**Following the Protocol**

By Brian Del Bono, Senior Contract and Grant Officer

Will your study use Human Subjects or data derived from living human participants? Study protocols which meet the definition of Human Subject Research must be submitted to and approved by the Stanford Institutional Review Board (IRB) before any study activities begin. IRB approval is also required before the associated agreement can be accepted and endorsed by a Stanford Institutional Official (IO).

The SeRA Proposal Development Routing Form (PDRF) prompts users to disclose if human subjects will be used in the study. IRB approval is not required at time of proposal submission, but the protocol must be submitted for IRB review before an early account can be approved. An early account is valid for only 90 days if the protocol is pending review.

Once the protocol is approved with the correct SPO number and funding source referenced in the eProtocol system, the IO may issue the SeRA Award Approval Notification (AAN) to initiate the account setup funding process.

Even if human subject research is scheduled to start later in the project performance period, an IRB approval is still required before a SeRA AAN can be issued. The protocol should be submitted exactly as it was proposed to the sponsor.

Stanford IRB will issue an approval for protocols that do not include human subject research at the beginning of the project, based on future human subject activities as described in the project. A revised protocol must be approved before the human subject research begins.

A single protocol can be supported by multiple funding sources, and a single funding source can support multiple protocols. Coordinate with the appropriate IRB panel manager if you have questions on whether a SPO can be added as a funding source to an existing protocol, or if a new protocol must be submitted for full review. Revised protocols can be submitted almost any time to add a SPO number as a funding source. These types of revised submissions do not need a convened meeting to be approved if there is no change in the use of human subjects.

If your project includes Subrecipients, ask your PI if the Subrecipient’s work will be subject to IRB review as well. To ensure uninterrupted processing of a Subaward, secure the Subrecipient IRB approval letter and attach it to the Stanford IRB protocol submission.

Continued review of Subrecipient IRB approval is a key requirement of Stanford’s compliance responsibilities. Revised protocols can be submitted to add attachments as necessary. It is recommended for department administrators to secure and submit Subrecipient IRB approval letters to

**Did You Know?**

For 2016, as of Oct 31st OSR completed

- 1,652 Proposals
- 995 New Awards
- 2,128 Award Amendments
- 201 New Subawards
- 613 Subaward Amendments
- 1,956 New Account Setups
- 3.947 Amendment Setups
- 1,096 Early/Extend Setups
- 1,521 OSR Request Forms

Newsletter Feedback?
Tim Leung - ttleung@Stanford.edu
Mich Pane - michiko@Stanford.edu

Say “Good-Bye” to the NSF Grant Proposal Guide

By Nicole Pobuta, Contract and Grant Officer

With each New Year, you can always look forward to new changes from the National Science Foundation (NSF). This year’s biggest surprise is that NSF has revamped the Proposal and Award Policies and Procedures Guide (PAPPG) by eliminating the separate Grant Proposal Guide (GPG) and Award & Administration Guide (AAG) sections.

The new PAPPG goes into effect on January 30, 2017 with the guide becoming a comprehensive twelve chapter guidance document covering everything you need to know.

As expected, there are also some additional changes to the policies and guidelines - below are the key changes you should be aware of. Review NSF 17-1 for the full details of the publication on the NSF website.

Key PAPPG Changes You Need to Know About

- There are two new types of proposal opportunities: Research Advanced by Interdisciplinary Science and Engineering (RAISE) and Grant Opportunities for Academic Liaison with Industry (GOALI).
- The Collaborators & Other Affiliations Information document now requires all sections to be listed in alphabetical order by last name and removes the requirement to list postgraduate scholar sponsors.
- The Results from Prior NSF Support section is now required in equipment proposals and the PAPPG provides guidance on the information needed if listing a recently awarded project that has not yielded new results.
- Domestic Travel guidelines have been revised to clarify that travel, meal and hotel expenses are unallowable for grantee employees not on travel status.
- Additional language has been added to emphasize the importance of submitting letters of support only when specifically required by a program solicitation...otherwise, the proposal may be returned without review.
- Your funds can expire. Per 31 USC § 1552, on September 30th of the 5th fiscal year after the period of availability for obligation of a fixed appropriation account ends, the account shall be closed and any remaining balance (whether obligated or unobligated) in the account shall be canceled and thereafter shall not be available for obligation or expenditure for any purpose. NSF will notify grantees of canceling appropriations, whether in full or in part, but this means that no extensions, requests for payment, or upward adjustments will be allowed beyond the end of the fiscal year in which the funds cancel.
What’s a Grant with Special Conditions?
By Michiko Pane, Director, Pre-Award

