects will be verified through the SRP and Controller’s offices.

2. Effort reporting is required for all compensation payments.

3. The Human Resources Additional Compensation Request Form will be filled out by the faculty or staff member and processed through the Vice President, Human Resources, and EVP.

4. The Grant Accountant and Director of Sponsored Research will review and either approve or deny the Additional Compensation request in the University’s personnel system, PeopleAdmin.
GONZAGA UNIVERSITY LEVEL-OF-EFFORT CERTIFICATION POLICY

PURPOSE
As a condition of receiving federal funding, institutions must maintain an accurate system for reporting the percentage of time that employees devote to sponsored projects. All employees involved in certifying effort must understand that severe penalties and funding disallowances could result from inaccurate, incomplete, or untimely effort reporting. Gonzaga must comply with the guidelines established in the Uniform Guidance 200.43 which requires that non-federal entities comply with a stringent framework of internal control objectives and requirements that includes reasonable assurance that charges are accurate, allowable and properly allocated with emphasis on written policies and consistent definition of work covered by Institutional Base Salary.

POLICY
Gonzaga University has elected to report effort on sponsored projects via the after the fact activity method as described in the Uniform Guidance 200.43. Under this system, the distribution of activities by Gonzaga University employees paid on sponsored projects will be supported by periodic reports confirming that effort expended on these projects closely approximates the actual salary distribution for the period. Other employees not directly paid from a grant, but required to complete a Level-of-Effort Report are employees who spend time working on a sponsored project (cost share). Supplemental compensation is excluded from the reporting process. Level-of-Effort Reports will be distributed to departments based on academic terms. The reports should be reviewed, modified if needed, signed by the employee and returned to the Controller's Office within a reasonable time.

SCOPE
This policy applies to all faculty, staff, and students participating in sponsored projects.

DEFINITIONS

EPAF Form is a document prepared by the department for each employee on Banner HRIS. It allows the charging of salary and wages to designated funds. These documents include information about an employee's appointment(s) and funds from which the employee is paid. EPAFs affect an employee's pay in future pay periods.

Effort is work or the proportion of time spent on any activity and expressed as a percentage of total time worked. Total time worked is based on total hours worked during the week and could be greater than 40 hours. Total effort for an employee must equal 100%. Salaries and wages charged to sponsored projects must be based on effort expended.

PAR Coordinator is the effort reporting administrator at the department level who facilitates the distribution and submission of the PAR reports.
BACKGROUND INFORMATION

Requirements of OMB Circular A-21, Section J.8 and the Uniform Guidance as of December 26, 2014:

1. Payroll system will reasonably reflect the activity for the employee.
2. Method must recognize the principle of after-the-fact confirmation.
3. Practices vary as to activity constituting a full workload. Therefore, the payroll system may reflect categories expressed as percent of total distribution.
4. Payroll charges may be made initially to sponsored agreements on basis of estimates made before services are performed. When such estimates are used, significant changes in the work activity must be identified and entered into the payroll distribution system. Short-term fluctuations need not be considered as long as the distribution is reasonable over the longer term, such as an academic period (school term).
5. Confirmation of effort (activity reports) will be reported on a percentage basis and reasonably reflect the activities for which employees are compensated by the institution.
6. Effort confirmation will be signed by the employee, principal investigator, or responsible official using means of verification that the work was performed; i.e., person with first-hand knowledge.
7. Reports will be prepared each academic term for all academic, professional faculty, or classified employees who are paid either totally or in any part by restricted funds or by cost sharing funds. For other employees (students and temporary), no effort reports are generated because their timesheets split by fund number, which is signed by their supervisor, serves as their certification.
8. Time cards or other forms of after-the-fact payroll documents should be signed by the principal investigator as original documentation for payroll charges. Copies of these forms should be kept at the department and will then serve as documentation for effort reporting purposes.
GONZAGA UNIVERSITY LEVEL-OF-EFFORT CERTIFICATION PROCESS

1. Effort reporting is explained and reviewed by the Grant Accountant with the PI at the time the funding is awarded. The PI will sign the new award documentation indicating their understanding of the need and process for reporting their time and effort on sponsored projects.

2. Effort reports are distributed by the Grant Accountant for each reporting period. Gonzaga University has 3 reporting periods:

<table>
<thead>
<tr>
<th>Reporting Periods</th>
<th>Certification Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>June 1 – August 31</td>
<td>October 31</td>
</tr>
<tr>
<td>Sept 1 – Dec 31</td>
<td>February 28</td>
</tr>
<tr>
<td>Jan 1 – May 31</td>
<td>July 31</td>
</tr>
</tbody>
</table>

3. All the information on the form should be reviewed. If an employee is not familiar with the funding information, the Grant Accountant can provide assistance.

4. OMB Circular A-21, Section J.10 requires that the certification report be signed by “the employee, principal investigator, or responsible official(s)” using suitable means of verification that work was done.

   Effort Certifications are signed by both the employee and principal investigator confirming that all activities (sponsored or non-sponsored) are reported correctly and that distribution of effort is a reasonable estimate (plus or minus 5%) of percentage of the effort.

   If the individual is not available to certify the effort report, a responsible official having first-hand knowledge of the employee’s total effort will certify the report. This would include departmental chairpersons, principal investigators, or deans.

5. Return signed Effort Certification to the Grant Accountant.

6. The Effort Certifications are filed in the Controller’s Office by fiscal years.

Compliance

Improper or inadequate certification of effort can result in the following restrictions imposed on Gonzaga University by the Federal Government: Payback of award funds to sponsor; Withholding of future awards; Special monitoring by sponsor; Temporary withholding of payments; Audit findings; Requirement for corrective action plan; Designation as a “high risk” organization; Loss of Expanded Authorities; Payment of punitive damages.
GONZAGA UNIVERSITY AWARD SET-UP POLICY

PURPOSE
As a recipient of federal awards, Gonzaga University is obligated to comply with rules and regulations promulgated by various federal offices. These offices include sponsoring agencies such as the National Institutes of Health and National Science Foundation and regulatory agencies such as the Office of Management and Budget (OMB) and the Department of Health and Human Services. The OMB has adopted regulations from the Cost Accounting Standards Board (CASB) and applies them to educational institutions. This policy has been established to meet the compliance standards set forth in OMB Circular A-21, Cost Principles for Educational Institutions, and 48 Code of Federal Regulations Part 9905, Cost Accounting Standards for Educational Institutions. This policy establishes consistent practices for identifying the process for award approval & set up.

POLICY
Determination of the appropriate fund is made by Sponsored Research and Programs (SRP) and the Controller’s Office at the time of the award based on any conditions that may be presented in the award letter. A statement of conditions for acceptance accompanies most grants from the grant making entity. An individual and award-specific fund is established upon the receipt and approval of the formal award documentation. The University process for award-setup is required for all sponsored grant and contract funding prior to release of sponsor funds.

SCOPE
This policy should be known and understood by all faculty and staff PIs.
GONZAGA UNIVERSITY AWARD SET-UP PROCESS

For purposes of these guidelines, a “sponsored project” is any project receiving external support (including but not limited to research, scholarly work, training, workshops, and services) that has defined performance requirements.

