

COLUMBUS STATE

GRANTS OFFICE

Procedures for Pre-Award Development Services

	Page
1.0 Context of Grants Development at Columbus State Community College.....	1
2.0 Relationship with the Foundation and Center for Workforce Development	2
3.0 Pre-award Procedures	2
3.1 Grant Planning Process.....	2
3.2 Cost Principles for Developing Budgets	3
3.3 Allowable and Unallowable Costs	3
3.4 Cost Sharing	5
3.5 Procedures for Developing Line Item Budgets on Sponsored Programs	6
3.5.1 Personnel Costs.....	6
3.5.2 Fringe Benefits.....	8
3.5.3 Indirect Costs	8
3.5.4 Travel Costs	10
3.5.5 Meeting Costs	10
3.5.6 Equipment Costs	10
3.5.7 Materials and Supply Costs	11
3.5.8 Consultant Costs	11
3.5.9 External Evaluators.....	14
3.5.10 Publication Costs	14
3.5.11 Participant Support Costs.....	15
3.5.12 Sub-awards with Colleges, Universities, and other Partners	15
3.5.13 Scholarships and Financial Aid.....	17
3.5.14 Other Costs	17

COLUMBUS STATE

GRANTS OFFICE

Procedures for Pre-Award Development Services

This is the first of a two-volume set of manuals. This document focuses on procedures for pre-award services—the services offered by the Grants Office to potential Principal Investigators developing projects and proposals. The companion document focuses on procedures for post-award services and includes information to help a Principal Investigator manage a funded project. Note: you can click on any blue underlined text to access a linked website or document.

1.0 Context of Grants Development at Columbus State Community College

Founded in 1963, Columbus State Community College in Columbus, Ohio is a comprehensive community college chartered by the Ohio Department of Higher Education in accordance with Chapter 3358 of the Ohio Revised Code. It is a public institution of higher education and a political subdivision of the State of Ohio. The College offers associate degree programs, certificate programs, and non-credit workforce development programs to nearly 25,000 learners in the Central Ohio Region. All fiscal college expenditures are audited annually. The College's financial statements have received unqualified audit opinions with no findings or questioned costs, and no material weaknesses, significant deficiencies or material noncompliance of any kind identified. The College is considered a low-risk auditee.

Columbus State is not a research institution and does not operate a traditional university sponsored program office. Sponsored programs at Columbus State are not research oriented, but rather focus on improving curriculum, student success and completion. Grants are a small part of college operations. The college averages \$11 million per year in federal, state, city and private grants while the operating budget exceeds \$137 million. Pre-award and post-award functions:

- Span multiple departments in different divisions.
- Are located in various campus locations.

The Grants Office is in the Academic Affairs Division and consists of one administrator and five professional staff members. The Grants Office provides pre-award services including ideation, Compression Planning[®], project planning, grant writing, transmittal of proposals to agencies and outreach to potential external partners. Post-award services focus on official requests for project changes (i.e., budget transfers requiring prior approval, change of PI or Co-PI, etc.), assistance with program reports, and technical assistance to Principal Investigators. PI responsibilities are described in section 4.1 below.

Grants Accounting and Reporting Services are housed in the Accounting Services Department within the Business and Administrative Services Division and consists of one supervisor and several accounting professional staff. The Grants Accounting function provides draw-down of agency funds, monitoring and approval of invoices and expenditures, financial reporting and final expenditure reports.

2.0 Relationship with the Columbus State Development Foundation and Center for Workforce Development

- The **Grants Office** develops and submits all institutional proposals for project funding to agencies. Institutional proposals have a designated Principal Investigator, project narrative, timeline and line item budget.
- The **Columbus State Development Foundation** is a 501(c)(3) non-profit corporation that seeks funding from private sponsors and donors for support and scholarships.
- The **Center for Workforce Development (CWD)** is a division that works with organizations and companies for short-term non-credit training events and related instructional and support services. The CWD collaborates with the Grants Office to submit proposals to agencies, and the CWD manages the operational aspects of contracts.
- The **Grants Office** collaborates with the Foundation and Center for Workforce Development on many major college initiatives.

See the [Fund Classification Decision Guide](#) to determine if an award is a sponsored program administered by the Grants Office, a gift facilitated by the Foundation, or a contract administered by the Center for Workforce Development.

