



Guide to Research and Sponsored Projects Compliance

Table of Contents

Introduction.....	1
Solicitation of Sponsored Funding	2
Eligibility to Serve as a Principal Investigator.....	3
Award Terms and Conditions	4
Responsible Conduct of Research	7
Conflict of Interest.....	10
Technical Progress and Final Reports	12
Cost Principles	14
Facilities and Administrative Costs	16
Administrative Salary and Wage Costs	17
Expenses to Watch	21
Administrative Salary and Wage Costs	17
Cost Transfers.....	22
Cost Share.....	23
Effort Reporting.....	26
Developing and Monitoring Sub-Recipient Relationships.....	27
Research Involving Humans	28
Research Involving Animals.....	29
Export Controls and Economic Sanctions	30
Biological Safety.....	32
Laboratory Safety.....	35
Radiation and Laser Safety	36
Environmental Health and Safety Training.....	37

Radiation and Laser Safety	39
Office of Enterprise and Innovation.....	36
Risk Management.....	39
Roles and Responsibilities	40
Contact Information	41

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Introduction

The administration of academic research and sponsored projects has grown more complex over the years. In addition to leading the research that is a core mission of the University of Nevada, Reno (UNR or University), principal investigators (PIs) have ultimate responsibility for compliance with award terms and conditions, federal, state and local regulations, and University policies directly related to their research and/or sponsored projects.

This publication provides an overview of these policies and regulations. It is intended as a supplement to — not a substitute for — the services provided by the [Office of Sponsored Projects](#), [Research Integrity Office](#), [Environmental Health and Safety](#), [Office of Lab Animal Medicine](#) and other campus offices charged with supporting UNR faculty and staff.

Herein you will find the following:

- Information relating to the most frequently asked questions about award administration.
- Key points relating to issues that, in the past, have cost projects funding or have been called out by internal and external auditors.
- Contact information for the departments that can assist PIs and department administrators with the finer points of award administration and compliance.
- Policy references and links to all relevant policies.

The goal of this guide is to assist PIs and their support staff in avoiding common compliance pitfalls so that they can receive the full value from their sponsored awards and focus on the advancement of knowledge, the development of the next generation of scholars and service to the worldwide community.

Solicitation of Sponsored Funding

At UNR, all awards must be made to the “Board of Regents, Nevada System of Higher Education, on behalf of the University of Nevada, Reno,” not to schools, colleges, programs, departments or faculty members. No official solicitation for sponsored research funding or funding for any other sponsored activity such as training, public service programs or special projects may be made in the name of the University without prior approval of the Nevada System of Higher Education (NSHE) or an authorized officer of the University. At UNR, the chancellor has delegated this authority, within the limits set forth by the Board of Regents, to the president. In turn, the president has delegated this authority to the assistant vice president for research administration in the Office of Sponsored Projects (OSP).

University employees who receive any part of their salary through the University or whose activities use any University resources or facilities must submit proposals for sponsored funding through OSP. This ensures that all sponsored projects conducted by University employees or with University resources or facilities have proper signature authority and comply with relevant University policies and guidelines. UNR has put this policy in place to protect faculty and the University.

OSP assists the campus community in securing sponsored funding while promoting proper stewardship of those funds. When processing a proposal and resulting award, OSP reviews all documents to ensure compliance with relevant policies and guidelines. OSP staff are available to assist with questions regarding applicable policies, guidelines, statutes and regulations, and proposal preparation.

Key Points

Awards must be made to the Board of Regents, Nevada System of Higher Education, on behalf of the University of Nevada, Reno.

University policy requires that proposals be submitted through the Office of Sponsored Projects.

Who to Contact

[Office of Sponsored Projects
ospadmin@unr.edu](mailto:ospadmin@unr.edu)
(775) 784-4040
(775) 784-6680 Fax

Helpful Links

NSHE *Procedures and Guidelines Manual*, [NSHE Preparation and Approval of Contracts](#). (See Section 3.)

University Administrative Manual, Section 505, President Delegated Signature Authority. [See paragraph heading, “Contracts (Other than Terms of Employment.”)]

Eligibility to Serve as a Principal Investigator

The individual responsible for the design, scientific and administrative conduct and reporting of a research, training or public service project supported by sponsored funding is known as the principal investigator (PI).

Individuals meeting the following criteria may serve as a PI for grants, contracts, and/or research protocols involving animals, human subjects, recombinant DNA and biological agents if they are deemed to possess the requisite training, skill, commitment and expertise:

1. Faculty at the University with renewable appointments, as defined in the *University Administrative Manual (UAM)*, [section 2,511](#).
2. Postdoctoral fellows at the University as defined in the *UAM* [section 2,636](#) with a supervising faculty, as defined in item 1 above, included on the transmittal in InfoEd.
3. Visiting faculty or scientists during the time they are on University payroll.
4. Full-time classified staff at the University, with signature approval from the appropriate dean and the vice president for research and innovation.
5. Emeritus faculty in residence at the University who wish to continue their research programs, with signature approval from the appropriate dean and the vice president for research and innovation.
6. Students submitting applications for which the funding agency requires a student to be the sole PI and the application to be submitted through the institution, with approval from the appropriate dean and vice president for research and innovation. A full-time faculty member must serve as mentor or faculty advisor.

To request approval to serve as PI under items 4, 5 and 6 above, complete a [Request for Approval to Serve as Principal Investigator for Sponsored Project form](#), obtain requisite signatures and submit the signed original to the Office of Sponsored Projects.

Approvals for full-time classified staff and emeritus faculty are valid only for the specific project listed on the Request for Approval to Serve as Principal Investigator form.

Key Points

The term, principal investigator (PI), designates the individual responsible for a sponsored project.

Eligibility to serve as a PI is contingent upon certain criteria, listed at left.

Who to Contact

[Office of Sponsored Projects](#)
ospadmin@unr.edu
(775) 784-4040
(775) 784-6680 Fax

Helpful Links

OSP Policy Document:
[Requirements for University of Nevada, Reno Principal Investigators](#)

Award Terms and Conditions

Understanding all funding source requirements and restrictions is critical. The PI must thoroughly understand what the sponsoring agency expects in managing the project. These expectations are explained in the award terms and conditions. PIs should always carefully read the award terms and conditions and consult the Office of Sponsored Projects (OSP) for clarification of anything that is unclear. Note: When individual award terms and conditions are stricter than applicable federal guidelines and University policy, the award terms and conditions take precedence. For example, while travel expenses are allowable under federal guidelines and University policy, they may be specifically excluded or limited by your specific award.

When managing an award, pay close attention to the key award terms and conditions detailed below.

Budget

The PI prepares a budget and justification for the project. The budget must be in accordance with allowable cost principles including application of the appropriate facilities and administrative (F&A) rate, also referred to as indirect cost rate. As the project progresses, PIs should compare the initial, sponsor approved budget to actual expenditures on a regular basis.

When budget category overruns or shortfalls occur, re-budgeting may be necessary. Below are some general re-budgeting rules; however, the award terms and conditions should be consulted before re-budgeting to ensure that prior sponsor approval is not required.

- Modest re-budgeting is generally allowable without approval of the awarding agency.
- Absent specific award terms to the contrary, re-budgeting of more than 25 percent generally represents a change of scope requiring pre-approval from the granting agency.
- Significant re-budgeting of key personnel effort indicates a change in scope that requires pre-approval from the granting agency. (Consult award terms and conditions for thresholds that constitute "significant" re-budgeting of key personnel effort.)

Expense Pre-Approvals

Some sponsoring agencies require pre-approval for certain types of expenses. For example, foreign travel may require sponsor

Key Points

The PI is responsible for managing their project in accordance with the award terms and conditions.

Individual award terms and conditions that are stricter than applicable federal guidelines and University policy take precedence.

When managing an award, pay close attention to the key award terms and conditions detailed at left.

Project budgets must be in accordance with allowable cost principles.

As the project progresses, PIs should compare the initial, sponsor approved budget to actual expenditures on a regular basis.

When budget category overruns or shortfalls occur, re-budgeting may be necessary. Prior to re-budgeting, PIs should consult the award terms and conditions to ensure compliance with sponsor procedures.

When reviewing the award terms and conditions, PIs should note any expenditure pre-approval requirements.

In general, all project expenses must be incurred within the award performance period. The exception is that some federal sponsors allow 90 days pre-award spending.

A memo account may be requested from OSP to enable the charging of project costs when funding is delayed.

pre-approval as might the purchase of equipment. Be sure to check the award terms and conditions or consult your OSP post-award analyst for information about what purchases require sponsor pre-approval.

Performance Period

As a general rule, expenses must be incurred during the award performance period in order to be considered allowable. The exception, though, is that some federal agencies allow pre-award spending 90 days prior to the start date of the award (with prior written approval from the federal sponsoring agency) for extenuating project circumstances. For example, pre-award spending might be requested to purchase a piece of equipment in advance of the actual project start date so that it will arrive and be ready for use on the project start date. For information on whether pre-award spending is allowed for your particular award, consult your post-award analyst in OSP for guidance.

Memo Accounts

On occasion, funding may be delayed when the project is ready to commence. If a delay in funding is anticipated, a memo account may be requested to enable the charging of project costs in the absence of the sponsor issued award document. Memo accounts must be requested through OSP, and the PI, department chair/director and dean/VP must guarantee that if the proposal is not awarded, all expenses incurred while the account is on memo will be covered by departmental or other discretionary funds.

