

# Research

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## Combatting Trafficking In Persons Policy

**Type of Policy:** Administrative

**Effective Date:** Aug 2016

**Last Revised:** Aug 2016

**Review Date:** Aug 2019

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director, OSP

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Reason for Policy:**

The United States Government has adopted a zero tolerance policy regarding trafficking in persons. These statutes and regulations require federal grant recipients and contractors to prohibit the use of research funds received from federal sources for promotion of prohibited activity.

**Policy Statement:**

Georgia Institute of Technology opposes prostitution, forced labor and any related activities contributing to the phenomenon of trafficking in persons. Trafficking in persons is a violation of U.S. Law and recognized as a violation of human rights.

**Related Regulations**

[18 USC Section 1581](#)

[45 CFR Section 52.222-50](#)

**Applicability**

This policy applies to all researchers at Georgia Tech and all employees or students who assist these researchers or participate in performing tasks related to such research activities.

**Definitions**

Trafficking in Persons

The United States government considers trafficking in persons to include all of the criminal conduct involved in forced labor and sex trafficking, essentially the conduct involved in reducing or holding someone in compelled service. [\[More\]](#)

**Procedures:**

Report any violations via Ethics Point which can be found online at <https://secure.ethicspoint.com/domain/media/en/gui/7508/index.html>.

**Responsibilities:**

Report any violations via Ethics Point which can be found online at <https://secure.ethicspoint.com/domain/media/en/gui/7508/index.html>.

**Enforcement:**

Non-compliance with this policy would be a violation of U.S. law. Georgia Tech will take action for violation of this policy including, but not limited to, removal from the contract, taking disciplinary action up to and including termination of employment.

**Policy History:**

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| Revision Date | Author | Description |
|---------------|--------|-------------|
| 04/08/2016    | OSP    | New Policy  |

## Contracting Services for other Georgia Tech Affiliated Non-Profit Entities

For Information about Contracting Services for other Georgia Tech Affiliated Non-profit Entities, please see [Office of Sponsored Programs website](#):

- BOR Agreements
- GATV Agreements
- GCMI Agreements

## Environmental Health and Safety

The Environmental Health and Safety (EHS) Office at Georgia Tech consists of the following department units: Fire and Life Safety, General Safety, Chemical/Lab Safety, Radiation Safety, Biosafety, and Hazardous Materials.

"EHS develops programs and provides oversight, consultation, training, and other specialized services to assist the Institute community in meeting its public health, safety, environmental protection, and compliance responsibilities.

For more information please visit, [Environmental Health and Safety](#).

## Industry Contracts

For Information on Industry Contracts, please see [Office of Sponsored Programs website](#):

- Advance Payments
- Contract Templates
- Establishing Relationships
- IP and Licensing
- International Collaboration
- STTR/SBIR

## Intellectual Property Assignment Agreement

For information on the Intellectual Property Assignment Agreement, please see:

- [Intellectual Property Assignment Agreement](#)

## International Agreements

For Information on International Agreements, please see [Office of Sponsored Programs website:](#)

- Compliance Requirements in International Agreements and Subagreements
- Export Controls Policy
- F&A on International Agreements
- Foreign Corrupt Practices Act Policy
- Foreign Sponsors
- Internationally-Sourced Agreements Fee

## Investigational New Drug (IND) Application

**Type of Policy:** Administrative

**Last Revised:** Nov 2013

**Review Date:** Nov 2016

**Contact Title:** Executive Vice President for Research

**Reason for Policy:**

An Investigational New Drug (IND) Application is submitted to U.S. Food and Drug Administration (FDA) if a drug not previously authorized for marketing in the US is intended to be used for the purposes of clinical investigation.

A clinical investigation is defined by the FDA as “an experiment in which a drug is administered or dispensed to, or used involving, one or more human subjects. Such an experiment is any use of a drug [whether approved or unapproved] except for the use of a marketed drug in the course of medical practice.”

The Sponsor of an IND application is the party who submits the application to FDA. In the absence of any other sponsor (e.g. pharmaceutical company), the investigator conducting the proposed clinical investigation is the sponsor of the IND application.

When developing new drugs and devices in pre-clinical research to the point where they transition to investigations clinical applications, FDA approval is required and the Principal Investigator for the research serves as the Sponsor of the IND unless or until the further development and/or commercialization of the new drug or device is undertaken by a third party.

### Consistency with Georgia Tech’s Strategic Plan, Other Institute Policies, and Related External Documents

21 CFR 11 (Electronic records and electronic signature)

21 CFR 54 (Financial Disclosure by Clinical Investigators) [FDA forms 3454 and 3455]

21 CFR 210 (Current Good Manufacturing Practice In Manufacturing, Processing, Packing, Or Holding of Drugs; General)

21 CFR 211 (Current Good Manufacturing Practice for Finished Pharmaceuticals)

21 CFR 312 (Investigational New Drug Application)

21 CFR 314 (Drugs for Human Use)

21 CFR 320 (Bioavailability and Bioequivalence Requirements)

21 CFR 330 (Over-The-Counter (OTC) Human Drugs Which are Generally Recognized as Safe and effective and Not Misbranded)

21 CFR 601 (Biologics Licensing)

### Policy Statement:

The Principal Investigator for the project under which a new drug may become the subject of a clinical investigation and

who is responsible for the initiation and conduct of the clinical investigation shall be responsible for developing the IND Application to be submitted to the FDA and will be a "Sponsor-Investigator" in accordance with 21CFR§312.53. Usually, the intent of the research in such a clinical investigation is to gain scientific knowledge without seeking market approval for the drug or device. This responsibility is generally part of the Principal Investigator's research duties when it takes place in the course of sponsored or Institute-funded research. The Sponsor-Investigator is the source of the information for the relevant FDA filings and reports and is responsible for their content.

The Sponsor-Investigator's responsibilities include:

- Selecting clinical investigators. Clinical investigations must be conducted in appropriate clinical setting under the direction of a physician (or dentist, when appropriate) qualified by training and experience as appropriate experts to investigate the drug who should be listed as a Sub-investigator for the trial and should be responsible for all trial-related medical (or dental) decisions. Clinical investigations will generally be conducted pursuant to an appropriate contract or subcontract with a Clinical Research Organization (CRO), most often an academic medical center, with the Sub-investigator generally serving as its Principal Investigator. The negotiation and awarding of the contract or subcontract will follow all applicable Institute policies, guidelines, and applicable regulations.
- Selecting a Contract Manufacturing Organization (CMO) or other source to provide the drug for use in the study in compliance with applicable FDA requirements. The negotiation and awarding of the contract with the CMO or supplier will follow all applicable Institute policies, guidelines, and applicable regulations.
- Informing and qualifying investigators by obtaining their commitment to supervise the study, follow the protocol, and obtain consent.
- Monitoring the conduct of the study by auditing documentation and conducting site visits.
- Completing regulatory filings related to the IND or IDE, adverse events, amendments or revisions, progress reports, withdrawal of IRB approval, and final reports.
- Controlling the distribution, tracking, and dispensation of the regulated products.

Sub-investigator (Principal Investigator for Clinical Contract or Clinical Subcontract) Responsibilities Include:

- Ensuring IRB approval for the study is obtained before any subjects are enrolled.
- Ensuring that informed consent is obtained in accordance with FDA regulations.
- Ensuring that the investigation is conducted according to the investigational plan and applicable regulations.
- Administering the drug or using the device only in subjects under the investigator's supervision or under the supervision of a recognized sub-investigator.
- Maintaining adequate records of the dispensation of the drug or device.
- Returning unused materials at the end of trial.
- Preparing and maintaining adequate case histories and signed informed consent documents.
- Maintaining correspondence with the IRB and the sponsor to make sure that both have reviewed protocol amendments, recruitment materials, investigator brochures.
- Retaining records in accordance with regulations.
- Providing progress, safety, final and financial disclosure reports.
- Notifying the sponsor if IRB approval is withdrawn.
- Comply with International Conference on Harmonisation (ICH) guidelines, if applicable. Please see the module International Conference on Harmonisation, ICH for Investigators.
- Inspections and Audits
- Ensuring computer systems comply with 21 CFR Part 11.

**Scope:**

All units of the Institute must comply with this policy.

**Procedures:**

Faculty Investigator/Sponsor must complete IND Investigator Responsibility form and provide a copy to the Office of Research Integrity Assurance for review of any research study where an IND application will be filed by a Georgia Tech Investigator.

### **Impact on Institute**

- The CMO and CRO agreements will be GT procurements or sub-agreements. The consultants hired for projects engaged in this kind of technology development are under contract to Georgia Tech and working under the direction of the Principal Investigator on the project. However, the contracts with those organizations may be reviewed at the request of the office of Legal Affairs, Purchasing, or the Office of Sponsored Programs by consulting counsel expert in the specific transaction and FDA regulatory requirements.
- Georgia Tech will require outside consulting counsel to review certain FDA filings and reports.
- The costs for outside consulting counsel to review CRO, CMO and other agreements and for counsel to review FDA filings may or may not be directly chargeable to sponsored research (to be determined). If not a source of funds will need to be identified.

### **Stakeholders Consulted in Developing This Policy**

- Faculty investigator
- Office of Research Integrity Assurance
- Office of Legal Affairs and Risk Management
  - Insurance and Risk Management
  - Office of Legal Affairs

### **Compliance Mechanisms Existing or to Be Created**

Faculty investigator will complete the IND responsibility form and submit the form to the Office of Research Integrity Assurance for review of any research study where an IND will be held by a Georgia Tech Investigator. All human subject research shall be reviewed and approved by the Georgia Tech IRB or in accordance with a reciprocity agreement with the CRO.

### **Timing Requirements for this Policy**

*The Institute must promulgate this policy as soon as possible to comply with FDA regulations.*

**Forms:** [IND Investigator Responsibility form.docx](#)

## **Joint and Dual Academic Agreements**

**Type of Policy:** Administrative

**Effective Date:** Jul 2014

**Last Revised:** Jul 2014

**Review Date:** Jul 2019

**Policy Owner:** Library Learning Excellence

**Contact Name:** Catherine Murray-Rust

**Contact Title:** Vice Provost Learning Excellence and Dean of Libraries, SACSCOC Accreditation Liaison

**Contact Email:** catherine.murray-rust@library.gatech.edu

**Reason for Policy:**

This policy is designed to ensure that Georgia Tech complies with applicable accreditation principles of SACSCOC and

Policy and Procedures of the Board of Regents (BOR) of the University System of Georgia (USG) for academic programs offered via collaborative agreements between Georgia Tech and other institutions.

**Policy Statement:**

Georgia Tech is responsible for providing timely notification to SACSCOC and to the USG's BOR of agreements involving dual or joint academic agreements (awards), providing signed copies of the agreements and any other documentation or information required by SACSCOC or USG BOR policies and procedures for review.

This policy outlines the procedures Georgia Tech must follow to comply with SACSCOC's Agreement Involving Joint and Dual Academic Awards Policy and the USG's BOR Curriculum and Off-Campus Instructional Sites policy. Adherence to the policy will ensure Georgia Tech avoids sanctions and penalties associated with non-compliance.

**Scope:**

This policy applies to dual or joint academic agreements (awards) established for the purposes of awarding academic completions awards, e.g. certificates, diplomas or degrees.

**Policy Terms:****Dual Academic Award**

Students study at two or more institutions and each institution grants a separate academic award bearing only its name, seal and signature.

**Joint Academic Award**

Students study at two or more institutions and the institutions grant a single academic award bearing the names, seals and signatures of each of the participating institutions.

**Faculty Sponsor / Point of Contact**

The Georgia Tech faculty employee responsible for developing and / or negotiating the terms and operational details of the dual or joint academic award on behalf of Georgia Tech and providing information and regular reports to every responsible person in his / her business unit responsible for oversight. The agreement must be signed by an authorized agent of Georgia Tech – this may or may not be the Georgia Tech Faculty Sponsor / Point of Contact.

**Procedures:****5.1 Dual Academic Awards****SACSCOC: Dual Academic Awards**

Entering into an agreement with another institution involving a dual academic award is a substantive change that requires an institution to submit a letter of notification to SACSCOC six months prior to implementation of the agreement and a final signed copy of the agreement. Formal, written acceptance of that notification and agreement by SACSCOC is required before implementation of the provisions of the agreement.

The following should be submitted to SACSCOC:

- A notification letter that includes a statement of intent, the anticipated beginning date of the agreement, a description of the agreement, the complete address/location parties involved in the agreement and information for contact persons at each participating institution regarding the agreement
- A copy of the final signed agreement

*If the joint or dual academic award involves offering 50 percent or more of a program at a previously unapproved off-campus site by a member institution or involves offering a new program which is significantly different from currently offered approved programs, notification is due six months prior to implementation date with a prospectus for approval*

*due at least three months prior to implementation.*

### **USG's BOR: Dual Academic Awards**

Dual Degrees in the University System of Georgia are defined according to the SACSCOC Agreements Involving Joint and Dual Academic Awards: Policy and Procedures Policy. Notification to the Office of Academic Programs is required at least two weeks prior to implementation. Only dual degrees comprised of academic programs that have been previously approved by the BOR either at a single University System institution or between University System institutions shall be forwarded as notification items. All new degree programs require Board approval.

## **5.2 Joint Academic Awards**

### **SACSCOC: Joint Academic Awards –**

#### **Category One: Partner Institutions that are all SACSCOC accredited**

Entering into an agreement with another institution involving a dual academic award is a substantive change that requires an institution to submit a letter of notification to SACSCOC six months prior to implementation of the agreement and a final signed copy of the agreement. Formal, written acceptance of that notification and agreement by SACSCOC is required before implementation of the provisions of the agreement.

The following should be submitted to SACSCOC:

- A notification letter that includes a statement of intent, the anticipated beginning date of the agreement, a description of the agreement, the complete address/location parties involved in the agreement and information for contact persons at each participating institution regarding the agreement
- A copy of the final signed agreement

*If the joint or dual academic award involves offering 50 percent or more of a program at a previously unapproved off-campus site by a member institution or involves offering a new program which is significantly different from currently offered approved programs, notification is due six months prior to implementation date with a prospectus for approval due at least three months prior to implementation.*

### **SACSCOC: Joint Academic Awards –**

#### **Category Two: At least One Partner Institution is accredited by a US Department of Education (DOE) recognized accreditor other than SACSCOC**

Entering into an agreement with another institution involving a dual academic award is a substantive change that requires an institution to submit a letter of notification to SACSCOC six months prior to implementation of the agreement and a final signed copy of the agreement. Formal, written acceptance of that notification and agreement by SACSCOC is required before implementation of the provisions of the agreement.

The following should be submitted to SACSCOC:

- A notification letter that includes a statement of intent, the anticipated beginning date of the agreement, a description of the agreement, the complete address/location parties involved in the agreement and information for contact persons at each participating institution regarding the agreement
- A copy of the final signed agreement
- Documentation that the non-SACSCOC partner institution is not on a public sanction with its accreditor
- Documentation that the courses or programs of the non-SACSCOC Partner institution (s) are consistent with the educational purpose and goals of the SACSCOC-accredited institution (s)
- Documentation that the institution meets the provisions of Comprehensive Standard 3.4.7 (consortial

- relationships / contractual agreements) including the analysis of credits accepted in transfer
- A plan to monitor and ensure that the quality of contributions made by the partner institution (s) meets SACSCOC expectations
  - A plan and process produced by the SACSCOC accredited institution (s) ensuring that the agreement and awarding of a joint award does not result in the appearance of extending SACSCOC accreditation to partner institutions through promotional materials, academic publications, student transcripts, credentials verifying program completion and releases to the news media
  - Prototypes of official academic documents (e.g. student transcript, degree, diploma, certificate) involved in the agreement.

If the joint or dual academic award involves offering 50 percent or more of a program at a previously unapproved off-campus site by a member institution or involves offering a new program which is significantly different from currently offered approved programs, notification is due six months prior to implementation date with a prospectus for approval due at least three months prior to implementation.

*If the joint or dual academic award involves offering 50 percent or more of a program at a previously unapproved off-campus site by a member institution or involves offering a new program which is significantly different from currently offered approved programs, notification is due six months prior to implementation date with a prospectus for approval due at least three months prior to implementation.*

#### **SACSCOC: Joint Academic Awards –**

##### **Category Three: At least One Partner Institution is not accredited by a US Department of Education (DOE) recognized accreditor**

Entering into an agreement with another institution involving a dual academic award is a substantive change that requires an institution to submit a letter of notification to SACSCOC six months prior to implementation of the agreement and a final signed copy of the agreement. Formal, written acceptance of that notification and agreement by SACSCOC is required before implementation of the provisions of the agreement.

The following should be submitted to SACSCOC:

- A notification letter that includes a statement of intent, the anticipated beginning date of the agreement, a description of the agreement, the complete address/location parties involved in the agreement and information for contact persons at each participating institution regarding the agreement
- A copy of the final signed agreement
- A description of (1) any external governmental or accrediting agency approval for the institution (s) or programs (s) involved in the agreement, excluding the SACSCOC institutions (s), (2) the process of quality assurance used by the agency granting this approval, and (3) any required legal or licensing approvals
- Documentation that the courses or programs of the non-SACSCOC Partner institution (s) are consistent with the educational purpose and goals of the SACSCOC-accredited institution (s)
- Documentation that the institution meets the provisions of Comprehensive Standard 3.4.7 (consortial relationships / contractual agreements) including the analysis of credits accepted in transfer
- Documentation that faculty involved in the collaboration are qualified to teach assigned components or courses and a description of the means by which the SACSCOC accredited institutions (s) will monitor these qualifications (Submit a completed SACSCOC Faculty Roster Form)
- Documentation describing the physical and learning resources that will support the collaboration
- A plan and process to monitor and ensure that the quality of contributions made by the partner institution (s) meet applicable SACSCOC requirements
- A plan and process produced by the SACSCOC accredited institution (s) ensuring that the agreement and awarding of a joint award does not result in the appearance of extending SACSCOC accreditation to partner institutions through promotional materials, academic publications, student transcripts, credentials verifying

- program completion and releases to the news media
- Prototypes of official academic documents (e.g. student transcript, degree, diploma, certificate) involved in the agreement

*If the joint or dual academic award involves offering 50 percent or more of a program at a previously unapproved off-campus site by a member institution or involves offering a new program which is significantly different from currently offered approved programs, notification is due six months prior to implementation date with a prospectus for approval due at least three months prior to implementation.*

### **USG's BOR: Joint Academic Awards**

Joint Educational Programs in the University System of Georgia are defined according to the SACSCOC Agreements Involving Joint and Dual Academic Awards: Policy and Procedures Policy. Notification to the Office of Academic Programs is required at least two weeks prior to implementation. Only joint degrees comprised of academic programs that have been previously approved by the BOR either at a single University System institution or between University System institutions shall be forwarded as notification items. All new degree programs require Board approval.

Required notification forms and documentation can be found at [http://www.usg.edu/academic\\_programs/changes](http://www.usg.edu/academic_programs/changes)

### **Form Links:**

[SACSCOC Policy on Agreements Involving Joint and Dual Academic Awards](#)

[USG's BOR External Programs: Off Campus & Distance Learning Delivery](#)

**Frequently Asked Questions:** [Substantive Change FAQ's – Commission on Colleges](#)

### **Responsibilities:**

#### **8.1. Responsible Party**

##### **Faculty Sponsor / Point of Contact**

- Notifies and receives approval from every responsible person/business unit noted in the Institute's Graduate and Undergraduate Curriculum Committees Process for Approving Curricular Change – Steps 1-3 and 5 in the Approval Process. This can be found on the ICC website (information on website and location from Reta)
- Consults with SACSCOC Accreditation Liaison to determine if SACSCOC requirements and standards apply
- Provides final agreement to the SACSCOC Accreditation Liaison for submission to SACSCOC is applicable
- Completes and provides to the Substantive Change Standing Committee and the SACSCOC Accreditation Liaison all required SACSCOC and USG BOR documentation necessary for approval of any substantive change (i.e. a completed prospectus)
- Implements and submits annual assessment and periodic review report to every responsible party including the SACSCOC Accreditation Liaison

#### **8.2. Responsible Party**

##### **Registrar**

- Ensures that the policies, procedures for internal review and approval are developed, maintained and followed for internal reviews and approvals
- Responsible for the Institute's Graduate and Undergraduate Curriculum Committees Process for Approving Curricular Change

#### **8.3. Responsible Party**

##### **SACSCOC Accreditation Liaison**

- Provides feedback to the Faculty Sponsor / Point of Contact regarding elements in the dual or joint agreement

that may be of concern to SACSCOC

- Receive from the Faculty Sponsor / Point of Contact all required documentation. Review and timely submits all required documentation to SACSCOC and the USG BOR. Coordinate with the Faculty Sponsor / Point of Contact any required follow up action items / information needed
- Ensure compliance with appropriate SACSCOC, USG's BOR and U.S. Department of Education responsibilities and requirements

**Enforcement:**

Failure to comply with SACSCOC's substantive change procedures, could result in the Institute's loss of Title IV funding, the Institute's reimbursement to the U.S. Department of Education money received for programs related to unreported substantive change, sanction or removal from membership with SACSCOC.