The following criteria shall be used for classifying sponsored projects:

- **Governmental External Support.** A project receiving either direct or indirect external support from any federal, state, local, foreign, or other governmental entity shall be considered a sponsored project at the time the support is committed or paid.

- **Non-Governmental External Support.** A project receiving external support from a non-governmental entity shall be considered a sponsored project if the project is subject to any of the following conditions at the time the support is committed or paid:
  - The **specific** project involves any of the following: human subjects, vertebrate animals, or third-party proprietary materials.
  - The external support is subject to any of the following conditions:
    - A. Delivery of specific goods, services, or other deliverables by the University
    - B. Performance milestones
    - C. Restrictions on publication of research results
    - D. Audit requirements
  - The provider of the external support may withhold or seek a refund of the support if the project fails to meet performance requirements or project objectives, including certain research outcomes.

All sponsored projects shall be processed through the Sponsored Research & Programs Office (SRP), and all gifts shall be processed through University Advancement gift accounting department. SRP processes the awards and obtains all the necessary signatures and award acceptance documentation. SRP routes the pertinent information to the PI, Controller’s Office, Department Chair, Dean, and Academic Vice President and any other area PI immediate supervisor and/or Vice President.

The Controller’s Office creates an award-specific fund and a cost-share fund if required. After the fund(s) are set up, a Restricted Fund Agreement is sent to the PI to designate a Budget Officer and indicate who will have signature authority on the sponsored Project. All government grants receive a fund designation of 952xxx, and philanthropic grants receive a fund designation of 953xxx.

The Grant Accountant and Director of SRP meet with the new PI and review contract and policy information. This meeting is held prior to approved expenditure of grant funds. The University follows funder policies in regard to prior contract allowable expenses. The grant accountant and SRP Director are available throughout the granting period to the PI to answer sponsor and grant related questions.
GONZAGA UNIVERSITY SUB AWARD RISK EVALUATION POLICY

PURPOSE
As a recipient of federal awards, Gonzaga University is obligated to comply with rules and regulations promulgated by various federal offices. A Subaward is an award of financial assistance in the form of money, or property in lieu of money, made under an award by a recipient to an eligible subrecipient or by a subrecipient to a lower tier subrecipient. The term includes financial assistance when provided by any legal agreement, even if the agreement is called a contract, but does not include procurement of goods and services.

As of December 26, 2014 the OMB Uniform Administrative Requirements, Guidance (CFR 200.207, 330, 331, 338, and 521) has increased scrutiny for monitoring subrecipients including a requirement for initial and ongoing risk assessment of all subrecipients. Mandatory monitoring obligations include, the review of subrecipients technical and financial reports; following up and ensuring that the subrecipient takes timely and appropriate action on deficiencies detected through audits, on-site reviews or other means; issuing a management decision for audit findings; verifying that a subrecipient received its mandatory Single Audit if the entity exceeded the $750,000 threshold for Federal funds expended in the previous fiscal year.

POLICY
Gonzaga University is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of sponsor funds. This policy addresses institutional responsibilities and assists Principal Investigators and staff to ensure that, in addition to achieving performance goals, subrecipients comply with Federal laws and regulations and with the provisions of any agreements that govern the subaward. Gonzaga University will place emphasis on distinguishing between subrecipient categorization selection and vendor categorization and selection and documenting these decisions. The University will also track whether an outgoing subcontract is issued as cost reimbursable or fixed price. Gonzaga and all other institutions receiving federal funding must now ensure mechanisms for documenting reviews of these reports for audit purposes ultimately requires increased engagement by the PI, department, Controller’s office, and Sponsored Project leaders.

Two levels of risk will be utilized for subrecipients, high risk and low risk. Risk level will be determined by the Sponsored Research and Controller’s office at the pre-award stage.

SCOPE
This policy should be known and understood by all faculty and staff PIs.
GONZAGA UNIVERSITY SUB AWARD RISK EVALUATION PROCESS

At the pre-award stage, subrecipients will be sent the Research Sub Award Agreement from SRP and the agreement must be returned to SRP prior to the proposal submission. The PI, SRP, and the Controller will determine the risk level (high or low) based on the responses of the subrecipients Research Sub Award Agreement.

Subrecipient monitoring responsibilities are shared among the following:

**Principal Investigators (PIs)** have the primary responsibility for monitoring subrecipients’ progress and ensuring compliance with Federal regulations and both prime and subrecipient award terms and conditions.

**Sponsored Research and Programs and the Controller/Grant Accountant** assist PIs in reviewing their monitoring responsibilities, reviewing subrecipient invoices, identifying and following up on questionable expenditures, if necessary, and maintaining documentation of monitoring efforts. The Office of Sponsored Research and Programs ensures that the University’s subrecipient monitoring policies and procedures comply with federal and other applicable regulations and are applied consistently and may provide further training and guidance in interpreting regulations and subrecipient award terms and conditions.

**The PI, Controller, and SRP will** regularly review subrecipient risk assessments, assist in developing monitoring plans, and review results of subrecipient findings, corrective action plans, and other issues brought to its attention.

**Office of the AVP** reviews and approves certain high risk subrecipients at the proposal stage and as necessary during the life of the award based on the review criteria.

**PROCEDURES**

The frequency and scope of monitoring procedures should be determined by the responsible PI, SRP, and the Controller’s office, consulting as appropriate and monitoring, focusing more frequent monitoring efforts on those subrecipients deemed to pose a greater risk for potential non-compliance.

The Principal Investigator (PI), SRP, and the Controller’s Office should use the following subrecipient monitoring procedures when appropriate:

1. review technical performance reports or other specified deliverables on a timely basis. Any unforeseen issues should be documented, investigated, and resolved.

2. perform an expense to budget comparison for cost-reimbursement subagreements. The subrecipient’s invoices must show both current period and cumulative expenses-to-budget.

3. review invoices regularly and document their review in the grant file. Such documentation may include, for example: PI initials or authorizing signature on invoices, email communications and notes of meetings.
4. Request the subrecipient to provide clarification of invoiced charges that appear unusual, excessive, or otherwise questionable. If the subaward terms permit, SRP and the Controller’s Office may request detailed justification to verify the allowability of the cost. Examples of detailed justifications include:
   - Payroll records
   - Copies of paid invoices showing item cost and Vendor Justification forms if required
   - Descriptions of services rendered by consultants including hourly rates and time reports
   - Details of incurred travel charges stating the purpose of the travel
   - Records identifying any unallowable costs

5. Subrecipients not subject to Uniform Guidance Subpart F - Audit Requirements may require additional monitoring to ensure compliance. For subrecipients deemed to require closer scrutiny, PIs, SRP and the Controller should establish additional channels of communication and monitoring methods. Subrecipient monitoring plans should be devised, as appropriate.

6. The PI and/or SRP or Controller may at their discretion conduct on-site visits to evaluate compliance with the project’s scientific objectives and the appropriateness of the subrecipient’s administrative systems, processes and charges. Audits of subrecipients may be performed on a discretionary basis in order to resolve questionable costs or other noncompliance issues.