3.0 Pre-award Procedures

The Grants Office offers [Comprehensive Services](#) to Principal Investigators (PI). Working with potential PIs, the department manages the [Grants Life Cycle Process](#) to develop projects that fulfill the college mission and are compliant with agency guidelines. This section outlines the pre-award procedures—the steps involved in converting an idea into a proposal submitted to a sponsor.

3.1 Grant Planning Process

Columbus State Community College uses a methodical planning process to obtain external funding to advance the College's strategic plan and achieve a significant return on investment. The following table outlines the grants planning process.

Annual Grants Agenda: The Grants Office staff interviews key stakeholders and creates an Annual Grants Agenda, which lists deadlines for continuing projects, institutional priorities, and divisional/department priorities. Information from the agenda is used to create the Grants Office work plan for the upcoming fiscal year.

Decision Matrix: New grant opportunities will surface during the year which are not on the agenda. These sudden opportunities are sometimes assessed using this Decision Matrix to facilitate a rational process for making the critical go/no-go decisions.

Concept Paper: As approved projects are developed during the fiscal year and more details are known, the information is shared with a Concept Review Team, which includes the Principal Investigator, any Co-Principal investigators, their supervisors, the Grants Accounting Administrator, the Budget Office and the Director of the Grants Office. Adjustments are made to the project based on this review.

3.2 Cost Principles for Developing Budgets

The federal government is the largest sponsor of external program funding at Columbus State Community College. For that reason, the cost policies of the federal government contained in the Office of Management and Budget Omni Circular (OMB Uniform Guidance: Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), are the standard for all sponsored grant activities. For a given cost to be charged against a grant, it must meet the *all of the following tests*:

1. **Is it reasonable?** (Would a prudent person off the street who is not part of the project think the expense is reasonable?)
2. **Is it allocable?** (Is the expense beneficial to the project?)
3. **Is it consistent with institutional policy?** (Is the expense treated the same way regardless of the source of funds?)
4. **Is it allowable by the grantor?** (It is in the approved budget and does the sponsor permit the expense?)
5. **It is available?** (Are there sufficient funds in the line item to cover the expense?)
6. **Is it necessary?** (Is the product/service necessary to operate the project?)

3.3 Allowable and Unallowable Costs

Different funding agencies specify different items allowable in a grant budget. In general, projects funded by private sponsors (corporate foundations, local foundations) have fewer regulations than state or federal grants. Careful reviews of the specific program solicitations identify allowable and unallowable costs. The following is a **general list** of such costs. See [Post-Award Services section 8.0](#) for an extensive analysis of allowable and unallowable costs.

General List of Allowable Costs
<ul style="list-style-type: none"> • Personnel (salaries and wages of personnel providing direct services to the project <i>at College approved rates</i>) • Fringe Benefits (<i>at College approved rates</i>) • Equipment (that supports the project goal and objectives) • Travel (that supports the project goal and objectives) • Participant support costs (stipends, meals, lodging, incidental equipment, supplies, and materials provided to a participant that support the project goal and objectives) • Project specific materials and supplies • Publication Costs • Consultant services • Sub-awards (with colleges and universities; <i>note that it is advisable to avoid sub-awards with educational service centers, high schools, and non-profit agencies</i>; these organizations must be carefully vetted) • Other costs as outlined in program solicitations such as training costs and booths for NSF PI conferences • Indirect costs • Recruiting costs