Post-Award Spending

Expenses incurred after the end of the performance period are not allowable. If there is reason to believe a project will not be completed by the performance period end date, a no-cost extension should be requested from the sponsor through OSP. Be sure to check the award terms and conditions for information regarding no cost extension request procedures as failure to follow sponsor procedures may result in the request being denied.

Program Income

As defined in the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, [§200.80](#), program income is defined as "gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance" Program income can be generated in a variety of

Project expenses may not be incurred after the performance period end date. If it is anticipated that a project will not be completed by the performance period end date, a no-cost extension should be requested.

Program income is "gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance" It can be generated in a variety of ways, some included at left.

Anticipated program income should be disclosed in the project proposal. Unanticipated program income should be disclosed to OSP as soon as it is recognized.

Helpful Links

OSP policy document: [Memo Accounts](#)

[Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200](#)

Who to Contact

[Office of Sponsored Projects](#)
ospadmin@unr.edu

(775) 784-4040

(775) 784-6680 Fax

ways including (but is not limited to) income derived from the following:

- Fees for services performed
- The use or rental of real or personal property acquired under Federal awards
- The sale of commodities or items fabricated under a Federal award
- License fees and royalties on patents and copyrights
- Principal and interest on loans made with Federal award fund

If program income is anticipated as part of a proposed project, it should be disclosed in the project proposal. If program income arises during the life of the award that was not anticipated at the proposal stage, OSP must be notified so that the proper method to account for the income can be established. All program income and related expenses must be reported to the sponsoring agency along with the award financial activity.

Responsible Conduct of Research

Federal regulations require research institutions to have policies and procedures for handling allegations of research misconduct, protecting whistleblowers and educating all personnel in the responsible conduct of research. For projects funded through the U.S. Public Health Service, the institution and principal investigators must formally certify the integrity of their research.

Allegations of research misconduct involving UNR faculty are reported through the Vice President for Research and Innovation (VPRI) and investigated by the Research Integrity Office (RIO). The RIO director is responsible for assessing and investigating research misconduct and ensuring that investigation reports are submitted to the federal Office of Research Integrity (ORI) in a timely manner.

Definitions

- *Research*. All basic, applied and demonstration research in all fields of science, engineering and mathematics including, but not limited to, research in economics, education, linguistics, medicine, psychology, social sciences and statistics, and research involving human subjects and animals.
- *Research misconduct*. Fabrication, falsification or plagiarism in the proposal, performance or review of research, or in reporting research results.
- *Fabrication*. Making up data or results and recording or reporting them.
- *Falsification*. Manipulating research materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
- *Plagiarism*. The appropriation of another person's ideas, processes, result, or words without giving appropriate credit.

Proving Research Misconduct

A finding of research misconduct requires proof of *both* items below and must be proven by a preponderance of the evidence.

- Fabrication, falsification or plagiarism that constitutes a significant departure from accepted practices of the relevant scholarly community.
- Misconduct committed either intentionally *or* knowingly *or* recklessly.

Key Points

In accordance with federal regulations, UNR has policies and procedures in place for educating researchers in the responsible conduct of research, handling allegations of research misconduct and protecting whistleblowers (i.e., complainants).

Research misconduct includes fabrication, falsification or plagiarism in any phase of a research project including the proposal, performance and review or in the reporting of research results.

Allegations of research misconduct are reported through the VPRI or the president's office, and assessed and investigated by the RIO

NSF-funded students and postdoctoral scholars must receive formal training related to the responsible and ethical conduct of research.

All NIH-supported training programs must include specific topics related to the responsible conduct of research.

USDA NIFA awards require program directors, faculty, undergraduate and graduate students, postdoctoral researchers, and any staff participating in the funded project to undertake appropriate training and exercise oversight in the responsible and ethical conduct of research.

Research misconduct does not include honest error, differences of opinion or authorship credit disputes. (See Ethics in Authorship below.)

Investigating Research Misconduct

UNR's process for handling allegations of research misconduct involves the following steps:

1. *Reporting.* A written report of the allegation must be filed with the VPRI.
2. *Preliminary assessment.* Does the allegation meet definitions? Is there sufficient evidence to go forward?
3. *Inquiry.* Initial fact-finding to determine if the allegation of misconduct warrants an investigation.
4. *Investigation.* A formal examination/evaluation of all relevant facts.
5. *Reporting.* The University must report to the federal ORI when an investigation is initiated and when the outcome of the investigation is determined. The institution must notify ORI at *any* stage in the event of the following:
 - An immediate hazard or public health issue
 - An immediate need to protect federal funds or equipment
 - A possible criminal violation
 - A risk of premature public release of allegations

Role of the Complainant

The *complainant* is the person (or persons) who reports possible misconduct or makes a formal charge of misconduct. The complainant has a duty to report allegations of potential misconduct in good faith, meaning there must be a reasonable basis for the allegations and not merely a suspicion. The complainant is required to cooperate with the inquiry and investigation process while maintaining confidentiality during the process. Complainants have a right to protection against retaliation related to their good faith allegations.

Role of the Respondent

The *respondent* is the person (or persons) against whom an allegation of research misconduct is directed or the person(s) whose actions are the subject of the inquiry. The respondent has a reasonable duty to cooperate in the investigation process. Rights of the respondent include timely notification of allegations after sequestration of evidence, confidentiality and the opportunity to respond to allegations, present evidence and review and comment upon the investigation report. Respondents also have a right to restoration of

Who to Contact

If you see or experience possible research misconduct:

[Vice President for Research and Innovation](#)

(775) 327-2365

(775) 327-2362 Fax

[UNR Research Integrity Office](#)

(775) 327-2368

(775) 327-2369 Fax

[U.S Department of Health and Human Services Office of Research Integrity](#)
AskORI@hhs.gov

Helpful Links

[University Administrative Manual, Section 6,515, Ethical Standards in the Conduct of Research](#)

Title 2 - NSHE Code, [Chapter 6, Rules and Disciplinary Procedures for Faculty Except DRI and Degree Revocations](#)

[UNR Graduate Student Guide](#)

[NIH Responsible Conduct of Research Training Requirements](#)

[NSF Responsible and Ethical Conduct of Research Training Requirements](#)

[USDA NIFA Responsible and Ethical Conduct of Research Training Requirements](#)

[America Competes Act](#)

their reputation if no misconduct is found.

Sanctions for Research Misconduct

The sanctions for findings of research misconduct can include any or all of the following:

- Retraction of publications
- Suspension/debarment
- Job-related discipline up to and including termination
- Imprisonment for criminal acts

Education Requirements

The [America Competes Act](#) regulations require that National Institutes of Health (NIH) and National Science Foundation (NSF)-funded students and postdoctoral scholars receive formal training related to the responsible conduct of research. Awards received from the U.S. Department of Agriculture (USDA), National Institute of Food and Agriculture (NIFA) require program directors, faculty, undergraduate and graduate students, postdoctoral researchers, and any staff participating in the funded project to undertake appropriate training and exercise oversight in the responsible and ethical conduct of research.

UNR offers opportunities to complete these requirements, primarily through its [Responsible Conduct of Research \(RCR\) training](#). The RCR training provides graduate students, postdoctoral scholars, faculty, staff and NSF-funded undergraduate students with information, training and tools to address the increasingly complex ethical issues they will confront during their careers.

Conflict of Interest

A conflict of interest is a situation in which the conduct of research is or appears to be compromised by a related outside financial or business interest on the part of the principal investigator (PI) or key research personnel.

Outside financial and business interests include remuneration or compensation from an entity other than the University and business relationships related to one's responsibilities as a University employee. For example:

- Salary or other payments received for services
- Equity interests, such as stocks, stock options or other ownership interests (excluding funds not directly managed by the employee)
- Income from intellectual property rights such as patents, copyrights and royalties except those received through the University
- Appointment to a position as an officer, director, agent or employee of a business entity
- Performing an official act as a University employee that directly benefits oneself or one's spouse, domestic partner, or dependent children

Rules regarding conflict of interest apply to all investigators and key personnel on the project, and their spouses, domestic partners and dependent children.

On projects sponsored by private sector organizations, any financial interest in the sponsor in the 12 months preceding and during the performance period constitutes a potential conflict of interest.

University policy prohibits faculty, staff, managers or officials from engaging in any activities that create a conflict of interest between official University activities and any personal interest or obligation unless an approved COI management plan is in place.

Because conflicts of interest can arise in the course of an individual's interactions outside the University, the presence of an actual, potential or perceived conflict of interest does not automatically constitute wrongdoing. However, financial and business interests must be disclosed and may require management per the University's COI policy.

Key Points

University faculty, staff, and administrators must disclose all financial and business relationships for assessment for a conflict of interests between their official University duties and outside financial or business interests or obligations.

The University Conflict of Interest policy applies to investigators, key personnel and their spouses, domestic partners and dependent children.

Any potential conflict of interest must be disclosed.

Association of UNR's image or name with commercial interests in the public eye may lead to a conflict of interest.

Who to Contact

[Research Integrity Office](#)
(775) 327-2368
(775) 327-2369 Fax

Helpful Links

[UNR Conflict of Interest Policies, Processes and Forms](#)

The University COI policy requires investigators and key research personnel to do the following:

- Disclose their financial/business interests and those of their spouse/domestic partner and dependent children using the COI Disclosure Form.
- Update their disclosure form within 30 days of changes to the amount or nature of an interest.

The purpose of the University's COI disclosure and management processes is to protect investigators, their sponsored research, other educational and professional activities in which they are engaged and the University.

