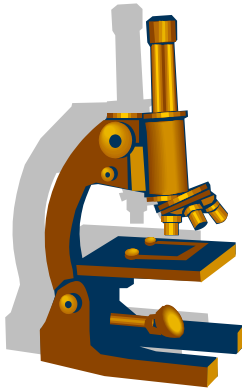


OSPA HANDBOOK



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I. **Introduction**

ISU encourages faculty and professional staff to seek external financial support for specific projects undertaken to further the mission of the University in teaching, research, and public service.

Sponsored programs enhance and expand the educational opportunities available to undergraduate and graduate students at the University. They facilitate research and scholarly inquiry, as well as the development of new knowledge while contributing to the academic achievement and stature of the institution. Sponsored program information, assistance, and technical support are provided to the principal investigator during the proposal submission, award negotiation, and post-award monitoring by the Office of Sponsored Programs Administration (OSPA).

OSPA provides the following services:

- Assistance with proposal budget review
- Review of sponsor guidelines
- Review of proposal for conformance with sponsor, university and other requirements
- Submission of proposals electronically (as required)
- Award review and negotiation
- Development and negotiation of subrecipient agreements
- Provide assistance with non-financial post-award actions (no cost extensions; budget revisions; award transfers; supplemental budgets; changes in PI; changes in scope; etc.)
- Work with other ISU departments to create a client-service driven research environment

II. Proposal Submission Process

A. Funding Sources

Funding Links

The Vice President for Research maintains a site with external funding opportunities at <https://funding.vpresearch.iastate.edu/fundingopps/>.

[Grants.gov](#) is the single access point for over 1,000 grant programs offered by all federal grant-making agencies. Investigators have the option to sign-up and receive notification of all funding opportunities or may choose a specific discipline and/or federal agency.

[Foundation Center](#) Founded in 1956, the Foundation Center is the nation's leading authority on philanthropy and is dedicated to serving grantseekers, grantmakers, researchers, policymakers, the media, and the general public.

[National Institutes of Health](#) – the nation's premier government source of funding for biomedical research.

[National Science Foundation](#) – the nation's premier government source of funding for hard sciences research.

B. Review of Sponsor Guidelines and Proposal Documentation

OSPA assists with review of sponsor guidelines. With the advent of Grants.gov and other electronic submission systems, it is particularly important for principal investigators and their teams to work together with OSPA to ensure that all formatting and submission issues are reviewed and submissions conform to sponsor requirements. If a proposal does not conform to sponsor requirements, the proposal may be rejected by the sponsor. Electronic submission systems are particularly sensitive to submission errors. Researchers should work closely with OSPA to avoid these problems.

Principal investigators should submit all proposal documentation to OSPA **four** days prior to the submission deadline to ensure a successful submission.

Proposal documentation that should be provided to OSPA includes:

- Sponsor guidelines
- Statement of work
- Proposal budget and budget justification
- Completed GoldSheet
- Subrecipient statement of work, budget, letter of commitment

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- Cost-sharing documentation (if a third party is involved, a letter from the third party should be provided detailing the cost-sharing commitment)

C. Budget Development

Preparation of the budget is, for many researchers, the most difficult section of the proposal. Granting agencies review hundreds of proposals annually and are proficient at comparing level of funding requested to perform the research work proposed. Therefore, it is important that the budget section of the proposal reflect, as accurately as possible, the funding needed to carry out the proposed research. The investigator should neither overestimate the funds required nor underestimate budgetary needs. Either of these strategies may lead to proposal rejection. A budget that accurately details the funds necessary to carry out the technical statement of work can strengthen the total proposal and increase the likelihood of funding. Furthermore, a carefully prepared budget can often identify weak areas in the proposal narrative and result in improvement of the proposal. Grant coordinators at the department and college level can provide expertise in completing a budget request, applying fringe benefit and facilities and administrative cost rates, and documenting subrecipient agreements, consultants, matching funds, and cost-sharing. In the case of more complicated proposal requirements, OSP will complete sponsor assurances and certifications and will assist the investigator in interpreting sponsor guidelines.