General List of Unallowable Costs

- | |
|--|
| <ul style="list-style-type: none"> • Airfare tickets other than coach • Advertising and public relations costs (<i>except in the case of recruitment for a position necessitated by the grant or public promotion of the grant activities</i>) • Alcoholic beverages • Alumni activities • Bad debt • Capital expenditures (>\$5,000) not pre-approved by federal agency (<i>may become allowable if approved by federal agency</i>) • Commencement and convocation costs • Computers and other technological devices, including cell phones, iPads, printers, etc. (<i>unless demonstrably to be used for the specific purposes of a grant and included in proposal budget submitted to federal agency</i>) • Contingency provisions (for example, a 10% contingency for possible cost changes) • Construction and facilities modifications (<i>generally are not permitted</i>) • Contributions or donations, including cash, property, or services • Costs incurred in connection with any criminal, civil, or administrative proceedings • Defense costs if found guilty • Donations or contributions • Entertainment costs (<i>even on business trips</i>) • Fines and penalties • Food costs (<i>except for business meetings with a documented, legitimate business agenda, or meals while traveling on grant business that abide by normal College policies</i>) • Fund raising and investment costs • Goods or services for personal use • Housing and personal living expenses • Interest expenses • Institutionally furnished automobiles or other vehicles • Lobbying costs, at any level of government • Losses on other sponsored agreements or contracts (<i>it is not allowable to cover an over-expenditure on one grant by using funds from another</i>) • Meeting costs (<i>except where part of project delivery or dissemination of technical results or for project planning that has an agenda and includes off-campus partners</i>) • Memberships and subscriptions (<i>except when required by the grant</i>) • Office supplies (<i>unless for a large printing project or mailing necessitated by the grant</i>) • Payroll for College employees not engaged in the grant's activities • Payroll in disproportionate amounts to the work performed on the grant (<i>i.e., an office assistant working half his/her time on a research project may not receive more than 50% of his/her pay from that award</i>) • Postage (<i>if included in Facilities & Administrative costs, exception can be made if large mailing is necessitated by the grant</i>) • Professional service costs when work could be performed by qualified College personnel • Proposal development costs, including payroll for personnel working on the proposal |
|--|

- Publication and printing costs (*except when a research paper reports work sponsored by the federal government*)
- Public relations (*except for communications with public directly related to results or project accomplishments*)
- Recruitment and relocation costs for employees not working on the grant
- Selling and marketing costs (*promotion and outreach is allowable*)
- Student activity costs (*unless specifically provided for in the grant award*)
- Supplanted funds—federal funds must be used to supplement existing funds for program activities and must not replace those funds that have been appropriated for the same purpose at the college
- Tuition & fees (*except for training grants approved by agency*)

3.4 Cost Sharing

“Cost sharing,” “matching funds,” “in-kind-contributions,” and “leveraged funds” are interchangeable terms to indicate the portion of total project costs provided by the College and its partners.

Principal Investigators at Columbus State should avoid committing to any type of matching funds, in-kind contributions or leveraged funds on any project.

However, in some cases cost sharing is required by an agency, and the College must commit to a specific amount. The amount of required cost share might be described as a ratio (1:1), or a percentage (50%) or as “significant” or “substantial.”

Matching funds can be **cash** (items the College and its partners purchase or supply to the project), or **in-kind** (items the College and its partners have in place and donates toward the project). Contributions counted as cost sharing, or matching, for federal grants must meet all of the following criteria:

- Can be documented in the College's or its partner's accounting system records.
- Have not already been counted as contributions for any other grant.
- Are necessary and reasonable to accomplish project objectives.
- Are allowable costs under the circular (known as the Uniform Grant Guidance (UGG) — Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards).
- Are not paid under another federal award, except where authorized by federal statute to be used for cost sharing or matching.
- Are included in the approved budget when required by the awarding federal agency.

Unrecovered facilities and administrative costs (also known as “overhead” or “indirect costs”) may be included as part of cost sharing or matching with the prior written approval of the awarding federal agency, or with the approval of a federal sponsor's section of the Code of Federal Regulations. If allowable, the proposal will calculate the difference between the College's rate and the rate the sponsor allows. That difference may be counted as cost sharing and added to the proposal budget.

Columbus State Grants Office has a grants matching account—a pool of funds that may be used for cash match. The Director of the Grants Office, working with the Principal Investigator, the Principal Investigator’s supervisor, and the Senior Vice President for Academic Affairs will make decisions on allocations from the grants matching account.