Human Subjects and Conflict of Interest

Research involving human subjects poses special concern with regard to conflict of interest. For example, the research may potentially involve drugs, equipment, materials or methods in which the investigator, key personnel or their spouse, domestic partner or dependent children have a financial or business interest. Such interests may appear to compromise the rights and well-being of the research subjects and the integrity of the related research. For this reason, potential, perceived, and actual conflict of interests must be disclosed to the University and to the IRB. The IRB assesses disclosed financial and business interests related to human-subjects research.

The University and the IRB also required disclosure of faculty interests that may affect the design, implementation, reporting, or publication of research conducted by student investigators.

Use of the University Name and Logos

Association of UNR's name or logo with commercial interests may lead to a conflict of interest. For example, in the course of consulting or research, faculty members may provide professional evaluations of products or services. However, care must be taken to avoid identifying the University with their opinions or conclusions in any public or private reports that may support their own outside financial interests. Faculty must also avoid implying an endorsement on the part of the University.

Technical Progress and Final Reports

As prescribed in the award terms and conditions, sponsoring agencies require a variety of project reports from the award recipient. Sponsors can and do suspend funding in cases where progress or final reports are not submitted in a timely fashion. Required reports include the following:

Technical Progress Reports

The PI is responsible for submitting all required technical progress reports (including the final progress report) to the award sponsor. In addition, copies of reports should be forwarded to the assigned post-award analyst in the Office of Sponsored Projects (OSP). OSP accepts reports electronically via email. Progress report content requirements are specified in the award terms and conditions and typically include the following:

- Identification information (project title, grant/contract number, PI contact information, period of performance, including authorized extensions, etc.)
- Significant results of the project
- Technical difficulties and solutions
- List of publications including articles in progress
- A discussion of milestones and/or deliverables

Final Financial Report

The final financial report reconciles all project expenditures and required cost share. OSP prepares and submits the final financial report to the sponsoring agency.

Final Invention Report (if applicable)

OSP prepares the final invention report from information supplied by PI and then submits the report to the sponsor. The report describes any new technology developed with support from the award whether or not it has been disclosed to the UNR Office of Enterprise and Innovation.

Equipment Inventory Report (if applicable)

The equipment inventory report details all equipment acquired under the award. OSP prepares and submits equipment inventory reports to the sponsoring agency.

Key Points

Sponsors require a variety of project reports including those detailed at left.

The PI submits all required technical progress reports (including the final progress report) to the award sponsor and OSP post-award analyst.

Check the award terms and conditions for the sponsor's technical progress report requirements.

OSP prepares and submits the final financial report to the sponsoring agency.

OSP prepares the final invention report from information supplied by PI and then submits the report to the sponsor.

OSP prepares and submits equipment inventory reports to the sponsoring agency.

Who to Contact

[Office of Sponsored Projects](#)
ospadmin@unr.edu
(775) 784-4040
(775) 784-6680 Fax

Helpful Links

[OSP Information on Project Management and Reporting](#)

[OSP Project Close-Out Information](#)

Cost Principles

The University and its PIs are jointly responsible for stewardship of sponsored project funds in compliance with federal cost principles established by the Office of Management and Budget (OMB) in the [*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200*](#).

Adherence to all cost principles is required to properly and appropriately account for the expenses of conducting sponsored projects at UNR. The consequences of failing to comply with cost principles can range from disallowance of specific incurred costs to termination of the award to federal sanctions depending on the particular cost and circumstances in question.

Allowable costs

The key concept of cost principles is “allowability.” For a cost to be allowable on a sponsored project, it must meet all three of the following criteria:

- *Reasonable.* It is necessary for the performance of the project, and the cost is what a “prudent person” would pay for the particular goods or services obtained.
- *Allocable.* The project that pays the cost is the project that benefits from it. Expenses shared across multiple projects benefit all projects proportionately when benefit can be clearly allocated or reasonably when proportionate value cannot be readily determined due to the inter-relationship of the work involved.
- *Consistently treated.* The university consistently designates that type of cost as either direct or indirect when incurred for the same purpose in like circumstances.

Additionally, the cost must not be explicitly excluded by federal guidelines or the terms and conditions of the award. Some expenses that directly benefit a project may be prohibited by the award sponsor and, thus, are not allowable on the award.

External Audits

Federal, state and local agencies as well as private sponsors have the right to perform financial and administrative reviews of their awards made to the

Key Points

UNR and its PIs are jointly responsible for the stewardship of sponsored project funds in compliance with applicable federal cost principles.

Consequences for failure to comply with cost principles can range from disallowance of specific incurred costs to termination of the award to federal sanctions.

For a cost to be allowable on a sponsored project, it must be reasonable, allocable and consistently treated. Further, the cost must not be explicitly excluded by federal guidelines or the award terms and conditions.

The OSP post-award manager facilitates and supports external audit activities when sponsors request an audit of their awards issued to UNR.

Who to Contact

[Samir Mehtaji](#)

OSP Post-Award Manager, Post-
smehtaji@unr.edu
(775) 784-4043
(775) 784-6680 Fax

Helpful Links

[*UNR Guidelines for Federal Sponsored Expenditures*](#)

[*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200*](#)

University. At UNR, the post-award manager in the Office of Sponsored Projects (OSP) facilitates and supports external audit activities by performing the following duties:

- Acting as a liaison, the main point of contact, for both the campus and the external auditors.
- Managing and coordinating financial and administrative information and data requests.
- Assisting in resolving questions and issues.
- Reporting outside audit activities to campus leadership.
- Following up on agreed-upon corrective actions.

If contacted by an external agency or sponsor with an audit request, contact the OSP post-award manager.

Facilities and Administrative Costs

As a publicly funded institution, UNR must conduct its activities, including sponsored projects, on a “no profit, no loss” basis. However, project direct costs (costs easily identified as directly benefitting the project) in sponsored project budgets do not fully reimburse UNR for all of its costs because there are also indirect costs associated with projects. For example, salaries of those individuals involved in administrative services are generally not part of the direct costs. In addition, facility costs, general office supplies or copying expenses are seldom included in budgets, yet these expenses are reasonable and necessary and must be borne by the institution.

These indirect costs are referred to as facilities and administrative (F&A) cost which are defined in the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* 2 CFR 200 as costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved” (§200.56). To recover F&A expenses on sponsored projects, UNR applies an [F&A rate](#) to all of its sponsored projects.

As a recipient of federal funds, UNR is required to negotiate a F&A cost rate agreement with UNR’s cognizant federal audit agency, the Department of Health and Human Services (DHHS) to establish F&A cost rates for use with the University’s sponsored projects. UNR negotiates “predetermined” F&A cost rates. These rates are final and not subject to upward or downward adjustment based upon actual costing experience.

All UNR sponsored projects are required to charge the full, applicable DHHS F&A rate regardless of the sponsor. This requirement to charge the full F&A rate applies to applications and proposals submitted to government agencies, private companies, industrial groups, foundations and other organizations. UNR Office of Sponsored Projects (OSP) procedure allows for indirect cost rate exclusions/ exceptions to be granted under certain circumstances, as described below.

Exceptions and Exclusions

- *Non-profit and governmental sponsors.* The University will grant an exception to the policy of charging its full F&A rate for non-profit sponsors and governmental agencies that have an explicit, published policy or statute limiting F&A recovery. As supporting documentation of the F&A restriction, a copy of the published policy or statute must be included with the proposal materials submitted to OSP. The reduced F&A rate will be applied to total direct costs unless the sponsor’s published policy or statutes dictates otherwise.

Key Points

Since UNR does not recover all of its sponsored projects costs through reimbursement of project direct costs, it applies an F&A rate to recover associated project indirect costs.

Unless a project qualifies for one of the exceptions or exclusions detailed at left, all UNR sponsored projects are required to charge the full, applicable F&A rate regardless of the sponsor.

With the required supporting documentation, UNR will grant an exception to its full F&A rate policy for non-profit sponsors and governmental agencies that have an explicit, published policy or statute limiting F&A.

For-profit sponsors are charged the full, applicable F&A rate for the project activity.

F&A waivers or reductions are granted only under exceptional circumstances and only when the programmatic benefit to UNR is compelling and outweighs the benefit of recovering full F&A.

A waiver of or reduction in F&A is requested by completing the F&A Cost Rate Exception Request form (OSP-12).

Who to Contact

[Office of Sponsored Projects](#)

Email: ospadmin@unr.edu

Phone: (775) 784-4040

Fax: (775) 784-6680

Helpful Links

OSP Policy Document: [Facilities and Administrative Rates](#)

- *For-profit sponsors (including clinical trial projects).* For-profit sponsors are charged the full, applicable F&A rate for the project activity. A subsidy of any cost of the project would constitute a use of public funds for private benefit and would be an improper use of University resources.

F&A Waiver

In contrast to the policy exceptions outlined above, an F&A cost waiver is an institutional agreement between the University and a sponsor that F&A costs will be charged at less than the University's full, applicable rate. A waiver or reduction shall be granted only under exceptional circumstances and only when the programmatic benefit to the University is compelling and outweighs the institutional benefit of recovering the full cost of conducting the project.

Waiver Requests

To request a waiver of or reduction in F&A costs, the [F&A Cost Rate Exception Request form](#) (OSP-12) must be completed and submitted by the principal investigator (PI) along with the proposal and OSP-1 Transmittal form (through InfoEd) five business days prior to the sponsor's proposal deadline. The F&A Cost Rate Exception Request form must include the signed concurrence of the department chair/director and dean/vice president or center/institute director, acknowledging that the F&A costs waived will be deducted from any allocation of F&A returned to the unit(s) for the award performance period. Reductions in F&A will begin with the PI's proportion, then the department, then the college/division proportion of F&A. Any remaining deduction will be taken from the vice president for research and innovation's F&A allocation.