1. Direct Costs

a. Salaries and Wages

To determine total salaries and wages, list the amount of time to be spent by each person, including any administrative staff, who will be working on the project. Time should normally be shown in terms of person-months and a percent of full-time effort. Show a breakdown between summer and regular academic year for faculty. No employee may be scheduled for activities in excess of 100% of effort in any given month. Sponsored activities may not result in any employees receiving compensation at a rate in excess of their authorized salary or academic rate. For multi-year projects, the budget should take into consideration any possible salary increases. [OMB Circular A-21](#), the federal regulation that determines the allowability of costs on federally sponsored awards, requires special justification for the use of administrative support on sponsored programs. The budget justification should include this information.

b. Fringe Benefits

Fringe benefits are a direct cost to a sponsored project, are clearly related to the salaries and wages to be paid, and are shown as a separate entry in the budget.

A pooled fringe benefit rate is used to estimate costs. The rates can be viewed at:

<http://www.ospa.iastate.edu/policies/benefits.html>

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Note, however that the actual costs for fringe benefits are charged (billed) to the sponsored project at the time the costs are incurred; the amount charged is based on salary, selected benefit package, and other variables applicable to the individual employee.

If fringe benefit expenses for a project exceed the projected amount included in the budget, it is the responsibility of the principal investigator to pay these costs from the direct award funds provided by the sponsor or from some other unrestricted source if adequate funds are not available in the sponsored project account.

c. Consultants (Independent Service Providers)

Normally, consultants are paid a consulting fee plus travel expenses. Whenever possible, identify in the budget the proposed consultant by name, indicate the number of days of work, daily rate, and provide curriculum vitae or resume for the consultant in the proposal.

Many sponsors do not permit payments to consultants and some restrict or limit such payments, or require that the university obtain written approval for consultants. If in doubt as to the allowability of consultants or rates paid to consultants, refer to the award terms, sponsor guidelines, or contact OSPA.

d. Capital Equipment

Equipment means an article of nonexpendable, tangible property having a useful life of more than one year and an acquisition cost of \$5,000 or more per acquisition. Components, other than on-campus machine-shop labor, used to fabricate an item of capital equipment may be considered as capital equipment for budgeting purposes and should be identified as such for inventory purposes. Any on-campus machine-shop labor component involved in fabrication of capital equipment is subject to facilities and administrative costs.

e. Expendable Equipment and Supplies

These are items costing less than \$5,000. Normally, a research project will consume expendable supplies such as laboratory items, teaching aids, computer software, and office supplies. A reasonable amount should be budgeted for these items.

f. Publications

Budget the anticipated cost of publishing the results of the research, keeping in mind that page charges may vary from journal to journal. Consider both page charges and reprint costs.

g. Travel

If foreign travel is anticipated the detailed information for the trip(s) should be provided in the budget. Reimbursement levels for domestic travel expenditures are set by the university or may be determined by sponsor guidelines (the most restrictive guideline will be used). Federal

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funds cannot be used to make trips to secure new or additional research support or funds.

h. Computer Time

Computer time costs should be included as a budget item, if appropriate. If non-sponsor funded computer time is needed, arrangements must be made in advance with the researcher's academic department or research unit. Facilities and administrative costs apply to all types of computer time, and to all computer supply budgets.

i. Subrecipient Agreements

A **subrecipient** is a state or local government, college, university, corporation or other organization that expends federal funds received from a prime grantee to carry out a sponsored program.

Typically, a **subrecipient**:

- * Has its performance measured against program objectives;
- * Has responsibility for programmatic decision-making;
- * Has responsibility for adherence to applicable sponsor program compliance requirements; and
- * Uses funds to carry out a program of that organization, rather than providing goods or services for a program of the prime grantee.

Other indications that an organization should be deemed a subrecipient include when:

- * The organization is contributing to the scholarly/scientific conduct of the project as described in a statement of work for the organization;
- * The conduct of the organization's portion of the project requires use of the discretion and unique expertise of the organization; or
- * Payments are made before the work is performed and that ultimate settlement of the agreement will be on the basis of incurred allowable cost.

When the Principal Investigator contemplates collaboration with a colleague at another institution, if the collaboration is to be funded, this will constitute a subrecipient relationship. At the time of proposal submission, the collaborating institution should provide to OSPA a statement of work and detailed budget, signed by the collaborator's authorized institutional representative.

j. Other Direct Costs

Costs such as those for copying; long-distance telephone calls for the project; postage for the project; reference books and materials; tuition and required fees for participating students; equipment maintenance; and contracted services are all considered Other Direct Costs. The principal investigator should justify the need for these items in relation to the project.