Prior to issuing a subcontract, a review of Gonzaga’s subrecipient risk assessment will be performed to inform any measures (e.g. additional monitoring procedures, special terms and conditions) necessary to appropriately monitor the subrecipient. Particular attention to those deemed high risk may require closer scrutiny including, but not limited to, the following:

   a) Gonzaga’s current and prior experience with the subrecipient
   b) The size of the subrecipient award’s annual budget and size relative to the subrecipient’s total sponsored research portfolio
   c) The percentage of the program award passed through to the subrecipient
   d) The complexity of the award, sensitivity of the work and/or scope of governing regulations
   e) The international location of the subaward or subrecipient
   f) The for-profit status of subrecipient
   g) The level of sophistication of the subrecipient’s administrative team and financial system
   h) The audit results

1. The PI, Controller, and SRP shall review subrecipient audit reports to verify that the subrecipient has completed the Subpart F - Audit Requirements and to assess the audit findings, if any. In the case of audit findings, the Controller, PI, and Grant Accountant are responsible for reviewing the subrecipient’s corrective action and for issuing the University’s management decision.

2. For entities not subject to the Uniform Guidance Audit Requirements, the Controller may request audited financial statements and/or completion of a financial controls questionnaire from the subrecipient.
GONZAGA UNIVERSITY COST TRANSFERS POLICY

PURPOSE

The purpose of this policy is to provide guidelines for performing cost transfers that allow Gonzaga University (GU) to comply with the standards set forth in OMB Circular A-21, Cost Principles for Educational Institutions, and 48 Code of Federal Regulations Part 9905, Cost Accounting Standards for Educational Institutions. As a recipient of federal awards, Gonzaga University is obligated to comply with rules and regulations promulgated by various federal offices. These offices include sponsoring agencies such as the National Institutes of Health and National Science Foundation and regulatory agencies such as the Office of Management and Budget (OMB). The OMB has adopted regulations from the Cost Accounting Standards Board (CASB) and applies them to educational institutions.

Cost transfers are an area of concern to federal auditors and negotiators; therefore, it is important that this policy is understood and consistently followed.

Federal, state, and private agency policies and audit guidelines have become quite stringent as they relate to cost transfers between grant and contract programs. A key Federal regulation pertaining to the expenditure of sponsored project funds contains the following statement:

"any costs allocable to a particular sponsored agreement . . . may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored agreement, or for other reasons of convenience."
(Office of Management and Budget Circular A-21/section c.4b.)

Since the University has a stewardship responsibility for all funds made available for research and training, these cost transfer guidelines are applied consistently to all sponsored agreements. The Controller’s and Sponsored Research and Programs offices are available to answer PI questions regarding this policy and purpose.

POLICY

Since costs must be charged to accounts accurately according to applicable rules and regulations, original transactions should not need corrections. However, in certain circumstances, charges may have to be moved from one account to another. Therefore, cost transfers are allowable with adequate documentation and approval. An adequate explanation for all cost transfer actions must be clearly stated on the request. Once a transfer is made, the new source of funding is considered correct and further transfers of that same cost is not allowable.

Timely - Cost transfers must be made within 90 days of the original occurrence of the charges or within 45 days of the expiration of a grant or contract. No cost affecting operating funds will be processed between fiscal years.
Adequate documentation - Documentation must include a printout of Banner FIS indicating the date, fund, and account code of the original charge, the reference number of the original document (invoice number, JE number), description of the charge being transferred and why the cost is being transferred. This explanation cannot merely state that the transfer was made 'to correct error' or 'to transfer to correct project.' If the transfer is necessary because of an error, the explanation must state how and why the error occurred. In addition, salary cost transfers must include the name of the individual whose salary is being transferred, the pay periods affected, if applicable. If the cost transfer will affect more than one department, the department initiating the request is responsible for advising all impacted parties.

Approval - The principal investigator must sign cost transfer requests if a sponsored project is involved.

SCOPE
This policy should be known and understood by all faculty and staff PIs.

DEFINITIONS

Cost Transfers are the moving of costs from one accounting distribution (fund and/or organization) to another accounting distribution. Normally, the account code would be the same on both the debit side and the credit side of an entry.
GONZAGA UNIVERSITY COST TRANSFERS PROCESS

TYPES OF TRANSFERS OR CORRECTIONS

1. **Correction of Errors**
   
   Correction of clerical errors must be made promptly after errors are discovered. The transfer must be supported by text explaining how the error occurred, i.e.: obvious typographical error.

2. **Unallowable Cost**
   
   If you have been notified by the Sponsored Research & Programs Office or Controller’s Office that this cost is not appropriate on the grant/contract and is to be paid from University funds, state that fact.

3. **Closely Related Work**
   
   When closely related work is supported by more than one funding source, a cost transfer may be made between those funds, provided it is a proper charge and the transfer is supported by an explanation.

   A proper explanation might be: “Both these projects concern fiddler crab biomaterials research conducted by Dr. XXXX and it has been determined that this labware charge more properly belongs on fund 95XXXX.”

   When closely related work is supported by more than one funding source, a cost transfer between funds may be made under these conditions:
   
   - The cost is proper and allowable.
   - The transfer is made within 45 days of the time of the original charge.

   Justification for the transfer is documented by the PI/Dept and kept for audit purposes and review by the Sponsored Research & Programs Office.

TEXT CHECKLIST

When entering a cost transfer journal voucher, ask yourself the following questions.

Does your text clearly show:

1. The reason why the expense was charged incorrectly to the first project?
2. How the expense directly benefits the receiving project?
3. The reasons for any delay in a timely processing of the transfer?  (After 90 days)
4. The transactions should be corrected document-by-document, line-item by line-item, referencing the original document number
5. Contact Name (First, Last) and phone number?

Any “No” answers on this checklist could result in delays or ultimately in the disapproval of the transfer.

Keep this standard in mind:

Would an outside auditor reviewing this documentation three years from now understand this explanation?

Acceptable Types of Approval

E-mail from PI approving or confirming change
Written request for change from PI
Detail report signed by PI, that includes correction

All journal voucher entries and complete supporting documentation should be kept by the department for verification during the course of an audit or other review. The Sponsored Research Office and the Controller’s office maintain records of grant activity but the PI is responsible for maintaining their own records of grant fund spending and reports. These records must be made available immediately anytime GU or auditors make such a request.
GONZAGA UNIVERSITY PI TRANSFER POLICY

PURPOSE

Most sponsored projects are the property of the institution, Gonzaga University (GU); they are not the property of the Principal Investigator (PI). Careful consideration of the project’s scope, funding agency, and PI situation is necessary by the Dean, AVP, and Director of Sponsored Research and Programs (SRP) as not all sponsored projects can be transferred to another institution or PI. PI transfers can occur without a faculty leaving the institution, but most PI transfers occur when the PI leaves the awarded institution. PI transfers must go to another institution-they cannot go to an individual.

POLICY

To remain compliant with all federal regulations, Gonzaga University will consider a PI transfer. Prior to making any decisions about retaining or releasing a sponsored project by transferring the PI, the Dean of the faculty’s college and AVP will consult with the Director of Sponsored Research (SRP) and the Grant Accountant to discuss and obtain up to date information about the project including budget implications, equipment, funding agency requirements, and other grant project-related issues.