OSP Procedures: [Calculating Facilities and Administrative Costs](#)

OSP Procedures: [Facilities and Administrative Cost Recovery and Waivers](#)

OSP Document: [UNR Facilities and Administrative Cost Rate Agreement](#)

[Current UNR F&A Rates](#) (select F&A Rates)

OSP-12 Form: [F&A Cost Rate Exception Request form](#)

[Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200](#)

Administrative Salary and Wage Costs

Salaries and wages of administrative and clerical staff should generally be treated as F&A costs and charged to a non-sponsored department administration account.

The following types of administrative and clerical activities are considered F&A costs. They should not be charged to sponsored projects because they cannot easily be directly identified with specific projects.

- Administration and support services that span multiple departmental activities
- Contracts and grants analysis
- Personnel functions
- Accounting and budgeting functions
- Routine travel planning
- Processing and tracking of routine purchase orders

Activities and expenses associated with the development and preparation of proposals including word processing, data entry, photocopying, scanning and mailing are F&A costs and should be considered part of the departmental administration budget.

However, the Uniform Guidance permits direct charging of administrative and clerical salaries to federal awards when *all* of the following criteria are met:

1. Administrative or clerical services are integral* to a project or activity
2. Individuals involved can be specifically identified with the project or activity
3. Such costs are explicitly included in the budget or have the prior written approval of the federal awarding agency
4. The costs are not also recovered as F&A costs

If all of these requirements are met, PIs should add a justification statement to proposals to facilitate the required agency approval and complete the OSP [Administrative Costs Justification form](#) (OSP-3).

*UNR has determined that *integral* means the services are essential, vital or fundamental to the project or activity and UNR has sponsor approval for spending direct costs in this manner.

Key Points

Salaries and wages of administrative and clerical staff should generally be treated as F&A costs and included in the departmental administration budget.

The Uniform Guidance permits charging administrative expenses to a project when four criteria are satisfied. In such cases, the expenses must be identified in the proposal budget, supported by a written justification and approved by the sponsoring agency.

Who to Contact

[Office of Sponsored Projects](#)
ospadmin@unr.edu

(775) 784-4040

(775) 784-6680 Fax

Additional Information

OSP Policy Document: [Charging Administrative and Clerical Costs to Federally Sponsored Projects](#)

OSP-3 Form: [Administrative Costs Justification form](#)

Expenses to Watch

The importance of sponsored project expenses cannot be overemphasized. But with the myriad federal regulations, program and University policies that govern allowable project costs, particular expense categories are frequently misunderstood and highly scrutinized by auditors. The sections below highlight project expenses to which PIs should pay close attention. Before incurring any of these expenses, check the award terms and conditions and University policy to ensure that the expenses are allowable.

Proposal Preparation Costs

Costs of preparing proposals and applications (e.g., copying, mailing, long distance telephone charges, etc.) for the purpose of acquiring sponsored funding are not allowable.

Programmatic Salary Costs

Costs related to protocol development and maintenance, managing substances/chemicals, managing and securing project-specific data and coordination of research subjects are allowable direct costs when they contribute to and are directly related to work under the sponsored project agreement. These programmatic costs may be direct charged using the same underlying requirements as other types of direct costs and are not subject to the prior approval requirements necessary for administrative and clerical salaries.

Participant Support Costs

Under the *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*, 2 CFR 200, [§200.407](#), participant support costs are allowable only with the sponsor's prior written approval. This includes stipends and subsistence allowances, travel allowances and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects. Participant support costs are not routinely allowed on sponsored projects but can be charged if the project includes an education or outreach component and the sponsoring agency approves such costs. These costs must be explicitly listed in the proposal budget and approved by the sponsor at the award stage. Participant support costs must be excluded from the base when calculating the indirect cost for project budgets.

Equipment

Equipment is defined by the federal government and the University as tangible, nonexpendable property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit (including tax, shipping and installation). Like participant support expenses, equipment is excluded from the base on which F&A is calculated.

Key Points

PIs should review award terms and conditions and University policy prior to incurring any expenses in the categories emphasized at left.

Proposal preparation costs are an unallowable sponsored project expenses.

Programmatic salary costs are allowable on a sponsored project when they contribute to and directly benefit the project.

Participant support costs are allowable only with the sponsor's prior written approval and excluded from the base on which F&A is calculated.

Equipment is tangible, nonexpendable property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit (including tax, shipping and is excluded from the base on which F&A is calculated.

Except with the prior written approval of the sponsor, general purpose equipment is an unallowable cost.

Equipment purchases benefitting multiple projects should be proportionately charged to each benefitting project.

Maintenance and repair costs for project-specific equipment may be allowable. Verify that the expense is allowable by checking the award terms and conditions.

Food is typically unallowable unless travel-related but may be allowable if in conjunction with a formal meeting or conference.

Important considerations before purchasing equipment on a sponsored project:

- General purpose equipment is unallowable as a direct cost except with the prior written approval of the sponsor.
- The cost of equipment that will benefit more than one sponsored project should be proportionately distributed to all benefiting projects.
- Budgeted equipment is generally purchased in the beginning of a project unless the scope of work is such that the equipment is essential during a later budget period.
- Maintenance and repair costs to keep project-specific equipment—whether existing or purchased with project funds—in operating condition may be allowable within the timeframe of the award performance period; however, these costs are not included in the value of the equipment; rather, they are project operating expenses.
- As with equipment purchases, if the maintenance agreement or repair cost benefits more than one sponsored agreement or activity, the cost must be allocated to the various projects proportionately based upon the benefit directly received by each.

Food

Whether food is an allowable expense can be a source of confusion. Food is generally not an allowable sponsored project expense. However, meal costs incurred during the course of travel are generally allowable. Local business meals may be charged directly to a sponsored project if they are linked to a formal meeting or conference at which technical information directly related to the project is being shared or disseminated and there is a formal agenda and documented attendee list. The rules for allowability of food expenses are included in the *University Administrative Manual (UAM)*, [Section 1,067: Host Expenses](#).

Travel

Before charging travel to a sponsored project, PIs should review all relevant travel policies — sponsor, program, federal and University — and follow the most restrictive policy, noting any special requirements such as pre-trip approval. Reviewing the [Fly America Act](#), which restricts travelers to American flag air carriers when traveling on federal funds unless exception criteria are met, is especially important. Travelers should also be familiar with [export control requirements](#) when travelling internationally.

Tuition Remission

Some sponsors do not allow student fees or tuition remission as a direct charge to projects. Check the award terms and conditions or agency guidelines if you are employing a graduate student on your project. Because tuition remission is a graduate assistantship benefit, an alternate, non-sponsored funding source will need to be identified to pay these costs if the sponsored project does not allow tuition.

PIs are advised to review all relevant travel policies prior to charging travel to a sponsored project. Travel supported by federal funds must comply with the Fly America Act.

Tuition remission is a graduate assistantship benefit. If not funded by the sponsored project, it must be funded from an alternative, non-sponsored account.

Memberships and subscriptions are allowable under certain circumstances detailed at left.

Office supplies, postage/ mailing costs and telecommunications charges are normally treated as F&A costs and may only be directly charged to a sponsored project in rare instances

Publication costs related to sharing of project results are allowable.

Costs of essential, project-specific computing devices and peripherals are allowable in certain instances detailed at left.

Costs of recharge activities and service centers are allowable when such costs are necessary to achieve the project work.

Some visa costs are allowable under specific conditions detailed at left.

Who to Contact

[Office of Sponsored Projects](#)
ospadmin@unr.edu
(775) 784-4040
(775) 784-6680 Fax

Helpful Links

OSP Policy Document: [Charging Administrative and Clerical Costs to Federally Sponsored Projects](#)

Memberships and Subscriptions

Per the *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*, 2 CFR 200, [§200.454](#), the following rules apply to membership and subscription expenses:

- Costs of membership in business, technical, and professional organizations are allowable.
- Costs of subscriptions to business, professional, and technical periodicals are allowable.
- Costs of membership in any civic or community organization are allowable with the prior approval of the federal awarding agency or pass-through entity.
- Costs of membership in any country club or social or dining club or organization are unallowable.
- Costs of membership in organizations whose primary purpose is lobbying are unallowable.

Administrative Salaries and Expenses

For guidance on administrative and clerical salaries, please see the previous chapter, "Administrative Salary and Wage Costs."

Office Supplies, Telecommunication Charges and Postage Charges

Office supplies, postage/ mailing costs and telecommunication charges (e.g., local telephone line charges, cell phone charges and internet charges) are normally treated as F&A costs and are included in the departmental administration component of the F&A rate. These expenses may only be charged to a sponsored project as direct costs in atypical instances such as a project based large-scale mail or telephone survey. Long-distance charges that are specifically identifiable to a project may be directly charged.

Publication Charges

Costs related to the publication or sharing of sponsored project results are allowable. Further, these expenses can be charged to a federal award after the award performance period end date as long as the expenses occur before the end of the 90-day award closeout period.