3.5 Procedures for Developing Line Item Budgets on Sponsored Programs

The following section defines how the Columbus State Grants Office develops the expenses included in line item budgets. The Grants Office has budget templates you can download:

Generic Budget	National Science Foundation Budget
--------------------------------	--

3.5.1 Personnel Costs

A. Faculty Salaries & Wages

Faculty members (both full-time and part-time adjunct) are eligible to work on sponsored programs. Full-time faculty members have nine-month contracts that commence on the first day of fall semester and end on last day of spring semester—typically from mid-August to early May of the following year. Faculty members are paid twice monthly (on the fifteenth and the last day of the month) and have the option of receiving salary payments in 18 pay periods for nine months or the same annual salary spread over 24 pay periods for 12 months. The following table summarizes the weekly workload of faculty members:

Academic Year Faculty Workload	Fall Semester	Spring Semester
Required teaching workload for base salary	15 hours	15 hours
Required mission and learning support workload for base salary (including office hours, student advising, serving on college-wide, divisional, and departmental committees, etc.)	25 hours	25 hours
Total weekly faculty workload	40 hours	40 hours
Maximum overload (optional additional workload)	12 hours	12 hours

During the academic year, faculty time on externally-sponsored programs is charged in credit equivalents¹ (for example 3 credits or 3/40ths of base salary or 12 credits or 12/40ths of base salary) at (1) the actual percentage of the base salary or (2) the salary rate for adjunct faculty. The rates change annually based on salary negotiations.

During the academic year, faculty members can work on sponsored programs up to **the maximum of 15 hours per week** per semester. Note that the National Science Foundation limits faculty participation on funded programs to a **maximum of two months of effort per year**—unless specifically itemized in the budget and approved by the NSF federal program officer.

¹ **Academic year:** one credit = one hour per week

During the summer semester, Columbus State faculty members have the option of a ***maximum of 12 hours per week*** additional work. Faculty time on sponsored programs during the summer semester is charged in a similar manner.

Optional Summer Semester Faculty Workload	Optional Summer Semester
Required work load for summer base salary	12 credits (or 15 clock hours)
Required mission and learning support workload for summer base salary	25 hours
Total weekly faculty summer workload	40 hours
Maximum summer overload (optional additional workload)	12 credits

During the summer semester, faculty time on externally sponsored programs is charged in credit equivalents² (for example 3 credits or 3/40ths of base salary or 12 credits or 12/40ths of base salary) at the actual percentage of the base salary. Part-time adjunct faculty members may also work on sponsored programs and are paid according to the procedure described above at the lower adjunct rate.

B. Staff (administrative, professional, support) Salaries & Wages

Columbus State full-time and part-time staff members are eligible to work on sponsored programs as well. For current full-time staff members, the Grants Office staff will request actual salary and wage rates from Human Resources. If needed for a proposal, the total salary for a full-time employee is divided by 2,080 hours to determine an hourly rate. If a proposal budget includes a new position to be hired, the position is aligned to an HR classification, and assigned an estimated starting salary. If required for the proposal, the Grants Office will work with the appropriate HR Business Partner to develop a job description. Staff members are paid twice monthly (on the fifteenth and the last day of the month) and receive payments of their annual salary spread over 24 pay periods for 12 months, or hours reported on time cards for non-exempt staff. The actual percent of time a full-time staff member works on a project will be included in the project's budget (for example 8 hours per week or 20% of a full-time equivalent). Part-time staff may work on a sponsored program and their actual hourly wages will be included in the project budget. Part-time staff may work no more than a total of 29 hours/week for all combined college work. The budgeted amount does not increase staff compensation above the College-approved salaried amount.

C. Estimating Person-Months of Effort

The National Science Foundation requires estimating the personnel effort on sponsored programs in person-months. Estimating the number of person-months for staff members is a straightforward calculation (for example 8 hours per week or 20% of full time equivalent is equal to 2.4 person months [20% x 12 months]). This 2.4 person months is reported as Calendar Months on the Current and Pending Support Form and NSF budget form.

² ***Summer semester***: one credit = 1.25 hours per week

Estimating the number of person-months for faculty is less obvious. The Grants Office uses the following table to determine person-month equivalencies:

Number of Contact Hours	Academic Year Person-Months	Summer Semester Person-Months
1	0.6	0.2
2	1.2	0.4
3	1.8	0.6
4	2.4	0.8
5	3.0	1.0
6	3.6	1.2
7	4.2	1.4
8	4.8	1.6
9	5.4	1.8
10	6.0	2.0
11	6.6	2.2
12	7.2	2.4
13	7.8	2.6
14	8.4	2.8
15	9.0	3.0

On the Current and Pending Support Form and NSF budget reform, list the correct number of Academic Year person-months and Summer Semester person-months.