While funding entities may label their award instrument as a “Grant”, many are including terms and conditions that extend beyond basic terms. Basic terms are what we’d typically see in a government grant. But many organizations, such as foundations and other non-profits, are including terms that bump their agreements into a different classification for Stanford.

Stanford’s Board of Trustees has designated specific terms of an award as a “Special Condition”. As a result, awards that contain any of the following provisions fall into the Grants with Special Conditions classification:

- Sponsor retaining rights to Stanford generated-data
- Sponsor ownership of Stanford IP
- Non-standard IP licensing rights
- Any publication restrictions, including delay in excess of 90 days
- Foreign national participation restrictions
- Bioterrorism language
- Export Control language
- Anti-terrorism language
- Requirements for Stanford to pay for re-performance of work not found to be satisfactory by the Sponsor
- Non-standard payment provisions
- Financial provisions authorizing incentive payments
- Assumption of third-party liability
- Non-standard warranty language
- Any other terms imposing special requirements on Stanford, or is otherwise unusual

Agreements that contain any of the above provisions can sometimes be inconsistent with university policies and your OSR Contract & Grant Officer (CGO) will have to negotiate with the sponsor. If non-standard intellectual property (IP) terms are included, the CGO will consult with our colleagues in the Industrial Contracts Office. Negotiating a “grant” can be as complex as negotiating a contract!

Some sponsors will issue agreements that will always fall into the Grant with Special Condition classification due to the nature of their standard terms and conditions. Other sponsors issue some agreements that are basic and others with special conditions depending on their program.

How can you tell a grant is one with special conditions? SeRA award transactions records this distinction and displays it on the Notice of Award:

Terms and Conditions

This Notice of Award provides a summary of basic information. Please read the award document for complete requirements.

General

Grant With Special Conditions: Yes

Grant with Special Conditions will soon be added to the SeRA list of Agreement Types and displayed on the SeRA Project Summary page.
Updates to the Cost Transfer Policy and Process
By Tim Reuter, Director, Post-Award

Why are we updating the policy?

• Clearly define a cost transfer as “Late” if the original expense was posted more than 6 months earlier
• Require additional approvals and justification for later cost transfers
• Place additional emphasis on Internal Controls due to the implementation of the Uniform Guidance
• Restate and update what information is required in the justification
• Clearly define when and what additional documentation must be submitted

When will the updated policy be implemented?

Starting with cost transfers processed in January 2017 and forward.

Simplify the 6 month rule

Cost transfers for corrections of errors should be completed within 3 months of when the error is discovered and no later than 6 general ledger (GL) months after the original expense was posted to the award. Errors found during the required monthly expenditure statement review process should be corrected upon discovery. For example, expenses for winter quarter (January to March) must be reviewed and certified by the PI by the end of May. If a transaction posted during the January GL month was discovered during the review and certification process, it must be corrected no later than July month end close.

The same exceptions still apply:

• Transactions necessitated by unforeseen circumstance
• Transfers between tasks of the same sponsored project
• Changes in expenditure types within the same sponsored project
• Incorrect charges must be transferred off the award regardless of age
• Refunds and unexpected credits must be allowed to post
• Clearing an Overdraft
• Transfers to sponsored PTAs after 6 months or after closeout require OSR and school approval (NEW)

Additional Approvals Required for Late Cost Transfers

The School of Medicine has reviewed, and if appropriate, approved all late cost transfers prior to OSR review and approval. Starting with January 2017 transactions, all late cost transfers will also require School level approval in addition to OSR approval. The appropriate School level designee will be listed on the DoResearch website with the new policy prior to December 1st.