Computers, Software and Computer Supplies

Computing devices under \$5,000 per unit may be direct charged to a sponsored project under the following circumstances:

1. The devices are essential* and allocable to the project in that they are necessary to acquire, store, analyze, process and publish data and other information electronically. This includes accessories (or "peripherals") for printing, transmitting and receiving or storing electronic information.
2. The project does not have reasonable access to other devices or equipment that can achieve the same purpose. Devices may not be purchased for reasons of convenience or preference.
3. Items costing more than \$5,000 per unit are considered equipment and follow federal equipment rules for when they can be direct charged.

OSP Document: [Guidelines for Federal Sponsored Expenditures](#)

[Fly America Act](#)

[Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR 200](#)

[OSP Information on Export Controls and U.S. Economic Sanctions](#)

Recharge Activities and Service Centers

Costs of recharge activities and service centers are allowable as direct costs to a sponsored project in which such costs are required under the scope of the project. All usage must be accounted for and services must be charged to all users based on actual usage using uniform, non-discriminatory rates. The rates must be based on the direct costs of providing the service. Rates must be approved within University policies and appropriately revised based upon review of the actual direct expenses and charges to users. Charging a tax on projects is prohibited. In other words, a programmer's time could be directly recharged based upon hours worked on the project, but three percent could not be charged to all sponsored projects in a department to pay for programming services.

Visa Costs

The *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*, 2 CFR 200, allows short-term, non-immigration visa costs for a specific period and purpose as direct costs to federal awards. The person connected with these visa costs must be critical, necessary and clearly identified as directly connected to the work performed on the federal award. These expenses are classified as recruiting costs, so only the initial visa cost is allowable. J-1 and H-1B visas are for a specific period and purpose; therefore, these visa types are generally allowable if the specific conditions are met.

*PIs are responsible for determining whether or not a device is essential and to what extent the cost of the device is allocable to the sponsored project. PIs and departments should maintain documentation that describes how the proposed computing device meets the above requirements.

Cost Transfers

A cost transfer is the movement of an expense from one account to another. This may be necessary to correct an error, to move or split costs into accounts that did not exist when the original transaction was made or for other reasons associated with a department's financial operation.

Transfers should be the exception, not the rule. Cost transfers must meet the guidelines for allowability, allocability, reasonableness and consistency. PIs are responsible for reviewing their monthly sponsored project account expenditures, available in the University financial system, for allowability and allocability and to identify errors and omissions for resolution in a timely manner.

With the knowledge and approval of the PI, department staff may initiate a cost transfer. All cost transfers must adhere to the following:

- *Timely.* The transfer should be requested within 90 days of original expense posting date to the ledger, requested prior to the last 45 days of the project and requested prior to effort certification. Untimely cost transfers require additional documentation on a [Cost Transfer Justification form](#) (OSP-6).
- *Fully justified and documented.* The cost transfer must address the reason why the original charge was incorrect and why the charge is allowable and allocable to the new account

A high frequency of cost transfers can imply that financial transactions are not being properly reviewed and recorded when originally incurred. For this reason, cost transfers are highly scrutinized by auditors to determine the reason for the correction and the allowability of the charge to the project.

Requesting a Cost Transfer

Once an expense has been recorded, it is appropriate to request a cost transfer only in the following situations:

- To correct an erroneous recording.
- To record a change in the original decisions made as to the use of goods or services.
- To redistribute certain high-volume, low-value charges that may be shared among several projects under the jurisdiction of the department.
- To redistribute payroll costs based on the after-the-fact verification of effort reported through the campus effort-reporting system.

Key Points

Cost transfers should be rare occurrences.

Cost transfers must meet the rules for allowability, allocability, reasonableness and consistency.

Cost transfers are highly scrutinized by auditors and must be recorded in a timely manner and fully justified and documented.

Who to Contact

[Office of Sponsored Projects](#)
ospadmin@unr.edu
(775) 784-4040
(775) 784-6680 Fax

Additional Information

OSP Policy Document: [Cost Transfers for Sponsored Projects](#)

OSP Policy Document: [Change of Payroll Charges](#)

Cost Share

Cost share is the portion of project expenses funded by the University and not by the sponsoring agency. It includes *all* contributions, including cash and in-kind, that a recipient makes to an award. Shared costs are typically paid from departmental or discretionary funds or provided by a third party (e.g., cost share from a project subcontractor).

There are three types of cost sharing:

- *Mandatory cost sharing.* Costs that the University must contribute toward the project in order for an award to be made.
- *Voluntary committed cost sharing.* Costs associated with a project and identified in the proposal for which funding is not being requested from the sponsor.
- *Voluntary uncommitted cost sharing.* Any cost associated with a project and not funded by the sponsor and which has not been identified in the proposal or in any other communication to the sponsor as a commitment of the University.

If cost share is mandatory, it will be noted in the request for proposal issued by the sponsoring agency. The PI is responsible for identifying the accounts that will pay for the cost share and both the PI and Office of Sponsored Projects are responsible for ensuring that those cost shared expenses are tracked and reported properly. Mandatory cost share must be disclosed to the sponsor in the proposal. Cost share disclosed to the sponsor in the proposal constitutes a promise that University funding will be provided to directly support the project. Once an award is made, the cost share documented in the proposal becomes a binding commitment for the University. Failure to fulfill cost share obligations may result in a reduction of the sponsor's award amount.

Using unrecovered F&A (when solicitation limits recovery of F&A to less than the full negotiated rate) to offset a mandatory cost share component in the proposal requires prior sponsor written approval. If unrecovered F&A is included in the proposal budget, it must also be specifically requested in the budget justification section.

Per the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, 2 CFR 200, [§200.306](#), expenses must meet certain criteria to be accepted as cost share.

Key Points

Cost share occurs when a portion of project expenses are funded by the University or by a third party.

Cost share should only be proposed when the sponsor requires it as a condition of receiving the award.

Cost-shared expenses are paid from departmental, discretionary or third-party funds.

Failure to fulfill a proposed cost sharing obligation may result in reduction of the sponsor's award.

The PI is responsible for identifying the account that will pay for the cost share and for tracking the costs appropriately.

Use of unrecovered F&A as cost share requires prior sponsor written approval.

Cost share disclosed to the sponsor in the proposal constitutes a promise that University funding will be provided to support the project.

Cost shared expenses must meet certain eligibility criteria detailed at left.

The PI and OSP share responsibility for tracking, reporting and certifying cost-shared expenses.

Cost share is reported to the sponsoring agency per the award terms and conditions or sponsoring agency guidelines.

PIs should notify OSP immediately if there is any possibility that a cost share commitment will not be fulfilled.

Expenses must meet the following criteria to be accepted as cost share:

- Readily verifiable in the University's records (i.e. ledger expenses) or documented in writing if provided by a third party.
- Necessary and reasonable to achieve the project objectives.
- Allowable under applicable cost principles.
- Not paid by another award except as specifically authorized by the agency.
- Provided for in the approved budget when required by the awarding agency.
- Incurred within the performance period of the award.
- Not included as contributions for any other sponsored agreement.

Tracking, Reporting and Certifying Cost Share

The PI and the Office of Sponsored Projects (OSP) share responsibility for tracking, reporting and certifying cost-shared expenses.

Proposal Stage

When preparing a proposal containing mandatory cost share, the PI should do the following:

- Clearly document cost share in the proposal budget and budget justification.
- Omit from the proposal text any normal University resources necessary for the project which are not being offered as voluntary committed cost share. If such University resource information is deemed necessary in the proposal, this type of information should be narrative in nature and must not include quantifiable financial information for the resource.
- Complete an OSP-11 [Cost Share/Match Worksheet](#) to document sources and amounts of cost share.
- Collect signed letters of cost share commitment from third party cost share contributors. Letters must be on the third party contributor's letterhead and signed by an authorized company official.
- Submit (through InfoEd) all signed forms and documentation along with the proposal package to OSP.

Post-Award Stage

If the project is awarded and the cost share accepted by the sponsor,

Who to Contact

[Office of Sponsored Projects](#)

ospadmin@unr.edu

(775) 784-4040

(775) 784-6680 Fax

Helpful Links

OSP Policy Document:

[Institutional Sponsored Project](#)

[Cost Sharing Guidelines](#)

[Uniform Administrative](#)

[Requirements, Cost Principles, and](#)

[Audit Requirements for Federal](#)

[Awards, 2 CFR §200](#)

the project account number is added to OSP's Cost Share Report. The report is updated as the PI reports cost share to OSP:

- Mandatory, salary cap and voluntary committed effort must be reported in UNR's [Effort Reporting System](#).
- Non-salary expenditures are reported via a cover sheet and supporting balance and activity report from Campus Advanced Systems ([CAIS](#)) that shows the expenditure.
- Third party cost share must be reported on company letterhead and signed by an authorized company official. All third party cost share must include proper supporting documentation and be verifiable from the recipient's records.
- Non-salary expenditures and third party costs are reported to the sponsoring agency as required in the award terms and conditions. Cost shared salary must be reported during the effort reporting term in which it was earned.
- The OSP post award analyst responsible for financial reporting to the sponsor will include all reported cost share in invoices and/or statements as required by the sponsor.
- It is the responsibility of the PI to monitor cost share expenditures and the Cost Share Report statement issued monthly.

Reporting

The frequency and formats for reporting cost share to the sponsoring agency will be dictated by the award terms and conditions or sponsoring agency guidelines. The cost share activity will be reported based on activity posted to the appropriate accounts established for this purpose. Require cost share that does not need to be reported to the sponsor will be tracked internally.