3.5.2 Fringe Benefits

Fringe benefits include any nonwage payment or benefit granted to employees by employers. Examples include State of Ohio pension plans (SERS, STRS), vacation pay, and College-paid life, health and unemployment insurance. The College's payments for fringe benefits are included in employee-compensation costs and therefore are not usually taxed. Fringe benefits are included at a specific percentage of an individual's salary based upon the category of an employee (full-time or part-time).

3.5.3 Indirect Costs

Indirect costs (also known as **Facilities and Administrative [F&A] Costs** or overhead costs) are those incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular grant-funded project, an instructional activity or any other college activity. Indirect costs include two broad categories of expenses:

- **Facilities** are defined as depreciation and use allowances, interest on debt associated with certain buildings, equipment and capital improvements, operation and maintenance expenses and library expenses.
- **Administration** is defined as general administration and general expenses, departmental administration, grants administration, student administration and services, and all other types of expenditures not listed specifically under one of the subcategories of Facilities.

The Columbus State Community College Grants Accounting and Reporting Services negotiate the Indirect Costs Rate Agreement every five years. The current Columbus State Community College Facilities and Administrative Costs Rate Agreement from the U.S. Department of Health and Human Services; Division of Cost Allocation is shown in the following table and is calculated at 50% of salaries excluding benefits (when the work is completed predominantly on-campus) and 23.6% of salaries excluding benefits (when the work is completed predominantly off-campus).

The current Columbus State Community College Facilities and Administrative Costs Rate Agreement from the U.S. Department of Health and Human Services, Division of Cost Allocation.

COLLEGES AND UNIVERSITIES RATE AGREEMENT

EIN: 1310729591A1

ORGANIZATION:

Columbus State Community College

550 East Spring Street

Columbus, OH 43216-1609

DATE: 02/18/2014

FILING REF.: The preceding agreement was dated 02/24/2010

The rates approved in this agreement are for use on grants, contracts and other agreements with the Federal Government, subject to the conditions in Section III.

SECTION I: Facilities And Administrative Cost Rates

RATE TYPES:

FIXED

FINAL

PROV. (PROVISIONAL)

PRED. (PREDETERMINED)

EFFECTIVE PERIOD

<u>TYPE</u>	<u>FROM</u>	<u>TO</u>	<u>RATE(%) LOCATION</u>	<u>APPLICABLE TO</u>
PRED.	07/01/2013	06/30/2018	50.00 On Campus	All Programs
PRED.	07/01/2013	06/30/2018	23.60 Off Campus	All Programs
PROV.	07/01/2018	06/30/2019		Use same rates and conditions as those cited for fiscal year ending June 30, 2018.

It is College procedure to always charge the full indirect rate on all grants that permit such charges.

If the full F&A rate is not allowed and there is a cost sharing requirement, with sponsor approval the Grants Accounting Office will calculate the difference between the College's rate and the rate the sponsor allows. That difference will be counted as part of cost sharing.

In rare circumstances, the College will reduce its F&A rate on grants. The Director of Grants will work with the Principal Investigator to write a summary justification. The Director will then meet with the Senior Vice President and the Vice President and Chief Financial Officer to vet the request for reducing the F&A rate. This team will decide to accept, modify, or reject the request.

3.5.4 Travel Costs

Travel expenses necessary to support and advance the sponsored program may be included in the sponsored program budget. All travel will be consistent with the documented College Policy and Procedures Manual. Commuting expenses between the employee's residence and his/her place of employment are not reimbursable. ***Under no circumstances will employees be reimbursed for alcoholic beverages.*** The following are procedures used to estimate travel costs (for more detail, see <http://www.csc.edu/resources/media/about/pdf/9-06A.pdf>).

