QuickCard: Award Obligation Setup Procedure

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Purpose
NU-RES Research Administration is responsible for the complete and consistent institutional review of all award obligations made to Northeastern University (NU), including adherence to University policies, verification of applicable regulatory compliance and confirmation of the institution’s ability to accept the terms and conditions of the award. Acceptance of an award occurs once this institutional review is completed by NU-RES Research Administration and the award notice and related materials have sent to NU-RES Research Finance for final award setup in Banner, the University’s system of record

Note: Please refer to the NU-RES Glossary for additional information and definitions related to terms referenced within this document.

Receipt of Award Obligation
A fully executed (or if applicable, no signature required) Notice of Award (NOA) obligating funds is sent to NU-RES@northeastern.edu.

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Support: NU-RESHC@northeastern.edu
Grant Officer: https://research.northeastern.edu/nu-res/contact/
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Grant Management Administrator (GMA) Responsibilities

GMAs are responsible for tracking and final processing of all award obligations received by NU-RES@northeastern.edu. Each award obligation is entered on the Obligation Tracking Log by the GMA and assigned a tracking number.

The GMA will send the Congratulations Email and any other applicable emails as described below. All email templates are located on the NU-RES SharePoint.

1. **Congratulations Email:**
   - An email is sent from the GMA to the PI, with a cc: to the Department Administrator and GO (CC Nancy Thomas if Subawards are present):
     - Congratulating them on their newly awards funds.
     - Indicating the tracking number for their award obligation.
     - Asking them to:
       - Complete a new Award Obligation Budget(s) when:
         - The obligation differs from proposed budget; and/or
         - Budgets for cost-share and child accounts are applicable.
       - Produce any other documents/certifications pertinent to this award, including verification of applicable regulatory compliance (e.g. FCOI, IRB, IACUC, IBC, etc.).

2. **IRB/IACUC/IBC Emails:**
   - If award includes human subject research (IRB), animal research (IACUC), stem cells or biosafety registrations, GMA emails the appropriate compliance office for proof of approval/congruence.
     - Contacts:
       - Animal Research (IACUC): Sean Sullivan, DLAM Director at S.Sullivan@northeastern.edu
       - Human Subject Research (IRB): Nan Regina, HSRP Director at N.Regina@northeastern.edu and Andrea Goldstein, HSRP Coordinator at An.Goldstein@northeastern.edu.
       - Stem Cells – either Biosafety@northeastern.edu or the Human Subject Research Office
       - BioSafety Biosafety@northeastern.edu

3. **RCR Notification:**
   - For applicable awards with student support (undergraduates, graduates, post-docs), GMA sends Responsible Conduct of Research (RCR) notification email to PI, with a cc: to the Department Admin and GO.

4. **Financial Conflict of Interest (fCOI) Forms:**
   - GMA initiates fCOI review and completes the Project Information section of the Financial Conflict of Interest fCOI Certification form and the Investigator Financial Conflict of Interest Determination

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5. **Administratively-Initiated Request (AIR) for Advance Account:**
   - An AIR request is sent from the GMA to Research Finance (RF):
     - GMA verifies whether the award already has an advance account.
     - If no advance account exists, GMA assigns the AIR request a UPAF tracking number, completes the UPAF form and sends it along with the NOA to Research Finance via Banner_Setups@northeastern.edu with a cc: to the Department Admin and GO.

   **NOTE:** If unsure if an item is required (e.g. updated budget, IRB, IACUC, IBC, RCR, AIR request, etc.), GMA should discuss with GO before requesting information from PI, Department or Research Finance.

6. GMA creates Coeus Award Module Shell

7. **Compilation of Award Package:**
   - As the necessary documentation is provided to the GMA, they are scanned, the electronic Award Package (AP) is compiled, Award Obligation budget (if not requested from dept.) and an Award Obligation Setup (AOS) Form are completed by the GMA.
   - Award Package Order, as applicable:
     - Award Obligation Setup (AOS) Form (saved as a stand-alone PDF)
     - Completed Award Checklist
     - Applicable Award Obligation Budget(s) (saved as a stand-alone Excel)
       - If award matches proposal, GMA prepares budget. If award differs from proposed amount, Department prepares budget.
     - Institutional Base Salary Calculator
     - IBS Certification / verification (see p. 4 of this SOP)
     - Financial Conflict of Interest (fCOI) Certification Form (saved as a stand-alone PDF)
     - Investigator Financial Conflict of Interest (fCOI) Determination Certificate (saved as a stand-alone PDF)
     - Backup Documentation (saved as 1 PDF):
       - Notice of Award
       - AIR UPAF
       - Regulatory Compliance Documents (e.g. Investigator Certification, IRB, IACUC, etc.)
       - Final, Submitted Application

   - GMA sends AP package via email to GO.
   - GMA changes status on Obligation tracker to “GO Review” while the file undergoes GO review.
   - GMA changes the status to “Director Review” while the file undergoes Quality Control review.