*Optional:* To report suspected instances of noncompliance with this policy, please visit Georgia Tech's *EthicsPoint*, a secure and confidential reporting system, at:

[https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Related Information:**

[University System of Georgia Board of Regents Policy Manual](#)

[University System of Georgia Board of Regents Academic Affairs Handbook – Academic Programs \(Section 2\)](#)

[University System of Georgia Board of Regents Academic Programs](#)

[SACSCOC Substantive Change Policy](#)

[SACSCOC Policy on Agreements Involving Joint and Dual Academic Awards](#)

**Policy History:**

| Revision Date | Author                      | Description |
|---------------|-----------------------------|-------------|
| 08-2014       | Library Learning Excellence | New Policy  |

## Other Agreements

- Non-Disclosure Agreements, please see [Office of Legal Affairs](#).
- For Information about Other Agreements, please see [Office of Sponsored Programs](#):
  - [Intellectual Property Assignment Agreement](#)
  - [Intergovernmental Personnel Act](#)
  - [Material Transfer Agreements \(MTA's\)](#)
  - [Memoranda of Understanding](#)
  - [Software In-licenses](#)
  - [Teaming Agreements](#)
  - [Visiting Scholars](#)

## Research Administration Policies

For additional information on Research Administration Policies & Procedures, please see the following:

### 1.0 Overview

The Georgia Tech Research Corporation ([GTRC](#)), a non-profit educational and research corporation affiliated with Georgia Institute of Technology, serves as the contracting entity for Resident Instruction colleges of Georgia Tech. Georgia Tech Applied Research Corporation ([GTARC](#)), also a non-profit research and education affiliate of Georgia Tech, acts as the contracting entity for the Georgia Tech Research Institute. Both corporations serve Georgia Tech in the financial administration of externally funded research programs and related research activities. All proposals for

external funding must be routed through the Office of Sponsored Programs ([OSP](#)) or the Office of Industry Engagement ([IE](#)) for official submission to the sponsoring agency in the name of GTRC or GTARC as appropriate.

OSP verifies the proposed budget and handles all contractual or grant administrative matters relating to the submission and subsequent funding of proposals. OSP or Industry Engagement is responsible for negotiating the terms of research and related contracts. GTRC or GTARC is the recipient of the award and the contracting party while research is performed, per formal agreement, by Georgia Institute of Technology faculty, staff, and students under the direction of the Principal Investigator who shall be a member of the General Faculty and under the oversight and control of the school chair and dean, laboratory director, or other designated senior administrative official of the units in which the research is conducted.

**Additional Resources:**

[Faculty Handbook Part 31: Office of Sponsored Programs](#)

## 1.1 Offices Involved with Sponsored Projects

Throughout the life-cycle of research projects, a number of Institute offices and affiliated organizations that serve as contracting entities for the institute have the responsibility for stewardship of funds, resources, results, and intellectual property.

### 1.1.1 Office of Sponsored Programs

The Office of Sponsored Programs (OSP) provides progressive and responsive assistance in several areas of research administration including specialized educational, informational, and technological support to research administrators and faculty.

**Additional Resources:**

[Office of Sponsored Programs](#)

### 1.1.2 Grants and Contracts Accounting

The Office of Grants & Contracts Accounting is part of Financial Services within the Division of Institute Planning and Resource Management.

**Additional Resources:**

<http://grants.gatech.edu/>

### **1.1.3 Georgia Tech Research Corporation**

The Georgia Tech Research Corporation (GTRC) advances research and technological development at Georgia Tech as it continually seeks to advance society and the global competitiveness of Georgia and the nation.

**Additional Resources:**

<http://www.gtrc.gatech.edu/>

### **1.1.4 Georgia Tech Applied Research Corporation**

The mission of the Georgia Tech Applied Research Corporation (GTARC) is to provide efficient and effective contracting, grant, and research administration services for the Georgia Tech Research Institute (GTRI), a non-profit research arm of the Georgia Institute of Technology.

**Additional Resources:**

<http://www.gtarc.gatech.edu/>

### **1.1.5 Office of Research Integrity Assurance**

The Office of Research Integrity Assurance works with faculty oversight committees and boards to promote the ethical and responsible conduct of research and to ensure compliance with regulatory requirements relating to research involving human and vertebrate animal subjects, and rDNA.

**Additional Resources:**

<http://researchintegrity.gatech.edu/>

### **1.1.6 Industry Engagement**

At Industry Engagement, we work together with campus innovators and industry partners to move new technologies and discoveries out of Georgia Tech and into the mainstream of the U.S. economy. As a public university, Georgia Tech has a responsibility to ensure its research results benefit the general public.

**Additional Resources:**

<http://industry.gatech.edu/>

### **1.1.7 Office of Legal Affairs**

The Office of Legal Affairs (OLA) supports the academic and research mission of the Georgia Institute of Technology through development of solutions designed to minimize Georgia Tech's legal exposure, while advancing the goals and programs of Georgia Tech within the bounds of the law.

**Additional Resources:**

<http://legal.gatech.edu/>

### **1.1.8 GT Global and International Affiliated Organizations**

Georgia Tech's vision is to define the technological research university of the 21st century and educate the leaders of a technologically driven world. In a global context.

**Additional Resources:**

<http://global.gatech.edu/>

**1.1.9 Office of Conflict of Interest Management****1.2 Signature Authority**

The Board of Regents for the State of Georgia delegates signature authority to the President of the Institute who then delegates in writing that authority to other individuals and offices.

Signature authorities for GTRC and GTARC are delegated by their respective boards of trustees.

Only individuals with specific delegations of authority may sign any documents for Georgia Tech, GTRC, or GTARC in any matter related to research. Consult the Office of Sponsored Programs (OSP), Industry Engagement (IE), the Office of Research Integrity Assurance (ORIA), or the Office of Legal Affairs for information or to obtain signatures on proposals, agreements, or other documents.

See also [Policy 2.4](#)

**Additional Resources:**

[Office of Sponsored Programs](#)

[Industry Engagement](#)

[Office of Research Integrity Assurance](#)

[Office of Legal Affairs](#)

**2.0 Pre-award Project Management and Proposal Development****2.1 Principal Investigator Policy**

**Policy No:** RESEARCH 2.1

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Oct 2014

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** [Trudy.Riley@osp.gatech.edu](mailto:Trudy.Riley@osp.gatech.edu)

**Policy Statement:**

It is the policy of the Institute that the Project Director or Principal Investigator must hold a title of Academic Faculty or Research Faculty. Members of the Academic Faculty or Research Faculty who are retired but working on an hourly-as-needed basis may serve as PD/PI provided there is at least one School/Laboratory/Department willing to provide the necessary administrative commitment to permit the program to be carried out.

Externally funded sponsored projects at Georgia Tech are under the scholarly and administrative control of a member of the faculty, the Project Director or Principal Investigator (PD/PI or Co-PDs/Pis), who is responsible for the overall design, conduct and reporting of the research or other activity.

When a sponsor recognizes Co-principal Investigators, one of them must be designated as the “Corresponding Principal Investigator” who shall be the individual who assumes institutional responsibility for the overall project and with whom the Office of Sponsored Programs will communicate for administrative matters.

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Definitions:**

PD/PI Project Director/Principal Investigator, individual responsible for the overall design, conduct and reporting of the research or other externally funded sponsored activity.

**Related Information:**

[Unofficial Proposals](#)

[Professional Education](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-30-2013    | OSP    | Rev 1.0     |

**2.1.1 PI/PD Eligibility**

**Policy No:** RESEARCH 2.1.1

**Type of Policy:** Administrative

**Effective Date:** Sep 2013

**Last Revised:** Sep 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

When Georgia Tech accepts a grant or contract from an external sponsor, the Institute assumes responsibility for the proper performance of the stated project, for the fiscal management of the funds received, and for accountability to the sponsor. The PD/PI is responsible for determining the intellectual direction of the research and scholarship, and for the training of graduate students. In addition, the PD/PI is responsible for the design, conduct, and reporting – both scientific or technical and fiscal – of the research.

Therefore, it is the policy of the Institute that the Project Director or Principal Investigator must be a current member of the General Faculty of the Institute. Members of the general faculty who are retired but working on an hourly-as-needed basis may serve as PD/PI provided there is at least one School/Laboratory/Department willing to provide the necessary administrative commitment to permit the program to be carried out. At the recommendation of the appropriate School Chair/Department Head, a Post-doc employee may be designated as a Co-PD/Co-PI.

There are other requirements for the title of Principal Investigator on studies reviewed by the Institutional Review Board, the Institutional Animal Care and Use Committee, and the Institutional Biosafety Committee. Click here to access the Office of Research Integrity Assurance website: <http://researchintegrity.gatech.edu/>

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Definitions:**

PD/PI

**Responsibilities:**

The PD/PI is responsible for the design, conduct, and report – both scientific or technical and fiscal – of the research. In addition they are responsible for any additional regulatory and review requirements.

**Enforcement:**

Description of potential repercussions for those within policy scope who are found in violation of the policy. As much as possible, there should be a prescribed set of consequences for the various *types* and *frequencies* of noncompliance that may occur.

*Optional:* To report suspected instances of noncompliance with this policy, please visit Georgia Tech's *EthicsPoint*, a secure and confidential reporting system, at:

[https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Related Information:**

[Office of Research Integrity Assurance](#)

[Institutional Review Board](#)

[Institutional Animal Care and Use Committee](#)

[Institutional Biosafety Committee](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-30-2013    | OSP    | Rev 1.0     |

**2.1.2 PI/PD Responsibilities**

**Policy No:** RESEARCH 2.1.2

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** [Duane.Hutchison@osp.gatech.edu](mailto:Duane.Hutchison@osp.gatech.edu)

**Policy Statement:**

The Principal Investigator (PI) is ultimately responsible for both the technical goals of a research project and the fiscal management of such project, in accordance with sponsor and Institute regulations. Such fiscal management responsibilities include, but are not limited to:

- Preparation and submission of proposal budgets, including consideration of allowability of costs, cost sharing, commitment of effort and estimating methods
- Authorizing only those expenses that are reasonable and necessary to accomplish the project goals and that are consistent with the sponsor's terms and conditions
- Seeking sponsor approval (in conjunction with the Office of Sponsored Programs), if necessary, for any significant change(s) in financial plans, rebudgeting or carryforward of funds
- Spending no more than the amount authorized by the sponsor for the project period
- Charging project costs directly to the project account
- Monitoring and reviewing expenditures in a timely fashion to assure their appropriateness and correctness
- If subrecipients are involved, [reviewing the invoices of the subrecipient to ensure that expenditures are in line](#)

[with performance](#)

- Documenting cost-share commitments
- Identifying and accounting for any program income that accrues to the project
- Ensuring that those to whom authority for expenditure approval is being delegated (for example, on Personnel Service Forms (PSF's), requisitions, purchase orders, travel expense statements and check requests) be documented by the Principal Investigator in writing on the Sign-Off Form for the individual project or by documenting the department's award file
- Overseeing proper financial closeout of sponsored accounts, including approval and certification of the draft financial status report prepared by Grants and Contracts Accounting

*It is important to emphasize that, while Principal Investigators can delegate their authority, they are still ultimately responsible for the transactions.*

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Definitions:**

PD/PI

**Enforcement:**

*Optional:* To report suspected instances of noncompliance with this policy, please visit Georgia Tech's *EthicsPoint*, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Related Information:** [Sub-recipient Monitoring](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-30-2013    | OSP    | Rev 1.0     |

**2.1.3 Transitional PI/PD**

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

Non-employees are not generally eligible to serve as a PD/PI on sponsored projects. Requests for exceptions for a non-employee to serve as PD/PI on a specific project for a limited time may be directed to the Executive Vice President for Research. A without-compensation appointment such as a Visiting Scholar Agreement and associated agreements regarding intellectual property, liability insurance, and compliance with institute policies and procedure and related matters will be required. **This exception is generally appropriate for newly hired faculty in transition from another institution and enables research to continue with minimal interruption.**

**Scope:**

This policy applies to all Georgia Tech faculty, staff, and visitors.

**Definitions:**

PD/PI

**Policy History:** Revision Date  
12-30-2013Author  
OSPDescription  
Rev 1.0**2.1.4 Absence of PI/PD****Policy No:** RESEARCH 2.1.4**Type of Policy:** Administrative**Effective Date:** Mar 2013**Last Revised:** Mar 2013**Policy Owner:** Sponsored Programs, Office of**Contact Name:** Duane Hutchison**Contact Title:** Director of Sponsored Programs**Contact Email:** Duane.Hutchison@osp.gatech.edu**Policy Statement:**

It is the policy of Georgia Tech that the PI/PD must be a currently active faculty member and that a substitute PI/PD be named in the event that a PI/PD is absent from regular duty, including leaves of absence, for 90 days or more.

Schools, Labs and Departments must notify OSP when PD/Pis arrange to terminate their employment, take a leave of absence, or are absent for medical or family leave.

**Scope:**

This policy applies to all Georgia Tech faculty, staff.

**Definitions:**

PD/PI

**Procedures:**

Change of PD/PI

Initiating a Change

To initiate a change, the PD/PI or, if unavailable, the School or Lab should inform OSP of the request for a change in the PD/PI on a project. The PD/PI's School or Lab must concur in the recommendation of a new PD/PI. OSP will submit the request to the sponsor, if required, and will update the contract file after approval has been obtained. The curriculum vitae of the replacement PD/PI should accompany the request. In the event a sponsor objects to the nominated replacement, OSP will contact the requesting campus department.

Federal Sponsoring Agencies

Federal sponsoring agencies require, at a minimum, advance notification if the PD/PI is absent or relinquishes

## Change of PD/PI

active direction of a project for a period of three continuous months or longer, plans a significant change in effort, or plans to transfer to another institution. Repeated absences of less than 90 continuous days during a year represent a significant change in effort. The awarding agency must approve a replacement PD/PI who is requested by the awardee institution; departing PD/PIs often suggest or recommend such replacements. Agencies reserve the right to terminate a grant if approval for a leave of absence has not been sought or if the replacement PD/PI is not acceptable.

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |

**2.1.5 Change of PI/PD****Policy No:** RESEARCH 2.1.5**Type of Policy:** Administrative**Effective Date:** Mar 2013**Last Revised:** Mar 2013**Policy Owner:** Sponsored Programs, Office of**Contact Name:** Duane Hutchison**Contact Title:** Director of Sponsored Programs**Contact Email:** Duane.Hutchison@osp.gatech.edu**Policy Statement:**

It is the policy of Georgia Tech that the PI/PD must be a currently active faculty member and that a substitute PI/PD be named in the event that a PI/PD is absent from regular duty, including leaves of absence, for 90 days or more. Schools, Labs and Departments must notify OSP when PD/PIs arrange to terminate their employment, take a leave of absence, or are absent for medical or family leave.

**Scope:**

This policy applies to all Georgia Tech faculty, staff.

**Definitions:**

PD/PI

**Procedures:**

Change of PD/PI

Initiating a Change

To initiate a change, the PD/PI or, if unavailable, the School or Lab should inform OSP of the request for a change in the PD/PI on a project. The PD/PI's School or Lab must concur in the recommendation of a new PD/PI. OSP will submit the request to the sponsor, if required, and

## Change of PD/PI

will update the contract file after approval has been obtained. The curriculum vitae of the replacement PD/PI should accompany the request. In the event a sponsor objects to the nominated replacement, OSP will contact the requesting campus department.

## Federal Sponsoring Agencies

Federal sponsoring agencies require, at a minimum, advance notification if the PD/PI is absent or relinquishes active direction of a project for a period of three continuous months or longer, plans a significant change in effort, or plans to transfer to another institution. Repeated absences of less than 90 continuous days during a year represent a significant change in effort. The awarding agency must approve a replacement PD/PI who is requested by the awardee institution; departing PD/PIs often suggest or recommend such replacements. Agencies reserve the right to terminate a grant if approval for a leave of absence has not been sought or if the replacement PD/PI is not acceptable.

### Policy History:

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |

### 2.1.6 Minimum Effort

**Policy No:** RESEARCH 2.1.6

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

#### Policy Statement:

Georgia Tech policy is that a Principal Investigator (PI) or other senior researcher must devote at least 1% effort – or a level of effort as required by sponsor – on an ongoing basis over the term of a sponsored project award. After the award is granted and accepted, the PI and key personnel are committed to provide that proposed level of effort over the budget period unless the sponsor permits otherwise. The committed effort, whether mandatory or voluntary, will be separately budgeted and accounted for by way of either the sponsored project or a companion cost sharing account.

### What does ongoing basis mean?

Ongoing basis means per budget year over the life of the project.

### Why do I need to put at least 1% effort on my projects?

The federal government expects a commitment of some effort on the part of the principal investigator for conducting

work, over-seeing students, preparing deliverables, etc. during each project year. This effort may be expended during the academic year or summer and may be charged to the project or paid by the Institute and treated as cost sharing.

**Can another investigator on the project satisfy this requirement?**

Any senior researcher on the project can satisfy the requirement for the entire project.

**Are there any exceptions?**

This requirement does NOT extend to:

- equipment grants
- dissertation support
- limited-purpose awards, such as travel grants, conference support, etc.

**How are Calendar, Academic, and Summer months treated?**

Cost shared effort is calculated the same as sponsor paid effort, so it is very important to use the calculation that pertains to your faculty appointment.

For faculty on academic year contracts, months are expressed as either academic or summer months. The academic year is defined as a nine month period. Summer is defined as a three month period. The monthly rate for AY faculty is their salary divided by 9. One month =  $1/9 = 11.11\%$ . (This also explains why faculty can earn up to 33.33% of their AY salary in summer.) To express 1% in academic or summer months, divide 1% by 11.11%, which equals 0.09 academic or summer months.

For faculty on fiscal year contracts, months are expressed as calendar months, never academic or summer. The calendar year is a 12-month period. The monthly rate for 12-month faculty is their salary divided by 12. One month =  $1/12 = 8.33\%$ . To express 1% of a 12-month contract in calendar months, divide 1% by 8.33%, which equals 0.12 calendar months.

**Are there any special considerations I need to know for NSF?**

Unless stated otherwise in the solicitation, cost sharing (match, in-kind, institutional commitment, etc.) is unallowable.

**Are there any special considerations I need to know for NIH?**

The National Institutes of Health (NIH) Grants Policy Statement notes that “‘zero percent’ effort or ‘as needed effort’ is not an acceptable level of involvement for Key Personnel. Those that may contribute to the scientific development or execution of the project, but are not committing any specified measurable effort to the project, should be described as Other Significant Contributors (OSC) rather than as a co-investigator.

**If cost shared, how is this tracked?**

If the PI chooses to cost share the 1% minimum effort instead of charging it to the sponsored project, a formal companion cost share account must be established. Voluntary cost sharing of this nature will not be reflected on the invoices or financial reports submitted to our sponsor.

**Is the cost share reflected on the effort report?**

Companion cost share accounts are established in the official Institute records and are reflected on the employee's Workload Assignment Report E-mailed each month from the Salary Planning & Distribution Office in Grants and Contracts Accounting.

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Definitions:**

PD/PI

**Procedures:**

Reporting Minimum Effort  
Committed Effort Budgeting

The committed effort, whether mandatory or voluntary, will be separately budgeted and accounted for by way of either the sponsored project or a companion cost sharing account. See information on the [Plan Confirmation System](#). PD/PIs should watch the [Minimum Effort Training Video](#), for more information on minimum effort requirements

Minimum Effort Training Video

**Enforcement:**

*Optional:* To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Related Information:**

[Plan Confirmation System](#)  
[Minimum Effort Training Video](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |

**2.1.7 Maximum Effort**

**Policy No:** RESEARCH 2.1.7

**Type of Policy:** Administrative

**Effective Date:** Nov 2014

**Last Revised:** Nov 2014

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech that sponsored effort is accounted for on a consistent and reasonable manner. The PD/PI and key personnel may have other responsibilities that prevent them from devoting 100% of their time to sponsored program activities. Those activities which are deemed unallowable through sponsored programs under the

Uniform Administrative Requirements (2 CFR 200), therefore, cannot be paid from sponsored program accounts or included in Georgia Tech's effort reporting system ([Plan Confirmation System](#) – Salary Planning and Distribution). Sponsored activities must be reviewed regularly to ensure that adjustments are made consistently with sponsored terms and conditions.

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Definitions:**

PD/PI

**Enforcement:**

*Optional:* To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Related Information:** [Plan Confirmation System](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |
| 11-20-2014    | OSP    | Rev 2.0     |

**2.2 Funding Mechanisms**

**Policy No:** RESEARCH 2.2

**Type of Policy:** Administrative

**Effective Date:** Aug 2013

**Last Revised:** Aug 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** [Trudy.Riley@osp.gatech.edu](mailto:Trudy.Riley@osp.gatech.edu)

**Policy Statement:**

It is the policy of Georgia Tech that funding for research and other sponsored activities be awarded to the legal entity designated by the Institute as follows:

**GTRC/GTARC**

- Grants, contracts, and cooperative agreements with U.S. government agencies, state and local governments, and municipalities
- Grants and contracts with foreign governments
- Industry contracts
- Grants with restrictions, intellectual property provisions or deliverables

**Georgia Tech Foundation (GTF)**

- Philanthropic gifts, donations, bequests, endowments
- Unrestricted grants from industry or Foundations

## Georgia Tech (GT)

- IPAs
- Fellowships and scholarships

### Scope:

This policy applies to all Georgia Tech faculty and staff members.

### Related Information:

[GTRC](#)

[GTARC](#)

[GTF](#)

[Georgia Tech](#)

### Policy History:

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |

## 2.2.1 Policy on Distinguishing Gift vs. Sponsored Agreements in External Funding

**Policy No:** RESEARCH 2.2.1

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

### Policy Statement:

It is the policy of Georgia Institute of Technology to manage all funds received in accordance with applicable federal, state and local laws and with the specific terms and conditions of any gift, grant and contract. The Institute's approval, negotiation and agreement processes and mechanisms, accounting, budget practices, and oversight differ depending on whether the funds are categorized as a gift or as a sponsored award.

### Scope:

This policy applies to all Georgia Tech faculty and staff members.

### Procedures:

The terms gifts and sponsored agreements (grants, contracts or cooperative agreements) are often used interchangeably, however it is important that categorization of external funding received be undertaken with care and concern with the considerations listed below.