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2. Facilities and Administrative (F&A) Costs

a. Facilities and Administrative Costs

Facilities and administrative (F&A) costs must be included in proposal budgets unless the sponsor has a written policy on F&A rates applicable to all potential grantees. All deviations from full recovery of F&A rates are subject to ISU administrative approval. Sponsor guidelines limiting facilities and administrative costs must be provided with a proposal. To calculate F&A costs for a project: 1) Calculate the Total Direct Costs (TDC), which is simply the sum of all direct costs (salaries, benefits, supplies, equipment, etc.) 2) Calculate the base against which the F&A rate will be multiplied by subtracting exempt items (capital equipment, graduate student tuition and required fees, stipends, and subrecipient agreement costs in excess of the first \$25,000 of each subrecipient agreement over the life of the agreement) from TDC. This will give the Modified Total Direct Costs (MTDC). 3) Multiply the correct F&A rate against the MTDC base to calculate the facilities and administrative costs for the project. 4) Add the TDC to the F&A to calculate the Total Project Costs.

$TDC - \text{exemptions} = MTDC$

$MTDC \times F\&A \text{ rate} = F\&A$

$TDC + F\&A = \text{Total Project Costs}$ Please note that since the federally-negotiated facilities and administrative cost rates are subject to change every three to five years, principal investigators should be prepared to make adjustments in budgets for such changes.

ISU's F&A rate agreement may be viewed here:

<http://ospa.iastate.edu/proposal/preparation/fa-rate.html>

b. On- and Off-Campus Rates

Off-campus activities are those activities that operate entirely off University property (either owned, leased, or rented) and do not increase or decrease the costs of those activities (i.e., operations and maintenance) that would be affected had the activities been operated on property maintained and/or depreciated by the University.

Off-campus rates are generally used when the principal investigator conducts research away from the campus for a period of no less than one semester or all three summer months. They are not used for conducting of workshops, seminars, etc. off campus, especially when data collection and analysis takes place on campus.

3. Matching Funds/Cost-Sharing

If sponsor guidelines require cost-sharing or matching funds (cash contribution or donation of in-kind services such as contributed time and effort by the principal investigator and other key

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personnel), please provide the details of any cost sharing provided by the PI, department/unit or college and/or provide appropriate letters of commitment from third-party sources. All matching funds or cost-sharing commitments based on the faculty member's academic time and effort must be approved in advance by the principal investigator's department chair and dean. The university does not provide cost-sharing for projects on which it is not required.

D. Other Proposal Information

1. Limited Submission Proposals

Limited submission programs are those for which funding agencies restrict the number of nominations or proposals a university may submit for consideration for an award. ISU, therefore, must internally screen all eligible and interested nominees to determine which will represent the university in the regional, national, or international competitions.

Documents required by the University will be listed for each internal competition. Potential nominees must ensure that they are aware of any additional requirements of the awarding body beyond the University internal competition. In all cases, requirements for internal review will mirror the requirements of the awarding body to reduce duplication or extraneous paperwork. Unless stated otherwise, all required documentation should be submitted by email (preferably as a pdf file) to the Office of the Vice President for Research by the posted deadline.

It is the responsibility of the researcher and nominating body to ensure that all eligibility guidelines are met prior to submission for internal review.

2. Compliance Review of Proposals

Sponsors may require approved human subject, animal subject, biosafety, or radiation protocols prior to submission of the proposal. Many sponsors will permit proposals to be submitted with pending compliance protocols but will require approved protocols prior to issuance of the award. If you are unsure about the sponsor's guidelines on this issue, contact OSPA to discuss. If you have questions about protocol submission, please contact the [Office of Responsible Research](#) (4-4215).

3. Review of Proposals by Offices Other than OSPA

In some circumstances, proposals to external agencies may require institutional authorization and approval by university offices in addition to the normal proposal submission process that occurs within the department, college, at OSPA and on occasion, the Board of Regents.