Once a decision is made that a PI will be leaving the institution, a decision must be made as to whether GU will retain the project. If the project is to remain here, then someone else must be identified as the PI on the project. Different agencies have different requirements as to the notification and approval process to accomplish this.

If, however, the PI is transferring to another institution and GU is releasing the project with the PI, they must first receive agency, Dean, AVP, and SRP approval to transfer a sponsored award with them. The funding agency has the first approval if a transfer is allowed. The Dean and AVP approve on behalf of the institution. The Director of SRP oversees the institutional and funding agency approvals and that procedures are in place. Once those approvals have been obtained, the University process shall be followed.

SCOPE

This policy should be known and understood by all faculty and staff PIs.
GONZAGA UNIVERSITY PI TRANSFER PROCESS

BASED ON SPONSORING AGENCY POLICIES AND PROCEDURES, a Relinquishing Statement must be completed by the PI. The statement will indicate the expected unobligated balance at the time of termination, including a breakdown between direct and indirect costs. It must also include a list of any equipment transferring with the award. The amount to be relinquished cannot be greater than the current year funding. The PI should work with the Grant Accountant and Director of SRP to prepare the relinquishing statement. The Director of SRP will obtain the required signature(s) and forward the documentation to the sponsoring agency. Typically, the Relinquishing Statement will require the signature of both Director of SRP and the Controller.

An Invention Statement must be completed by the PI. This discloses any inventions that were developed in direct correlation to the sponsored project, and must be completed even if there were no inventions. The Director of SRP and Corporate Counsel will sign on behalf of GU.

A Property Report must be completed pertaining to any equipment that was purchased using funds awarded by the sponsoring agency. A designee in the Purchasing Department will sign on GU's behalf. Per prior approval from the AVP and the PI’s Dean, an asset transfer statement must be submitted to the Purchasing Office if any transfer of equipment to the new institution will occur.
INTELLECTUAL PROPERTY AND SPONSORED RESEARCH

The GU Patents and Scholarly Work Policy and the Copyright Policy provide specific guidance on intellectual property rights and obligations. These policies define how the University pursues traditional principles of education and research and encourages the creation and publication of scholarly, technical, literary and artistic work.

The University’s Policy on Patents and Scholarly Work applies to all faculty, staff, and students of the University. While it imposes certain obligations on those who conduct research, its purpose is to adopt an inventor-friendly process in dealing with patents and scholarly work.

SPONSOR REQUIREMENTS

As a condition of receiving awards, sponsors impose various requirements on GU, including patent-related obligations. The University, through SRP, in turn seeks to verify that certain protections for the inventor and the University related to such rights are negotiated and included in awards.

The U.S. Government: The ownership of Inventions, Discoveries, Technologies or Innovations made by University faculty, staff, or students on Government sponsored programs is determined by federal law as applied through the Award, whether a prime award directly with the Government or a federal pass-through (subaward). One major responsibility is the prompt disclosure to the Government of all Inventions, Discoveries, Technologies, or Innovations made in the performance of such an Award. Such disclosures should be promptly made to the Director of Sponsored Research Office. Making such disclosures enables the University to meet its obligations under the Award and is necessary to permit the inventor to potentially benefit in any royalties that may result in the event that the University elects to retain title and pursue a practical application of the Invention, Discovery, Technology, or Innovation. For a copy of the appropriate disclosure form, please go to the Research Office.

Sponsors Other Than the U.S. Government: The University will normally not enter into agreements with non-government sponsors unless agreements explicitly state what the rights of the sponsors and of the University will be in Inventions, Discoveries, Technologies and Innovations that result from the sponsored work. It is expected that the University will retain title to such Inventions, Discoveries, Technologies and Innovations, and to any resulting patents. The PI plays an important role in reviewing and approving these negotiated arrangements.

Normally, the University would grant the sponsor certain exclusive or non-exclusive license rights in exchange for appropriate consideration which may include the payment of patent expense and royalties provided that the University is entitled to practice the patent and to permit other nonprofit organizations to practice the patent for research purposes. GU also requests that the sponsor agree that its rights in any Inventions, Discoveries, Technologies, or Innovations are subject to any rights the U.S. Government may have by virtue of its sponsorship or related research.

RIGHTS IN INVENTIONS, DISCOVERIES, TECHNOLOGIES, OR INNOVATIONS
For information regarding the patenting review process, inventor’s economic rights in Inventions, Discoveries, Technologies, or Innovations, and related material, please refer to the University’s Policy on Patents and Scholarly Works, or contact the Research Office.

When doing industry sponsored work, be cognizant of who owns the right.

**MANAGE LICENSING AND INTELLECTUAL PROPERTY**

License agreements are arranged through the collaborative efforts of the PI, SRP, and the Corporate Counsel. It is important to contact the SRP office if you have any questions.

If you anticipate any intellectual property resulting from this project please contact the Sponsored Research and Programs Office.
GONZAGA UNIVERSITY ALLOWABLE COSTS POLICY

PURPOSE

The Allowable Costs Policy outlines the allowable costs for grants, contracts, and sub-awards at Gonzaga University. The policy matches the Uniform Guidance. Regardless of the funding agency, costs for sponsored programs are based on answering the question: Are costs allocable, allowable, consistent, and reasonable in like circumstances?

POLICY

Costs incurred for the same purposes in like circumstances must be treated consistently as either a direct cost or as an F&A cost. In other words, where GU treats a direct cost of sponsored agreements, all costs incurred for the same purpose in like circumstances shall also be treated as direct costs of all activities of the institution.

Costs charged to federally sponsored projects which result in inconsistent treatment of direct cost practices will be documented with written justifications supporting the Uniform Guidance of exceptions of “major project” or “unlike circumstances.”

Identification with the sponsored work, (i.e., the scope of work) rather than the nature of the goods and services involved is the determining factor in distinguishing direct from F&A costs of sponsored agreements.

SCOPE

This policy should be known and understood by all faculty and staff PIs.

DEFINITIONS

Allocable: The cost is incurred for the benefit of only one project, or the item can be easily assigned to multiple benefiting projects. A specific project may only be charged that portion of the cost that represents the direct benefit to that project.

Allowable: Costs must conform to any limitations or exclusions stated in generally accepted accounting principles or in the sponsored agreement; i.e., the cost must be designated as “allowable” and not specifically as "unallowable" by regulation or grant/contract-specific award conditions.

Consistent: Similar costs are treated as direct or F&A costs when incurred in like circumstances. Costs generally direct charged to a sponsored project should not be included as F&A costs on other projects when incurred for the same purposes. Where GU treats a particular type of cost as a direct cost of sponsored agreements, all costs incurred for the same purpose in like circumstances shall be treated as direct costs of all activities of the institution.
**Reasonable**: Cost is generally recognized as necessary for the performance of the project and is one that a prudent person would consider reasonable given the same set of circumstances.

**Facilities & Administrative (F&A) 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 the term "indirect costs."

**Unlike Circumstances**: When a cost is incurred for a purpose outside of the normal practices or activities for that type of cost.
GONZAGA UNIVERSITY ALLOWABLE COSTS PROCESS

At Gonzaga University the Office of Sponsored Research and Programs will assist PI’s in the development of their budgets. This is to ensure allowable costs, funder guidelines, and University mission and expectations are followed.