PIs should notify OSP immediately if there is any possibility that a cost sharing commitment will not be fulfilled. This includes situations in which a PI transfers to another institution during the project performance period

Effort Reporting

Effort reporting is a method of assuring sponsors that projects have been charged the appropriate amount for salaries and wages and that the amount of effort required as a condition of the award was actually met. Per the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, 2 CFR 200, charging salaries and wages to sponsored project accounts based on budget estimates is initially allowable, but an institution must review the charges “after-the-fact” and make all necessary adjustments so that the final amounts charged are “accurate, allowable and properly allocated.” Any necessary adjustments should be initiated by the project PI.

On an effort report, effort is expressed as a percentage of the total amount of time spent on all work-related activities for which the University compensates the individual.

For both mandatory and voluntary committed cost share, UNR (via the PI and OSP) is required to track the cost-shared effort and certify that the campus has satisfied its commitment to the project. Voluntary uncommitted cost-shared effort is not tracked, reported or certified.

It is the PI’s responsibility to ensure that all personnel expenses charged to a project are accurate, allowable and properly allocated.

Certifying Effort

An effort report must be certified for each employee meeting the following criteria:

- Employees whose salary (or portion thereof) is charged to a sponsored project (whether through payroll or a payroll cost transfer).
- Employees who have cost-share commitments on the project.

Ideally, employees certify their own effort reports. However, effort may be certified by the PI, the employee’s supervisor or another responsible official. The certifier must have firsthand knowledge of the work performed and the amount of effort expended on the project.

UNR utilizes a web-based effort reporting system for the after-the-fact review of effort. Classified employees review their effort monthly, while faculty and graduate students certify every six months. Faculty who work during non-contract periods have two additional effort reporting periods. The deadline for certifying an effort report is 28 days after it has been created.

Key Points

Effort reporting lets sponsor know that personnel expenses were charged appropriately and that effort commitments were met.

When a project includes mandatory or voluntary committed cost sharing, UNR must track and certify the cost-shared effort and expenditures.

Those who certify effort must have firsthand knowledge of the work performed and effort expended.

Effort reporting periods vary by employee type.

It is the PI’s responsibility to assure that all personnel expenses charged to a project are accurate, allowable and properly allocated.

Who to Contact

The PI’s Department Administrator

[Office of Sponsored Projects
ospadmin@unr.edu](mailto:ospadmin@unr.edu)
(775) 784-4040
(775) 784-6680 Fax

Helpful Links

OSP Policy Document: [Effort Reporting Policy](#)

OSP [Effort Reporting Information](#)

[UNR Effort Reporting System](#)

[Effort Reporting Dates and Deadlines](#)

[Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR §200](#)

Developing & Monitoring Sub-Recipient Relationships

As the prime recipient of a grant, UNR may collaborate with other organizations to carry out a portion of the project. Such organizations are referred to as “sub-recipients.” Sub-recipients receive their funding from UNR in the form of a sub-award from the prime award.

Determining whether the relationship with an outside provider will be considered a sub-award or a vendor procurement transaction is important. Therefore, before developing a proposal, the PI should discuss any necessary outside providers with his or her pre-award research administrator in the Office of Sponsored Projects (OSP). If the relationship is appropriately characterized as a sub-recipient relationship, OSP prepares the sub-award once the prime award is received.

Sub-recipients must comply with all terms and conditions of the prime award. The PI is responsible for monitoring the sub-recipient for compliance with award terms and conditions and for satisfactory performance of their portion of the project including the completeness and acceptability of work performed, reasonableness of expenditures and fulfillment of cost-sharing commitments. PIs should understand that federal awards can be at risk if they sign an invoice authorizing payment of funds to a sub-recipient without first evaluating the sub-recipient’s progress.

Sub-awards are monitored using one or more of the following mechanisms:

- *Reporting:* Review of financial and performance reports submitted by the sub-recipient.
- *Contact:* Regular contact with sub-recipients about program activities and progress.
- *Invoice review:* Invoices are approved by the PI and processed for payment by OSP.

Key Points

Sub-recipients are collaborating institutions that participate in a portion of a project and receive funding as a sub-award from the prime award.

PIs are advised to contact OSP to determine if a collaborator qualifies as a sub-recipient or a vendor.

PIs are responsible for monitoring and accurately reporting the performance of their sub-recipients.

Who to Contact

[Office of Sponsored Projects](#)

ospadmin@unr.edu

(775) 784-4040

(775) 784-6680 Fax

Helpful Links

[Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR §200](#)

Research Involving Humans

The University and its researchers have both legal and ethical obligations to ensure that the rights and welfare of human research participants are adequately protected.

Research Involving Humans

Federal regulations at [45 CFR 46 \(the Common Rule\)](#), [other federal regulations](#) and UNR policy require a written exempt determination or review and approval by the Institutional Review Board (IRB) before human participants may be involved in research activities.

Federal regulations define research as a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge. Some demonstration and service programs may include research activities. For research to involve human subjects an investigator conducting research must obtain data through intervention or interaction with or identifiable private information about a living individual.

All personnel who participate in studies involving human subjects must successfully complete the required training for the protection of human participants.

PIs must comply with requirements for initial review and approval, and for continuing review of approved projects. Failure to ensure that an approved project is re-approved by the IRB in a timely manner may result in an expiration of IRB approval which will affect grants related to the study.

Steps to complete prior to beginning a study involving human subjects:

- *Complete the online human subjects training course approved by the IRB.* This requirement applies to PIs, associate investigators, student investigators, study coordinators, visiting scientists, consultants, laboratory technicians and all assistants who will have direct contact with human subjects of research. Training must be renewed as determined by IRB. The PI is responsible for ensuring compliance with training requirements.
- *Submit the required materials* for exempt determination or IRB review and approval. This requirement applies to all projects, even when federal regulations exempt certain research from full IRB review.

Key Points

Federal regulations and UNR policy require an exempt determination or IRB review and approval of all research involving human participants prior to commencing activities.

All personnel who participate in studies involving human subjects must satisfy the requirements for human research protection training.

Who to Contact

[Research Integrity Office](#)
jananderson@unr.edu
(775) 327-2368
(775) 327-2369 Fax

Helpful Links

[Human Subjects Research and IRBs](#)

[Human Research Protection Policy Manual](#)

[Required Human Subjects Studies Training](#)

Research Involving Animals

UNR is a USDA registered research facility, is accredited by the peer-review system of the Association for Assessment and Accreditation of Laboratory Animal Care International and has provided assurances to the Public Health Service and National Science Foundation to comply with animal welfare standards. To comply with its legal and ethical obligations to ensure that animal subjects used in research are treated responsibly, all research, teaching and testing involving the use of vertebrate animals must be approved by the UNR Institutional Animal Care and Use Committee (IACUC) before any activities are performed. This includes the ordering and/or transferring of animals from another investigator.

The UNR IACUC is charged with the responsibility to review and approve all protocols involving the use of live vertebrate animals, to review and approve the program for the care and welfare of animals used at UNR and to inspect and evaluate all facilities in which animals are housed and maintained. In addition to activity conducted on the UNR campus, compliance with animal welfare standards holds for the generation of customized antibodies using procedures involving vertebrate animals as well as custom requests for surgical modification of animals by offsite companies. Subcontracted animal use sites are subject to the same requirements. Any significant changes to an approved project must be approved by the IACUC before they are implemented.

The IACUC and the Office of Lab Animal Medicine (OLAM) can assist PIs in complying with animal welfare regulations pertinent to each type of study, whether it is laboratory or field-based research.

Prior to beginning a study involving live vertebrate animals, PIs must complete the following steps:

- Contact the UNR Laboratory Animal Medicine (LAM) office for project start-up assistance.
- Submit a protocol of the proposed work to the UNR IACUC for their review and approval.
- Complete the Collaborative Institutional Training Initiative (CITI) training for animal studies.
- Enroll in the University's occupational health and safety program for animal users.
- Obtain animal facility orientation and technical procedures training from the OLAM staff.

Key Points

UNR has legal and ethical obligations to ensure that animal subjects used in research are treated responsibly.

All research, teaching and testing involving vertebrate animals must be approved by the UNR IACUC prior to commencement of any activities including the ordering of animals.

The IACUC is charged with the responsibility to review and approve all protocols involving the use of live vertebrate animals and to evaluate the program for the care of animals used at UNR on an ongoing basis.

The UNR IACUC can assist PIs in complying with applicable federal, state, local and institutional regulations regarding animal care and use.

PIs must comply with the steps detailed at left prior to beginning a study involving vertebrate animals.

Personnel who participate in studies involving vertebrate animals must successfully complete training for animal researchers.

Who to Contact

[Office of Lab Animal Medicine
bweigler@unr.edu](mailto:bweigler@unr.edu)

Phone: (775) 784-4874

Helpful Links

[Using Lab Animals](#)

[Required Animal Studies Training](#)

Export Controls and Economic Sanctions

U.S. export control and economic sanctions regulations exist to protect national security, foreign policy interests, and the domestic economy. Export controls impact the shipping, transmission, and sharing of sensitive items, technology, software and services with foreign entities. Economic sanctions regulations prohibit trade, financial transactions, and the provision of services to certain individuals, institutions and countries. These regulations have the potential to affect the research, education, and services faculty and staff provide at institutions of higher education, so it is important to become familiar with them.

A license may need to be obtained prior to exporting controlled items, technology, software and services; or prior to initiating a transaction with, or providing a service to, a sanctioned entity or country. License applications typically take several weeks to process and are not always approved.

Deemed Exports

A type of export that warrants particular attention at institutions of higher education is the release of export controlled technology to foreign persons located in the U.S. The release of controlled technology to foreign persons in the U.S. is deemed to be an export to the person's country of nationality and is subject to the same licensing requirements as other forms of export.