#### 5.1 Sponsored Agreements

Sponsored projects are established when funds are awarded to the Institute by external sources in support of research, instruction, training, or services under an agreement that includes any one of the following:

- a set of terms and conditions that binds the Institute and requires endorsement.
- an obligation by the investigator to a line of scholarly or scientific inquiry that typically follows a plan, provides for orderly testing or evaluation, or seeks to meet stated performance goals.
- an understanding of how funds will be used (typically includes a detailed budget that identifies expenses by activity, function, or project period).
- a requirement for fiscal accountability as evidenced

## 5.1 Sponsored Agreements

by the submission of financial reports to the sponsor, an audit provision, or the return of unexpended funds at the conclusion of the project (if the contract type is cost reimbursement).

- an obligation to report project results
- disposition of tangible or intangible property resulting from the project. Examples of tangible property include equipment, records, technical reports, theses or dissertations. Intangible property includes rights in data, copyrights or inventions.
- an imposition of legal or financial considerations such as indemnification or warranties

## 5.2 Gifts (via Development Office – Foundation Relations)

A gift is an unconditional, voluntary, non-reciprocal transfer of assets (including unconditional promises) from a private entity to a not-for-profit organization. The donor may have certain expectations but there cannot be any actual control over expenditure of funds or any quid pro quo. The donor may not benefit from the execution of the gift. Gift accounts are established when funds are received from outside sources that are for unrestricted use and are free of the constraints or obligations of sponsored projects as described above. Acceptance of a gift usually precludes any accounting and reporting by the Institute.

### Terms:

- In no instance should federal flow-through be considered a “gift.”
- A gift does not change any research compliance obligations (protocol submissions) the PD/PI has in terms of their research. [See Section 3. for details]

If you have any questions regarding the above terms, please contact the Office of Sponsored Programs at 404.894.6937 or the Office of Foundation Relations at 404.894.2481.

### Related Information:

[OSP](#)

[GTF](#)

### Policy History:

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |

## 2.2.2 Policy on Limited Submissions (Restricted Program)

**Policy No:** RESEARCH 2.2.2

**Type of Policy:** Administrative

**Effective Date:** Aug 2013

**Last Revised:** Aug 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

### Policy Statement:

It is the policy of Georgia Tech that it is the principal investigator's responsibility to review the solicitation they are applying for and notify the EVPR & OSP if s/he intends to make an application to a limited submission opportunity. A Limited Submission is a program in which a sponsor restricts the number of proposals the Institute may submit in

response to an announcement. An internal screening process has been set up to select the candidate(s) who may submit a proposal to the sponsor which is administered by the Office of the Executive Vice President for Research. Principal Investigators/Directors must coordinate with the appropriate Contracting Officer in Sponsored Programs.

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Definitions:**

EVPR

**Related Information:**[EVPR](#)[EVPR – Limited Submissions](#)**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |

**2.2.3 Teaming Agreements****Policy No:** RESEARCH 2.2.3**Type of Policy:** Administrative**Effective Date:** Jun 2013**Last Revised:** Jun 2013**Policy Statement:**

It is the policy of Georgia Tech that when faculty and staff are establishing a working relationship with another company or organization for the preparation of a specific proposal to a potential sponsor of research a Teaming Agreement is utilized. The Teaming Agreement delineates the responsibility of each party in preparing the proposal. Furthermore, the Teaming Agreement establishes the intent of the parties to share the work required under the resulting contract, should the team be successful. Upon award of the contract, contract terms and conditions take effect and the Teaming Agreement expires. Teaming Agreements are exclusive or non-exclusive. In an exclusive Teaming Agreement, Georgia Tech (usually including the Institute, GTRC, and GTARC) can only submit a proposal with the designated prime contractor in response to the solicitation. Georgia Tech restricts its acceptance of exclusive Teaming Agreements and will not accept a campus-wide exclusivity provision and limits the exclusivity provision to a single unit or Project Director/Principal Investigator (PD/PI). Georgia Tech prefers non-exclusive teaming arrangement to maximize opportunities for Georgia Tech researchers in different parts of the Institute to team with additional parties or to submit a proposal independently in response to a Request for Proposal.

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Procedures:**

To establish a Teaming Agreement, the PD/PI must complete and sign a **Teaming Agreement Routing and Analysis Form** and submit the form to OSP to negotiate the terms of the Agreement.

**Form Links:**

[Teaming Agreement Request \(pdf\)](#)

[Teaming Agreement Request \(Word\)](#)

**Related Information:** [OSP](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 1-2-2014      | OSP    | Rev 1.0     |

**2.2.4 Interagency Personnel Act (IPA) Agreements**

**Policy No:** RESEARCH 2.2.4

**Type of Policy:** Administrative

**Effective Date:** Sep 2013

**Last Revised:** Sep 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech to utilize an Interagency Personnel Act (IPA) agreement to facilitate Federal-State-Local cooperation through the temporary assignment of Georgia Tech academic and research faculty to governmental agencies to provide skills that meet a national need, to engage in policy advice and formation in the area of the faculty member's scholarship, or gain new research insights or perspectives. Georgia Tech encourages faculty to consider IPA service when such service is consistent with the mission of the Institute.

**Appropriate Use:** An IPA permits the temporary assignment of skilled career employees to positions with Federal Agencies, State, local governments, Indian tribes, institutes of higher learning and other eligible organizations as defined in 5 CFR 334. The assignment must be for specific work beneficial to both entities. The assignment should be used to achieve one of the following objectives:

1. For the strengthening of management capabilities of the Federal Agency and Georgia Institute of Technology.
2. Assisting with the transfer and use of new technology and approaches to solving governmental problems.
3. Serving as a means of involving non-federal officials in developing and implementing Federal programs.
4. Providing developmental experience to enhance job performance of the IPA Assignees.

Career employees may participate on an IPA provided that they have been employed in a regular career position at Georgia Tech for a minimum of 90 days prior to beginning an IPA assignment and their assignment meets one of the objectives stated above. The Georgia Tech Assignee may not be employed by Georgia Tech for the sole purpose of becoming an eligible participant of the IPA program. Employees hired for a 90 day research contract for a particular federal government agency, to be sent on an IPA assignment to that federal government agency are not career employees for the purposes of this policy. The Provost may waive the provisions of this paragraph as a policy exception as provided below.

During the period of an IPA assignment a Georgia Tech Assignee will remain a regular employee of Georgia Tech, and will remain bound by Georgia Tech policies and procedures and the terms of the employment agreement for all purposes including but not limited to, salary increases, benefits and the assignment of Intellectual Property to GTRC.

An assignment may be for a period of 2 years. The assignment may be extended for up to another 2 years with the approval of all parties. Extensions beyond a 4 year period require additional justification and written approval. In no event shall a Georgia Tech Employee remain on a continuous IPA Assignment for more than 6 years.

An IPA assignment may be terminated upon request of either party upon 30 days advance notice or automatically when the employer/employee relationship ceases to exist between the IPA assignee and his/her original employer as provided in 5 CFR 334.107. At the end of the IPA assignment, the IPA Assignee should return to the career position such employee held at Georgia Tech prior to the IPA.

Employees on IPA assignment are subject to the Ethics in Government Act of 1978, 5 CFR Chapter 735 which regulates employee responsibilities and conduct as well as any agency standards of conduct.

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Procedures:**

After a Georgia Tech Department Head determines that it is appropriate to place an employee on an IPA, the Department Head will provide the Office of Human Resources (OHR) and the Office of Sponsored Programs (OSP) with all information regarding the terms of the assignment, such information includes a routing sheet, proposal, copy of the IPA Agreement and budget information.

The IPA Agreement will be negotiated and processed by OSP. Any terms in the Agreement relating to personnel administration should be reviewed and approved by OHR in advance of action being taken. The Agreement should describe responsibilities and obligations of all parties.

The Agreement shall be signed on behalf of Georgia Tech, The Federal Agency and the IPA Participant.

Federal Appropriations are available to pay or reimburse, a federal, state or local government employee in accordance with the provisions of the IPA Act. An IPA Proposal or Agreement containing any cost recovery not specifically authorized by the IPA Act or IPA Regulations will not be processed without the prior written approval of Legal Counsel for the Federal Agency receiving the IPA assignee. The Georgia Tech Office of Legal Affairs will obtain the necessary written approval from the Federal Agency's legal counsel.

Any exceptions to this Policy or Procedure must be approved by the Provost in advance writing.

**Applicable Rules and Regulations:**

- 5 CFR Part 5, Chapter 334, federal regulations implementing the Intergovernmental Personnel Act Mobility Program.
- 5 USC Sections 3371-3375 – Legal Authority for assignments under the IPA 18 USC Sections 203, 205, 208, 602, 603, 606, 643, 654 and 1905, Standard of Conduct and Conflict of Interest Provisions.
- The provisions of the [U.S. Office of Personnel Management Intergovernmental Personnel Act Mobility Program](#).

**Related Information:**

[OSP](#)

[U.S. Office of Personnel Management Intergovernmental Personnel Act Mobility Program](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 1-2-2014      | OSP    | Rev 1.0     |
| ?             |        |             |

## 2.3 Budget Development

It is the policy of Georgia Tech that the project budget provides a sponsor and the Institute with a complete financial picture of the proposed project and follow Cost Accounting Standards (CAS). Budgets are reviewed by the sponsor to verify if the costs are allowable, reasonable and necessary to carry out the proposed project, and if it conforms to the sponsor's instructions and/or format. The cost elements of a budget must be those necessary to accomplish the proposed activity. Cost estimates of individual line items should be carefully calculated so that the requested funds are adequate, but not excessive. [Click here](#) for more information.

### 2.3.1 Tools

## Budget Example & Wizard

We have developed a [wizard](#) to assist you with preparing your budget. This wizard will also route your proposal, additionally your CO can assist you with the budget if you provide them access to the budget. [Agency \(Form\) Budget](#) (the budget example is a .pdf file and includes information on how to calculate F&A

## Agency Specific Guidelines

[Guidelines for Department of Defense Cost Proposals](#)

## Service Center Rates

View [Service Center Rates](#) (pdf)

### 2.3.2 Tuition Policy

**Policy No:** RESEARCH 2.3.2

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Apr 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** [Trudy.Riley@osp.gatech.edu](mailto:Trudy.Riley@osp.gatech.edu)

**Policy Statement:**

Revised November 2007, Georgia Tech developed and implemented a plan in 1996 named the Graduate Student Tuition Remission Plan (GSTRP). This plan was reviewed and approved by the Office of Naval Research (ONR). Since that time annual rate studies have been provided to ONR that are audited by the Defense Contract Audit Agency (DCAA) to produce approved rates for each fiscal year. The key features of this program are:

1. The Tuition Remission Award is managed through our graduate coordinators in each academic department. Upon approval of the appointment as a Graduate Research Assistant or Graduate Teaching Assistant (GRA/GTA) the home department of the student will enter a waiver code into the student system and then a credit is processed to the student's account for the fee reduction for the academic term (set on an annual basis). All GRA/GTA appointments are processed in this manner. The fee reduction is charged against one of

two ledger accounts based on whether the reduction is for in-state or out-of-state tuition.

2. Part of the requirement for the appointment as a GRA/GTA includes the appointment to provide services to GIT at 33% to 50% time, registered for at least 12 credit hours of which 9 are letter grade/pass/fail. GRA/GTA's must be hired in the appropriate job code for a GRA/GTA in Human Resources. These appointments are made by the academic departments and the charges will be made against appropriate benefiting activity.
3. On a monthly basis, the Salary Planning and Distribution (SPD) System identifies the GRA/GTA payroll charges to sponsored projects and charges the sponsored project the approved monthly rate. If the student provides services to multiple projects, the charge is prorated. The charge to the sponsored project is offset by a credit to a Revenue Account- Sponsored Funded Fees.
4. Waivers of GSTRP charges to sponsored projects are considered by the Office of the Provost when required. Any such request should identify the unique features of the sponsored project that might warrant this special accounting treatment.

### Tuition Remission Escalation Factor

Based on the proposed Fiscal Year (FY) 2013 Graduate Student Tuition Remission Program (GSTRP) rate proposal, please continue to use the 8% tuition remission escalation factor for fiscal years beyond FY2013.

#### Scope:

This policy applies to all schools and Graduate Research and Teaching Assistants.

#### Definitions:

GRA/GTA

#### Related Information:

[Current and prior year approved GSTRP rates may be accessed from the Grants and Contracts Accounting web site](#)  
[xpanded graduate student policies, eligibility/appointment information and FAQs may be accessed from the Georgia Tech Graduate Studies web site:](#)

#### Policy History:

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |

### 2.3.3 Allowable Direct Costs

**Policy No:** RESEARCH 2.3.3

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Oct 2014

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

#### Reason for Policy:

All costs charged to any sponsored projects must meet the standards established in the Uniform Administrative Requirements (2 CFR 200) and must meet the following criteria to be allowed:

- *Reasonableness* - at the time the costs was incurred, a prudent person would have made a similar decision (in

relationship to the goods or services purchased and the amount paid).

- *Allocable to sponsored agreements* - the goods or services are chargeable to sponsored research projects (either directly or indirectly) in relationship to the benefits received (an equitable allocation process).
- *Consistent treatment* - the cost is consistently treated as either a direct cost or an F&A cost by all university departments.

### Policy Statement:

Direct costs are those that can be specifically identified with a single sponsored project. These costs usually include salaries/wages, fringe benefits, contracted services, supplies, equipment, travel, communication\*, tuition remission and participant support costs. In most instances the direct costs should be reflected by major budget categories with an attached narrative detailing how the costs were calculated. The budget narrative should contain enough detail for the sponsor to verify the appropriateness of the costs. (\*see definition of communication costs listed below.)

1. *Salaries and Wages* – The budget detail should include the title, name and percentage of time/number of months summer or academic for each person listed on the budget. If a specific technician, graduate student or other student worker has not been identified at the time of budget preparation the salary amount for those categories should be consistent with those normally paid by the department or if you are unsure of the rate then use the [Institute average](#) category.

ESTIMATING YOUR BUDGET: Salary compensation should be based on the percent of time the employee will spend on the project.

Example: (monthly salary rate) x (\_\_\_% of effort) x (no. of months).

If the project is multi-year, most people include at least a 3% annual increase effective July 1 of every year. Salaries posted to a sponsored program will be based upon actual salaries not projected salaries. All budgets have their limitations! If you budget for a graduate student and end up hiring a post doc instead; keep in mind that there are additional fringe benefits that you MUST pay out of the budget for a post doc!

2. *Fringe Benefits* ([Current Rates](#)) – Ineligibility for Fringes: Undergraduate Students\* and Graduate Students.\* Fringe Benefits are calculated according to the Rate Agreement for the Georgia Tech Research Corp. negotiated with our cognizant federal agency, the Office of Naval Research and include FICA, unemployment and workman's compensation, retirement and group health insurance. [*\*Note: Salaries and wages of employees who participate in all or part of the social security program but do not participate in retirement or group health and life insurance plans. This rate covers (i) temporary classified persons, (ii) temporary academic or research professionals not eligible for the retirement programs or group health or life insurance coverage, (iii) student employees who are registered for less than a full academic load and (iv) part-time employees employed for less than 50 percent of a full work schedule.*]
3. *Equipment* – Only items costing \$5,000 or more with a useful life of two years or more should be listed here. Cost estimates should include any installation, tax and shipping costs associated. The need for the equipment should be adequately justified on the budget explanation page. General purpose equipment, such as computer equipment, is not eligible for support unless primarily or exclusively used in the actual conduct of scientific research. [*Note: Restriction on General Purpose Office Equipment - The Office of Management and Budget does not allow purchase of general purpose office equipment. According to OMB Circular A-21, "General purpose equipment" means equipment, the use of which is not limited only to research, medical, scientific or other technical activities. Examples of general purpose equipment include office equipment and furnishings (chairs, file cabinets, etc.), air conditioning equipment, reproduction and printing equipment, motor vehicles, and automatic data processing equipment.* These are only allowable if they have been specifically identified and approved by the sponsoring agency in advance of purchase.]
4. *Travel* – Proposed travel should include number of trips planned, number of persons for each trip, conference name, location, purpose and cost. The purpose of the travel should be adequately justified on the budget explanation page. Many federal agencies require utilization of U.S. Flag Carriers on international flights. Be sure to check your guidelines for details. URL for Federal Per Diem Rates: <http://www.state.gov>

5. *Participant/Trainee Support Costs* – Typically used on federal awards for the costs of the travel, meals and lodging of project participants (not GaTech employees); i.e., the trainees at a science education conference or a stipend for participants who complete project survey. Facilities and administration costs are not charged on participant support costs on federal awards.
6. *Other Direct Costs* – Other Direct Costs include materials and supplies, publication costs, consultant services, long distance telephone/fax and subcontracts. All direct costs should be itemized. The following list explains the most commonly requested ‘other direct costs.’
  1. *Materials And Supplies* – Indicate in general terms the type of expendable materials and supplies required along with their estimated costs. The breakdown should be more detailed when the cost is substantial. General purpose office supplies are not to be included in this category as they are covered by indirect costs. i.e., local phone calls!
  2. *Publication Costs* – Funds may be requested for the costs of preparing, publishing, or otherwise making available the findings and products of the work conducted under the research project, including costs of reports, reprints, or page charges.
  3. *Consultant Services* – Anticipated consultant services should be justified and information furnished on each individuals’ expertise, primary organizational affiliation, daily compensation rate, and number of days of expected services. We recommend that a letter be included in the proposal from the consultant stating their willingness to participate, as well as their actual daily rate with proper documentation. Some federal agencies will limit the maximum daily compensation rate paid to off-campus consultant services – check with your Contracting Officer to verify limitations.
  4. *Subawards* – Subawards should be disclosed in the technical section of the proposal to show a clear delineation of the work to be performed by each organization. The total amount for proposed subawards should appear under “Other Direct Costs” in the master budget for the project. Each “sub” should follow the following guidelines:

F&A is charged on the first \$25,000 of each subaward.

Formal proposal signed by authorized representative with a statement of work and budget are required to be submitted to the Contracting Officer. See Interdivisional Transfer for information on issuing subprojects between Georgia Tech Departmental Units & GTRI.
7. *Cost Sharing* – If cost sharing is to be included in a proposal then the sources of cost sharing and matching must be identified at the proposal stage with appropriate forms identifying such. Only mandatory cost sharing is tracked by OSP and G&C accounting.
8. *Tuition* ([Link to F&A Rates](#)) – Tuition for graduate students is normally included in the budget.
9. *Communication* – This includes telephone communication, postage, FedEx, advertising and associated costs that are non-routine and pose an extraordinary need (i.e., a phone bank for a project that includes a survey administered via the telephone.)
10. *Repairs and Maintenance* – This includes costs of maintaining property, i.e., maintenance contracts for office equipment and repairs of that equipment.
11. *Interdivisional Transfers* – Interdivisional Transfer is utilized when subprojects are established between Georgia Tech and GTRI. The subproject recipient details their portion of work and the cost associated with it (both direct and indirect). The cost is then loaded into an “other” category and added to the total budget. Because it is an internal transfer, these costs would not be included in the F&A cost calculation.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Definition:****Direct Costs**

**Related Information:**[Equipment on Sponsored Projects](#)[Grants & Contracts Accounting – Allowable Expenses](#)**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |
| 11-20-2014    | OSP    | Rev 2.0     |

**2.3.4 Unallowable Costs****Type of Policy:** Administrative**Effective Date:** Nov 2013**Last Revised:** Oct 2014**Policy Owner:** Sponsored Programs, Office of**Contact Name:** Trudy M. Riley**Contact Title:** Executive Director of Sponsored Programs**Contact Email:** Trudy.Riley@osp.gatech.edu**Policy Statement:**

Unallowable Costs may not be charged as direct costs on sponsored projects including cost share accounts or as indirect costs. Certain costs incurred by higher education institutions cannot be charged to federally sponsored research projects, either as a direct or F&A cost. These costs are referred to as unallowable costs. The Uniform Administrative Requirements (2 CFR 200), Subpart E - Cost Principles, provides guidance for determining basic considerations such as allowability of costs. The following specific items cannot be included in the F&A rate calculation or charged as direct costs to federal research:

- Advertising (displays, exhibits),
- Alcoholic Beverages,
- Alumni Activities,
- Bad Debts (noncollectable invoices),
- Commencement costs, Donations and Contributions,
- Entertainment Expenses,
- Fund Raising,
- Fines and Penalties,
- Goods and Services for Personal Use,
- Housing and Personal Living Expenses,
- Memberships in Social Organizations,
- Lobbying, Selling/Marketing of Goods and Services

Federal agencies awarding projects to institutions may apply further restrictions on the allowability of certain costs.

**Other Unallowable Costs***Trafficking in Persons*

In compliance with the International Trafficking in Persons Act, no sponsor funds may be used to engage in or support trafficking in persons, procurement of sexual acts, or forced labor.

*Lobbying*

No sponsor funds may be used to effect any oral, written or electronic communications to a covered Legislative or Executive Branch Official in an attempt to influence the formulation, modification, or adoption of Federal legislation; the administration or execution of a Federal program or policy; formulation, modification, or adoption of a Federal rule,

regulation, Executive order, policy or position of the United States Government; or the nomination or confirmation of a person subject to confirmation by the Senate.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Enforcement:**

To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |
| 11-20-2014    | OSP    | Rev 2.0     |

**2.3.5 Subaward Considerations**

**Policy No:** RESEARCH 2.3.5

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Apr 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** [Trudy.Riley@osp.gatech.edu](mailto:Trudy.Riley@osp.gatech.edu)

**Policy Statement:**

Subrecipients, including subcontractors and consultants, must be identified in the proposal budget to ensure that costs are calculated correctly and so that appropriate documentation can be included in the proposal. Sponsor approval is required prior to entering into a subcontract. If it is a vendor relationship, no sponsor approval is required unless specified in the award terms and conditions.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Procedures:****5.1 Specific Considerations**

What is a Subagreement?

Subrecipients, including subcontractors and consultants, must be identified in the proposal budget to ensure that costs are calculated correctly and so that appropriate documentation can be included in the proposal. Sponsor approval is required prior to entering into a subcontract. If it is a vendor relationship, no sponsor approval is required unless specified in the award terms and conditions.