When a PI has determined they will be submitting a proposal, they meet with SRP and discuss the funder guidelines. SRP develops and initial draft budget and continues to work with the PI through the proposal submission. Through this process SRP ensures budgets align with the project narrative and funder guidelines and that GU commitment remain as approved by the Internal Approval Document (IAD).

If a budget is changed significantly (course release, increased cost sharing, etc.) SRP then re-routes the IAD to the appropriate approvers and explains the budget change.

At GU, the following costs ARE normally budgeted and charged as direct costs. The common element is that the cost is necessary to perform the project's stated scope of work.

- Salaries and fringe benefits of faculty, technicians, post docs, graduate research assistants and other staff engaged in performing sponsored project's scope of work.
- Supplies and materials, travel, repairs, fees and services, local and long distance telephone expenses, postage, or copying necessary for performing sponsored project's scope of work.
- Capital equipment and service/maintenance agreements on capital equipment that is approved by the sponsor (or internally approved if allowed by the sponsor) necessary for performing sponsored project's scope of work
GONZAGA UNIVERSITY COST SHARING POLICY

PURPOSE

The following policy establishes the procedures for managing cost share for sponsored agreements. “Cost sharing” shall mean the use of Gonzaga's own resources, funds, or third-party contributions toward the total allowable costs of a sponsored project. This policy aligns with the OMB Uniform Guidance 200.306.

POLICY

Cost sharing must be reviewed and approved by SRP and the Grant Accountant when the proposal is routed for approving signatures and again when the project is awarded.

SCOPE

This policy should be known and understood by all faculty and staff PIs.

SOURCES OF COST SHARE

First, the department and college must provide as much cost share as reasonably possible. Second, the University’s Sponsored Programs will provide cost share on a limited basis with the AVP’s support. Federal funds may not be used for cost share.

EFFECT ON FACILITIES AND ADMINISTRATIVE COSTS (F&A)

Since cost share can reduce the overall research F&A rate, consume departmental resources, and reduce available resources for additional research and teaching for colleges and departments, all voluntary cost share must receive approval from the department chair and dean on the IAD. Mandatory cost share usually receives precedent over voluntary cost share. In practice, voluntary cost share is discouraged, but will not necessarily be denied as long as plans are made to account for these dollars as outlined in this policy.

There are four (4) types of cost share as follows.

**Mandatory Cost Share** is the amount of cost share required by a sponsor as a condition of making an award. Required cost share is almost always specified in the published description of the program. When claiming mandatory cost share, the applicant will be required to present the published description of cost-share requirements to Sponsored Programs before the proposal is routed for approval and this amount is reflected in the SRP generated budget and on the IAD.

**Voluntary Committed Cost Share** is cost sharing GU may offer in a proposal to reflect accurately the total resources necessary to complete a project. Although voluntary in nature, the cost share is committed and must be monitored in the accounting records the same as mandatory cost share.
Voluntary Committed Cost Share includes any non-sponsored expenditure that results in total cost sharing of expenses in excess of that required in the published description of federal programs.

**Voluntary Uncommitted Cost Share** is cost sharing that is not committed or budgeted for in a sponsored agreement. It need not be tracked or reported to the sponsor. Most frequently this type of cost share is the result of cost overruns or effort of personnel in excess of that which has been committed.
Gonzaga University Cost Sharing Process

Prior To Award and Submission of the Grant Proposal

The Office of Sponsored Research and Programs must be involved in the budget development of all grant applications public or private. The Director of SRP manages the cost sharing budget and continues to monitor, along with the Grant Accountant that account for efficient and best use. When a grant proposal includes committed cost share, (i.e. any cost share, whether mandatory or voluntary, addressed in the proposal narrative or budget), the expenses to be shared by the University must be stated in the budget and on the IAD.

1. The cost share can be provided from unrestricted departmental funds, other non-federal restricted projects, from third party contributions of cash or in-kind expense, or finally from Sponsored Programs.
   1. Unrestricted Departmental Funds If the cost share is to be provided from departmental funds, the department involved in the cost sharing agreement is responsible for providing the cost center where the budgeted funds reside.
   2. Other Restricted Non-Federal Funds If the expenses of another restricted non-federal project are being used for cost share, the department involved in the cost sharing agreement is responsible notifying SRP. Specific written approval from the non-federal funding source to use funds from their award as matching on another project is required.
   3. Third Party In-Kind Contributions If the cost share is to be provided by a third party, that party and the type of assistance to be provided must be identified by amount and in writing.
      4. If the applicant’s cost participation includes salary and fringe benefits of GU employees, the employee, the position, and the proposed effort contributed to the cost share must be identified.
      5. The use of “disallowed” or “unrecovered” indirect costs as cost sharing must first be approved by GU’s Sponsored Research and Programs and, subsequently, be approved by the awarding agency.

After a Project is Awarded

Gonzaga University must maintain records of all project costs that GU claims as cost sharing and records of all costs to be paid by the funding agency. These records are maintained in separate accounts by Grants Accounting and are subject to audit. Grant Accounting is responsible for keeping SRP informed of the status of these accounts on a quarterly basis.

If the cost share is provided from department funds, the budget allocated to cost share must be committed to the cost share account (set up by the Grant Accountant), shortly after receiving the notice of award.
If the University’s cost participation includes in-kind contributions, the basis for determining the valuation of volunteer services and donated property must be documented. (Grant Accountant and SRP will keep each other informed of the status of this information in a timely manner.) The PI is responsible for maintaining the following documentation and forwarding to the Grant Accountant at the close out of the project:

1. The letter obtained from the Principal Investigator or Business Officer documenting the source of contribution to agreement.
2. The basis for valuation of in-kind contributions, i.e., worksheets, surveys, time cards, etc.
3. All recorded documents of in-kind expenditure by the third party.
4. Any salary contribution provided by GU employees toward cost share requirements must be certified through the GU time and effort certification process.

Items of costs that are generally allowable as grant-funded costs will also be generally allowable as cost sharing.
GONZAGA UNIVERSITY HIRING GRANT FUNDED PERSONNEL POLICY

PURPOSE

The purpose of this policy to provide consistent processing of grant or sponsor funded personnel to align with state, federal, and agency guidelines.

POLICY

All hiring of sponsor funded personnel must be consistent with federal and University guidelines. Hiring grant funded personnel includes the development of a job description. The job description must be approved by the Office of Sponsored Research and Programs, Human Resources, and the Grant Accountant to ensure duties, funding, and University processes and guidelines are met.

SCOPE

This policy should be known and understood by all faculty and staff PIs.
GONZAGA UNIVERSITY HIRING GRANT FUNDED PERSONNEL PROCESS

SRP assists in the development of the job description typically at the pre-award stage of a project. The job description is processed through HR’s routing to ensure completeness and accuracy of job duties, status, and wage. The Grant Accountant reviews the job description and wage to ensure funding is available for the position.

After the award is made the job announcement is created and sent to HR for processing.

