College of Nursing and Health Professions
Office of Research, Discovery, and Innovation

Post-Award Management of a Research Grant or Contract: A Guideline for Investigators

(Robert Palisano, October 1, 2018)

Congratulations on your research award! This document describes post-award management of extramural funded grants and contracts including responsibilities of investigators and services provided by the Office of Research, Discovery, and Innovation. On behalf of investigator, the Office of Research, Discovery, and Innovation interacts with the post-award administrator in the University Office of Research, Research Accounting Services, Human Resources, and Procurement Services on administrative management including the budget, hiring research personnel, and purchasing supplies and equipment.

Notify Office of Research, Discovery, and Innovation of Award

Depending on the sponsor, the University Office of Research, the principal investigator, or both are notified of the award. Upon receiving notification, immediately **forward the notice** to the Grant Administrator who assisted with submission of the proposal and **schedule a meeting**. The Grant Administrator will make sure the University Office of Research has received the notice of award.

Institutional review board (IRB) Approval

Institutional review board (IRB) approval of human subjects research is required by many sponsors (including the NIH) before funds are released. In all cases IRB approval (or IRB statement that the study is exempt) is necessary before data collection begins.

IRB applications and renewals are submitted through COEUS (software system for Research Management supported by the Office of Research).

COEUS eIRB access form:
https://drexel.qualtrics.com/jfe/form/SV_2bJ65RSpZPmzNtz

Request access to on-line training in COEUS lite:
https://drexel.qualtrics.com/jfe/form/SV_7Op1GbEiYtz1nEh

The *COEUS Lite eIRB User Manual* is available in the *CNHP SharePoint site –Research* and http://drexel.edu/research/compliance/human-research-protection/institutional-review-board/How%20To%20Submit/

Contact Adam Fuhrer (agf33@drexel.edu or 215-762-3419) if you have questions.

Investigators who would like to post a flyer to recruit participants on the CNHP web-site need to indicate this in the IRB application or submit an amendment requesting approval.

Obtain Web Finance Account

The Office of Research Accounting Services sets up a Web Finance funding account for each grant or contract. The principal investigator is provided a **cost center** and **organization** (.org) number to access the account. The principal investigator is able to view all account transactions.

Spending cannot occur until the Web Finance account is active. In general, accounts are set-up 5 business days after the Office of Research Accounting Services receives the notice of award from the University Office of Research. If an account is not established after 5 business days, the Office of NHP Research will follow-up.

Once an account is active, an important first step is to confirm that the **project start/end date and all line items in the budget are accurate** (completed during meeting with Office of NHP Research team).

Meet with the Grant Administrator

Schedule a meeting with the grant administrator (also Institutional Advancement if they assisted with a foundation grant) as soon as your Web Finance funding account is active. During the meeting, all aspects of post-award management are explained and questions are addressed. Sponsor terms and conditions are reviewed. The Web Finance funding account is viewed to confirm accuracy. Procedures for processing expenses, hiring personnel, and management reports (expense reporting, effort reporting) and the supports provided by the Office of Research, Discovery, and Innovation are explained.

Non-Personnel Expenses

Non-personnel expenses include:

- Supplies
- Equipment
- Advertising
- Participant expenses (i.e. monetary incentive, travel, gift cards)
- Publication expense for open access journal article
- Travel expenses

Jim Bergey is the contact person for questions and assistance with non-personnel expenses. Jim works with investigators to order and determine the most practical method to process payments. Often times this is a **P-Card** (see next section).

Drexel Smart Source is an eProcurement application designed to make the purchase of goods and services easier for faculty and staff by automating the procure-to-pay process. *Smart Source*, accessible from the Employee Tab in Drexel One, is the primary method to purchase goods and services at Drexel University. Through *Smart Source*, investigators can view catalogs of pre-approved vendors and make purchases without having to utilize a P-Card. http://drexel.edu/procurement/makingPurchases/smart-source/

Government grants require that the purchasing guidelines of the University be strictly followed (research projects with a fund number in the 200000 range):

- Request to Purchase under $25,000 (other than those for equipment and subcontracts) should be sent directly to Procurement Services.
- Any Request to Purchase for equipment, subcontracts or over $25,000 must be routed through the Office of Research Administration.

The **Travel Expense Reimbursement Report** is completed for reimbursement of travel expenses. The form is updated as mileage rates change. The form is available at http://drexel.edu/procurement/travel/travel-expense-forms/ Submit the completed form to Jim Bergey for processing.