Subrecipients vs. Vendors

It is not always clear when the pass-through entity should award federal funds to a subrecipient via a subcontract or subgrant, or a procurement contract to a vendor. A subrecipient is a state or local government, college, university or nonprofit organization that expends federal awards received from a pass-through entity to carry out a

## 5.1 Specific Considerations

federal program. Under a subaward, a subrecipient generally has a specific scope of work to conduct in conjunction with the proposed research. The PI with the subaward is accountable for programmatic progress as well as for following federal guidelines.

In contrast, a vendor is a dealer, distributor, merchant or other seller providing goods or services that are necessary for conducting a federal program. These goods or services may be for an organization's own use or for the use of beneficiaries of the federal program. They provide the service as part of their normal business operations. They provide similar services to many different purchasers

Under a procurement contract, a vendor provides goods or services that are auxiliary to the proposed research.

### What constitutes a Consultant?

A Consultant Agreement is issued to either a company or to an individual who is clearly a bona fide consultant (expert advisor) who pursues this line of business for him/herself. The consultant is paid for his/her time at the fixed daily (or hourly) rate of compensation specified in an agreement. Consulting effort is usually limited to the term and the pay line is usually determined by a rate per day, which includes travel, expenses, and any other overhead. Consultants set their own hours, use their own equipment and materials, choose their work methods, and are responsible for paying taxes on their earnings as consultants. They will receive Tax Form 1099 from Georgia Tech. Furthermore a consultant's effort is considered "work for hire" and therefore all intellectual property and copyrightable information produced is assigned to GTRC.

The primary difference is that a subcontract is almost invariably with another institution or with a company, and a consulting agreement is almost invariably with an individual who is not a Georgia Tech employee and has not been employed by Georgia Tech for at least 1 year.

### Subagreements under Federal Contracts (Not Grants)

In order to establish a subrecipient relationship under federal contracts, the Federal Acquisition Regulation (FAR 35.009) states that "it is important that the contractor not subcontract technical or scientific work without the contracting officer's advance knowledge." The FAR goes on to state that "during the negotiation of a cost-reimbursement R & D contract, the contracting officer shall obtain complete information concerning the contractor's plans for subcontracting any portion of the experimental, research, or development effort." Typically approval is granted when a subrecipient is included in the proposal to

## 5.1 Specific Considerations

the Government and an award is made based on that proposal. If a subrecipient relationship is not approved as part of a proposal submitted to the agency, written sponsor approval would be required before any unbudgeted subrecipient subcontract could be established.

**Related Information:** [Board of Regents Consulting Policies](#)

### Policy History:

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |

### 2.3.6 Facilities & Administrative Costs (F&A, Indirect Costs, or Overhead)

**Policy No:** RESEARCH 2.3.6

**Type of Policy:** Administrative

**Effective Date:** Oct 2014

**Last Revised:** May 2015

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** [Trudy.Riley@osp.gatech.edu](mailto:Trudy.Riley@osp.gatech.edu)

#### Policy Statement:

It is the policy of Georgia Institute of Technology to recover Facilities & Administrative costs on all of its sponsored programs. When estimating the proposal cost of a sponsored activity, the appropriate Facilities and Administrative (F&A) rate is applied. This provides a means for Georgia Tech to recover the F&A (indirect) costs which are incurred by the total sponsored activity but which cannot be directly assigned to an individual project. Georgia Tech and GTRC negotiate Facilities & Administrative Costs rates for research performed by Resident Instruction with the Office of Naval Research which is the cognizant audit agency for the institution. Rates are based on an audited cost proposal. Facilities & Administrative Costs are consistently applied to sponsored projects in accordance with the requirements of the Uniform Administrative Requirements (2 CFR 200), Subpart E.

|   |  |
|---|--|
| Types of Facilities & Administrative Rates<br>(a.k.a.: Overhead or Indirect Costs)<br>For current rates: <a href="http://www.osp.gatech.edu/rates/">www.osp.gatech.edu/rates/</a> |  |
| Research Capped (Federal Grants and Non-DoD Contracts)  | Applies to all DoD contracts awarded before November 30, 1993, all Non-DoD Instruments, and all DoD Grants.  |
| Research Uncapped (DoD Contracts & Industry Subcontracts under DoD)   | Applies only to DoD contracts awarded on or after November 30, 1993 in accordance with and under the authority of DFARS 231.303(1)   |
| Industrial (Non-Federal, International, and Non-Georgia State and Local Government Entities)  | Applies to projects funded by for-profit entities and others that are not U.S. entities described in the General Exception.  |
| Other Sponsored   | Applies to projects that benefit the public with activities other than research & development and instruction. Used for projects funded by the State and Local Government Entities in Georgia. |
| Instruction   | Applies to projects that primarily involve the delivery of   |

## Types of Facilities &amp; Administrative Rates

(a.k.a.: Overhead or Indirect Costs)

For current rates: [www.osp.gatech.edu/rates/](http://www.osp.gatech.edu/rates/)

educational programs; teaching.

Except as noted 2.5.3 below, any request to cost share F&A costs either fully or partially must be approved by the Executive Vice President for Research. A justification must be provided for consideration. Cost share request forms can be found at <http://www.osp.gatech.edu/forms/costshareform.pdf>.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Form Links:** [Cost Share Request Forms](#)

**Related Information:**

[Current F&A Rates:](#)

[Information on how F&A rates are calculated:](#)

[Information about Georgia Tech financial operations and F&A recovery:](#)

[F&A Rate Agreements for Current and Previous Years:](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 12-31-2013    | OSP    | Rev 1.0     |
| 11-20-2014    | OSP    | Rev 2.0     |
| 06-03-2015    | OSP    | Rev 3.0     |

**2.3.6.1 Other Sponsored Activities and State and Local Government Overhead Rates**

**Policy No:** RESEARCH 2.3.6.1

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Aug 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** [Duane.Hutchison@osp.gatech.edu](mailto:Duane.Hutchison@osp.gatech.edu)

**Policy Statement:**

Georgia Tech applies the Other Sponsored Activities (OSA) F&A rate to projects that benefit the public through activities other than research, development, or instruction. Other Sponsored Activities make available to the public various resources and special capabilities that exist within the institution. OMB Circular A-21, *Cost Principles for Educational Institutions*, describes Other Sponsored Activities to include ". . . programs and projects financed by Federal and non-Federal agencies and organizations which *involve the performance of work other than instruction and organized research*. Examples of such programs and projects are health service projects, and community service programs...." These activities are intended to be available to, and to *benefit*, "individuals and groups," the "public" and "various sectors of the community." As a result, the application of the OSA Facilities & Administrative rate hinges upon a determination of who will *benefit* from the activities associated with a particular project, regardless of the source of funding for that project.

In addition to those activities that qualify for the OSA rate based on the above guidelines, the following specific activities will be allowed to use the OSA rate (by direction of Georgia Tech's administration):

- Advanced Technology Development Center (ATDC) - (ATDC company's campus service accounts only)
- Georgia Internships for Teachers (GIFT) Program regardless of funding source
- K-12 Education Community

For activities meeting the above criteria and for the specific activities noted, Contracting Officers in the Office of Sponsored Programs are authorized to approve use of the OSA rate. Otherwise, use of the rate requires approval by the Vice President for Research.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 01-02-2014    | OSP    | Rev 1.0     |

**2.3.6.2 Rate Used for Projects Funded by the State of Georgia and Georgia Local Governments**

**Policy No:** RESEARCH 2.3.6.2

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Aug 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

Georgia Tech uses the Other Sponsored Programs rate that is negotiated with the Office of Naval Research as its "Georgia State and Local Government" rate regardless of the nature of the activity. It will automatically change for future periods to remain equal to the prevailing OSA Facilities & Administrative rate. This rate is also applicable to Georgia's county and city agencies, and to all Georgia colleges and universities when using their own funds.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 01-02-2014    | OSP    | Rev 1.0     |

**2.3.6.3 Policy on Reduced F&A and General Exception**

**Policy No:** RESEARCH 2.3.6.3

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Aug 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

Georgia Tech's policy is to recover F&A on sponsored projects. As a *General Exception*, Georgia Tech will accept a limitation on F&A recovery in the following situations:

1. When a statutory limitation is imposed by the U.S. Congress for certain U.S. Government-funded programs, or
2. When a regulatory restriction is imposed by a U.S. Government agency and is published in the solicitation for proposals, program guidelines, or RFP, or
3. A U.S. domestic, non-profit (501.c.3) charitable organization imposes a limit that is published in its program solicitation and uniformly applied to all grantees.

Note that the industrial rate generally applies to projects funded by foreign governments, foreign governmental entities, and industry.

**In agreeing to a reduced F&A rate, Georgia Institute of Technology is agreeing to cost share real costs associated with sponsored activities**

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Form Links:** [OSP Forms Library](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 01-02-2014    | OSP    | Rev 1.0     |

#### 2.3.6.4 Waiver of F&A Reimbursement

**Policy No:** RESEARCH 2.3.6.4

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Aug 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

An F&A waiver must be obtained from the Executive Vice President of Research prior to proposal submission if less than the full applicable F&A rate is to be used in a proposal submitted to a sponsor or obtained prior to acceptance of an award if the awarded rate is less than the full applicable rate. General exceptions to the policy can be found at [2.3.6.3](#)

Cost share request forms can be found at [OSP Forms Library](#)

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Form Links:** [OSP Forms Library](#)

**Related Information:** [Policy on Reduced F&A and General Exception](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 01-02-2014    | OSP    | Rev 1.0     |

## **2.4 Policy on Routing**

**Policy No:** RESEARCH 2.4

**Type of Policy:** Administrative

**Effective Date:** Sep 2013

**Last Revised:** Sep 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech that all proposals for sponsored funding must be transmitted to the Office of Sponsored Programs using the Georgia Institute of Technology Sponsored Program / Research Proposal Authorization Routing Form. All information blocks on the front of the form must be completed and all required approvals on the back of the form must be obtained by the proposed Project Director/Principal Investigator. The routing form is also required for electronically routed proposals, such as those submitted to the National Science Foundation (NSF) via FastLane.\* In these cases, the PD/PI is to provide the properly signed routing form to the Contracting Officer prior to the NSF deadline.

**Policies on submission:**

- The Electronic Submission Policy: proposals that are to be submitted by an electronic means need to be ready to be released to the sponsor 24 hours prior to submission deadline and additionally, it needs to be ready for OSP review 2 days prior to that. This includes electronic submissions via a dedicated online system or via email.
- Paper copies must be in OSP by 2pm the day it needs to be submitted otherwise it will be processed the next business day.

## **Signature Authority & Proposal Submission**

The Office of Sponsored Programs is the unit legally authorized to approve proposals and negotiates awards on behalf of Georgia Tech Research Corporation (GTRC) and Georgia Tech Applied Research Corporation (GTARC). OSP is also the Authorized Organizational Representative to Sponsors that require such a role. The PI or Project Director is not considered an authorizing official and cannot legally sign award documents. For more information, go to: <http://www.osp.gatech.edu/proposal-process/>

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Procedures:**

**3.1 Routing Procedures**

Pre-proposals, Letters of Intent (LOI) & White Papers only need to be reviewed and approved by OSP if:

1. The pre-proposal, LOI & White Paper must be submitted by an authorizing official (AOR) through an electronic submission process;
2. A detailed budget is required; or
3. The sponsor requires that the pre-proposal be signed by an authorizing official.

**In addition to a new proposal submission, an OSP Routing form is required for the following types of**

### 3.1 Routing Procedures

#### proposals:

- Non-Competing Continuations
- Supplements
- Competitive Renewals
- SubAwards
- Budget Reductions/Additions of 10% or greater requires a new routing form
- Progress Reports that include a budget for a subsequent period of time

Requests for carryover of funds from one budget period to another, no-cost extensions, and requests to rebudget after the grant has been funded do not require a routing form. Non-financial requests that require the signature of the institutional official also do not require a routing form.

### 3.2 Post Application Submissions

#### NIH – Just in Time (JIT)

[http://era.nih.gov/services\\_for\\_applicants/application\\_tracking\\_and\\_award/just\\_in\\_time-at-nih.cfm](http://era.nih.gov/services_for_applicants/application_tracking_and_award/just_in_time-at-nih.cfm)

Other agency requests may include:

#### 1. Budget questions/revisions

- NSF Budget Impact Statement. If asked to reduce the overall budget there is an obvious need to indicate that there is an impact to the budget.

#### 2. Questions regarding the scope of work 3. Research Compliance Approvals (IRB, IACUC, etc.)

#### 3. Research Compliance Approvals (IRB, IACUC, etc.)

#### Form Links:

[OSP Forms Library](#)

[Proposal Routing Forms](#)

**Related Information:** [OSP Proposal Process](#)

#### Policy History:

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 1-2-2014      | OSP    | Rev 1.0     |

### 2.4.1 Post Application Submissions

#### NIH – Just in Time (JIT)

- [http://era.nih.gov/services\\_for\\_applicants/application\\_tracking\\_and\\_award/just\\_in\\_time-at-nih.cfm](http://era.nih.gov/services_for_applicants/application_tracking_and_award/just_in_time-at-nih.cfm)

Other agency requests may include:

#### 1. Budget questions/revisions

- NSF Budget Impact Statement. If asked to reduce the overall budget there is an obvious need to indicate that there is an impact to the budget.

2. Questions regarding the scope of work
3. Research Compliance Approvals (IRB, IACUC, etc.)

## **2.5 Cost Sharing**

**Policy No:** RESEARCH 2.5

**Type of Policy:** Administrative

**Effective Date:** Jan 2015

**Last Revised:** Jan 2015

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Policy Statement:**

Georgia Tech may provide cost-sharing or matching funds for projects funded by the federal government or non-profit organizations where mandatory and approved prior to proposal submission by the Executive Vice President for Research. The commitment of funds for cost-sharing is subject to the availability of funds for that purpose. It is the policy of Georgia Tech that all researchers who engage in sponsored or externally funded research will comply with Institute policies and sponsoring agency regulations regarding cost sharing or matching requirements on all proposals, and awards with regard to project costs and reporting of cost sharing funds on those projects. Cost sharing or matching is defined as that part of a project or program costs not borne by the funding agency but supported by contributions from the recipient and third parties.

***Mandatory Cost Sharing:***

Required by the sponsor as a condition of receiving an award. Principal investigators must include the total amount of the cost share commitment in the proposal budget.

Cost sharing, matching and in-kind costs cannot include contributions designated for other sponsored projects, unless they are specifically authorized by that sponsor. For example, a gift designated as a match on one project cannot also be used as a match on another project. Costs used to satisfy cost sharing or matching/in-kind commitments will be subject to the same policies as other costs under the approved budget, unless they are specifically authorized by that sponsor. Thus, to qualify for cost sharing, matching, or in-kind, all charges must be:

- allowable under Institute and sponsor policies
- allocatable as a cost to the project
- reasonable and necessary for performance of the project
- allowed as a direct cost on the project (for example administrative salaries cannot normally be used as cost sharing on federal projects)

Cost share commitments are auditable and must meet the same criteria as a direct charge to a grant.

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Procedures:**

Whenever cost sharing is proposed as part of a sponsored project, the source of funds must be identified and approval obtained from the person with authority to commit those funds. If the source is identified as "To Be Determined", the funds from the unit originating the proposal are obligated until an actual source is committed prior to the time of award. Funds to be provided by entities outside of Georgia Tech, typically referred to as "third-party" cost sharing, must be supported at the proposal stage by written documentation from the outside entity indicating their commitment to provide cost sharing.

Cost sharing funds are actually made available to the Project Director/Principal Investigator (PD/PI) when/if the proposal results in a sponsored award. Cost sharing approvals are obtained by way of the Proposal Routing Form and a Cost Sharing Approval Form. The Office of Sponsored Programs (OSP) furnishes a management report of all outstanding cost sharing commitments associated with pending sponsored proposals to the Office of the President on a monthly basis.

**Form Links:**[Cost Sharing Approval Form](#)[Proposal Routing Form](#)**Related Information:** [OSP Forms Library](#)

| Policy History: | Revision Date | Author | Description |
|-----------------|---------------|--------|-------------|
|                 | 01-2-2014     | OSP    | Rev 1.0     |
|                 | 11-20-2014    | OSP    | Rev 2.0     |
|                 | 02-13-2015    | OSP    | Rev 3.0     |

## 2.6 Agency Specific Proposal Requirements

### 2.6.1 Salary Rate Caps

**Policy No:** RESEARCH 2.6.1**Type of Policy:** Administrative**Effective Date:** Nov 2013**Last Revised:** Sep 2013**Policy Owner:** Sponsored Programs, Office of**Contact Name:** Trudy M. Riley**Contact Title:** Executive Director of Sponsored Programs**Contact Email:** [Trudy.Riley@osp.gatech.edu](mailto:Trudy.Riley@osp.gatech.edu)**Reason for Policy:**

Georgia Tech complies with salary rate limitations in projects funded by agencies of the United States government that are statutorily required to implement such limitations.

**Policy Statement:**

Georgia Tech complies with salary rate limitations in projects funded by agencies of the United States government that are statutorily required to implement such limitations. The amount of salary above the cap for faculty and other researchers except Graduate Research Assistants receiving tuition remission shall be paid by the employing unit.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Procedures:****3.1 NIH salary caps**

For NIH

- [http://grants.nih.gov/grants/policy/fy2012\\_salary\\_cap\\_fags.htm](http://grants.nih.gov/grants/policy/fy2012_salary_cap_fags.htm)
- [NIH Salary Cap – Additional Guidance and FAQs \(02/2013\)](#)
- [NIH Graduate Student Salary Cap \(06/2013\)](#)

For NIH funded Graduate Research Assistants

### 3.1 NIH salary caps

**Related Information:** [Grants and Contracts Manuals and Notices](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 01-02-2014    | OSP    | Rev 1.0     |

### 2.6.2 Salary Cost Limitation

**Policy No:** RESEARCH 2.6.2

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Aug 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Policy Statement:**

Georgia Tech complies with the salary direct cost limitations in projects funded by agencies of the United States government where such limitations are established in published regulations for the program or agency.

Please see the related policy [Minimum PI Effort](#).

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Related Information:** [Policy on Minimum PI Effort](#)

| Policy History: | Revision Date | Author | Description |
|-----------------|---------------|--------|-------------|
|                 | 01-02-2014    | OSP    | Rev 1.0     |

### 2.6.3 GT Implementation of NSF Responsible Conduct of Research Policy

**Policy No:** RESEARCH 2.6.3

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Sep 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Reason for Policy:**

Georgia Tech students and trainees engaged in research at the undergraduate, graduate and post?doctoral levels shall receive formal instruction in ethical considerations and decision?making in *Responsible Conduct of Research*. See [www.rcr.gatech.edu](http://www.rcr.gatech.edu) for the current policy, guidelines, and procedures. This policy is intended to comply with the requirements of the National Science Foundation's (NSF) implementation of the requirements of Section 7009 of the *America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act* (42U.S.C. 1862o-1) found in the NSF Award and Administration Guide, Chapter IV, and National Institutes of

Health (NIH) requirements found in NOT-OD-10-019.

**Policy Statement:**

It is the policy of the Georgia Institute of Technology's RCR Compliance Policy that all graduate students, all students who participate in Georgia Tech's Undergraduate Research Program, and any student receiving research funds or who participates in research activities funded by NIH or NSF shall engage in a program of study in the Responsible Conduct of Research that includes, at a minimum, the following elements (RCR elements):

- Conflicts of interest (personal, professional, and financial)
- Policies regarding the use of human subjects in research
- Policies regarding the use of vertebrate animals in research
- Laboratory safety, biohazard management, chemical safety, and policies regarding the use of radioisotopes and radiation sources in research
- The responsibilities and relationships of mentors and mentees
- Collaborative research
- The peer review process
- Data acquisition and laboratory tools; management, sharing and ownership of data and research tools
- Research misconduct and policies for handling research misconduct
- Authorship and publication
- Science and Engineering in Society: the scientist and engineer as responsible members of society and ethical issues in research and the environmental and societal impacts of scientific research

It is the responsibility of the Principal Investigators of NSF and NIH-funded projects to ensure that all students engaged in research are informed of the requirement and that the requirement has been met. Moreover, it is the responsibility of the Principal Investigator to provide mentoring in RCR through discussions of RCR topics and through oversight of students' research.

**Scope:**

This policy applies to all Georgia Tech Faculty, Staff, and Students

**Definitions:****Responsible Conduct of Research****Responsibilities:****5.1 Principal Investigators**

Principal Investigators of NSF and NIH-funded projects are responsible for ensuring that all students engage in research are informed of the requirement and that the requirement has been met.

**Related Information:** [Responsible Conduct of Research policies, guidelines, and procedures](#)

|                        |               |        |             |
|------------------------|---------------|--------|-------------|
| <b>Policy History:</b> | Revision Date | Author | Description |
|                        | 01-02-2014    | OSP    | Rev 1.0     |

## 2.7 Advance Project Number

**Policy No:** RESEARCH 2.7

**Type of Policy:** Administrative

**Effective Date:** Sep 2013

**Last Revised:** Sep 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Policy Statement:**

The Georgia Tech Advance Project Number Policy permits the establishment of an account to which expenses may be charged on behalf of an anticipated program prior to receipt of a grant or execution of an agreement, but only when there is strong evidence a proposed sponsor intends to fund the project and will recognize that funds will be expended in advance of the final agreement start date. In general, only charges incurred within 90 days of the start date of the project will be recognized by federal sponsors.

All Advance Project expenditures are guaranteed by the department>.

Once issued, the Advance Project Number will become the Project Number and stay with the project throughout its life and will not change.

All expenses charged to an Advanced Project must be for costs that will be allowable when the agreement is finalized.