8. GMA responsibilities are continued below in the Routing to Research Finance (RF) for Final Processing section.
Grant Officer (GO) Responsibilities
GOs are responsible for reviewing the entire award obligation package to ensure all funding agency and institutional regulatory and compliance matters are accurately documented.

1. **Budget Review:**
   - **Institutional Base Salary (IBS):**
     - Confirm that IBS has been calculated correctly (Appendix A) and is accurately represented on the Award Obligation Budget.
     - If any errors are present, GO will return Award Obligation Budget to College/Department for corrections.

<table>
<thead>
<tr>
<th>Acceptable IBS verification documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copy of letter of appointment</td>
</tr>
<tr>
<td>Certification (Appendix B) by individual with direct knowledge of the following:</td>
</tr>
<tr>
<td>Individual’s Appointment(s) type and title, e.g.: Professor (faculty); Chair (administrative supplement);</td>
</tr>
<tr>
<td>1. FTE: Full Time (1.0) or if PT % (e.g. 0.6 FTE);</td>
</tr>
<tr>
<td>2. Base Term of the appointment (8 months/9 months/12 months); and</td>
</tr>
<tr>
<td>3. Compensation</td>
</tr>
</tbody>
</table>

   - **Measurable Effort:**
     - Memoranda 01-06 Clarification of OMB A-21 Treatment of Voluntary Uncommitted Cost Sharing and Tuition Remission Costs
       - **All extramurally-funded research programs (except for those outlined below) should have some level of committed faculty (or senior researchers) effort, whether supported by the grant (Salary Support On Grants SSOG) or cost-shared by NU. This effort can be provided at any time within the fiscal year (summer months, academic year, or both).** Such committed faculty effort shall not be

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excluded from the organized research base by declaring it to be voluntary uncommitted cost sharing. If a research program research sponsored agreement shows no faculty (or senior researchers) effort, paid or unpaid by the, an estimated amount must be computed by the university and included in the organized research base.

- However, some types of research programs, such as programs for equipment and instrumentation, doctoral dissertations, and student augmentation, do not require committed faculty effort, paid or unpaid by the Federal Government, and consequently would not be subject to such an adjustment.

- **DHHS Salary Cap**
  - A legislatively-mandated provision limiting the direct salary (also known as institutional base salary ("IBS") but excluding fringe benefits and indirect costs), for individuals working on NIH grants and cooperative agreements. The cap establishes a maximum annual rate of pay at which an individual’s full time effort of a twelve month period can be charged.

- **Proposed Levels of Commitment** – The amount of effort committed to an externally sponsored activity, as represented in the proposal budget and reviewed by the funding agency. This functions as the baseline for review/comparison once award is made and during life of award.

- **Committed Effort** - During the period of performance of an award, committed effort is tracked to confirm whether prior approval is needed due to any fluctuations based on funding agency guidelines. For example, review of committed effort during the RPPR review and submission process, cumulative adjustments, and Time & Effort certification managed by Research Finance.

- **Cost Share (Under Recovery of Salary)**
  - Please refer to the NU [Cost Share Policy](#)
  - Committed Cost Share (either voluntary committed or mandatory/stipulated) requires a separate Cost Share budget allocation form.
  - Please refer to the [NU-RES Glossary](#) for additional information and definitions related to Cost Share.

- **Capturing NU’s Contribution to Research and Sponsored Activities**
  - NU’s contribution to research is captured on the AOS form and includes the following information:

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- This information can be found on the Award Obligation budget

2. **FCOI Requirements:**
   - Financial Conflict of Interest (fCOI) Certification Form:
     - GO reviews the fCOI documents completed by GMAs during intake; updates document and confirms any updates with PI as applicable.
     - If fCOI documents are still outstanding when AP is routed to GO, GO follows up with PI, GMA, Compliance Office, as applicable.
   - PHS FCOI Policy:
     - If Sponsor follows PHS FCOI policy, GMA verifies whether all Investigators have completed FCOI training (individual training information is available in Coeus).
     - Verification is via the CITI website
     - Per PHS FCOI policy, training must be completed every four years.
     - If training is outstanding, GMA sends training request to applicable individuals and keeps PI informed.

3. **Best Practices:**
   - Review all award/proposal documents (e.g. solicitation, proposal, award notice,

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associated terms & conditions, etc.) using the Award Setup Checklist. Be sure to review for language related to insurance, export controls, confidential information, etc. and ensure appropriate approvals are in the file.