Once hiring is complete the appropriate College or School Budget Officer inputs the EAPF into the Banner system and the PeopleAdmin system for Grant Accountant, SRP, and HR approvals. Each hire on will receive the HR letter outlining the job duties, status, wage, and exact timeline of the job. The new hire must sign the HR letter; the original letter is to be kept with the original grant file in SRP. SRP will supply a copy of the letter to the new hire, PI, HR, and the Grant Accountant.
Use of the HR letter to clearly inform the potential hire of their employment status and duration.

HUMAN RESOURCES

June 18, 2010

John Smith
555 N. Elm St.
Somewhere, WA 99206
Dear John,

Welcome to Gonzaga University! We are pleased you have accepted the position of ______(job title)______________, ____ (department)________. Your hire date is ___(date)____, and your position classification is Exempt (or non-exempt), X hours per week, X months per year, for a fixed-term position through __(date)____.

Your grant funded annual salary will be $XX,XXX. This is a fixed salary through the duration of the grant and is not eligible for a salary increase unless otherwise funded by the University.

Please make an appointment to come by the Human Resources Office on your first day of employment to finalize your hiring paperwork.

Gonzaga University is an at-will employer, therefore; this letter should not be considered a contract of employment for any period of time or the guarantee of any terms or conditions of employment. The policies and procedures that guide your employment with us are contained in the Personnel Policies and Procedures Manual; which you will receive on your first day of employment.

Your position is contingent upon successful passage of a background verification. Your position may also be contingent upon passing a pre-employment physical and/or providing a valid driver’s license and good driving record, if required.

Please acknowledge that you received this letter by signing and returning it with the completed enclosed forms to our office on your first day of employment. Again, welcome to Gonzaga University.

Sincerely,

Tracy Kelly
Employment & HRIS Specialist
Human Resources

NAME__________________________________________ DATE___/___/_____

Cc: Supervisor name

502 E. BOONE AVENUE • SPOKANE, WASHINGTON 99258-0080 • (509) 313-5996 • FAX: (509) 313-5813
Gonzaga University Process for Student Payments

These procedures apply whenever a Gonzaga entity provides funding that would otherwise be included in the Cost of Attendance calculated for financial aid eligibility which includes tuition, room, board, books & supplies, fees, transportation, personal expenses, and tuition. Within the context of sponsored research and payments to students from grant and contract awards this process is to be followed to maintain compliance with federal financial aid and federal funding guidelines. Please contact the Director of SRP or the Dean of Financial Aid if you have any questions regarding this process.

Gonzaga is required to coordinate all resources a student will receive for education. If a department wants to provide funding to a student, the Financial Aid Office must be notified.

1. Contact the Financial Office at x6583.

   The Financial Aid Office will need to know the student’s name, ID, amount of the award, and the term of disbursement (fall, spring, summer).

2. The department should generate a BAR or journal entry to transfer the money from the departmental budget to JBBA 1000 7A53. The funds will be disbursed to the student out of this fund using award code GS7A53, GU Departmental Scholarship. A copy of the BAR should be sent to the Associate Director of Financial Aid. Once the BAR is received the award will be added to the student record.

3. If the department does not want the student to know about the award until after a certain date that should be communicated to Financial Aid.

Important note: There is a limit to the amount of total financial aid a student can receive. In some cases the funds given to a student are expected to pay for additional expenses the student will incur. It would be important to communicate that to the Financial Aid Office.

Funds given to a student as compensation for work performed must be processed through Payroll.

Departments who are providing funds to students to attend a conference should send a list containing the student’s name, ID, and amount provided to Financial Aid, to make sure that this is coordinated with a student’s financial aid.

Scope

This policy should be known and understood by all faculty and staff PIs.
GONZAGA UNIVERSITY INDIRECT COST RECOVERY POLICY

PURPOSE

Facilities and Administrative or indirect costs and recovery, commonly referred to as F&A are those costs that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored agreement, an instructional activity, or any other institutional activity. F&A costs are broad categories of costs that can include depreciation, interest, operating expenses, general administrative expenses, departmental administration expenses, sponsored agreements administration and library expenses. F&A recovery is the mechanism by which the University is reimbursed for the F&A costs associated with managing sponsored agreements.

POLICY

The cost of a sponsored agreement is comprised of the allowable direct costs incident to its performance, plus the allocable portion of the allowable F&A costs or indirect costs.

The indirect cost recovery rate (F&A) is a percentage negotiated through the Controller’s office with the Department of Health and Human Services. Currently the indirect cost rate at Gonzaga University (GU) is 29% of Modified Total Direct Costs when allowed. Some federal and private funding agencies do not allow F&A or have an established rate. This policy will be updated when the negotiated indirect recovery rate changes.

To waive a part or all of indirect recovery (F&A) on an applicable grant the PI must have the signature of the AVP, Dean, Controller, and Director of Sponsored Research and Programs on the Internal Approval Document. Waiving indirect recovery does not increase the PI’s chance at receiving a grant award but at times may be necessary due to budget limitations of a project. If indirect recovery is waived on an applicable grant the indirect recovery will be seen as a GU cost share, if cost share is allowed by the agency.

SCOPE

This policy should be known and understood by all faculty and staff PIs.

DISTRIBUTION OF F&A RECOVERY

In order to stimulate further research and to reimburse the school/department that generated the F&A recovery, the University has elected to allocate the F&A recovery to the University General Fund, Departments at the Dean’s discretion, and the Principle Investigator. The dollar amount of the allocation will be made on an individual grant basis, depending on the actual amount recovered from the sponsor. Funds will be used to cover any overdrafts on the related sponsored research.
Gonzaga University Indirect Cost Recovery Process

Distribution of F&A (Indirect) Recovery

In order to stimulate further research and to reimburse the school/department that generated the F&A recovery, the University has elected to allocate the F&A recovery to the University General Fund, Departments at the Dean’s discretion, and the Principle Investigator. The dollar amount of the allocation will be made on an individual grant basis, depending on the actual amount recovered from the sponsor. Funds will be used to cover any overdrafts on the related sponsored agreement.

75% University General Fund to reimburse central administrative expenses related to sponsored agreements.

20% To Department at Dean’s discretion (funds remain with Dean/School when there is no department) to seed research projects, support research travel and other activities, and/or to cover research related administrative costs.

5% Principle Investigator may use the funds for future research related costs. If the grant was submitted by a program director or other University administrators, the allocation will be credited to the related program for future developments.

Process

Reimbursement Requests, Purchase Requisitions and journal entries that are charged to F&A funds are routed to the Dean’s office for review and approval and then to SRP. They are then forwarded to the appropriate office for processing, (i.e., Controller’s Office, Accounts Payable, Purchasing, etc.).

All funds should be expended for University-related purposes in accordance with existing University policies and procedures. For example, travel is routed through purchasing and hiring is routed through Human Resources, and et cetera.