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Procedures:**

3.1 Advance Project Number Requests

Advance Project Number Form

Submission of Advance Project Number Form to OSP

Approved Request for Advance Project Number Form

Requests for an Advance Project Number are submitted to the Office of Sponsored Programs on a Request for [Advance Project Number Form](#).

Upon receipt of the completed request for an Advance Project Number, the OSP Contracting Officer will obtain confirmation that the sponsor intends to authorize the work, negotiate contract terms and conditions in good faith, and that the agreement effective date has been established such that any advance project charges will be allowable and recoverable from the sponsor.

OSP will distribute copies of the approved Request for Advance Project Number Form, which includes the following information:

- the project number assigned
- the amount of advance funding authorized
- the approved advance project time period
- 

**Form Links:** [OSP Advance Project Number Form](#)

**Related Information:** [OSP Form Library](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
|---------------|--------|-------------|

1-2-2014

OSP

Rev 1.0

## 2.8 Related Georgia Tech Policies and Procedures

Administration and Finance

<http://af.gatech.edu/>

Grants & Contracts Accounting

<http://grants.gatech.edu/>

Office of Legal Affairs

<http://www.legal.gatech.edu/>

OIT

<http://www.oit.gatech.edu/>

## 3.0 Regulatory Management and Research Risks

### 3.1 Office of Research Integrity Assurance

Universities, as partners in the national research enterprise, are required by federal regulations to establish specific research committees to ensure the ethical and safe conduct of research and certain other scholarly activities. The Institutional Animal Care and Use Committee, the three Institutional Review Boards, and the Institutional Biosafety Committee have been established to oversee activities involving, respectively, vertebrate animal subjects, human research subjects, and recombinant DNA (rDNA). These federally mandated faculty committees are administered and supported by the Office of Research Integrity Assurance, which reports to the Vice President for Research.

Procedures for obtaining committee approval can be found at [www.researchintegrity.gatech.edu?](http://www.researchintegrity.gatech.edu?)

#### 3.1.1 Institutional Review Board (IRB)

**Policy No:** RESEARCH 3.1.1

**Type of Policy:** Administrative

**Effective Date:** Aug 2013

**Last Revised:** Aug 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Barbara Henry

**Contact Title:** Executive Director

**Contact Email:** [barbara.henry@gtrc.gatech.edu](mailto:barbara.henry@gtrc.gatech.edu)

**Reason for Policy:**

Georgia Tech subscribes to the basic ethical principles that underlie the conduct of biomedical and behavioral research involving human subjects as set forth in the Belmont Report, the timeless statement of ethical principles and guidelines for the protection of human subjects published in 1979 by the National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research.

**Policy Statement:**

The three Georgia Tech Institutional Review Boards are charged with protecting the rights and welfare of human subjects participating in research projects conducted by Georgia Tech faculty, staff, or students. These include the Central IRB, the Joint Georgia State University-Georgia Tech IRB for the Advanced Brain Imaging Center, and the Classified IRB. The IRBs have the responsibility and authority to review, approve, disapprove, or require changes in research activities involving human subjects. All proposed research activities involving human subjects, regardless of source of funding or study location, must be reviewed and approved by the appropriate Georgia Tech Institutional

Review Board (IRB) prior to initiation of research. The IRBs hold regularly scheduled meetings to review research protocols involving human subjects.

Georgia Tech's Federalwide Assurance is approved by the Department of Health and Human Services, and the Institutional Review Boards are registered with the Department of Health and Human Services, Office for Human Research Protections.

Committee members are appointed by the Vice President for Research, who also serves as the Institutional Official for matters related to human subjects. Membership is structured in accordance with federal requirements set forth in Title 45 Code of Federal Regulations Part 46, "Federal Policy for the Protection of Human Subjects" including Subparts A, B, C, and D, and in Title 21 Code of Federal Regulations, Parts 50, 56, 312, and 812.

**Scope:**

This policy applies to all Georgia Tech Faculty, Staff, and Students.

**Enforcement:**

To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Related Information:**

[IRB Policies and Procedures](#)

[Belmont Report](#)

**Policy History:**

| Revision Date | Author    | Description |
|---------------|-----------|-------------|
| 12-30-2013    | GTRC-ORIA | Rev 1.0     |

**3.1.2 Institutional Animal Care & Use Committee (IACUC)**

**Policy No:** RESEARCH 3.1.2

**Type of Policy:** Administrative

**Effective Date:** Aug 2013

**Last Revised:** Aug 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Mary Beran

**Contact Title:** Associate Director

**Contact Email:** mary.beran@gtrc.gatech.edu

**Reason for Policy:**

The Georgia Institute of Technology is committed to ensuring that vertebrate animals used in research and teaching activities receive humane care and treatment.

**Policy Statement:**

The Institutional Animal Care and Use Committee (IACUC) is charged with reviewing all proposed use of vertebrate animals, regardless of where the work is performed and source of funding, if any. The IACUC has the responsibility and authority to review, approve, disapprove, or require changes in research activities involving vertebrate animals. This committee regularly inspects and monitors the animal care and use facilities and program at the Institute to ensure that all components are in compliance with regulations outlined in the federal Animal Welfare Act, the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals, and with the Eighth Edition of the Guide for the Care and Use of Laboratory Animals.

The animal facilities are registered with the U.S. Department of Agriculture and undergo frequent, unannounced inspections by that agency. Georgia Tech's Animal Welfare Assurance is approved by the Department of Health and

Human Services. Committee membership is structured in accordance with federal requirements; members are appointed by the Vice President for Research, who also serves as the Institutional Official for matters related to vertebrate animal subjects.

The IACUC has set forth procedures for reporting, without fear of reprisal, concerns about the humane use and treatment of vertebrate animals used in research and teaching activities at Georgia Tech. The IACUC meets monthly to review research protocols which propose the use of vertebrate animal subjects; committee approval must be obtained prior to initiation of proposed activities.

**Scope:**

This policy applies to all Georgia Tech Faculty, Staff, and Students.

**Enforcement:**

To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Related Information:** [IACUC Policies and Procedures](#)

**Policy History:**

| Revision Date | Author    | Description |
|---------------|-----------|-------------|
| 12-30-2013    | GTRC-ORIA | Rev 1.0     |

**3.1.3 Institutional Biosafety Committee (IBC)**

**Policy No:** RESEARCH 3.1.3

**Type of Policy:** Administrative

**Effective Date:** Aug 2013

**Last Revised:** Aug 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Mary Beran

**Contact Title:** Associate Director

**Contact Email:** mary.beran@gtrc.gatech.edu

**Policy Statement:**

The Institutional Biosafety Committee (IBC) is responsible for reviewing all registrations for research, teaching, and training that involve the use of recombinant DNA by Georgia Tech faculty, staff or students and ensuring that the proposed activities comply with the federal "*NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules*" and all other applicable regulations. All scholarly activities involving recombinant DNA, regardless of source of funding, must be reviewed by the IBC. The Committee has the responsibility and authority to review, approve, disapprove, or require changes in research, teaching, and training activities involving recombinant DNA materials.

Georgia Tech's Institutional Biosafety Committee is registered with the National Institutes of Health's Office of Biotechnology Activities (OBA). IBC works closely with Georgia Tech's Biosafety Officer in the Office of Environmental Health and Safety. Committee membership is structured in accordance with federal requirements. Members are appointed by the Executive Vice President for Research, who is also the Institutional Official for matters related to the Biosafety Committee. The IBC holds meetings as needed to review registrations.

**Scope:**

This policy applies to all Georgia Tech Faculty, Staff, and Students.

**Enforcement:**

To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Related Information:** [IBC Guidance](#)

**Policy History:**

| Revision Date | Author    | Description |
|---------------|-----------|-------------|
| 12-30-2013    | GTRC-ORIA | Rev 1.0     |

### 3.1.4 Export Control

**Policy No:** RESEARCH 3.1.4

**Type of Policy:** Administrative

**Effective Date:** Aug 2013

**Last Revised:** Aug 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Mary Beran

**Contact Title:** Empowered Official

**Contact Email:** [mary.beran@gtrc.gatech.edu](mailto:mary.beran@gtrc.gatech.edu)

**Reason for Policy:**

Research is a global endeavor, and international experiences and opportunities are vital in preparing Georgia Tech's students to become leaders who meet the challenges of the future. It is sometimes challenging to conduct these programs in compliance with complex laws and regulations that change frequently. The Office of Research Integrity Assurance (ORIA), in coordination with the Office of Legal Affairs (OLA) and the Research Security Department (RSD), assists faculty members with the review of research proposals and awards and when appropriate prepares Technology Control Plans (TCP) to protect export controlled technology.

**Policy Statement:**

It is the policy of the Georgia Institute of Technology (GIT) to fully comply with all applicable federal statutes, executive orders, regulations, and contractual requirements for the safeguarding of export controlled technical information in its possession. This includes full and total compliance with export controls and transfer of controlled technology. Under no circumstances shall employees or other persons acting on behalf of GIT engage in activities in contravention of U.S. export control laws. In general, export controlled Information means activities, items, and information related to the design, development, engineering, manufacture, production, assembly, testing, repair, maintenance, operation, modification, demilitarization, destruction, processing, or use of items with a capacity for military application utility. Export controlled information does not include basic marketing information on function or purpose; general system descriptions; or information concerning general scientific, mathematical, or engineering principles commonly taught in schools, colleges and universities or information in the public domain.

The export of equipment and information including technical data, software and hardware is controlled by federal regulations such as the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR). Information such as brochures, proposals, site visits and technical discussions are deemed "technical data." Exporting information or talking to a foreign sponsor (either in the U.S. or abroad) about certain types of technical data which may have a possible military application requires a State Department export license, which may take up to three months to obtain. Exporting information or a commodity which does not have significant military application usually requires obtaining one or more of the following: an assurance which precludes reexport; supporting documentation; or a Commerce Department export license. Export of some items to certain countries and some types of subcontracts with those countries are prohibited altogether. For more information: <http://www.export.gatech.edu/>

**Scope:**

This policy applies to all Georgia Tech Faculty, Staff, and Students.

**Enforcement:**

To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Related Information:** [Export Control Form & Procedures](#)

**Policy History:**

| Revision Date | Author    | Description |
|---------------|-----------|-------------|
| 12-30-2013    | GTRC-ORIA | Rev 1.0     |

**3.2 Conflict of Interest**

It is the policy of the Georgia Institute of Technology that all Financial Conflicts of Interests (FCOI) will be managed, reduced, or eliminated in accordance with Federal Regulations, State law, and Institute Policy. In order to ensure timely management and reporting of FCOIs, every Employee of the Institute, including all who participate in outside professional activities and/or sponsored research must complete an annual disclosure using the online Conflict of Interest system (eCOI), which is available at <https://ecoi.research.gatech.edu>. In answering the eCOI questions, if an Employee has indicated an actual or potential conflict, the system will notify the COI Office for review. Employees must update their disclosures on an ongoing basis when circumstances change. This includes receiving prior approval before engaging in any outside professional activity.

**3.3 Responsible Conduct of Research**

<http://researchintegrity.gatech.edu/rcr-policy/>

**3.4 Responding to Allegations of Scientific or Other Scholarly Misconduct**

<http://www.policylibrary.gatech.edu/faculty-handbook/5.7-policy-responding-allegations-scientific-or-other-scholarly-misconduct>

**3.5 Protecting Sensitive Data**

<http://researchintegrity.gatech.edu/protecting-sensitive-data/>

**3.6 Environmental Health and Safety**

The Environmental Health and Safety (EHS) Office at Georgia Tech develops programs and provides oversight, consultation, training and other specialized services to assist the Institute community in meeting its public health, safety, environmental protection, and compliance responsibilities.

<http://www.ehs.gatech.edu/>

**3.6.1 Office of Radiological Safety**

The Office of Radiological Safety (ORS) manages all aspects of the use of radioactive material (RAM) and radiation generating devices at Georgia Tech.

<http://www.ors.gatech.edu/>

### 3.7 Related Georgia Tech Policies and Procedures

Administration and Finance

<http://af.gatech.edu/>

Grants & Contracts Accounting

<http://grants.gatech.edu/>

Office of Legal Affairs

<http://www.legal.gatech.edu/>

OIT

<http://www.oit.gatech.edu/>

## 4.0 Post-award Management - Financial Administration

### 4.1 Grants and Contract Accounting

<http://grants.gatech.edu/main/>

### 4.2 Payment Terms

**Policy No:** RESEARCH 4.2

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech's Office of Sponsored Programs that, in issuing and administering sponsored projects/awards, the office is in compliance with:

- Georgia Institute of Technology Policies and Procedures
- Applicable sponsor regulations
- Terms and conditions of the prime award

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Enforcement:**

To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=750](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=750)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 01-02-2014    | OSP    | Rev 1.0     |

#### 4.2.1 Advance Payment

**Policy No:** RESEARCH 4.2.1

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech that an advance payment is required on all industrial projects with industry sponsors. This advance payment is required because it usually takes several months from the start of a project until receipt of the first payment. The amount of the advance payment is usually 25% of the total project cost. However, if the sponsor has a bad credit rating, a higher amount (up to the full project cost) may be required. The sponsor is notified of this advance payment requirement in the proposal transmittal letter. The amount of the advance payment is cited in the payment clause of the contract. An invoice for the advance payment is transmitted by the Program Initiation Division Contracting Officer with the proposal. The advance payment is applied against the final invoice for the project, and any funds remaining are returned to the sponsor. This policy does not apply when the industrial sponsor has a prime government contract under which Georgia Tech will be a subcontractor.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 01-02-2014    | OSP    | Rev 1.0     |

#### 4.2.2 Fixed Price

**Policy No:** RESEARCH 4.2.2

**Type of Policy:** Administrative

**Effective Date:** Oct 2014

**Last Revised:** Oct 2014

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

This contract is most appropriate when there is a clear SOW and little risk to the Institute. On occasion, a sponsor will insist on a fixed price contract. If the PD/PI's Lab/School determines that the financial/legal risks are minimal and acceptable, the researcher's Lab/School will state that internal funds will be available in the event of a cost overrun, and that the deliverables do not include hardware or software items, some special programs may be accepted on a fixed price basis with the approval of the Vice President for Research. This is preferred contract type when a PI has subcontractors or will be issuing sub-awards on the project.

Per the Uniform Administrative Requirements (2 CFR 200), Subpart - C, this type of agreement cannot be used when there is mandatory cost sharing required. Changes in PD/PI, project leader, project partner or scope of effort must receive the prior written approval of the Federal award agency or pass-through entity. Additionally, the non-Federal

entity must certify in writing to the Federal awarding agency or pass-through entity at the end of the Federal award that the project or activity was completed or the level of effort was expended. If the required level of activity or effort was not carried out, the amount of the Federal award must be adjusted.

Click [here](#) for the Georgia Tech Fixed Price Memo, which should be submitted along with the OSP Routing Form.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Related Information:**

[Budget, Planning and Administration](#)

[Project Closeout in Grants Management System](#)

| Policy History: | Revision Date | Author | Description |
|-----------------|---------------|--------|-------------|
|                 | 01-02-2014    | OSP    | Rev 1.0     |
|                 | 11-20-2014    | OSP    | Rev 2.0     |
|                 | 03-16-2015    | OSP    | Rev 3.0     |

**4.2.3 Cost-reimbursement**

**Policy No:** RESEARCH 4.2.3

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

There are several flavors of Cost Reimbursable (CR) contracts, the two most common at Georgia Tech are the pure Cost Reimbursement and Cost Plus Fixed Fee (CPFF). Including cost sharing in a contract or proposal is also a form of a cost reimbursable contract. The CR and CPFF contract is the preferred contract for the Institute to receive (without cost sharing), as it limits risk on research endeavors that may not have a clearly defined SOW. Under the CPFF, in addition to reimbursing the Institute for costs related to the work, the sponsor will also provide the Institute with a fee.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

| Policy History: | Revision Date | Author | Description |
|-----------------|---------------|--------|-------------|
|                 | 01-02-2014    | OSP    | Rev 1.0     |

**4.2.4 Time and Materials**

**Policy No:** RESEARCH 4.2.4

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs  
**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

Under this type of agreement the sponsor agrees to pay a negotiated hourly rate for specified types of labor and to reimburse the Institute for materials used on the project. Base hourly rates invoiced to the sponsor include base hourly rate plus all indirect costs. Prepare your budget as such. This type of contract requires careful oversight and management. This type contract also requires the approval of the Vice President for Research.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

| Policy History: | Revision Date | Author | Description |
|-----------------|---------------|--------|-------------|
|                 | 01-02-2014    | OSP    | Rev 1.0     |

#### 4.2.5 Foreign Sponsor Payments

**Policy No:** RESEARCH 4.2.5

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

**Exchange Rate Consideration**

The exchange rate is the price of one currency expressed in terms of another currency. For example, as of the November 2009, the exchange rate of one U.S. dollar for one Euro was approximately 0.67, which means that one dollar can be exchanged for 0.67 euros. Fluctuation in exchange rates have significant affects on the payments for sponsored research projects. All GA Tech units should be aware of the risks, including potential loss of dollars, involved in agreements containing payment terms in foreign currency.

#### Payment Terms for Foreign Sponsors

OSP generally requires at least 50% advance payment from all foreign sponsors. To eliminate the risk associated with exchange rates, OSP establishes the agreement amount and payment terms in U.S. dollars. If the sponsor will not agree to establish the agreement's price and payment terms in U.S. dollars, OSP will try to reduce the risk associated with exchange rates by requiring payment in full upon execution of the agreement or as much advance payment as can be mutually agreed upon. If the sponsor will not agree to advance payments, OSP will require a memo signed by the School Chair stating that they understand the ramifications associated with payments made in a foreign currency, and the School will be responsible for any cost over-runs associated with foreign currency fluctuations.

#### Budget

The PI should prepare a budget in U.S. dollars and the currency of the foreign sponsor. OSP will process the budget for the Agreement in U.S. dollars at the time an award is processed based on the current exchange rate. Grants & Contracts will notify the PI and OSP of the payment amount received to adjust the budget as necessary. The PI's School will be responsible for any shortfalls in the awarded amount due to fluctuations in the currency's exchange rate. Therefore, the PI should stay abreast of the affect the exchange rate will have on the budget throughout the life of

the research project.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

| Policy History: | Revision Date | Author | Description |
|-----------------|---------------|--------|-------------|
|                 | 01-02-2014    | OSP    | Rev 1.0     |

#### 4.2.6 Risk Mitigation Policy

**Policy No:** RESEARCH 4.2.6

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Duane Hutchison

**Contact Title:** Director of Sponsored Programs

**Contact Email:** Duane.Hutchison@osp.gatech.edu

**Policy Statement:**

Research projects that are funded by private industry sponsors and certain others carry an added risk of financial losses due to non-payment by the sponsor. The causes of non-payment range from financial exigencies faced by the company particularly during periods of general economic slowdown to disappointment on the part of the sponsor with the outcomes of the research project. With such sponsors, it is particularly important to establish clear contractual agreement as to the nature of the research relationship between Georgia Tech and the sponsor. It is equally important to develop payment terms that mitigate Georgia Tech's financial exposure, set clear expectations regarding payment, and exercise consistent and prudent oversight of project receivables.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

| Policy History: | Revision Date | Author | Description |
|-----------------|---------------|--------|-------------|
|                 | 01-02-2014    | OSP    | Rev 1.0     |

#### 4.3 Cost Sharing

**Policy No:** RESEARCH 4.3

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Jun 2014

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Policy Statement:**

Cost share (Matching) funds are those funds contractually obligated by the Institute to meet the financial requirements specified in a sponsored award. These expenses represent the Institute's contribution to an externally funded sponsored project. When a cost share obligation is identified in the sponsored agreement, it must be accounted for in the records of the Institute and reported to the sponsor. Cost share expenses should generally be incurred at the same

rate as the sponsor's portion of award expenses.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Procedures:****3.1 General Procedures**

From OMB Circular A-110, Section 23 (2 CFR 235),  
"Uniform Administrative Requirements for Grants and  
Agreements with Institutions of Higher Education,  
Hospitals, and Other Non-Profit Organizations":

"All contributions, including cash and third party in-kind,  
shall be accepted as part of the recipient's cost sharing or  
matching when such contributions meet all of the following  
criteria."

1. Are verifiable from the recipient's records.
2. Are not included as contributions for any other federally-assisted project or program.
3. Are necessary and reasonable for proper and efficient accomplishment of project or program objectives.
4. Are allowable under the applicable cost principles.
5. Are not paid by the Federal Government under another award, except where authorized by Federal statute to be used for cost sharing or matching.
6. Are provided for in the approved budget when required by the Federal awarding agency.
7. Conform to other provisions of this Circular, as applicable.

*\*\* If any expense cannot meet the above criteria, it is not eligible to be recorded and reported as cost share. \*\**

**Related Information:** [Grants & Contracts Cost Share Info](#)

| Policy History: | Revision Date | Author | Description |
|-----------------|---------------|--------|-------------|
|                 | 01-02-2014    | OSP    | Rev 1.0     |

**4.4 Prior Approvals of Budget, PI, or other program changes****4.5 No-Cost Extensions****4.6 Related Georgia Tech Policies and Procedures**

Administration and Finance

<http://af.gatech.edu/>

Grants & Contracts Accounting

<http://grants.gatech.edu/>

Office of Legal Affairs

<http://www.legal.gatech.edu/>

OIT

<http://www.oit.gatech.edu/>

## 5.0 Subcontracts, Subawards, and Subrecipient Administration

It is the policy of Georgia Tech's Office of Sponsored Programs that, in issuing and administering subawards, the office is in compliance with:

- Georgia Institute of Technology Policies and Procedures
- Applicable sponsor regulations
- Terms and conditions of the prime award

The ultimate goal of the following procedures is to guarantee that the subaward activities satisfy Institute and governmental reviews as well as government audit requirements while protecting the Institute's best interest.