Using a P-Card for Non-Personnel Expenses

The Drexel University Procurement Card (P-Card) is a Visa card issued by JP Morgan Chase. http://drexel.edu/procurement/makingPurchases/pcard/

Principal investigators with federal grants are often issued a P-Card. The principal investigator must attend a training session prior to receiving a P-Card. *The cardholder is responsible for ensuring the Drexel is not paying sales tax in states where the University is exempt.* (The University is tax exempt in PA and NJ.) The tax exemption number is printed on your P-Card. If sales tax is charged by mistake, the cardholder is responsible for contacting the vendor for a refund.

PI's are responsible for keeping receipts for all purchases, preparing and submitting the monthly *Transaction Allocation Report* electronically on the JP Morgan Chase web-site. Procedures are explained during the training session.

P-Card holders are notified via e-mail to prepare and submit the monthly *Transaction Allocation Report* with all required receipts, stated business purpose, and supporting documentation for each transaction.

Prior to submitting, the *Allocation Report* is downloaded and sent to your Grants Administrator along with the receipts. The Grants Administrator reviews and approves all transactions to ensure:

- All receipts and supporting documentation are provided
- Charges are for university-related business only
- Transaction notes have a defined research purpose
- All transactions are reconciled to the correct cost center (applies to investigators with more than one Web Finance account)
- That sales tax is not charged in states where Drexel is exempt

Principal investigators who do not have a P-Card may use their Department's P-Card for non-personnel expenses paid from a grant or contract. In this situation, P-Card charges are reconciled by the Department administrator to the cost center for the grant or contract.

Consultation for Purchase of Computer Software and Hardware

Arun Ramakrishnan, Director of Research Labs in the CNHP is available for consultation on purchasing computer software and hardware and other lab equipment. Arun will contact the vendor and obtain a price quote. He **is not** involved in purchasing.

Hiring Personnel

A person cannot begin working on a grant or contract until officially hired. The process for hiring personnel is governed by federal, state and local law, as well as Drexel Policy. Personnel are hired as either a temporary employee or an independent contractor. The decision is made on a case by case basis. Working with the Grants Administrator, contact Research Accounting Services Tax Office to establish the procedure that applies to your particular situation.

Temporary Employee

The following information is needed to initiate the hiring process:

- Job description
- Does job involve working with minors?
- Does the job involve working remotely?
- Essential qualifications
- Start and end date of employment
- If part-time - hours per week/month
- Compensation

If a person has been identified for a position, provide information on whether the person currently works or has worked at Drexel in the past year and whether or not the person is a US citizen or permanent resident.

Jim Heinz or Matt Sawicki (Finances, Dean's Office) work with investigators for positions that will be posted on **Drexel Jobs** (online full-time and part-time positions at Drexel University).

Most personnel are hired as **temporary employees** using the form **Authorization to Hire**. Approximate timelines:

- Obtaining department/school approvals (for Authorization to Hire form): 1-3 days
- Obtaining approvals from Human Resources and Research Accounting Services (for Authorization to Hire form): 2-3 days
- Human Resources sending and receiving completed new hire paperwork: 2-5 days
- Human Resources completion of background checks: 2-3 days
- Human Resources completion of PEBC background checks (for working with minors): 5-15 days
- Completion of Foreign National tax and visa processes (when applicable): 7-15 days
- Human Resource Information System processing Banner data entry: 1-2 days

Total processing time (business days):

- U.S. Citizen: 8-16 days
- U.S. Citizen working with minors: 11-28 days
- Foreign National: 15-31 days
- Foreign National working with minors: 17-31 days

Common reasons for hiring delays:

- P.I.'s grant proposals incorrectly classify how an individual will be paid (e.g. participant, independent contractor, employee, honorarium)
- Human Resources is notified after the new hire starts work, or when the new hire calls to ask why they haven't been paid.
- New hire cannot start before background check is completed, this processing time was never anticipated in the hiring timeline.
- New hire needs PEBC's (fingerprinting, child abuse, PATCH) because they are working with minors, this processing time was never anticipated in the hiring timeline.
- New hire submits incomplete paperwork resulting in back and forth delays.
- New hire does not have proper ID to complete the employment eligibility verification form (I-9) in Human Resource office, resulting in back and forth delays.
- Department has not notified the Office of International Students and Scholars Services that new hire is a foreign national and to start the work visa process.
- New hire is a foreign national who has not completed all the required steps with the Office of Tax Compliance - (Glacier™ Nonresident Alien Tax Compliance System)**.**

Offer Letter to Students Paid from a Grant/Contract

Faculty are strongly encouraged to include PhD students as research assistants on grants and contracts. Students paid from contract or contract are Drexel University employees.
As such they must receive and sign an offer letter that states the conditions of employment and salary. **Jim Bergey** is available to assist with preparation of offer letters to students.