Proposals that require additional institutional authorization and the timeframe required for such review are shown below:

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Proposals that	Timeframe for Review
Call for new buildings, renovations or alterations	See below under Construction and Renovation for more information on timeframe
May be funded by a non-U.S. sponsor or involve extensive work outside the U.S.	To OSPA at least two weeks in advance of sponsor deadline
Require institutional cost sharing*	To VPR and OSPA at least three weeks in advance of sponsor deadline.**
Involve exports, foreign national restrictions, intellectual property issues, or similar issues of concern	To OSPA at least two weeks in advance of sponsor deadline
Encompass or potentially create classified/secret information	To VPR four weeks in advance of deadline; ISU does not accept classified projects.
May result in provision of services outside the university's mission	To OSPA at least two weeks in advance of sponsor deadline
May encompass individual or institutional conflicts of interest	To OSPA at least two weeks in advance of sponsor deadline
Are budgeted at \$2M or above	To OSPA at least two weeks in advance of sponsor deadline
Establish a new academic program	Contact the Provost's Office to discuss several months in advance
Will be sent to a sponsor that limits the # of submissions permitted by an institution	To VPR by the deadlines noted in a limited submission announcement

*For proposal submissions that require mandatory cost sharing, PIs may obtain third party cost sharing from external organizations without VPR review. Documentation of the cost sharing is required. PIs may also use their incentive funds and may use a reasonable share of their salaries for cost sharing (5-10%) without obtaining VPR review, but only for programs requiring mandatory cost sharing.

**Requests for institutional support should go directly to the Vice President for Research office.

If your proposal includes any of the above scenarios, send a copy of the guidelines for the program and a summary of the statement of work to OSPA **two weeks** in advance of the program deadline unless otherwise listed above.

PLEASE NOTE: Proposals that do not involve the scenarios above should be submitted to OSPA four business days in advance of the deadline with copies of budgets, statements of work and sponsor guidelines.

Construction and Renovation

All projects that include funding for construction and/or renovations must be approved by both Facilities Planning and Management (FP&M) and the Capital Projects Advisory Committee (CPAC) prior to proposal submission. It is imperative that you start the process at least one month before the sponsor deadline to assure the needed approvals are obtained. For review and advice on construction and renovation estimates, contact University Architect Dean Morton in FP&M. For review and approval of construction or renovation projects by CPAC, contact Ellen Rasmussen, Associate Vice President for Budget and Planning. CPAC meets once a month.

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Feel free to contact Charlotte Bronson, Associate Vice President for Research, at 4-8700 or by email at cbronson@iastate.edu, for further details.

Institutional Policies Regarding Cost-Share/Institutional Support for Proposals:

The University (i.e., the departments, dean's offices, centers/institutes, and/or VPR office) will collectively provide cost-share support only when it is **required**. Institutional support will be considered for large (greater than \$1 million), multi-investigator, multi-institutional grant proposals.

Requests for institutional cost share support should be submitted to the VPR Office (rajanc@iastate.edu). Requests should be accompanied with the following information: (1) estimated budget (for all years combined and the budget per year), (2) the IDC revenues that ISU would be expected to receive (for all years combined and the amount of IDC revenues per year), (3) the required amount of cost-share, (4) the names of the PI-s, (5) the salaried home(s) of the PI-s, and the percentage of the PI's salary paid by each unit, if a PI is paid by multiple units, and (6) a copy of the solicitation (RFP, RFQ/BAA).

The VPR Office will coordinate all contributions from the departments, colleges, centers/institutes, PI incentives, and/or VPR Office, as appropriate. This will, in most cases, be less than the targeted amount of cost share. The PI will be notified of the contributions and will then have to find the remaining amount of cost-share through in-kind contributions or other sources. The VPR and Deans' offices would be willing to provide guidance and suggestions for how the in-kind contributions can be met.

The PI will notify the VPR once the remaining amount of cost-share resources has been finalized. The VPR Office will notify OSPA that the cost-share requirement has been met and agreed upon.

If the proposal is awarded at a significantly lower amount than what was proposed, the cost-share contributions will be revised accordingly.

Cost Sharing that Involves Buildings or Land

In rare circumstances, buildings or land may be used as cost share. All proposals that include buildings or land as a part of the cost share must be approved by all parties to whom the buildings or land are assigned as well as by Warren Madden, Vice President for Business and Finance.

Institutional Letters of Support

PI's will notify the VPR Office (rajanc@iastate.edu) regarding requests for letters of institutional support. PI-s will provide a draft letter that includes the uniqueness of the proposed work, the strengths at ISU that make it well suited to house the work on this campus, and any other pertinent information that would be useful. The letter will be edited and the VPR's

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Office will have the letter signed by either the Provost or the Vice President for Research, as appropriate. Please allow for at least **3-5 days** to get the letter prepared and signed, and do not contact the Provost directly.