### 5.1 Pre-Award Stage

**Policy No:** RESEARCH 5.1

**Type of Policy:** Administrative

**Effective Date:** Apr 2013

**Last Revised:** Apr 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Policy Statement:**

Subrecipients, including subcontractors and consultants, must be identified in the proposal budget to ensure that costs are calculated correctly and so that appropriate documentation can be included in the proposal. Sponsor approval is required prior to entering into a subcontract. If it is a vendor relationship, no sponsor approval is required unless specified in the award terms and conditions.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Procedures:**

3.1 Specific Considerations

What is a Subagreement?

Subrecipients, including subcontractors and consultants, must be identified in the proposal budget to ensure that costs are calculated correctly and so that appropriate documentation can be included in the proposal. Sponsor approval is required prior to entering into a subcontract. If it is a vendor relationship, no sponsor approval is required unless specified in the award terms and conditions.

Subrecipients vs. Vendors

It is not always clear when the pass-through entity should award federal funds to a subrecipient via a subcontract or subgrant, or a procurement contract to a vendor. A subrecipient is a state or local government, college, university or nonprofit organization that expends federal awards received from a pass-through entity to carry out a

### 3.1 Specific Considerations

federal program. Under a subaward, a subrecipient generally has a specific scope of work to conduct in conjunction with the proposed research. The PI with the subaward is accountable for programmatic progress as well as for following federal guidelines.

In contrast, a vendor is a dealer, distributor, merchant or other seller providing goods or services that are necessary for conducting a federal program. These goods or services may be for an organization's own use or for the use of beneficiaries of the federal program. They provide the service as part of their normal business operations. They provide similar services to many different purchasers

Under a procurement contract, a vendor provides goods or services that are auxiliary to the proposed research.

#### What constitutes a Consultant?

A Consultant Agreement is issued to either a company or to an individual who is clearly a bona fide consultant (expert advisor) who pursues this line of business for him/herself. The consultant is paid for his/her time at the fixed daily (or hourly) rate of compensation specified in an agreement. Consulting effort is usually limited to the term and the pay line is usually determined by a rate per day, which includes travel, expenses, and any other overhead. Consultants set their own hours, use their own equipment and materials, choose their work methods, and are responsible for paying taxes on their earnings as consultants. They will receive Tax Form 1099 from Georgia Tech. Furthermore a consultant's effort is considered "work for hire" and therefore all intellectual property and copyrightable information produced is assigned to GTRC.

The primary difference is that a subcontract is almost invariably with another institution or with a company, and a consulting agreement is almost invariably with an individual who is not a Georgia Tech employee and has not been employed by Georgia Tech for at least 1 year.

#### Subagreements under Federal Contracts (Not Grants)

In order to establish a subrecipient relationship under federal contracts, the Federal Acquisition Regulation (FAR 35.009) states that "it is important that the contractor not subcontract technical or scientific work without the contracting officer's advance knowledge." The FAR goes on to state that "during the negotiation of a cost-reimbursement R & D contract, the contracting officer shall obtain complete information concerning the contractor's plans for subcontracting any portion of the experimental, research, or development effort." Typically approval is granted when a subrecipient is included in the proposal to

### 3.1 Specific Considerations

the Government and an award is made based on that proposal. If a subrecipient relationship is not approved as part of a proposal submitted to the agency, written sponsor approval would be required before any unbudgeted subrecipient subcontract could be established.

**Related Information:** [Board of Regents Consulting Policies](#)

|                        |               |        |             |
|------------------------|---------------|--------|-------------|
| <b>Policy History:</b> | Revision Date | Author | Description |
|                        | 12-31-2013    | OSP    | Rev 1.0     |

### 5.2 Requesting a Subaward

**Policy No:** RESEARCH 5.2

**Type of Policy:** Administrative

**Effective Date:** Apr 2013

**Last Revised:** Apr 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** [Trudy.Riley@osp.gatech.edu](mailto:Trudy.Riley@osp.gatech.edu)

**Reason for Policy:**

A SubAgreement may be required if part of the research effort under a grant or contract is to be performed by an outside organization or institution.

**Policy Statement:**

Subcontracts should be set up as soon as possible after the receipt of an award. To initiate one, you or an authorized representative will need to make a request for subcontract agreement using Georgia Tech's web-based OSP Contract System - <https://webwise.gtri.gatech.edu/osp/sub/sitemap>

Upon final submission through the on-line system you will need to forward a signed copy of the request form to OSP. A notification of acceptance, as well as other progress notifications will be sent via the ICOL system. Upon receipt of the returned subcontracts, an agreement will be issued to the subcontractor against which project-related costs may be billed. The Principal Investigator will be responsible for monitoring the technical performance of the subcontractor, verifying that required cost-sharing is properly documented and approving the invoices for payment. Please notify a contracting officer in OSP's Subagreement Division promptly with any questions or concerns. A request for modification will be needed in order to add additional funds or time to the existing subcontract.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Procedures:**

#### 4.1 Requesting a Subaward

As part of the on-line "Request for a Sub-Agreement" process you will want to have the following information ready:

- a detailed budget
- [statement of work](#) (including any deliverables/reports)
- [a memorandum of selection](#) (short narrative as to why you selected the subcontractor)
- [as well as a technical cost/price analysis](#)

On-line "Request for a Sub-Agreement"

1. Visit OSP Contract System

#### 4.1 Requesting a Subaward

- <https://webwise.gtri.gatech.edu/osp/sub/sitemap>
2. Use your GT Kerberos Password or GTRI credentials to access the system.
  3. From the Subagreement site map click on “make a request for new subagreement”
  4. Query on the fund # you wish to issue the subcontract/consulting agreement under.
  5. After completing the required fields, “Submit to OSP”
  6. Print request form for signature
  7. FAX or e-mail signed copy of the request form to OSP. FAX (404)385-0864

#### Responsibilities:

##### 5.1 Principal Investigators

The Principal Investigator will be responsible for providing oversight of the subcontract including:

- monitoring the technical performance of the subcontractor,
- verifying that required cost-sharing is properly documented,
- and approving the invoices for payment.

|                        |               |         |             |
|------------------------|---------------|---------|-------------|
| <b>Policy History:</b> | Revision Date | Author  | Description |
|                        | 01-02-2014    | GTRC-IE | Rev 1.0     |

##### 5.2.1 Statement of Work

Preparing the Statement of Work - The Statement of Work (SOW) is a document that lists and describes all essential and technical requirements for the effort to be performed, including standards to be used to determine whether the requirements have been met. This document may include the following items where appropriate:

- Objective or Purpose
- Period of Performance
- A list of detailed work requirements
- Workload requirements
- Personnel requirements
- Resources (if any) to be furnished to the subcontractor.
- Reporting requirement/Other deliverables

##### 5.2.2 Sole Source Justification

It is necessary to include documentation that you have obtained quotes from alternative vendors or completed a Sole Source Justification form. The PI is required to provide information of the technical competence of the sole source selection.

##### 5.2.3 Cost Price Analysis

The PI is also required to provide a technical assessment of the subaward budget. The assessment would include verification that the costs are reasonable and necessary to carry out the proposed project. The cost elements within the subaward budget must be necessary to accomplish the proposed activity.

The Government is responsible for insuring that Georgia Tech maintains adequate policies and procedures governing subcontracting activities on federally sponsored grants and contracts. These activities are monitored through the periodic Contractor Purchasing Systems Review (CPSR) conducted on campus by the Office of Naval Research every three years. The cost price analysis form is a key component in the Government's review of our purchasing system.

One of the Government's principal procurement objectives is to obtain fair and reasonable contract prices. Sub-award pricing is a critical element in the pricing of prime contracts and a major consideration in receiving Government consent to sub-awards and approval for contractor purchasing systems. Sub-awards can sometimes represent a major portion of the total dollars spent under a prime contract. Contracting officers cannot ensure the fairness and reasonableness of prime contract prices without evaluating the prices of critical sub-awards.

In accordance with the Federal Acquisition Regulation (FAR), the contracting officer is responsible for the determination of price reasonableness for the prime contract. To make this determination, the contracting officer must conduct an analysis of the relevant facts and data including subcontractor cost or pricing data. In all cases, a main consideration is to assure that the price to be paid for these goods and services is fair and reasonable. This is essential to insure that both University and Government funds are utilized in a cost effective manner and to conserve funding where resources are limited. To accomplish this, some form of cost or price analysis must be made and documented in connection with every procurement action.

A price analysis is an examination of the price proposed by the anticipated subcontractor and an assessment or evaluation as to whether or not it is fair and reasonable. A cost analysis however, actually examines the individual cost elements that comprise the total proposed estimated cost. These elements generally include such things as labor rates, material costs, overhead or indirect rates, a cost of money factor, general and administrative expenses (G&A), and a profit or fee.

It is not possible for personnel in the Office of Sponsored Programs (OSP) to determine if the price is fair and reasonable without input from others. OSP can evaluate costs, but assistance will be required from the responsible Project Director/Principal Investigator to evaluate the appropriateness of the total price.

If a sub-award exceeding \$700,000 is to be issued under a Government contract prime award, OSP must be in compliance with Public Law 87-653, Truth in Negotiations. [The Public Law has been implemented in the United States Code of Federal Regulations 10 U.S.C. 2306a (Armed Forces) and 41 U.S.C. 254b (Public Contracts) and in the Federal Acquisition Regulation Part 15 and Clause No. 52.215-12.]. Public Law 87-653, Truth in Negotiations (TINA) is a requirement for cost or pricing data and certification for any sub-award expected to exceed \$700,000. The sub-awardee is required to submit cost or pricing data prior to placement of the sub-award unless one of the following exceptions applies:

- When the sub-award administrator determines that prices agreed upon are based on adequate price competition.
- When the sub-award administrator determines that prices agreed upon are based on prices set by law or regulation.
- When a commercial item is being acquired.
- When a waiver for cost or pricing data has been granted by the Government contracting officer under the prime award.
- When modifying a contract or sub-award for commercial items.

Cost or pricing data shall be obtained if the sub-award administrator concludes that none of the exceptions above applies. When cost or pricing data are required, the sub-award administrator shall require the sub-awardee to submit the following in support of any proposal:

- Cost or pricing data (See FAR 15.408, Table 15-2 for guidance).

- A certificate of current cost or pricing data, certifying that to the best of its knowledge and belief, the cost and pricing data were accurate, complete, and current as of the date of agreement on price or, if applicable, an earlier date agreed upon between the parties that is as close as practicable to the date of agreement on price. (See FAR 15.406-2 for format.)
- For sub-awards under the TINA threshold the guidelines of FAR 15.403-3, Requiring Information Other than Cost or Pricing Data, should be utilized in certain cases. This would also include thorough documentation of cost or price reasonableness in accordance with FAR 15.406-3, documenting the negotiation.

### 5.3 Subrecipient Monitoring

**Review Date:** Aug 2018

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

Georgia Tech is responsible for ensuring that all subrecipients of its sponsored research awards are in compliance with applicable requirements in accordance with 2 CFR 200 Subpart D Subrecipient Monitoring and Management and Subpart F – Audit Requirements, when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equals or exceed \$750,000 (2 CFR 200.501). These guidelines and procedures are provided to assist faculty and staff in ensuring that subrecipients conduct their portions of research projects in compliance with laws, regulations and terms and conditions of awards and subawards and that project costs incurred by subrecipients are reasonable and allowable.

### Roles and Responsibilities

- **Principal Investigators (PI)**

PIs have primary responsibility for monitoring subrecipient's technical and financial performance to ensure compliance with federal regulations and both prime and subrecipient award terms and conditions. The Federal Government places the primary responsibility for management of federally funded projects with the PI. This includes:

- Monitoring of subrecipient's programmatic and financial activities related to the sub-award.
- Review of technical/performance reports as required.
- The PI is responsible for verifying the subrecipient work is conducted in a timely manner and that the results delivered are in line with the proposed statement of work.
- The PI is responsible for reviewing and approving subrecipient invoices. This includes reviewing expenditures to ensure the charges are allowable, allocable, reasonable, and that the charges are within the period of performance.
- The PI is responsible for maintaining regular contact with the subrecipient.

- **Unit Financial Officers (Departmental Administrators)**

Unit Financial Officers (UFO's) should assist PI's in carrying out their subrecipient monitoring responsibilities. This includes:

- Reviewing invoices from subrecipients to ensure invoices are within the parameters of the sub-award budget, and questioning expenditures if necessary.
- Ensure that invoices are approved by the PI or his/her designee and submitted to Accounts Payable in a timely basis.
- If there are any unusual or excessive charges invoiced by the subrecipient, the department should request clarification from the subrecipient.

- Maintain copies of all invoices that provide evidence of the regular review of invoices by the PI. “Evidence” can be in the form of authorized signature by the PI or his/her designee, PI’s initials, e-mail communications, or notes of meeting between the PI with the department administrator.
- Maintaining documentation of monitoring efforts (copies of e-mail, phone log, etc.).

### • Office of Sponsored Programs (OSP)

OSP is responsible for the oversight of subrecipient monitoring and ensuring that the Institute’s subrecipient monitoring procedures are compliant with federal and other applicable regulations. These responsibilities include:

- Identifying to the subrecipient the Federal award information as required in section 2 CFR 200.331 (e.g., CFDA title and number, award name, name of Federal agency) and applicable compliance requirements, including any appropriate flow-down provisions from the prime agreement.
- Ensure the use of subrecipient is well documented and cost price analysis performed in accordance with applicable regulations.
- Determining whether or not the subrecipient or its PI’s are debarred or suspended from receiving Federal funds.
- On an annual basis, reviewing all active sub-awards for which monitoring is mandated. Accordingly, OSP requests audit certification letters from all subrecipients expending \$750,000 or more in Federal funds during the subrecipient’s fiscal year.
- The returned certification letters are reviewed by the OSP Audit Coordinator to verify that no audit findings related to Federal funds provided by Georgia Tech are reported. If no findings are indicated, the OSP Audit Coordinator will initial, date, and notate that no follow-up action is required. OSP will inquire further into those that are deemed to require closer scrutiny, and take appropriate action.
- Add additional conditions to the subaward when appropriate in accordance with 2 CFR 200.207 to manage any risk posed by subrecipient.
- In accordance with FAR 52.219-9(d)(9), for Subrecipients under Federal Contracts, when a subcontract is awarded to a subcontractor (other than a Small Business) and is in excess of \$650,000, OSP will obtain a Subcontracting Plan from the subcontractor.
- In accordance with FAR 52.215-12, will obtain from the subcontractor a Certificate Cost or Pricing Data on all subcontracts in excess of \$700,000 and issued under a Federal contract.

The above list is not exhaustive of all compliance requirements. In addition to the general elements of compliance noted above, there may be additional sponsor- or program-specific requirements that mandate collecting and documenting other assurances (e.g. on lab animals, human subjects, biohazards, export controls, financial conflicts of interest etc.) during the course of a project. OSP will work with PIs and department administrators to establish channels of communication with subrecipients that require further scrutiny.

### 5.4 Closeout of Subawards

Detailed information is available at: <http://www.osp.gatech.edu/contractual-close-out/>.

## 6.0 Post-award Management – Programmatic Administration

### 6.1 Intellectual Property and Licensing

**Policy No:** RESEARCH 6.1

**Type of Policy:** Administrative

**Effective Date:** Apr 2013

**Last Revised:** Apr 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

Commercializing your innovation begins with an initial disclosure to the Office of Industry Engagement. Through this process, Industry Engagement can record the innovation, determine what form of intellectual property is involved and any sponsor rights, establish accurate inventorship and ownership interests in the innovation, and determine through various means of evaluation whether the innovation has commercial potential. Innovations should be reported to the Office of Industry Engagement as early as possible in the discovery process to ensure protection of intellectual property and to gain a comprehensive understanding of the options available in commercializing your research.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Related Information:** [Industry Engagment](#)

| Policy History: | Revision Date | Author  | Description |
|-----------------|---------------|---------|-------------|
|                 | 12-31-2013    | GTRC-IE | Rev 1.0     |

## 6.2 Deliverables [Progress/Annual/Interim/Monthly Technical Reports]

**Policy No:** RESEARCH 6.2

**Type of Policy:** Administrative

**Effective Date:** Aug 2013

**Last Revised:** Aug 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** Trudy.Riley@osp.gatech.edu

**Policy Statement:**

It is Georgia Tech's policy to meet all contractual obligations of a sponsored project. It is the responsibility of the PD/PI to submit to the sponsor, all technical reports, final reports and any other deliverables that may be required under the sponsored agreement.

Deliverables must be submitted to OSP on-line via [WebWise](#).

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Procedures:**

### 3.1 Deliverable Submission

#### Online Submission

Deliverables must be submitted to OSP on-line via [WebWise](#) under the project deliverables tab.

Submissions are updated immediately by the system and may be viewed on line.

### 3.2 Training Tutorials

#### Deliverable Submission:

- [Granting Access to a Project](#)
- [Setting up a Designee for a Deliverable\(s\)](#)

### 3.2 Training Tutorials

Tips:

- [Unsatisfying a Deliverable](#)
- [Notifying OSP of Submission of Deliverable via a Sponsor System](#)
- Distributions made by the lab/school/center or via a 3rd party system directly to the sponsor must still be submitted via WebWise. Please upload the document as well as any proof of submission.
- In the comments section, please note mm/dd/yy of submission, how it was originally sent and OSP will back date the item for you providing you submit proof of submission.
- Publication Restricted field may be used for export control and ITAR controlled items
- 

#### Related Information:

[WebWise](#)

[OSP Online Training](#)

**Policy History:** Revision Date  
1-2-2014

Author  
OSP

Description  
Rev 1.0

### 6.3 Property Management

#### 6.4 Travel including International Travel

**Policy No:** RESEARCH 6.4

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** [Trudy.Riley@osp.gatech.edu](mailto:Trudy.Riley@osp.gatech.edu)

**Policy Statement:**

All travel by faculty, staff, students and guests utilizing sponsored programs funds administered through the Office of Sponsored Programs must meet the Cost Accounting Standard criteria. It is allowable, allocable, and reasonable. Travel is allowable as a direct charge if such travel will provide a direct benefit to the project.

If prior approval for foreign travel wasn't obtained in the proposal stage and it is a federal sponsor, please refer to the [FDP Approval Matrix](#) for next steps.

The Fly American Act applies for travel funded by federal awards

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Form Links:**

[FDP Prior Approval Matrix](#)

[Fly America Act Waiver Checklist](#)

**Related Information:** [Procurement Site for GT Travel](#)

**Policy History:**

| Revision Date | Author | Description |
|---------------|--------|-------------|
| 1-2-2014      | OSP    | Rev 1.0     |

## 6.5 Closeout

**Policy No:** RESEARCH 6.5

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director of Sponsored Programs

**Contact Email:** [Trudy.Riley@osp.gatech.edu](mailto:Trudy.Riley@osp.gatech.edu)

**Policy Statement:**

Project Close Out is an administrative process that is handled by a Contracting Specialist assigned to the Contracting Support Division within the Office of Sponsored Programs. The requirements for project closeout are established by contractual provisions and/or agency regulations. The Contracting Specialist will ensure that all required closeout documents are submitted to the sponsor (i.e. final invoice, disclosures on patents and inventions, property, and security).

**Scope:**

This policy applies to all Georgia Tech faculty and staff members.

**Procedures:**

### 3.1 Closeout Procedures

#### Process

30 days prior to end of performance date – Auto-generated e-mail sent to PI and department notifying PI that project expires in 30 days

1. PI notifies CO if extension will be requested
2. No action required by PI if project will expire at end of performance date

30 days after end of performance date – Auto-generated e-mail sent to PI stating project has passed its end of performance

Project is closed by Contracting Specialist

#### Reporting Requirements

1. PI responds to close out notice stating if there are inventions or discoveries associated with project
2. PI completes all deliverables for the project
3. Final Invoice/Financial Papers are completed by G&C Accounting or GTRI Accounting

### 3.1 Closeout Procedures

Subagreements  
Termination of Project

Questions?

#### Responsibilities:

##### 4.1. Principal Investigator

The PI is responsible for informing the Contracting Specialist and OSP, if an extension will be requested, if there are any inventions or discoveries associated with the project, and for completing all deliverables for the project

##### 4.2. OSP Contracting Specialist

?The Contracting Specialist is responsible for ensuring that all required closeout documents are submitted to the sponsor (i.e. final invoice, disclosures on patents and inventions, property, and security).

#### Related Information:

[Grants & Contracts Web Grants Management](#)

[GTRI – Report Central](#)

|                        |               |        |             |
|------------------------|---------------|--------|-------------|
| <b>Policy History:</b> | Revision Date | Author | Description |
|                        | 1-2-2014      | OSP    | Rev 1.0     |

### 6.6 Related Georgia Tech Policies and Procedures

Administration and Finance  
<http://af.gatech.edu/>  
Grants & Contracts Accounting  
<http://grants.gatech.edu/>  
Office of Legal Affairs  
<http://www.legal.gatech.edu/>  
OIT  
<http://www.oit.gatech.edu/>

### 7.0 Industry Contracts

The Office of Industry Engagement is your home for all industry-sponsored research activities, both in the U.S. and

abroad. We review all sponsored research proposals, negotiate terms and conditions, and execute the contracts. In addition, Industry Engagement can assist with preparation of proposal materials, including the statement of work, budget, forms, and agreements. We work with Georgia Tech researchers and industry partners to ensure that agreements are in accord with university policies and procedures as well as federal regulations and requirements.