These funds are intended to support research related costs and as bridge funding for near future grant applications. In addition, each area should adhere to the following guidelines:

Allowable Expenses

Departments

The 20% department’s allocation will be used under the discretion of the department head with approval of the Dean. These funds could be used to seed research projects, support research travel and other activities, and/or cover research related costs. These funds may be used for administrative salaries or fringe provided that the work is directly related to the support of existing or bridge funding for near-future grant proposals.
Principle Investigator

The 5% PI funds are available for professional development, equipment necessary for related research, or research supplies and related professional activities. The PI should adhere to all University policies and procedures when using these funds. These funds should be used for research-related costs for bridge funding for near future grant proposals. The PI portion of F&A must be used within 24 months of the end of the grant period. If a PI leaves the University, the remaining F&A funds remain at GU and are returned to the general fund.

UNALLOWABLE EXPENSES

The F&A funds are not available for faculty or administrative salaries or fringe, entertainment, general office support or other expenses not related to research or professional development in the pursuit of near future external funding. Funds may not be used for PI salary during the grant project period.

Examples of Research Related Costs:

- Operations support: Clerical salaries, postage, phones, etc., needed to manage the project but for which the federal sponsor expects F&A to pay
- Bridge funding: Salaries and benefits for key personnel to retain them between grants, as well as supplies, travel and clerical support to develop proposals for new funding.
- Allowable project costs: Salaries for research assistants, chemical supplies, travel for grant purposes, or other types of support approved but not fully-funded by the sponsor.
- Non-allowable but related project costs: Items such as participant food, promotional items, office equipment, space rental, etc. that the sponsor does not allow but are needed to conduct or enhance the project.
- Project development costs: Pilot projects; proposal writing; proposal typing/editing; travel to conferences and/or to meet with sponsors; expenses to host sponsors, prospective partners, or influential project supporters; specialized equipment; and workshops leading to proposal submissions.
- Research faculty recruitment and initial support: Salaries/equipment for new faculty or research faculty bringing grants with them; salaries for promising research associates or new faculty with the expectation they will write proposals and obtain future grants.
- Research center/institute support: Shared administrative/executive assistants, technicians, equipment purchases or maintenance, and other support for groups of principal investigators.
- Over-expenditures or disallowed costs: Although rare, if these occur they will be deducted from the annual distribution, in consultation with the AVP, Dean, SRP Director, and the PI.
GONZAGA UNIVERSITY AWARD MODIFICATIONS POLICY

PURPOSE

To identify the processing of pre-award costs for sponsored programs funded by various federal agencies.

POLICY

Several federal agencies have adopted expanded authority policies that are intended to reduce overhead costs, increase research productivity, and reduce paperwork. Non-federal award modifications vary per agency and are processed per the award documentation through SRP and the Controller’s Grant Accountant. The PI must communicate with SRP and the Grant Accountant prior to submitting an Award Modification.

SCOPE

This policy should be known and understood by all faculty and staff PIs.

DEFINITION

Expanded Authority

The authority granted to Gonzaga University that waives the prior approval requirements by a sponsoring agency. Expanded authority is used only for changes that are necessary for the completion of the project within its original scope and original total budget.

Prior Approval Requirements

A Sponsoring Agency's requirement that the Agency approve changes prior to the change occurring.
GONZAGA UNIVERSITY AWARD MODIFICATIONS PROCESS

BUDGET CHANGES
For government award, departments may only request changes in:

- Reallocation of budget line items.
- Pre-Award setup and costs limited to 90 days prior to start date of award.
- **One-time only**, No-cost Extension up to one year.

Examples of changes **not** covered under expanded authority (written agency approval is required to do any of the following):

- Change student support in the form of fellowships and stipends
- Write new subcontracts into a project
- Building Construction changes
- Change F&A rate
- Change in scope of work
- Change of PI - See Policy and Process for Sponsored Programs to transfer PI

Modification of the Research Work Order is required when expending for a new direct cost line item that was not in the original budget, or to modify the objectives, increase funding levels, or extend the time frame of the award.

PRE-AWARD COSTS

**NSF, PHS, NASA, DOE, NOAA, CSREES, AFSOR, ARO, and ONR:** Approval may be granted for expenditure of funds up to 90 days prior to the expected start date of a new grant or cooperative agreement. Advance funding must be necessary for the effective and economical conduct of the project. Pre-award costs will not be approved unless a Department Head/Chair or a Dean/Director guarantees to reimburse the university in the event the grant or cooperative agreement is not received.

**ALL OTHER AGENCIES OR SPONSORS:** Gonzaga is not authorized to approve pre-award costs for other agencies. However, it may be possible for the Controller’s Office to set up a “pending fund” for awards which have passed the start date, but for which the award document has not yet been received or fully executed.

Normally, expenditures may not be charged against sponsored programs before the effective date of a sponsored program agreement. However, some federal agencies allow requests for pre-award expenditures to be reviewed and approved within Gonzaga.
NO-COST EXTENSIONS

Gonzaga can grant a single no-cost extension of time up to 12 months. The request must be submitted SRP 45 days prior to the expiration date of the project. SRP must notify the agency within 30 days of the extension and prior to the expiration date of the project. Exceptions vary based on the funding agency.

**NSF, NIH/PHS, NASA, NOAA, ARO, AFOSR and DOE:** Gonzaga may approve a one-time no-cost extension of up to one year beyond the original expiration date. Request must be made prior to current expiration date of grant. Review of request will consider summary of progress, estimate of funds remaining, and plans for the completion of the project.

Such an extension may be made when one of the following applies:

a. additional time is required to assure completion of the original approved project scope or objectives; or
b. continuity of grant support is required while a competing application is under review; or

No-cost extensions are typically not requested past the end date of an awarded project. The request for extension must be made by the PI, in writing, reviewed by the Director of Sponsored Research, and then submitted to the contracting office of the sponsoring agency. The letter should be signed by the PI and countersigned by the Gonzaga official authorized representative who signed the award.
GONZAGA UNIVERSITY PURCHASING POLICY

PURPOSE

The Procurement Policy outlines the procurement standards for grants, contracts and sub-awards at Gonzaga University. The policy matches the Uniform Guidance, 2 CFR 200.318. Regardless of the funding agency (federal or non-federal), procurement for sponsored programs must follow the procurement sections of the Uniform Guidance.

POLICY

In December 2013, the US Office of Management and Budget (OMB) issued comprehensive grant reform rules titled “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.” With that issuance, there were important updates made to specific areas of Uniform Guidance. Procurement is one of the areas that had significant changes.

While the new Uniform Guidance is effective for new federal awards and changes to funding increments with changed terms and conditions issued after December 26, 2014, there is a one year grace period after the effective date of the Uniform Guidance for implementing the new procurement requirements. The new general requirements and five methods of procurement most closely follow the previous OMB Circular A-102, Grants and Cooperative Agreements with State and Local Governments.

Many of the key requirements are outline below, however it is important to fully read the procurement sections of the Uniform Guidance, located at 2 CFR 200.318, to ensure your compliance.

SCOPE

This policy applies to all University faculty, staff, students, and administrators.

STANDARDS

Some of the general standards over procurement include:

- Every non-federal entity receiving federal awards must have documented procurement procedures that reflect federal law, Uniform Guidance standards, and any state regulations.
- Entities should focus on the most economical solution during the procurement process, and must avoid using federal funds for the acquisition of unnecessary items. Organizations are encouraged to consider the use of shared services and intergovernmental agreements to foster greater economy and efficiency.
- Written conflict-of-interest policies are required. No employee or agent of the entity may participate in the selection, award, or administration of a contract funded by federal grant.
dollars if he or she has an actual or apparent conflict of interest. Use Form COI I and COI II for this documentation.