- Review AOS and budget to make sure all fields are complete and correct.
- If items are missing (e.g. IACUC, IRB, Budget, etc.), GO follows up with the PI and Department on status.
  - Reminder- If any errors are present, GO will return Award Obligation Budget to College/Department for corrections.
- If RCR requirements are applicable, but RCR notification was not generated by GMA, GO prepares the notification and sends it to the PI.
- If an AIR account has been requested but not set up, GO follows up with Finance.
- Once the AP is updated and complete, GO emails it to the Associate Director with a cc: to NU-RES@northeastern.edu.

Quality Control Review
Associate Director conducts final compliance and regulatory review and approves the AP. Upon approval, Associate Director emails package to Research Finance for processing. If questions arise, Associate Director returns AP to GO for resolution.

Routing to Research Finance (RF) for Final Processing
Once the final, complete and approved AP is routed by the Associate Director to Research Finance via Banner_Setups@northeastern.edu, copying NU-RES@northeastern.edu as well as the following stakeholders:

- The PI
- Department Administrators
- Grant Officer
- Subcontract Manager (if applicable)

Associate Director will upload final AP to the Coeus Award Module (see Coeus Award Guide for instructions).

GMA completes the following final tasks:
1. Uploads copy of AP into the Shared Drive.
2. Changes status in Coeus Award Module from “Under Review” to “Active”.
3. Updates the transaction is closed on the obligation-tracking log.

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1. NOA with obligated funds is received
2. Tracking number assigned
3. A congratulatory email is sent to PI with tracking number, requesting new budget and pertinent documentation, as applicable
4. AIR Account is created
5. Coeus Award Module shell is created
6. Award Obligation Setup (AOS) form is created and backup compilation begins
7. Institutional Base Salary and other regulatory requirements are confirmed
8. Final AP routed to Research Finance
9. AP uploaded to COEUS and Shared Drive
10. Award is setup and the status in tracking sheet is changed to complete
Appendix A - IBS Calculator Instructions

IBS Calculator can be found on the NU-RES Resources Webpage.

IBS Calculation Instructions:

Step #1

- Establish the Proposed Level of Commitment (Effort)
- Convert % Proposed Level of Effort into Person Months (PM)
  - Academic Year Period and, if any,
  - Outside-Academic Year (OAY)/Summer Period

Step #2

- Establish the individual’s IBS
- Calculate the Corresponding IBS Per Month Rate

Step #3

- Multiple the PMs x IBS Per Month Rate = Salary Support on Grant (SSOG)

Identify any issues that may complicate Steps 1-3

(Variance of 3-5% due to inflation is acceptable)
## Appendix B- IBS Certification Form

In accordance with Northeastern University’s Policy on Institutional Base Salary for Extramurally-Funded Sponsored Projects\(^1\), Research Enterprise Services (NU-RES) requires IBS\(^2\) documentation on file for all individuals who attribute effort to a sponsored project.

The preferred form of IBS documentation is the individual’s appointment letter(s). The purpose of this form is to provide an alternate method of collection when the letter(s) are unavailable or cannot be shared. An updated form should be submitted beginning of each NU fiscal year or anytime changes affecting IBS occur.

<table>
<thead>
<tr>
<th>Name:</th>
<th>NU Fiscal Year:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Primary Appointment</strong></td>
<td></td>
</tr>
<tr>
<td>College:</td>
<td>Department:</td>
</tr>
<tr>
<td>Appointment Title:</td>
<td>Term (in months):</td>
</tr>
<tr>
<td>Full-Time Equivalent %:</td>
<td>Salary:</td>
</tr>
<tr>
<td><strong>Subsequent Appointment</strong></td>
<td></td>
</tr>
<tr>
<td>College:</td>
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<td>Salary:</td>
</tr>
</tbody>
</table>

**Comments/Notes:**

The information contained herein is, to the best of my knowledge and belief, accurate and current as of the date of this certification.

Signature: __________________ Date: __________

Name: __________________ Title: __________________

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1. [https://research.northeastern.edu/nu-res/institute-base-salary-policy/](https://research.northeastern.edu/nu-res/institute-base-salary-policy/)
2. Institutional Base Salary (IBS) is defined as the annual compensation paid by Northeastern University for an individual’s appointment(s), whether that individual’s time is spent on research, teaching, administration, or other activities.

IBS includes regular salary as well as administrative and endowed supplements for additional appointment(s) such as dean, chair, and/or center or institute director.

IBS does not include bonuses, honoraria, extra service or incentive pay, if any, reimbursed expenses, or any income that an individual earns outside of duties or responsibilities performed for NU, such as consulting. IBS also does not include supplemental pay that may be issued for temporarily performing duties that fall outside the responsibilities associated with current appointment(s).

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