Time Sheet Approval Processing

Temporary employees of Drexel University are paid biweekly. The **Principal Investigator** has responsibility for ensuring that timesheets are completed by employees and hours are accurate.

The **employee** is responsible for:

- Recording hours following each work day on an **electronic timesheet in Drexel One.**
- Electronically submitting the timesheet for approval every two weeks on Friday by 5 pm.

The **principal investigator** or **proxy** (Department Chair) is responsible for:

- Approving the timesheet by Monday at 12 noon

When timesheets are not submitted by the deadline, a **Payroll Resolution Form** must be completed and submitted to the Payroll Department. This situation should be avoided.

The Grants Administrator for your study is available to orient new employees and principal investigators and to provide a template for completion of the Payroll Resolution Form.

Independent Contractor

Jim Bergey is available to assist investigators with the contract for an independent contractor. Drexel University's policy on independent contractors is available at: http://drexel.edu/comptroller/general-accounting/policies-procedures/independent-contractor-policy/

The form **Certification for Determination of Independent Contractor Status** is completed to determine whether a person qualities to be paid as an independent contractor and sent to the Office of Tax Compliance for approval. If approved, an **Independent Contractor** or **Consulting Agreement** is drafted and submitted for approval. The **IRS Form W-9** *Request for Taxpayer Identification Number and Certification* must be submitted to Accounts Payable before payment is issued.

Changes in Personnel Salary and Past Effort

Electronic Personnel Action Form (EPAF) is completed when there are personnel changes in the salary amount paid by the grant or contract (future salary redistribution).

Labor Redistributions is completed for personnel who have provided effort that has not been charged to a grant or contract (prior salary distribution).

The Grants Administrator for your study will complete these forms in DrexelOne.

Subcontract Agreements / Purchase Services Agreement

When a grant or contract is awarded, the University Office of Research notifies the Office of Research Accounting Services to initiate subcontracts and purchase service agreements. The institution or individual submits a purchase order for transfer of funds/payment from Web

Finance. The transaction occurs through a purchase order submitted by the subcontractor. The principal investigator must approve payment through **Drexel Smart Source** (accessible from the Employee Tab in Drexel One).

Management Reports

Principal investigators are encouraged to **view the Web Finance Account for the grant/contract monthly**. It is essential to view the account quarterly.

The Office of Research, discovery, and Innovation provides investigators a **Detailed Project-to-Date Expenditure Report of Monthly Activity**.

Contact the Grants Administrator for your study if there is an overage – the payment or cost exceeds the amount of funds in the budget - or questions regarding funding status.

Effort Reports are completed on a quarterly basis in Drexel One. The report pertains to percent effort on a sponsored grant or contract. You will receive e-mail notification when the effort report ready to certify

Register with Clinicaltrials.gov

ClinicalTrials.gov is a Web-based resource that provides patients, their family members, health care professionals, researchers, and the public with easy access to information on publicly and privately supported clinical studies on a wide range of diseases and conditions. The Web site is maintained by the National Library of Medicine (NLM) at the National Institutes of Health (NIH). Information on ClinicalTrials.gov is provided and updated by the sponsor or principal investigator of the clinical study. Studies are generally submitted to the Web site (that is, registered) when they begin, and the information on the site is updated throughout the study. In some cases, results of the study are submitted after the study ends. **The current policy for NIH grants is to register in ClinicalTrials.gov no later than 21 days after enrollment of first participant.** Peer-reviewed journals are increasingly requiring registration in ClinicalTrials.gov as a condition for publication.

Return of Indirect Costs (Overhead) to the Principal Investigator

Currently 30% of indirect costs from federal grants are allocated to the CNHP by the Office of Research. Indirect costs are evenly divided among the principal investigator (10%), Department (10%), and College (10%).

Close-out Process with Research Accounting Services

Research Accounting Services initiates a close-out process on grant accounts approximately 90 days after grant funding ends. The principal investigator and Department business administrator are notified that the account is being closed and to complete a *Close Out Certification Form.*

Upon notification, the **principal investigator/administrator has 3 days to contact Research Accounting Services if expenses were incurred after the grant ended**. If the principal investigator/administrator does not respond within 3 days and the account is closed then the investigator's Department cost center will be charged. Similarly if there is overage (costs charged exceed funds in account) the investigator's Department cost center will be charged. Both situations should be avoided.