- The organization must document the procurement steps and activities required to be completed. This includes the basis for the type of procurement, contract type, and the basis for the contractor selection and price.
- Ultimately, the recipient of federal awards must maintain an appropriate level of oversight to ensure that contractors perform in accordance with the terms of their contract.

There is a high level of formal documentation required to meet the procurement standards, beginning with required organizational policies and procedures through individual contract award and oversight activities.

**GONZAGA UNIVERSITY PURCHASING PROCESS**

The Uniform Guidance also requires full and open competition. Contractors who assist in drafting specifications for requests for proposals (RFP) must be excluded from competing for those opportunities. In addition, RFP specifications cannot have unreasonable requirements that are meant to limit competition. Also, procurements must be conducted in a manner that prohibits the use of geographical preferences in the evaluation of proposals, except in certain cases where federal law explicitly requires or encourages geographic preference or when contracting for architectural and engineering services, provided that specifying geographic location leaves an appropriate number of qualified firms.

The Uniform Guidance outlines five methods of procurement:

- **Micro-purchase:** Purchases where the aggregate dollar amount does not exceed $3,000 (or $2,000 if the procurement is construction and subject to Davis-Bacon). When practical, the entity should distribute micro-purchases equitably among qualified suppliers. No competitive quotes are required if management determines that the price is reasonable. *For purchases below the $3,000 threshold, the normal Gonzaga University purchasing procedures apply. Documentation of competitive pricing is highly encouraged.*

- **Small purchase:** Purchases less than $150,000, the Simplified Acquisition threshold. The price or rate quotes must be obtained from an adequate number of sources. *For purchases from $3,000 to $150,000, a minimum of three competitive bids must be solicited and documented.*

- **Sealed bids:** Purchases greater than $150,000, over the Simplified Acquisition Threshold. Under this purchase method, formal solicitation is required, and the fixed price (lump sum or unit price) is awarded to the responsible bidder who conformed to all material terms and is the lowest in price. This method is the most common procurement method for construction contracts. *For purchases exceeding $150,000, a formal RFP process must be used and documented.*

- **Competitive proposals:** Purchases greater than $150,000, over the Simplified Acquisition Threshold. This procurement method requires formal solicitation, fixed-price or cost-reimbursement contracts, and is used when sealed bids are not appropriate. The
contract should be awarded to the responsible firm whose proposal is most advantageous to the program, with price being one of the various factors. *For purchases exceeding $150,000, a formal RFP process must be used and documented.*

- **Noncompetitive proposals:** Also known as sole-source procurement, this may be appropriate only when specific criteria are met. Examples include when an item is available only from one source, when a public emergency does not allow for the time of the competitive proposal process, when the federal awarding agency authorizes, or after a number of attempts at a competitive process, the competition is deemed inadequate. *A distinct and separate approval process and forms are required for a noncompetitive proposal. Burden of proof and documentation are required in each instance.*

Documentation must be provided for any procurement action that exceeds the $3,000 threshold (or $2,000 if the procurement is construction and subject to Davis-Bacon). Documentation is highly encouraged for any procurement below the Micro-purchase threshold.

Recipients will take all necessary affirmative steps to assure minority businesses, women’s business enterprises, and labor surplus area firms are used when possible.

Affirmative steps shall include:

- a) Placing qualified small and minority businesses and women’s business enterprises on solicitation lists;
- b) Assuring that small and minority businesses, and women’s business enterprises are solicited whenever they are potential sources;
- c) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women’s business enterprises;
- d) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women’s business enterprises;
- e) Using the services and assistance of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and

Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed above.

The Gonzaga University Purchasing department can assist with the bidding requirements, vendor suggestions, and documentation.
GONZAGA UNIVERSITY RECORDS RETENTION POLICY

PURPOSE

This Policy outlines the principles for the retention and disposal of University records, outlines the roles and responsibilities associated with this policy, and provides a records retention schedule to be in compliance with all state and federal laws and best industry standards.

Gonzaga University will comply with the Uniform Guidance opportunity to shift from paper to electronic methods of storage. The Uniform Guidance encourages universities to use electronic formats rather than paper whenever practicable. While Gonzaga must still provide or accept paper when it is requested, the guidance says that when original records are electronic and non-alterable, there is no need to create and retain additional paper copies. Similarly, when original records are paper (e.g., receipts), electronic versions (e.g., pdf scans) may be substituted provided they remain readable, are subject to periodic quality control reviews, and are reasonably safeguarded against being altered.

POLICY

In compliance with Uniform Guidance 2 CFR 200.333-337 regarding Record Retention and Access, Gonzaga University Sponsored Research and Programs retains records for at least three years from the date of submission of the final expenditure report.

SCOPE

This policy applies to all University faculty, staff, students, and administrators and specifically the Office of Sponsored Research and Programs.

GONZAGA UNIVERSITY RECORDS RETENTION PROCESS

Note that there are inconsistencies between the Uniform Guidance and the Federal Acquisition Regulation (FAR). Federal contracts follow the FAR, plus UG for cost principles only. Under the FAR, paper records related to contracts must be kept for a year after they are converted to an electronic format. Such paper documents should be scanned and retained in the Office of Sponsored Research and Programs.

Gonzaga University is considering solutions to storing and managing scanned documents. At this time Gonzaga University will retain written and when possible electronic records in the Office of Sponsored Research and Programs for at least seven years past the award expiration date. The Uniform Guidance, section 200.333 Retention Requirements for Records requires universities to keep “records for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies
and pass-through entities must not impose any other record retention requirements upon non-Federal entities.” However, the Office of Sponsored Research and Programs has found it beneficial to the University to retain these records for a minimum of seven years.

For Records Collection, Transmission and Storage of Information Gonzaga University will follow 200.335 for Methods for Collection, Transmission and Storage of Information which states: “When original records are electronic and cannot be altered, there is no need to create and retain paper copies. When original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media provided that they are subject to periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.” Gonzaga University will retain records in paper form in the Office of Sponsored Research and Programs until electronic retention is activated and reasonable. At that time this process will be updated.”

Gonzaga University will follow section 200.336 regarding Access to Records that section states as follows as of 2015:

(a) Records of non-Federal entities. The Federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of the non-Federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the non-Federal entity's personnel for the purpose of interview and discussion related to such documents.

(b) Only under extraordinary and rare circumstances would such access include review of the true name of victims of a crime. Routine monitoring cannot be considered extraordinary and rare circumstances that would necessitate access to this information. When access to the true name of victims of a crime is necessary, appropriate steps to protect this sensitive information must be taken by both the non-Federal entity and the Federal awarding agency. Any such access, other than under a court order or subpoena pursuant to a bona fide confidential investigation, must be approved by the head of the Federal awarding agency or delegate.

(c) Expiration of right of access. The rights of access in this section are not limited to the required retention period but last as long as the records are retained. Federal awarding agencies and pass-through entities must not impose any other access requirements upon non-Federal entities.”