### 7.1 Intellectual Property Terms in Industry Contracts

**Policy No:** RESEARCH 7.1

**Type of Policy:** Administrative

**Effective Date:** Apr 2013

**Last Revised:** Apr 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

Georgia Tech Research Corporation asserts a right of ownership to any intellectual property that was developed by an employee of Georgia Tech or resulted from significant use of Georgia Tech resources, even in research projects sponsored by industry. However, GTRC has worked hard to create and establish mechanisms that enable companies to easily obtain access to the project IP on fair and reasonable terms with minimal negotiations.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Related Information:** [Industry Engagement](#)

|                        |               |         |             |
|------------------------|---------------|---------|-------------|
| <b>Policy History:</b> | Revision Date | Author  | Description |
|                        | 12-31-2013    | GTRC-IE | Rev 1.0     |

### 7.2 International Collaboration

[See Section 8.0](#)

### 7.3 STTR/SBIR

[Small Business Innovation Research \(SBIR\)/Small Business Technology Transfer \(STTR\)](#)

### 7.4 IP and Licensing

[See Section 6.1](#)

### 7.5 Advance Payments

**Policy No:** RESEARCH 7.5

**Type of Policy:** Administrative

**Effective Date:** Apr 2013

**Last Revised:** Apr 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech that an advance payment is required on all industrial projects with industry sponsors. This advance payment is required because it usually takes several months from the start of a project until receipt of the first payment. The amount of the advance payment is usually 25% of the total project cost. However, if the sponsor has a bad credit rating, a higher amount (up to the full project cost) may be required. The sponsor is notified of this advance payment requirement in the proposal transmittal letter. The amount of the advance payment is cited in the payment clause of the contract. An invoice for the advance payment is transmitted by the Program Initiation Division Contracting Officer with the proposal. The advance payment is applied against the final invoice for the project, and any funds remaining are returned to the sponsor. This policy does not apply when the industrial sponsor has a prime government contract under which Georgia Tech will be a subcontractor.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

| Policy History: | Revision Date | Author  | Description |
|-----------------|---------------|---------|-------------|
|                 | 12-31-2013    | GTRC-IE | Rev 1.0     |

## 7.6 Contract Templates

[Industry Forms & Contracts](#)

## 7.7 Related Georgia Tech Policies and Procedures

Administration and Finance

<http://af.gatech.edu/>

Grants & Contracts Accounting

<http://grants.gatech.edu/>

Office of Legal Affairs

<http://www.legal.gatech.edu/>

OIT

<http://www.oit.gatech.edu/>

## 8.0 International Sponsored Projects

Georgia Tech encourages international collaborations. The International Contracts and Technology Transfer group within Industry Engagement serves as the point of contact for all international sponsored projects. ICTT facilitates international collaborations and helps assure compliance with Georgia Institute of Technology policies, as well as state and federal rules, regulations, and laws.

For more information please visit the [Industry Engagement](#) site.

## 8.1 Foreign Sponsors

**Policy No:** RESEARCH 8.1

**Type of Policy:** Administrative

**Effective Date:** Apr 2013

**Last Revised:** Apr 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Reason for Policy:**

Georgia Tech encourages international collaborations. The International Contracts and Technology Transfer group within Industry Engagement serves as the point of contact for all international sponsored projects. ICTT facilitates international collaborations and helps assure compliance with Georgia Institute of Technology policies, as well as state and federal rules, regulations, and laws.

**Policy Statement:**

Projects are considered international when sponsored by a foreign government or by a private entity based in a foreign nation, regardless of where the work is to be performed. Examples of foreign sponsors are foreign governments and governmental agencies, foreign universities, non-U.S. domiciled companies (defined as a company legally organized and originally incorporated under the laws of a foreign country), and non-U.S. non-governmental organizations and foreign public charities.

Agreements with foreign sponsors will generally provide that English is the operative language, that advance payments are made, and that all payments are made in U.S. dollars.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Related Information:** [Industry Engagement](#)

| Policy History: | Revision Date | Author  | Description |
|-----------------|---------------|---------|-------------|
|                 | 12-31-2013    | GTRC-IE | Rev 1.0     |

## 8.2 Compliance Requirements for International Agreements and Sub agreements

### 8.2.1 Export Controls Policy

**Policy No:** RESEARCH 8.2.1

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Barbara Henry

**Contact Title:** Executive Director

**Contact Email:** barbara.henry@gtrc.gatech.edu

**Reason for Policy:**

The export of equipment and information including technical data, software and hardware is controlled by federal regulations such as the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR). Information such as brochures, proposals, site visits and technical discussions are deemed "technical data." Exporting information or talking to a foreign sponsor (either in the U.S. or abroad) about certain types of technical data which may have a possible military application requires a State Department export license, which may take up to three months to obtain. Exporting information or a commodity which does not have significant military application usually

requires obtaining one or more of the following: an assurance which precludes reexport; supporting documentation; or a Commerce Department export license. Export of some items to certain countries and some types of subcontracts with those countries are prohibited altogether.

**Policy Statement:**

Proposals to foreign sponsors submitted to International Contracts and Technology Transfer (ICTT) are provided to Research Integrity Assurance and to Legal Affairs for review and will not be sent to the sponsor before approval is received. It is strongly advised that proposals be submitted to ICTT at least 5 business days before the sponsor deadline to allow for this review. Proposals will not be submitted without export review.

For more information: <http://www.export.gatech.edu/>

**Scope:**

This policy applies to all Georgia Tech Faculty, Staff, and Students.

**Related Information:** [Export Control](#)

|                        |               |           |             |
|------------------------|---------------|-----------|-------------|
| <b>Policy History:</b> | Revision Date | Author    | Description |
|                        | 12-31-2013    | GTRC-ORIA | Rev 1.0     |

## 8.2.2 Foreign Corrupt Practices Act (FCPA) Policy

**Policy No:** RESEARCH 8.2.2

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech that each of our employees, faculty, staff, agents, representatives, vendors and other third parties that work with GIT, GTRC and GTARC comply with the anti-bribery laws of the United States and of the foreign countries where Georgia Tech does business. Bribery of any kind in the United States and abroad, regardless of foreign custom or practice, is strictly prohibited. No Georgia Tech employee, faculty, staff, agent, representative, vendor or any other third party with which Georgia Tech works shall make any payment or provide anything of value, to any person, in order to improperly influence that person to secure any advantage for Georgia Tech, including obtaining or retaining business, or directing business to any person or entity. It is also the policy of Georgia Tech that each of its employees, faculty, staff, agents, representatives, vendors and all third parties that work with Georgia Tech make and keep books, records, and accounts, which, in reasonable detail, accurately reflect any transactions and dispositions of the university and any of its subsidiaries or partners. Any contracts involving, directly or indirectly, foreign officials must be in writing and reviewed by the Georgia Tech Office of Legal Affairs prior to execution. The Foreign Corrupt Practices Act (FCPA) is a federal law (15 U.S.C. § 78-dd-21 et seq.) that exists to prevent corrupt practices in international transactions. The Act prohibits bribery of foreign officials and employees who work for foreign governments. The FCPA prohibits the corrupt payment (or offer, promise or authorization of payment) of anything of value to any foreign official or employee, directly or indirectly, for the purpose of obtaining or retaining business, directing business to any person or entity, or securing any improper advantage. The FCPA's prohibitions are applicable to United States organizations, public or private, and any person, including a foreign person or firm, if they commit a prohibited act in the United States. Further, a United States entity may be held liable under the FCPA for the improper activities of its foreign subsidiaries if the United States entity authorized or participated in the conduct. This policy ensures the Georgia Tech community is aware of, monitors, and complies with this statute.

**Scope:**

This policy applies to all Georgia Tech operations worldwide. It applies to the Institute's (including subsidiaries) own employees, faculty, and staff. The Institute expects that third parties with whom the university works, i.e., all vendors, representatives, joint venture partners, and other third parties on international operations will comply this policy.

**Definitions:****Foreign Officials****Enforcement:**

In addition to the federal civil and criminal fines and penalties imposed by the FCPA itself, violators of this Georgia Tech policy may be subject to disciplinary measures imposed by the Institute. Penalties for violations will vary with the circumstances, but may include termination. If any Georgia Tech employee is unsure about whether they are being asked to make an improper payment, they should not make the payment. They should consult with their supervisor, the Georgia Tech Office of Legal Affairs, or call Georgia Tech's Ethics Hotline at 1-866-294-5565, or report the instance using our online reporting tool if there is any doubt about the propriety of the payment. Institute policies prohibit retaliation for good faith reporting.

To report suspected instances of noncompliance with this policy, please visit Georgia Tech's *EthicsPoint*, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

**Policy History:**

| <i>Revision Date</i> | <i>Author</i> | <i>Description</i> |
|----------------------|---------------|--------------------|
| 12-31-2013           | GTRC-IE       | Rev 1.0            |

**8.2.3 Anti-boycott Compliance Policy; Restrictive Trade Practices**

**Policy No:** RESEARCH 8.2.3

**Type of Policy:** Administrative

**Effective Date:** Mar 2013

**Last Revised:** Mar 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech that that each of our employees, faculty, staff, agents, representatives, vendors and other third parties that work with GIT, GTRC and GTARC comply with all requirements set forth in Title 15 C.F.R. Part 760 (Restrictive Trade Practices or Boycotts) and all related regulations pertaining to boycotts of specific countries.

United States law prohibits any United States person from refusing, agreeing to refuse, or requiring or requesting any other person to refuse to do business with any business concern organized under the laws of a boycotted country, with any national or resident of a boycotted country, or any other person, when such refusal is the result of an agreement, requirement, or request of a boycotting country which runs counter to United States policy.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Enforcement:**

To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

| Policy History: | Revision Date | Author  | Description |
|-----------------|---------------|---------|-------------|
|                 | 12-31-2013    | GTRC-IE | Rev 1.0     |

#### 8.2.4 Trafficking in Persons Compliance Policy

**Policy No:** RESEARCH 8.2.4

**Type of Policy:** Administrative

**Effective Date:** Apr 2013

**Last Revised:** Apr 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech that that each of our employees, faculty, staff, agents, representatives, vendors and other third parties that work with GIT, GTRC and GTARC comply with all requirements set forth in 18 U.S.C. 77 §§1581 et. seq. (Peonage, Slavery, and Trafficking in Persons) and all related regulations.

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff..

**Enforcement:**

To report suspected instances of noncompliance with this policy, please visit Georgia Tech's EthicsPoint, a secure and confidential reporting system, at: [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=7508](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=7508)

| Policy History: | Revision Date | Author  | Description |
|-----------------|---------------|---------|-------------|
|                 | 12-31-2013    | GTRC-IE | Rev 1.0     |

#### 8.3 F&A on International Agreements

**Policy No:** RESEARCH 8.3

**Type of Policy:** Administrative

**Effective Date:** Apr 2013

**Last Revised:** Apr 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Reason for Policy:**

Georgia Tech encourages international collaborations. The International Contracts and Technology Transfer group within Industry Engagement serves as the point of contact for all international sponsored projects. ICTT facilitates international collaborations and helps assure compliance with Georgia Institute of Technology policies, as well as state and federal rules, regulations, and laws.

**Policy Statement:**

In general, the industrial F&A rate applies to all international projects including those funded by foreign governments and foreign government entities. Any exceptions to the F&A rate for international projects need to be approved in writing by the EVPRs office. <http://policies.gatech.edu/facilities-administrative-fa-cost-rates>

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Related Information:**

[Industry Engagement](#)

[F&A Cost Rates](#)

**Policy History:** Revision Date  
12-31-2013

Author  
GTRC-IE

Description  
Rev 1.0

## 8.4 Related Georgia Tech Policies and Procedures

Administration and Finance

<http://af.gatech.edu/>

Grants & Contracts Accounting

<http://grants.gatech.edu/>

Office of Legal Affairs

<http://www.legal.gatech.edu/>

OIT

<http://www.oit.gatech.edu/>

## 9.0 Other Agreements

**Policy No:** RESEARCH 9.0

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Nov 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

Georgia Tech researchers may find it necessary to enter into agreements with entities or individuals outside Georgia Tech to facilitate a research project. Such agreements may describe understandings about roles and responsibilities in a potential research collaboration, permit the exchange of non-public proprietary information or data, or the exchange of materials for use in research. It is the policy of Georgia Tech such agreements shall:

- Be negotiated by the office responsible for the agreement,
- Be signed by an individual authorized by Georgia Tech to do so,
- Include a start date and a termination date consistent with the project, and
- Become part of the project file for research awards, for human subjects protocols, and IACUC protocols for which the agreement is relevant.

These agreements may be executed by Georgia Institute of Technology, by Georgia Tech Research Corporation, or by Georgia Tech Applied Research Corporation. These agreements themselves are not confidential although material or data exchanged pursuant to them may be considered proprietary.

### Non-disclosure Agreements

It is the policy of the Georgia Institute of Technology that when proprietary information must be exchanged and Georgia Tech and an outside partner have determined to enter into a contract, a non-disclosure agreement (NDA) is used to outline the terms under which the proprietary information shall be exchanged. To initiate an NDA, please complete the NDA Routing Form, which is processed by the Office of Legal Affairs <http://www.legal.gatech.edu/>.

### Material Transfer Agreements

It is the policy of Georgia Tech that when faculty or staff at Georgia Tech want to send materials to or receive materials from companies, that a Materials Transfer Agreement (MTA) should be utilized. A MTA clarifies how the materials may be used and defines rights and responsibilities for both the provider and the recipient. The Office of Industry Engagement handles all incoming and outgoing MTAs. <http://industry.gatech.edu/researchers/forms/>

### Memoranda of Understanding (MoU)

It is the policy of Georgia Tech that when two or more parties wish to engage in a collaborative effort in research, education or other activities that furthers the mission of Georgia Tech that a Memoranda of Understanding [MOU] is utilized. MOUs are legal agreements defining the roles and responsibilities. MoUs do not include terms and conditions for funding, exchange of materials, non-disclosure of proprietary information, licensing or future licensing of intellectual property, or specific research activities. MoUs may, however, describe how agreements for such activities will be negotiated and establish a timeline for doing so. For more information see <http://www.legal.gatech.edu/>

#### Scope:

This policy applies to all Georgia Tech Faculty and Staff.

#### Form Links:

[NDA Routing Form](#)

[Incoming Material Transfer Initiation Form](#)

[Outgoing Material Transfer Initiation Form](#)

#### Related Information:

[Office of Legal Affairs](#)

[Industry Engagement – Forms and Agreements for Researchers](#)

**Policy History:** Revision Date  
01-02-2014

Author  
GTRC-IE

Description  
Rev 1.0

## 9.1 Non-disclosure Agreements (NDA)

**Policy No:** RESEARCH 9.1

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Nov 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

It is the policy of the Georgia Institute of Technology that when proprietary information must be exchanged and Georgia Tech and an outside partner have determined to enter into a contract, a non-disclosure agreement (NDA) is used to outline the terms under which the proprietary information shall be exchanged. To initiate an NDA, please complete the NDA Routing Form, which is processed by the Office of Legal Affairs <http://www.legal.gatech.edu/>

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

| Policy History: | Revision Date | Author  | Description |
|-----------------|---------------|---------|-------------|
|                 | 01-02-2014    | GTRC-IE | Rev 1.0     |

## 9.2 Material Transfer Agreements (MTA)

**Policy No:** RESEARCH 9.2

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Nov 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech that when faculty or staff at Georgia Tech want to send materials to or receive materials from companies, that a Materials Transfer Agreement (MTA) should be utilized. A MTA clarifies how the materials may be used and defines rights and responsibilities for both the provider and the recipient. The Office of Industry Engagement handles all incoming and outgoing MTAs. <http://industry.gatech.edu/researchers/forms/>

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

**Definition:**

### Material Transfer Agreement

**Related Information:** [Office of Industry Engagement](#)

| Policy History: | Revision Date | Author  | Description |
|-----------------|---------------|---------|-------------|
|                 | 01-02-2014    | GTRC-IE | Rev 1.0     |

### 9.3 Memoranda of Understanding (MoU)

**Policy No:** RESEARCH 9.3

**Type of Policy:** Administrative

**Effective Date:** Nov 2013

**Last Revised:** Nov 2013

**Policy Owner:** Georgia Tech Research Corp. (GTRC)

**Contact Name:** Kevin Wozniak

**Contact Title:** Executive Director

**Contact Email:** kevin.wozniak@gtrc.gatech.edu

**Policy Statement:**

It is the policy of Georgia Tech that when two or more parties wish to engage in a collaborative effort in research, education or other activities that furthers the mission of Georgia Tech that a Memoranda of Understanding [MOU] is utilized. MOUs are legal agreements defining the roles and responsibilities. MoUs do not include terms and conditions for funding, exchange of materials, non-disclosure of proprietary information, licensing or future licensing of intellectual property, or specific research activities. MoUs may, however, describe how agreements for such activities will be negotiated and establish a timeline for doing so. For more information see <http://www.legal.gatech.edu>

**Scope:**

This policy applies to all Georgia Tech Faculty and Staff.

| Policy History: | Revision Date | Author | Description |
|-----------------|---------------|--------|-------------|
|                 | 01-02-2014    | GTRC   | Rev 1.0     |

### 9.4 Software In-Licenses

### 9.5 Visiting Scholar Agreements

To access the Visiting Scholar Agreement form, please follow the link:

For assistance completing the form, questions or additional information, please contact the Office of Legal Affairs at [asklegal.gatech.edu](mailto:asklegal.gatech.edu)

**Form Link:** [Visiting Scholar Agreement](#)

## 10.0 Contracting Services for other Georgia Tech Affiliated Non-profit Entities

### 10.1 GCMI Agreements

### 10.2 BOR Agreements

### 10.3 GATV Agreements

## Research Integrity Assurance

**Review Date:** Dec 2014

Universities, as partners in the national research enterprise, are required by federal regulations to establish specific research committees to ensure the ethical and safe conduct of research and certain other scholarly activities. The Institutional Animal Care and Use Committee, the three Institutional Review Boards, and the Institutional Biosafety Committee have been established to oversee activities involving, respectively, vertebrate animal subjects, human research subjects, and recombinant DNA (rDNA). These federally mandated faculty committees are administered and supported by the Office of Research Integrity Assurance, which reports to the Vice President for Research. Procedures for obtaining committee approval can be found at [www.researchintegrity.gatech.edu](http://www.researchintegrity.gatech.edu).

### Conflict of Interest

For more information about Conflict of Interest, please see:

- [Faculty Handbook 5.6 Conflict of Interest and Outside Professional Activity Policy](#)
- [Conflict of Interest Management Office](#)

### Export Control

**Review Date:** Dec 2014

Research is a global endeavor and international experiences and opportunities are vital in preparing Georgia Tech's students to become leaders who meet the challenges of the future. It is sometimes challenging to conduct these programs in compliance with complex laws and regulations that change frequently.

**Because you, as an individual, and Georgia Tech can be held liable for improperly transferring controlled technology it is important that you review these federal requirements.**

#### What is Export Control?

"Exports" include:

- Verbal communication
- Transfer of written documents, and
- Transfer of U.S. computer software to a foreign national whether in the U.S. or abroad if the technology is controlled by export regulations.

The determination of whether a technology is controlled is critical in determining whether export control laws and regulations apply to the activity. To find out if technologies or data are controlled, check the Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR) control lists and contact the Office of Legal Affairs or by phone at 404.894.4812. Please refer to the both the EAR and ITAR web sites for a more general overview of the regulations regarding each of the above mentioned control lists.

As defined in these laws, technology includes information related to the design, development, or production of equipment or software. Transfers of listed technologies to non-U.S. persons or entities in the form of drawings, schematics, blueprints, research results, formulae, meetings, symposiums, classroom discussions, conversations, email, etc, are controlled.

**If any controlled information, technology, software, or equipment will be transferred to another party overseas or to a foreign party in the United States, a license must be obtained prior to the transfer unless a valid licensing exception or exclusion applies.**

For more information about Export Control, please see the [Export Control website](#).

## **Institutional Animal Care and Use Committee**

**Review Date:** Dec 2014

The Georgia Institute of Technology is committed to ensuring that vertebrate animals used in research and teaching activities receive humane care and treatment. The Institutional Animal Care and Use Committee (IACUC) is charged with reviewing all proposed use of vertebrate animals, regardless of where the work is performed and source of funding, if any. The IACUC has the responsibility and authority to review, approve, disapprove, or require changes in research activities involving vertebrate animals. This committee regularly inspects and monitors the animal care and use facilities and program at the Institute to ensure that all components are in compliance with regulations outlined in the federal Animal Welfare Act, the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals, and with the Eighth Edition of the Guide for the Care and Use of Laboratory Animals.

The animal facilities are registered with the U.S. Department of Agriculture and undergo frequent, unannounced inspections by that agency. Georgia Tech's Animal Welfare Assurance is approved by the Department of Health and Human Services. Committee membership is structured in accordance with federal requirements; members are appointed by the Vice President for Research, who also serves as the Institutional Official for matters related to vertebrate animal subjects.

The IACUC has set forth procedures for reporting, without fear of reprisal, concerns about the humane use and treatment of vertebrate animals used in research and teaching activities at Georgia Tech. The IACUC meets monthly to review research protocols which propose the use of vertebrate animal subjects; committee approval must be obtained prior to initiation of proposed activities.

For more information about the Institutional Animal Care and Use Committee, please see the [Institutional Animal Care and Use Committee website](#).

## **Institutional Biosafety Committee**

**Review Date:** Dec 2014

The Institutional Biosafety Committee (IBC) is responsible for reviewing all registrations for research, teaching, and training that involve the use of recombinant DNA by Georgia Tech faculty, staff or students and ensuring that the proposed activities comply with the federal *NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules* and all other applicable regulations. All scholarly activities involving recombinant DNA, regardless of source of funding, must be reviewed by the IBC. The Committee has the responsibility and authority to review, approve, disapprove, or require changes in research, teaching, and training activities involving recombinant DNA materials.

Georgia Tech's Institutional Biosafety Committee is registered with the National Institutes of Health's Office of Biotechnology Activities (OBA). IBC works closely with Georgia Tech's Biosafety Officer in the Office of Environmental Health and Safety. Committee membership is structured in accordance with federal requirements. Members are appointed by the Executive Vice President for Research, who is also the Institutional Official for matters related to the Biosafety Committee. The IBC holds meetings as needed to review registrations.