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III. Awards

A. Award Acceptance and Post-Award Administration

Award documents take many forms depending upon the type of sponsor and project. These documents require review and signature by the official institutional representative authorized to sign on behalf of the institution. OSPA is responsible for award document processing. The Principal Investigator is notified of each new award and its terms and conditions and is asked to accept the award and responsibility for complying with all award requirements by returning a signed acknowledgment to OSPA.

OSPA may negotiate the terms and conditions of an award if the terms are not consistent with the requirements of an educational institution. Occasionally, OSPA will seek changes in clauses related to governing law, indemnification and insurance to comply with Iowa law. OSPA will also negotiate clauses that permit the University to retain of intellectual property developed under the agreement. OSPA also protects academic freedom by ensuring a faculty member's right to publish by asking for appropriate terms. OSPA also seeks PI acceptance of award terms and conditions if they differ significantly from the usual federal terms prior to signing award documents.

Upon receipt of fully executed award documents or other proof of award, OSPA forwards the award documents to the [Office of Sponsored Programs Accounting](#), which sets up the project account number. Once the Principal Investigator receives notification of the project account number from SPA, funds may be encumbered or expended.

OSPA serves as a central point of contact for sponsor grant or contract officers regarding administrative matters throughout the duration of the project. OSPA also serves as facilitator for Principal Investigators in all matters post award non-financial administration. In addition, OSPA coordinates compliance with each sponsor's requirements for interim and final progress reports. Principal Investigators are responsible for submission of all required reports in a timely fashion.

B. Advanced Accounts – Pre-award Costs

If award documentation is delayed, procedures are available to obtain an advanced account for a limited period of time. After the award information is verified by a representative of the sponsoring agency with the authority to commit funds, OSPA will review the advanced account request and may authorize set up of an account. Many federal agencies allow pre-award costs up to 90 days prior to the start date of a grant or cooperative agreement. If pre-award costs are required, the above procedures for verification will be followed and pre-award costs may be approved. Note that advanced account requests for contracts will most likely not be approved since sponsors rarely permit expenditures prior to the start date of a contract.

C. Subrecipient Agreements

Sponsored program budgets often contain funding for pass-through funding to subrecipients.

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OSPA has the overall responsibility for developing and negotiating subrecipient agreements under sponsored project awards. OSPA maintains documentation relative to subrecipient agreement placement and any modification of the agreement.

OSPA will negotiate all subrecipient agreements in accordance with standard business practices and, as appropriate, the Federal Acquisition Regulation and/or OMB Circulars A-21, A-110, and A-133. These agreements will comply with all standard and special provisions of individual awards. After the subcontract/subrecipient agreement is fully executed and work has commenced, **it is the responsibility of the principal investigator to: 1) review all invoices from the subrecipient to determine if the charges are appropriate for the work performed; 2) monitor the progress of the subrecipient and; 3) obtain all required deliverables from the subrecipient.**

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IV. POST-AWARD ISSUES

A. Extensions of Time

One of the most frequently asked questions from principal investigators or their assistants is, “What do I need to do in order to extend my project without additional funds?” The answer to that question depends on the source of funding.

Federal Funds - If the award is from a federal sponsor and the terms and conditions of the award are noted as either Federal Demonstration Partnership (FDP) or Research Terms and Conditions, the University has the option of extending the project for a period up to 12 months without having to contact the sponsor for permission. The following sponsors usually issue Research Terms and Conditions awards: National Science Foundation, National Institutes of Health, National Aeronautics and Space Administration, Department of Energy, Environmental Protection Agency (but you can obtain a no-cost extension only if the extension will not cause the project period to exceed five years).

If researchers seek an extension on a project which provides for a no-cost extension under the Research Terms and Conditions, they should contact the [OSPA Awards Team](#) by email with the request. The no cost extension request must provide a valid rationale for the extension. Please note that extending the project to expend remaining funds is not a valid reason for extension. Potential acceptable rationales for the extension include a late start due to difficulties in hiring, late receipt of award from the sponsor, unexpected changes in the project timeline due to sponsor modifications, etc.

For Research Terms and Conditions grants and cooperative agreements, if the one-year Research Terms and Conditions extension has already been utilized, subsequent extension requests must be submitted through OSPA. In most cases, the request should be submitted to the OSPA Awards Team and should provide a justification for the extension. The justification should relate to the completion of the scientific objectives. (The fact that funds may remain is not a valid justification.)