Important Exclusions and Exceptions

Fortunately, the vast majority of activities at UNR are excluded from export control and economic sanctions regulations. Export control regulations generally do not apply to information that is 1) in the public domain/publicly available; 2) released in academic catalog-listed courses, or 3) results from Fundamental Research, the definition of which is "basic and applied research in science and engineering, the results of which ordinarily are published and shared broadly within the scientific community."

These exclusions apply to the transmission of data and information, not to the exchange of material goods or access to controlled technology and software. In some cases, license exceptions may be available for exports of material goods and technology not covered by these exclusions.

Key Points

U.S. export control regulations govern the shipment, transmission or transfer certain sensitive items, information, software and services to non-U.S. entities. Economic sanctions regulations prohibit transactions with targeted individuals, entities and countries, unless a license is granted.

Sharing controlled technology and software with foreign persons in the U.S. is "deemed" to be an export to that person's country of nationality and is governed by export control regulations.

Most of the activities at UNR are excluded from export control regulations.

Significant civil and criminal penalties can result from violations of these regulations. Always contact the Office of Sponsored Projects if you have questions about export controls and economic sanctions.

Who to Contact

Michele Dondanville, Research Compliance Program Manager
mdondanville@unr.edu
(775) 784-6360
(775) 784-6680 Fax

Helpful Links

OSP Information on [U.S. Export Controls and Economic Sanctions](#)

[Export Controls Training](#)

[U.S. State Department International Traffic in Arms Regulations \(ITAR\)](#)

While most of the items, technology, and information at UNR are not controlled for export, we are required to exercise due diligence in complying with the regulations, while preserving an atmosphere of openness in education and research. Violations of export control regulations can result significant civil and criminal penalties with fines up to \$1,000,000 and 20 years imprisonment. Always contact the Office of Sponsored Projects if you have questions about export controls and economic sanctions.

[U.S. State Department embargoed countries list:](#)

[U.S. Commerce Department Export Administration Regulations \(EAR\)](#)

[U.S. Department of the Treasury, Office of Foreign Assets Control \(OFAC\)](#)

Biological Safety

In pursuing cutting edge scientific research, UNR promotes safe science practices and the fulfillment of regulatory obligations through its facilitation of the Environmental Health and Safety (EH&S) Laboratory Safety Program. The main regulatory elements relating to biological safety come from the National Institutes of Health Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules (NIH Guidelines), the Occupational Safety and Health Administration (OSHA) Bloodborne Pathogens Standards, the Center for Disease Control (CDC)/U.S. Department of Agriculture (USDA) Select Agent Program and the Washoe County Health Department biohazardous waste regulations.

In order to comply with applicable regulatory elements relating to biological safety, PIs who plan to use biological agents during the course of their research are required to submit a Memorandum of Understanding and Agreement (MOUA) to the UNR Institutional Biosafety Committee (IBC) for approval and attend mandatory training.

Compliance Actions

Prior to acquiring or using biological agents, PIs must adhere to the following:

- Be familiar with regulatory requirements and University policies and procedures relating to biological agents.
- Evaluate biological agent risks and develop laboratory-specific safety procedures and training.
- Complete all required training and ensure that laboratory group personnel complete all required training.
- Submit an MOUA to the IBC as described above.

Training Requirements

The following training courses related to biological safety are required for all UNR personnel who use biological agents:

- *Laboratory Biosafety Training.* For UNR personnel who use biological agents in their research.
- *Select Agent Training.* For UNR personnel who use select agents in their research as described the Federal Select Agent Program. Annual refresher course is required.
- *Shipping of Infectious Materials.* For UNR personnel who ship or cause to ship infectious agents as described in the International Civil Aviation Organization (ICAO) Dangerous Goods Regulations. Refresher course is required every two years.

Key Points

UNR promotes safe science practices through its facilitation of the EH&S Laboratory Safety Program.

Researchers using biological agents must submit an MOUA to the UNR IBC for approval prior to commencing research activities.

Prior to acquiring or using biological agents, PIs must adhere to the compliance actions detailed at left.

Training, detailed at left, is required for all UNR personnel who plan to use biological agents.

IRB or IACUC approval is contingent upon first obtaining a Biological Use Authorization.

Training is required before investigators or their staff may work with specific types of biohazards.

The EH&S biological safety staff is the primary resource for information, training, consultation and compliance with biological safety requirements.

Who to Contact

Ben Owens, Assistant Director
Laboratory Safety/Biosafety
Officer
bowens@unr.edu
(775) 327-5196

Mike Kivistik, Senior Lab Safety
Specialist
kivistik@unr.edu
(775) 784-4981

Chet Carpenter, Laboratory Safety
Specialist
chestonc@unr.edu
Phone: (775) 784-4342

- *NIH OBA rDNA Compliance Training*. For UNR personnel who use recombinant DNA techniques as defined in the NIH Guidelines
- *Bloodborne Pathogens Training for Laboratory Workers*. For UNR personnel with a potential for exposure to human blood or other potentially infectious materials as specified in the *University of Nevada, Reno Bloodborne Pathogens Exposure Control Plan*. Annual refresher course is required.

PIs should contact the EH&S biological safety staff if they have any questions about training, consultation and compliance with biological safety requirements.

[EH&S](#)

(775) 327-5040

(775) 784-4553 Fax

Helpful Links

[Biosafety Information](#)

[Biosafety Manual](#)

[NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules](#)

[OSHA/USDA Bloodborne Pathogens Standards](#)

[Washoe County Health District Regulations](#)

[ATA Dangerous Goods Regulations](#)

[University of Nevada, Reno Bloodborne Pathogens Exposure Control Plan](#)

Laboratory Safety

Laboratories typically contain a variety of hazards including biological agents, hazardous chemicals and physical hazards. The Laboratory Safety Program, facilitated by UNR EH&S, seeks to mitigate these hazards while meeting regulatory requirements and supporting University research goals. The main regulatory elements relating to laboratory safety come from the OSHA/USDA Laboratory Safety and Bloodborne Pathogens Standards, the CDC/NIH *Biosafety in Microbiological and Biomedical Laboratories*, the Nevada State Fire Marshal, U.S. Environmental Protection Agency/Nevada Division of Environmental Protection and the University's own Chemical Hygiene Plan.

Under its Laboratory Safety Program, EH&S operates a comprehensive chemical inventory program that includes receipt and delivery of incoming chemicals. Chemical inventory data is used to maintain operating permits, improve safety within laboratories and to achieve regulatory compliance.

Compliance Actions

Prior to beginning and throughout the duration of laboratory research, it is the PI's responsibility to do as follows:

- Be familiar with regulatory requirements and University policies contained in the Chemical Hygiene Plan and Biosafety Manual.
- Conduct a risk assessment of lab operations and develop written safety procedures that describe safe work procedures.
- Ensure that a documented lab specific training program is established for all people who will work in their laboratories.
- Complete all required training and ensure that their lab personnel complete all required training.
- Communicate to EH&S any accidents or near-misses that occur in their labs.
- Work with EH&S to conduct regular lab safety assessments and complete chemical inventory activities.

Training Requirements

The following training courses related to laboratory safety are required for all UNR personnel who plan to work in or supervise those who work in laboratories:

- *Laboratory Safety Training*. For UNR personnel who work in a laboratory or supervise those who work in a laboratory possessing chemical or biological agents or other occupational hazards. Refresher course is required annually (refresher training is available online)

Key Points

The EH&S' Laboratory Safety Program, seeks to mitigate hazards while meeting regulatory requirements and supporting University research goals.

EH&S operates a comprehensive chemical inventory program that is used to maintain operating permits, improve safety and achieve regulatory compliance.

Prior to beginning and during laboratory research, PIs must adhere to the compliance actions detailed at left.

Training, detailed at left, is required for all UNR personnel who plan to work in or supervise those who work in laboratories.

Who to Contact

Ben Owens, Assistant Director
Laboratory Safety/Biosafety
Officer
bowens@unr.edu
(775) 327-5196

Mike Kivistik, Senior Lab Safety
Specialist
kivistik@unr.edu
(775) 784-4981

Chet Carpenter, Laboratory Safety
Specialist
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Luis Barthel-Rosa, Ph.D.
Manager, Chemical Management
Services
luisbr@unr.edu
(775) 327-2270

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(775) 327-5040
(775) 784-4553 Fax

- *Laboratory Supervisor Safety Responsibilities.* For UNR personnel who supervise personnel who work in laboratories (training available online).
- *Lab-Specific Training.* For UNR personnel who work in laboratories. Lab-specific training is to be provided and documented by the PI or other designated personnel.
- *Sewer & Stormwater Discharge Training.* For UNR personnel who work in a laboratory or supervise those who work in a laboratory on the main University campus (training available online).
- *Formaldehyde Training for Laboratory Personnel.* For UNR personnel who are exposed to formaldehyde in work places other than research laboratories, including anatomy, histology, and pathology laboratories (training available online). Refresher course is required annually.

Helpful Links

[Lab Safety Information](#)

[Safety Policies and Manuals](#)

[OSHA/USDA Bloodborne Pathogens Standards](#)

[CDC/NIH Biosafety in Microbiological and Biomedical Laboratories](#)

[Chemical Hygiene Information](#)

Radiation and Laser Safety

Use of ionizing and non-ionizing radiation must be performed in accordance with applicable government regulations and policies and procedures established by the UNR Radiation Safety Committee (RSC).