Documentation

Explanations merely stating the transfer was made “to correct an error” or “to transfer to correct project” is not sufficient. All cost transfers must be supported by documentation that fully explains the error as detailed below. Cost transfer documentation must include a justification that clearly shows:

1. How the expense directly benefits the receiving PTA
2. How the expense is allowable on the receiving PTA (e.g., attach documentation of sponsor approval)
3. The allocation methodology used if transferring expenses to multiple PTAs.
4. The reason the expense was charged incorrectly to the first PTA
5. That any systemic reasons which might cause this problem to be repeated have been addressed
6. The reason for the delay in the timely processing of the transfer

Continued on Page 5
**Grace Period Extensions for Vendor Invoice Payments**

By Nguyet Sin, Associate Director, Post-Award

The Office of Sponsored Research (OSR) has collaborated with Financial Management Services (FMS) Buy & Pay Office and Administrative Systems (AS) to enhance systems and extend the grace period for payment of vendor invoices intended for posting to end-dated PTAs.

The previous grace period did not allow sufficient time for invoices to be sent by vendors, received/uploaded by departments, and processed by central office. The short period also hindered completion of financial reports and billing of sponsors in timely fashion. Expenses were often forced to a suspense PTA, unless Departments provided another PTA for the invoiced expenses. This process created additional work for departments and central offices to transfer expenses back to the appropriate PTA and delayed financial report completion and final billing to sponsors.

Effective November 4, 2016, the grace period for paying vendor invoices to end dated PTAs will be as follows:

<table>
<thead>
<tr>
<th>Invoice Type/Case</th>
<th>Invoice Process Date (Date AP matches Invoice to PO)</th>
<th>Accounts Payable/Buy &amp; Pay</th>
<th>Department Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non Sub-award Invoices: Invoice is dated ON or PRIOR to the most restrictive PTA end date</td>
<td>Invoice process date is within 60 days after the most restrictive PTA end date.</td>
<td>Invoice / Purchase Order match process is allowed.</td>
<td>No action necessary.</td>
</tr>
<tr>
<td></td>
<td>Invoice process date is beyond 60 days after the most restrictive PTA end date.</td>
<td>Invoice / Purchase Order match process is not allowed. Accounts Payable places invoice on hold.</td>
<td>Department must provide another PTA for the invoiced expenses.</td>
</tr>
<tr>
<td>Non Sub-award Invoices: Invoice is dated AFTER the most restrictive PTA end date</td>
<td>Invoice is uploaded within 30 days after the most restrictive PTA end date. The invoice process date is within 60 days after the most restrictive PTA end date.</td>
<td>Invoice / Purchase Order match process is allowed.</td>
<td>No action necessary.</td>
</tr>
<tr>
<td></td>
<td>Invoice is uploaded beyond 30 days of the most restrictive PTA end date.</td>
<td>Invoice / Purchase Order match process is not allowed. Accounts Payable places invoice on hold.</td>
<td>Department must provide another PTA for the invoiced expenses.</td>
</tr>
<tr>
<td>Sub-award Invoices: Expenditure Type 54710 or 54720 (This change was implemented in January 2016)</td>
<td>Invoice process date is within 94 days after the most restrictive PTA end date.</td>
<td>Invoice / Purchase Order match process is allowed.</td>
<td>No action necessary.</td>
</tr>
<tr>
<td></td>
<td>Invoice process date is beyond 94 days after the most restrictive PTA end date.</td>
<td>Invoice / Purchase Order match process is not allowed. Accounts Payable places invoice on hold.</td>
<td>Department must provide another PTA for the invoiced expenses.</td>
</tr>
</tbody>
</table>

**Updates to the Cost Transfer Policy and Process**  
*Continued from Page 4*

Large transfers that exceed $10,000 or 10% of the award, transfers within the first or last 90 days of a project, and transfers that do not meet the timeliness criteria receive additional central review. For the transfer of all non-salary charges subject to the above criteria, a PDF of the general ledger** showing the expenditure(s) requesting to be moved must be attached to the transfer transaction by the originator. Attaching detailed documentation for these transfers will facilitate their timely review by OSR. The Cost Transfer Policy is on the DoResearch website at [RPH 15.8 Cost Transfer Policy for Sponsored Projects](#).