Requests for no cost extensions to NSF must be submitted through FastLane. NSF requires that the request be submitted 45 days prior to expiration.

Sponsor approved no-cost extensions must be submitted prior to the expiration date of the grant. Most sponsors have guidelines for submission of no cost extension requests and require them to be submitted within a certain timeframe prior to the end date of the award. Please note that, after submission of a request, it can take several weeks for a sponsor to approve. Consider the processing time when deciding when to submit such a request.

Non-federal requests for extension should be submitted to and routed through OSPA. The requests should include a programmatic justification for the extension. The University has no provision for extending these projects without sponsor approval. As with federal awards, these

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requests should be made prior to the expiration date with ample lead-time. A two-month lead time is suggested in order to have an approved extension prior to the original expiration date.

B. Budget Changes

If a principal investigator would like to revise his or her budget and sponsor guidelines do not permit the university to make the change without sponsor approval, the PI will need to request the revisions in writing from OSPA. The request must be processed through OSPA and will be forwarded to the sponsor. If the award does not require sponsor approval for budget changes, the PI may expend as the program requires, subject to sponsor requirements regarding allowable costs.

C. Supplemental Funds Requests

Requests for additional funding on an existing project are processed as proposals through OSPA. You will need to submit the following items to the OSPA Proposal Team: 1) GoldSheet; 2) budget; 3) statement of work for the additional effort; and 4) updated certification for all compliance issues if necessary.

D. Change of Principal Investigator

If a change of principal investigator is required on a project, a letter must be sent to the sponsor. The letter should be endorsed by the proposed PI, the department chair and OSPA. The letter should outline the qualifications of the new PI and include a copy of the new PI's curriculum vitae.

E. Leave of Absence

If a PI with a sponsored project plans to be away from the University, he or she will need to notify the sponsor in writing of the absence. Note that most federal awards require sponsor approval for any absence of more than three months. The PI's request should address how he or she plans to maintain oversight of the project during the absence. This request must be co-signed by OSPA.

F. Grant Transfers

Transferring a grant to another institution is a complicated process and requires proper timing to allow for the transfer and start-up at the new institution. Some sponsors have specific forms that must be completed to obtain a transfer. Other sponsors have no formal guidelines for transfers.

There are general procedures that need to be followed to prepare for a transfer. Please note the following steps in preparing for a grant transfer:

1. Select an expiration date for the project. In order to relinquish the project, Sponsored Programs Accounting must be able to determine the residual funds remaining after all

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obligations have cleared. It takes at least 45-90 days after the expiration date to obtain this information.

2. Review sponsor guidelines for grant transfer instructions and alert OSPA to any unusual circumstances.

NIH procedures are outlined at:

http://grants.nih.gov/grants/policy/nihgps_2010/nihgps_ch8.htm#_Toc271264936

NSF procedures are outlined at:

http://www.nsf.gov/pubs/policydocs/pappguide/nsf11001/aag_2.jsp#IIB2h.

3. To transfer equipment purchased on a sponsored project account at ISU to another institution, a researcher must:

Obtain approval from his or her Chair to transfer the equipment

Notify Inventory of the impending transfer

Notify SPA of the intent to transfer equipment and provide a listing of the equipment with serial numbers and descriptions

For more information on equipment disposition, please see:

<http://conroller.iastate.edu/fa/inventory%20control.htm>

4. The researcher may also be required to submit a non-competing continuation for the next year's funds through the new institution to which he/she transfers.

When an award has been officially relinquished by ISU, the sponsor will most likely re-award the project to the new institution.

G. Changes in Effort

When a principal investigator on a federally funded project wishes to make changes in work effort that result in a 25% or more decrease in effort for him or herself or any key personnel on the project, the principal investigator must notify OSPA of the change in effort so that the changes can be approved by the sponsor. Such modifications to effort are subject to the sponsor's approval before they can be implemented.

H. Effort Reporting

Personnel paid on sponsored project accounts will receive effort certification forms to confirm that effort was performed as proposed on sponsored projects. Effort certification is a requirement of OMB Circular A-21 and the university must obtain this documentation to satisfy

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federal regulation. Non-conformance with federal regulations related to effort certification can result in disallowed costs, fines, penalties and other sanctions. Return effort certifications promptly to Sponsored Programs Accounting.

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