UNR's Radiation Safety Program (RSP) supports radiation and laser use facilities by providing radiation safety and laser safety training, technical consultation and oversight of ionizing and non-ionizing radiation uses. Specific RSP tasks include the following:

- License maintenance and amendments
- Radiation producing machine registration
- Dosimetry service
- Laboratory design assistance and set up
- Radiation and laser warning sign posting
- Radioactive waste disposal
- Assistance in radioactive material transportation
- Optical density and nominal hazard distance calculation
- Laser safety goggle selection

Compliance Actions

Prior to beginning and throughout the duration of a study involving radiation or lasers, PIs must adhere to the following:

- Be approved to use radiation by the RSC.
- Follow the approved procedures and conditions.
- Know the hazards associated with the radiation/laser in use.
- Ensure that supervised employees and visitors comply with relevant regulations, policies, and procedures.
- Complete all required training and ensure that research group personnel complete all required training.
- Register all Class 3B and Class 4 lasers with the RSP.

Training Requirements

The following training courses related to radiation/laser safety are required for all UNR personnel who work with radiation and/or lasers:

- *Radiation Safety Training.* For UNR personnel who work with radioactive materials. Annual refresher course is required.
- *X-Ray Safety Training.* For UNR personnel who work with or near x-ray devices.
- *Laser Safety Training.* For UNR personnel who work with Class 3B and Class 4 lasers. Refresher course is required.

Key Points

Use of radiation must comply with applicable regulations and policies as well as UNR RSC procedures.

UNR's RSP facilitates safe radiation and laser use through the tasks detailed at left.

Prior to beginning and during a study involving radiation or lasers, PIs must adhere to the compliance actions detailed at left.

Training, detailed at left, is required for all UNR personnel who plan to work in or supervise those who work with radiation and/or lasers.

Who to Contact

Myung Chul Jo, Radiation & Laser Safety Officer
mjo@unr.edu
(775) 784-4540

[EH&S](#)

(775) 327-5040
(775) 784-4553 Fax

Helpful Links

[Radiation Safety Information](#)

[Radiation Safety Manual](#)

[Accelerator Radiation Safety Program](#)

Environmental Health and Safety Training

UNR's Department of Environmental Health and Safety (EH&S) provides a host of in-class and online training courses that, when supplemented by department and workspace-specific training, satisfy various local, state and federal training requirements.

In addition to the required training courses specified in the Laboratory Safety, Biological Safety, and Radiation and Laser Safety sections of this guide, attendance to various other training courses may be required depending on job task.

Compliance Actions

Prior to beginning research, the PI is responsible for determining the training requirements associated with the hazards involved in the activity.

Additional EH&S Training Courses

Below are some of the EH&S training courses required for members of the specified audience:

- *Bloodborne Pathogens Training for Non-Laboratory Workers.* For UNR personnel who have the potential for exposure to blood or other potentially infectious materials as specified in the University Bloodborne Pathogens Exposure Control Plan. A refresher course is required annually.
- *Fire Extinguisher Training.* For UNR personnel whose job tasks require the use of a fire extinguisher (*e.g.*, welders). A refresher course is required annually.
- *Hazard Communication Training for Non-Laboratory Workers.* For UNR personnel who use, handle, store or are exposed to hazardous materials outside of a laboratory environment. (Online course available.)
- *Heartsaver CPR/AED Training.* For UNR personnel whose job duties include performing CPR or using an AED (*e.g.*, child care workers). Retraining is required every two years.
- *Powered Industrial Truck (Forklift Operator) Training.* For UNR personnel who operate a forklift. An operator evaluation is required every three years.
- *Respirator Protection Training.* For UNR personnel whose job duties require the wearing of an air purifying respirator. Fit testing and training is required annually.

EH&S may add training courses and requirements in the future as laws or policies change, deficiencies are identified or at the behest of regulators. Check the [EH&S website](#) for training announcements and the latest course offerings.

Key Points

EH&S provides training that, in addition to department and workspace specific training, satisfy local, state and federal training requirements.

PIs are responsible for determining the training needs associated with their research activity.

EH&S offers many different job-specific training classes with examples detailed at left.

Who to Contact

Brock A. Young, Manager, EH&S Training
brocky@unr.edu
(775) 327-5058

[EH&S](#)
(775) 327-5040
(775) 784-4553 Fax

Helpful Links

[EH&S Training Program Information](#)

[EH&S Safety Training Matrix](#)

Office of Enterprise and Innovation

The Office of Enterprise and Innovation (OE&I) exists to help researchers identify discoveries that potentially have real world applications.

In addition, OE&I protects these innovations by securing intellectual property rights and transferring the technologies to companies that can develop them into commercial products or services. The individual researchers share a significant portion of any income generated through commercialization of their technology. The technology can be licensed to an existing company or to a spinout company formed by the researcher.

Services Offered

- Technology licensing
- Securing intellectual property (patent) rights
- Assistance with starting a company

Key Points

OE&I helps researchers identify discoveries with potential for real world applications.

OE&I protects innovations through intellectual property rights and the transfer of technologies to companies able to develop them into commercial products or services.

Who to Contact

April Sferrazzo, Coordinator,
Intellectual Property
asferrazzo@unr.edu
(775) 784-4421

Risk Management

The objectives of risk management are to protect the health and provide for the safety of students and employees, to protect the public from injury or damage incidental to the operations of [Business Center North](#) (BCN) institutions and to protect its assets and environment.

Duties of the BCN Risk Management Office include the following:

- Administer the property, automobile, liability and workers' compensation insurance programs.
- Review contracts for proper insurance requirements.
- Provide certificates of insurance for business purposes.
- Provide risk assessment/mitigation consulting services to departments.
- Develop and implement programs to protect NSHE's property and its environment with the goal to reduce legal liability.
- Purchase insurance when necessary.
- Investigate and settle property and auto physical damage claims.

Depending upon the nature of the work being conducted, PIs sometimes need the assistance of the BCN Risk Management Office. For example, some sponsored project award terms and conditions contain insurance requirements. Further, accidents in the field and work place can and do sometimes occur. Therefore, PIs should be aware that BCN Risk Management is available to manage such risks

Key Points

BCN Risk Management aims to protect the health and provide for the safety of students and employees, to protect the public from injury or damage incidental to the operations of BCN institutions and to protect its assets and environment.

BCN's comprehensive list of duties is detailed at left.

Who to Contact

[BCN Risk Management Office](#)

Sue Dunt

sdunt@unr.edu

(775) 784-4394

Helpful Links

[Auto Insurance](#)

[Liability Insurance](#)

[Property Insurance](#)

[Claim Information](#)

[Contractor Insurance Requirements](#)

[Field Trip Information](#)

[Forms/Documents](#)

Roles and Responsibilities

Different campus offices are responsible for various phases of the sponsored projects process. The following table demonstrates key proposal and award roles and responsibilities.

Principal Investigator	Office of Sponsored Projects Pre-Award
<ul style="list-style-type: none"> • Develops complete and timely proposals. • Understands sponsors’ terms and conditions and University policies and procedures related to sponsored project administration. • Manages and controls project funds, including subcontractor funds, to ensure compliance with award terms and conditions and University policy. • Authorizes expenditures. • Prepares all required reports and submit to sponsors. • When applicable, certifies personnel effort and approves cost-share reports. • Ensures scientific integrity and manages projects. • Manages subcontractor progress. • Ensures that their staff have adequate training for research involving human subjects, animals and/or hazardous materials. 	<ul style="list-style-type: none"> • Assists faculty in proposal and pre-award processing. • Advises principal investigator (PI) and University staff of federal, state, local government and other funding agencies' rules, regulations and procedures. • Reviews proposal materials and any other required internal forms. • Communicates with PI and staff about any proposal revisions required to comply with sponsor or University policies. • Advocates and acts as a steward for the policies and procedures of the University, vice president for research and sponsoring agency. • Submits proposals to sponsors as the authorized representative for the University.
Office of Sponsored Projects Grants and Contracts	Office of Sponsored Projects Post-Award
<ul style="list-style-type: none"> • Reviews award documents for terms and conditions not acceptable to the University as a public entity of the State of Nevada. • Confirms approval of project related protocols (e.g., IRB, IACUC, etc.). • Negotiates changes to the terms and conditions when necessary. • Prepares award documents for signature by authorized UNR signatory. • Sends award to account set up for issuing of project expense account number. • Prepares subawards to UNR subcontractors. 	<ul style="list-style-type: none"> • Reconciles account expenditures and invoice sponsors. • Processes sponsored project account budget revisions. • Reconciles required cost share and report to sponsor. • Reconciles government-owned property or project purchased equipment and submits report to sponsor. • Reconciles project patents or inventions with the UNR Office of Enterprise and Innovation and submits final patents and inventions report to sponsor. • Confirms submission of final progress/technical report to sponsor.

Contact Information

Office of the Vice President for Research and Innovation

(775) 327-2363

(775) 327-2362

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[Staff Contacts](#)

Office of Sponsored Projects

ospadmin@unr.edu

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(775) 784-6680 Fax

Ross Hall 204

[Staff Contacts](#)

Research Integrity Office

(775) 327-2368

(775) 327-2369 Fax

Ross Hall 218

[Staff Contacts](#)

Environmental Health & Safety

(775) 327-5040

(775) 784-4553 Fax

Applied Research Facility

[Staff Contacts](#)

Office of Lab Animal Medicine

(775) 784-4874

Neilor Biomedical Sciences 208

[Staff Contacts](#)

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