For more information about Institutional Biosafety Committee, please see the [Institutional Biosafety Committee website](#).

## Institutional Review Board

**Review Date:** Jan 2015

Georgia Tech subscribes to the basic ethical principles that underlie the conduct of biomedical and behavioral research involving human subjects as set forth in the Belmont Report, the timeless statement of ethical principles and guidelines for the protection of human subjects published in 1979 by the National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research.

The three Georgia Tech Institutional Review Boards are charged with protecting the rights and welfare of human subjects participating in research projects conducted by Georgia Tech faculty, staff, or students. These include the Central IRB, the Joint Georgia State University-Georgia Tech IRB for the Advanced Brain Imaging Center, and the Classified IRB. The IRBs have the responsibility and authority to review, approve, disapprove, or require changes in research activities involving human subjects. All proposed research activities involving human subjects, regardless of source of funding or study location, must be reviewed and approved by the appropriate Georgia Tech Institutional Review Board (IRB) prior to initiation of research. The IRBs hold regularly scheduled meetings to review research protocols involving human subjects.

Georgia Tech's Federalwide Assurance is approved by the Department of Health and Human Services, and the Institutional Review Boards are registered with the Department of Health and Human Services, Office for Human Research Protections.

Committee members are appointed by the Vice President for Research, who also serves as the Institutional Official for matters related to human subjects. Membership is structured in accordance with federal requirements set forth in *Title 45 Code of Federal Regulations Part 46*, Federal Policy for the Protection of Human Subjects• including *Subparts A, B, C, and D*, and in *Title 21 Code of Federal Regulations, Parts 50, 56, 312, and 812*.

For more information about the Institutional Review Board, please see the [Institutional Review Board website](#).

## Protecting Sensitive Data

Protecting Sensitive Data in Electronic Format and Best Practices for Backing Up Sensitive Data

- The Office of Information Technology (OIT) provided this guidance for the Office of Research Integrity Assurance to share with faculty and other researchers who possess sensitive data, particularly those data that involve human subjects and for which confidentiality is essential. Detailed safeguard recommendations for protecting sensitive data are posted on [OIT's site](#).
- These safeguards are highlighted here:
  - Store data only on a laptop/desktop with whole disk encryption. This will protect the data in the event the machine is stolen.
  - Back up the data regularly to a professionally-managed file server that is protected and backed up on a

routine schedule. Talk with OIT or a CSR for more information on options.

- Back up data to a tape or drive that is managed by OIT or the researcher's unit. Back ups should be encrypted and stored in a physically secure location.
- Machines on which data reside should be fully patched with the latest security patches.
- Limit access to the data strictly to those with legitimate need. For example, do not store data on a public-facing web server or Prism account.

For more information about Protecting Sensitive Data, please see: ["Protecting Sensitive Data in Electronic Format and Best Practices for Backing Up Sensitive Data"](#)

## Responding to Allegations of Scientific or Other Scholarly Misconduct

Please see [Faculty Handbook 5.7 Policy for Responding to Allegations of Scientific or Other Scholarly Misconduct](#)

## Responsible Conduct of Research

**Last Revised:** Jul 2013

**Review Date:** Jul 2016

### Policy Statement:

Georgia Tech students and trainees engaged in research at the undergraduate, graduate and post-doctoral levels shall receive formal instruction in ethical considerations and decision making in Responsible Conduct of Research that is appropriate for their disciplines and for the stages of their research careers. This policy is intended to comply with the requirements of the National Science Foundation's (NSF) implementation of the requirements of Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act (42 U.S.C. 1862o-1) found in the NSF Award and Administration Guide, Chapter IV, and National Institutes of Health (NIH) requirements found in NOT-OD-10-019\*.

Responsible Conduct of Research (RCR) is defined by NIH "...as the practice of scientific investigation with integrity. It involves the awareness and application of established professional norms and ethical principles in the performance of all activities related to scientific research."

For more information about Responsible Conduct of Research, please see: ["Responsible Conduct of Research"](#)

### Policy History:

| Revision Date | Author         | Description   |
|---------------|----------------|---|
| 08-2013       | Policy Library | Fixed Responsible Conduct of Research external link |

## Responsible Conduct of Research Compliance Policy

**Type of Policy:** Administrative

**Effective Date:** Dec 2015

**Last Revised:** Apr 2017

**Review Date:** Apr 2020

**Policy Owner:** Sponsored Programs, Office of

**Contact Name:** Trudy M. Riley

**Contact Title:** Executive Director, Office of Sponsored Programs

**Contact Email:** [Trudy.riley@osp.gatech.edu](mailto:Trudy.riley@osp.gatech.edu)

### Reason for Policy:

Georgia Tech's RCR Compliance Policy is intended to comply with the requirements of the National Science

Foundation's (NSF) implementation of the requirements of Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act (42 U.S.C. 1862o–1) found in the NSF Award and Administration Guide: Chapter IV, the National Institutes of Health (NIH) requirements found in NOT-OD-10-019, and the U.S. Department of Agriculture (USDA) National Institute of Food and Agriculture (NIFA) program's RCR training requirements. The applicability criteria contained within this Policy (see below) may expand to cover other groups of researchers and sponsors in the future.

RCR is defined by the NIH "...as the practice of scientific investigation with integrity. It involves the awareness and application of established professional norms and ethical principles in the performance of all activities related to scientific research."

**Policy Statement:**

It is the policy of the Georgia Institute of Technology that trainees engaged in research at the undergraduate, graduate, and postdoctoral levels shall receive formal instruction in ethical considerations and decision-making in Responsible Conduct of Research (RCR) that is appropriate for their disciplines and for the stage of their research careers. Faculty, staff, and other members of the Georgia Tech community will need to complete RCR training if the sponsor of their research imposes that requirement.

It is the responsibility of the Principal Investigator/Project Director (PI) of covered projects (see Applicability below) to ensure that all applicable research team members are informed of the requirement and that the requirement has been met. (In the case of the NSF Graduate Research Fellowship Program (GRFP), these responsibilities will be shared between the graduate advisor and the Coordinating Official in the Fellowship Office.) Moreover, it is the PI's responsibility to provide appropriate mentoring through discussions of RCR topics and through oversight of the research project.

**Scope:**

The RCR Compliance Policy requires that students, postdoctoral researchers, faculty, and staff receiving research funds or who participate in research activities funded by Georgia Tech's President's Undergraduate Research Award Program (PURA) and certain covered awards (see Applicability below) shall engage in a program of study in RCR that includes some or all of the following elements:

- Conflicts of interest (personal, professional, and financial)
- Policies regarding the use of human subjects in research
- Policies regarding the use of vertebrate animals in research
- Laboratory safety, biohazard management, chemical safety, and policies regarding the use of radioisotopes and radiation sources in research
- The responsibilities and relationships of mentors and mentees
- Collaborative research
- The peer review process
- Data acquisition and laboratory tools; management, sharing and ownership of data and research tools
- Research misconduct and policies for handling research misconduct
- Authorship and publication
- Science and engineering in society: the scientist and engineer as responsible members of society and ethical issues in research and the environmental and societal impacts of scientific research

**Applicability**

This Policy is intended to meet the RCR training requirements of federal funding agencies and other sponsors. This Policy covers:

**GT PURA** – This Policy applies to all students who participate in Georgia Tech's President's Undergraduate Research Award (PURA) Program.

**NSF** – This Policy applies to all undergraduate students, graduate students, and postdoctoral researchers, whether as an employee, GRA, or other trainee, funded by new proposals submitted, or due, on or after January 4, 2010, to conduct research; it excludes, for example, conference, symposium, workshop, or travel proposals. The Policy also applies to NSF GRFP Fellows funded by Fellowship Offers effective with the 2010 Competition.

**NIH** – This Policy applies to the following NIH programs: D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R. All undergraduate students, graduate students, and postdoctoral researchers funded by an NIH training grant, a career development award (individual or institutional), a research education grant, or a dissertation research grant must receive RCR instruction, with the exception of those funded by the K99/R00 program. For the K99/R00 program, only the PI (fellow) of the project is required to complete the RCR training.

**USDA NIFA** – This Policy applies to all researchers funded by the USDA National Institute of Food and Agriculture (NIFA) program, **including the principal investigator, other faculty members, students, postdocs, and any staff participating in the research project.**

The applicability criteria contained within this Policy may expand to cover other groups of researchers and sponsors in the future.

## RCR

## Responsible Conduct of Research

### Procedures:

#### 5.1 Training Requirements by Funding Source

##### **President's Undergraduate Research Awards (PURA) Program**

All undergraduate students participating in Georgia Tech's **PURA Program** must complete an online CITI RCR course (<http://www.rcr.gatech.edu/pura>).

The mentors of students funded by the PURA Program are strongly encouraged to provide discussion-based training opportunities for these students as well.

##### **Undergraduate Students Funded by NSF or NIH**

All undergraduate students paid in whole or in part from covered projects funded by **NSF** or **NIH** must complete both: (1) online RCR training and (2) in-person RCR training.

##### **Undergraduate Online Requirement**

The online training requirement involves successfully completing a CITI RCR course (<http://www.rcr.gatech.edu/online-training>).

## 5.1 Training Requirements by Funding Source

**Undergraduate In-Person Requirement**

Applicable **NSF**-funded undergraduates must complete at least 1 hour of discussion-based RCR instruction; it is strongly encouraged that this instruction be focused on the topic of research misconduct. **NIH**-funded undergraduates must complete at least 8 hours of discussion-based (“in-person”) RCR instruction. At the discretion of the PI or School, applicable undergraduate students shall fulfill the discussion-based (“in-person”) RCR training requirement by either:

- Participating in OSP approved RCR training events ([www.rcr.gatech.edu/workshops](http://www.rcr.gatech.edu/workshops)); or
- Participating in educational events that the PI or School has deemed appropriate for RCR training, which can include regularly scheduled meetings or discussions involving the research team that address RCR topics; or it can involve a class, seminar, or other interactive approach developed by the School or PI that addresses RCR topics.‡

| UNDERGRADUATE<br>IN-PERSON RCR<br>TRAINING<br>REQUIREMENT | Funding Source<br>and Hours<br>Required | Training Options  |
|---|---|---|
|   | NSF - 1 HOUR                            | <ul style="list-style-type: none"> <li>• OSP approved RCR Training Events</li> <li>• Research Team Meetings‡</li> <li>• Other events approved by the PI or School‡</li> </ul> |
|   | NIH - 8 HOURS                           |   |

‡ Documentation of this form of in-person training must be maintained in the project file by the PI. All other training will be documented in either the Research Administration Education & Compliance training system or in Banner.

## 5.1 Training Requirements by Funding Source

**NSF-Funded or NIH-Funded Master's Students**

All master's students paid in whole or in part from covered projects funded by **NSF** or **NIH** must complete both: (1) online RCR training and (2) in-person RCR training.

**Master's Online Requirement**

The online training requirement involves successfully completing a CITI RCR course (<http://www.rcr.gatech.edu/online-training>).

**Master's In-Person Requirement**

Applicable **NSF**-funded master's students must complete at least 2 hours of discussion-based RCR instruction. **NIH**-funded master's students must complete at least 8 hours of discussion-based RCR instruction. At the discretion of the PI or School, applicable master's students shall fulfill the "in-person" requirement by either:

- Participating in OSP approved RCR training events ([www.rcr.gatech.edu/workshops](http://www.rcr.gatech.edu/workshops)); or
- Registering through Oscar and successfully completing an approved RCR course (<http://rcr.gatech.edu/rcr-courses>); or
- Participating in educational events that the PI or School has deemed appropriate for RCR training, which can include regularly scheduled meetings or discussions involving the research team that address RCR topics; or it can involve a class, seminar, or other interactive approach developed by the School or PI that addresses RCR topics.‡

| MASTER'S STUDENT IN-PERSON RCR TRAINING REQUIREMENT | Funding Source and Hours Required | Training Options  |
|---|-----------------------------------|---|
|   | NSF - 2 HOURS                     | <ul style="list-style-type: none"> <li>• OSP approved RCR Training Events</li> <li>• Approved RCR course</li> <li>• Research</li> </ul> |

## 5.1 Training Requirements by Funding Source

|  |                      |  |
|--|----------------------|--|
|  | <b>NIH - 8 HOURS</b> | Team Meetings‡<br>• Other events approved by the PI or School‡ |
|--|----------------------|--|

‡ Documentation of this form of in-person training must be maintained in the project file by the PI. All other training will be documented in either the Research Administration Education & Compliance training system or in Banner.

**NSF-Funded or NIH-Funded Doctoral Students**

Doctoral students paid in whole or in part from covered projects funded by **NSF** or **NIH** must adhere to the training requirements delineated within the GT RCR Academic Policy for Doctoral Students (<http://www.rcr.gatech.edu/doctoral-policy/>).

While the same form of online training (a CITI RCR course) is required for all applicable doctoral students, those who began their graduate program prior to Fall 2011 should check with OSP if they need to discuss other options for satisfying the in-person training requirement.

**NSF-Funded or NIH-Funded Postdoctoral Researchers**

All postdoctoral researchers paid in whole or in part from covered projects funded by **NSF** or **NIH** must complete both: (1) online RCR training and (2) in-person RCR training.

**Postdoctoral Online Requirement**

The online training requirement involves successfully completing a CITI RCR course (<http://www.rcr.gatech.edu/online-training>).

**Postdoctoral In-Person Requirement**

Applicable **NSF**-funded postdoctoral researchers must complete at least 4 hours of discussion-based RCR

## 5.1 Training Requirements by Funding Source

instruction and **NIH**-funded postdoctoral researchers must complete at least 8 hours of discussion-based RCR instruction in order to satisfy the in-person training requirement. At the discretion of the PI or School, applicable postdoctoral researchers shall fulfill the “in-person” requirement by either:

- Participating in OSP approved RCR training events ([www.rcr.gatech.edu/workshops](http://www.rcr.gatech.edu/workshops)); or
- Receiving permission to attend and participating in the RCR course (PHIL 6000) offered by the Ivan Allen College (<http://www.rcr.gatech.edu/postdocs-inperson>); or
- Participating in educational events that the PI or School has deemed appropriate for RCR training, which can include regularly scheduled meetings or discussions involving the research team that address RCR topics; or it can involve an interactive approach developed by the School that addresses RCR topics.‡

| POSTDOCTORAL<br>IN-PERSON RCR<br>TRAINING<br>REQUIREMENT | Funding Source<br>and Hours<br>Required | Training Options  |
|--|---|---|
|  | NSF - 4 HOURS                           | <ul style="list-style-type: none"> <li>• OSP approved RCR Training Events</li> <li>• Receive permission to attend PHIL 6000</li> <li>• Research Team Meetings‡</li> <li>• Other events approved by the PI or School‡</li> </ul> |
|  | NIH - 8 HOURS                           |   |

‡ Documentation of this form of in-person training must be maintained in the project file by the PI. All other training will be documented in either the Research

## 5.1 Training Requirements by Funding Source

Administration Education & Compliance training system or in Banner.

### **USDA NIFA-Funded Students, Postdoctoral Researchers, Faculty, and Staff**

All researchers funded through the National Institute of Food and Agriculture (NIFA) program, including the principal investigator, other faculty members, students, postdocs, and any staff participating in the research project (defined as those who are funded by the project), must complete an online CITI RCR course (<http://www.rcr.gatech.edu/online-training>).

The PIs of projects sponsored by NIFA are strongly encouraged to provide discussion-based training opportunities for their research team as well.

## 5.2 Deadline for Training Completion

### **Online Training Deadline**

The online training requirement described within this Policy, a CITI RCR course, must be successfully completed within ninety [90] days of first being appointed to a covered project. However, the online training requirement must be completed before an applicable person graduates or otherwise leaves the Institute even if that imposes a shorter deadline.

### **In-Person Training Deadline**

The “in-person” RCR training requirements described within this Policy must be completed within the first year of the appointment to the project or before the applicable person graduates or otherwise leaves the Institute even if that imposes a shorter deadline. A doctoral student funded by a covered project must follow the in-person completion deadline delineated in this Policy unless the “in-house” RCR course required by their home academic unit is not offered during the first year of the student’s doctoral program. However, if an applicable doctoral student is unable to complete the required in-person RCR training prior to graduating or leaving the Institute, the student must, at a minimum, have an RCR exit interview with the PI/advisor.

### 5.3 Re-Training Requirements

#### Change of Career Stage

Any applicable student who received RCR training during one career stage at Georgia Tech (for example, as an undergraduate) and is required to complete RCR training after changing to a different career stage at the Institute (for example, by becoming a master's student) must at a minimum complete any additional RCR training requirements associated with the latter career stage. A postdoctoral researcher in this circumstance who received RCR training as a doctoral student at Georgia Tech must complete at least 1 additional "in-person" training hour. Applicable students and postdocs must also adhere to any re-training requirements imposed by their funding source.

#### NIH-Funded Students or Postdoctoral Researchers

According to the NIH, "Reflection on responsible conduct of research should recur throughout a scientist's career: at the undergraduate, post-baccalaureate, predoctoral, postdoctoral, and faculty levels ... Instruction must be undertaken at least once during each career stage, and at a frequency of no less than once every four years."

The PIs of covered NIH projects are required to develop an RCR training plan that addresses the re-training issue and ensure that their trainees adhere to that training plan.

### 5.4 Pre-Award Procedures

#### RCR Instruction Plan

Compliance with the requirements for providing RCR instruction is a responsibility of the PI. As such, the PI for covered proposals, with the exception of the PI for NSF GRFP Fellows, shall complete the *RCR Project Plan Addendum* to the Sponsored Programs/Research Proposal Authorization Routing Form at the time an applicable proposal is submitted.\* This Plan should indicate which instruction method(s) will be used for those individuals who are appointed to the project and are required to complete RCR training. It shall become part of the project file in the Office of Sponsored Programs (OSP).

## 5.4 Pre-Award Procedures

\* The training requirement for covered proposals will be flagged "Yes" in the OSP Oracle Database under T&C Ethics/RCR Training and in the Research Portal under "Effort on My Funds".

## 5.5 Post-Award Procedures

### Online Training

The Office of Grants & Contracts Accounting will prepare reports of applicable students, postdoctoral researchers, faculty, and staff that are paid from applicable projects and will check these individuals against CITI records. PIs, the School, or the Fellowship Office will be notified of any non-compliance of those who are required to complete CITI training.

Documentation of online RCR training is accomplished through the CITI Program; records will be maintained in the Research Administration Education & Compliance training system.

### In-Person Training

Documentation of in-person training that has been taken to satisfy the RCR Compliance Policy is the responsibility of the PI unless the training has been completed through an OSP approved RCR training event (<http://www.rcr.gatech.edu/workshops>) or through an approved RCR course (<http://www.rcr.gatech.edu/rcr-courses>). OSP approved RCR training events will be documented in the Research Administration Education & Compliance training system; RCR courses will be documented in Banner.

### Training Certification

It is the PI's responsibility to certify on an annual basis that all students and postdoctoral researchers funded by the project are in compliance with RCR training requirements. The Annual RCR Certification must be made via the OSP Deliverable System.

#### Form Links:

[OSP Routing Form](#)

[Proposal Routing Form Tips & Hints](#)

**Responsibilities:****The Principal Investigator (PI)**

The PI is responsible for:

- filling out the RCR Project Plan Addendum to the Sponsored Programs/Research Proposal Authorization (as described in 5.4);
- notifying the research team of any applicable RCR training requirements;
- ensuring that the research team completes the RCR training;
- retaining records in the project file (as described in 5.5);
- certifying to OSP on an annual basis that the RCR training has been completed (as described in 5.5); and
- if a covered NIH project, preparing a plan to address the re-training requirements (as described in 5.3).

**Office of Sponsored Programs (OSP)**

The OSP is responsible for:

- notifying PIs about the RCR training requirements via terms and conditions in the project initiation package;
- retaining records of online (CITI) RCR training completions;
- notifying trainees, staff, and/or PIs of any non-compliance of online (CITI) RCR training; and
- retaining records of attendance at OSP-approved RCR workshops and events.

**Coordinating Official (Fellowship Office)**

The Coordinating Official for the Fellowship Office is responsible for:

- advising NSF GRFP Fellows on RCR policies and training requirements;
- working with the GRFP Fellow's graduate advisor to ensure that the training is completed;
- working with the GRFP Fellow's graduate advisor to obtain the necessary verifications required by NSF which confirm that all responsibilities have been fulfilled;
- certifying Satisfactory Academic Progress;
- working in coordination with the PI to ensure that the annual RCR certification to OSP can be submitted; and
- retaining records of in-person training completed outside of OSP approved events or approved RCR courses.

**Enforcement:*****Penalties for Non-Compliance*****Students and Postdoctoral Researchers**

Non-compliance on the part of any employed student or postdoctoral researcher may result in the termination of employment and shall result in the disallowance of salary and any associated expenses charged to the sponsored project. Cases of student non-compliance may also be referred to the Dean of Students for additional disciplinary action.

Non-compliance on the part of any NSF Graduate Research Fellow shall result in the failure to certify the Fellow's Satisfactory Academic Progress and may result in the termination of the Fellowship.

**Faculty and Staff**

Non-compliance by faculty or staff on a USDA NIFA project shall result in the disallowance of salary and any associated expenses charged to the sponsored project.

Non-compliance by the PI on a USDA NIFA project may also result in the removal of the PI from the project and the appointment of a replacement PI.

**Related Information:**

- [OSP homepage](#)
- [RCR homepage](#)
- [RCR Compliance Policy homepage \(additional information\)](#)
- [RCR Compliance Policy - FAQs](#)
- [RCR Academic Policy for Doctoral Students](#)
- [RCR Academic Policy for Master's Thesis Students](#)

**Policy History:**

| Revision Date | Author | Description        |
|---------------|--------|--------------------|
| 01-01-2016    | OSP    | Compliance Updates |