**Acceptable versions of the general ledger include, OBI 285 Expenditure Detail Report, OBI 149 - Quarterly Review and Certification, OBI CER Expenditure Balance and Expenditure Details reports, and Expenditure Transactions (PTD) screens of FFIT.**
“Don’t We Just Catch That at Closeout?”

A Post Award Management Seminar will be held November 14th, 2:30 to 4:00 pm at Clark Center, S360. The seminar will include review and discussion on:
• Proper reviewing of agreement terms to maintain post-award compliance
• Account-PTA setup best practices for efficient financial management, expenditure review and reporting
• Setting-up chronological check points and expenditure burn-rate monitoring
• Leveraging Oracle Business Intelligence and Consolidated Expenditure Reporting to analyze financial data

BlueJeans video conferencing will be available. Join with the BlueJeans App, or cut and paste https://bluejeans.com/9313794753/ to Google Chrome browser. Download the BlueJeans App in advance.

Following the Protocol  Continued from Page 1

Stanford’s IRB for approval before a Subaward requisition is routed for OSR processing. OSR cannot sign a Subaward Agreement until the Subrecipient’s approval letter is included in Stanford’s protocol and the revised protocol is approved by Stanford’s IRB.

In an effort to reduce duplicative IRB review of the same protocol by multiple sites, the National Institutes of Health (NIH) issued a new policy regarding the use of a single IRB (sIRB) for multi-site studies, effective May 2017. The policy allows for a single site to be designated as the sIRB. Other participating sites may rely on the sIRB’s review and approval. If a Stanford study will rely on another site’s sIRB, a local (Stanford sIRB) protocol must be submitted to Stanford IRB for review and approval. These studies will receive a Stanford IRB Administrative approval letter and are recorded in SeRA.

Human subject research requires absolute compliance with numerous policies and regulations, the Stanford IRB, OSR and RMG are here to help you. IRB questions about reliance on a sIRB can be directed to Celia.Molvin@stanford.edu or 650-723-0082.

Winter Closure: Important Deadline Dates to Note

In accordance with the University’s Winter Closure, the Office of Sponsored Research will be closed during the winter break starting 5:00 pm, Tues., December 20, 2016 and re-open for business at 8:00 am, Wed., January 4, 2017. OSR will not be available during Winter Closure. To ensure timely processing of proposal submissions and account setups, please note the following deadlines and critical dates:

• Proposals
  PDRFs must be fully approved by the times noted. The University’s proposal deadline policy will apply.

<table>
<thead>
<tr>
<th>Sponsor Deadline</th>
<th>Stanford Internal Proposal Deadline (by 9:00 am of the day noted below)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tuesday, December 20, 2016 through Wednesday, January 4, 2017</td>
<td>Tuesday, December 13, 2016</td>
</tr>
<tr>
<td>Thursday, January 5, 2017</td>
<td>Thursday, December 15, 2016</td>
</tr>
<tr>
<td>Friday, January 6, 2017</td>
<td>Friday, December 16, 2016</td>
</tr>
<tr>
<td>Monday, January 9, 2017</td>
<td>Monday, December 19, 2016</td>
</tr>
<tr>
<td>Tuesday, January 10, 2017</td>
<td>Tuesday, December 20, 2016</td>
</tr>
</tbody>
</table>

• Account Setup
  For an account to be established by 5:00 pm, Tues., December 20, 2016, the department/PI must complete all necessary information in SeRA by 5:00 pm, Tues., December 6, 2016.

Contact your OSR Contract & Grant Officer or Research Accountant with questions. Officer and Accountant assignment are at: https://doresearch.stanford.edu/research-offices/office-sponsored-research-osr