- **Airfare**—the cost of coach class tickets; use a recognized U.S. airline, or a website such as Expedia; be sure to include baggage fees, taxes, and other fees.
- **Airport Parking**—use the rates of the current uncovered Blue Lot rate at Port Columbus Airport.
- **Mileage**—if using one's own vehicle, estimate the number of annual miles of project travel and multiply by the current rate determined annually by the Internal Revenue Service (for more detail, see <http://www.irs.gov/Tax-Professionals/Standard-Mileage-Rates/>).
- **Lodging**—estimate the number of nights lodging (for locations at least 40 miles from Columbus) and multiply by an average nightly rate (including taxes). Use Expedia or other website to estimate the lodging costs.
- **Ground Transportation**—estimated taxi or shuttle service costs.
- **Car Rental**—estimates from car rental websites.
- **Meals**—For a full day (24 hour period) meals will be \$48 for out-of-state travel and \$36 for in-state travel. (See [procedure 9-06 \(A\)](#) for calculation when partial day and/or meals provided.)

Note that the Business Travel Office should receive a Travel Request Form at least 21 days in advance of the departure date if the Travel Office is making air travel arrangements.

3.5.5 Meeting Costs

The project budget may include reasonable and customary meeting costs that are directly related to carrying out project activities, including attending conferences for dissemination of project results, holding dissemination conferences and workshops, and holding planning sessions that include off-campus project partners. Note that on-campus planning sessions must have a legitimate business purpose including a published agenda, specific outcomes and external project partners. Costs may include room rental, facilities rental (audiovisual, Internet access, etc.), meals when traveling away from Columbus, and parking fees.

3.5.6 Equipment Costs

Most agencies define equipment as tangible, nonexpendable personal property, including exempt property charged directly to the award having:

- A useful life of more than one year.
- An acquisition cost of \$5,000 or more per unit.
- The net invoice price of the equipment, including the cost of modifications, attachments, accessories, or auxiliary apparatus necessary to make the item usable for the purpose for which it was acquired.

Other charges, such as the cost of installation, transportation, taxes, duty or protective in-transit insurance, should be included. The Principal Investigator will obtain **written or e-mail** quotes from external vendors for all equipment items. College Capital Equipment guidelines must also be followed.

3.5.7 Materials & Supplies Costs

Under the following circumstances, the budget may include the cost of office materials and supplies (such as pens, paper clips, file folders, note pads, and ink cartridges) and classroom materials and supplies (such as file folders, pens, markers, crayons, scissors, etc.) for program participant use (such as notebooks, texts, laboratory books, workbooks, etc.).

The following is used to determine whether materials and supply costs are allowable in a budget.		
<i>CSCC Office Supplies</i> [53000] <i>Office Supplies Outside</i> [53010]	College IS entitled to take full F&A rate	Cannot purchase pens, paper clips, file folders, note pads, and ink cartridges for administrative purposes. Ask Chair or Director to purchase those items from an Operating Budget account.
<i>CSCC Office Supplies</i> [53000] <i>Office Supplies Outside</i> [53010]	College IS NOT entitled to take full F&A rate	Can purchase pens, paper clips, file folders, note pads for administrative purposes.
<i>CSCC Classroom Supplies</i> [53100] <i>Classroom Supplies Outside</i> [53110]	College IS entitled to take full F&A rate	Can purchase file folders, pens, markers, crayons, scissors, etc. for program participants' use. Can purchase ink cartridges used primarily to produce program materials
<i>CSCC Classroom Supplies</i> [53100] <i>Classroom Supplies Outside</i> [53110]	College IS NOT entitled to take full F&A rate	Can purchase file folders, pens, markers, crayons, scissors, etc. for program participants' use. Can also order pens, paper clips, file folders, note pads, and ink cartridges for administrative purposes .

3.5.8 Consultant Costs

An employee is an individual who performs services that are subject to the will and control of an employer—both what work must be done and how the work must be done. The employer can allow the employee considerable discretion and freedom on the job, so long as the employer has the legal right to control both the method and the result of the services.

An independent contractor is an individual over whom the employer has the right to control or direct only the result of the work and not the means and methods of accomplishing the result. Use the matrix on the following two pages to determine if an individual is an employee or an independent contractor. Check the most appropriate box for each of the factors.³

³ Adapted from the Accounting Office at Sinclair Community College.

Matrix for Determining if an Individual is an Employee or an Independent Contractor		
An Employee . . .	Check One	A Consultant . . .
Is required to comply with instructions about when, where, and how to work. College's right to instruct, not the exercise of that right, is the key. Instructions may be oral or in written procedures or manuals.	___ or ___	Is hired to provide goods or services and is not instructed in great detail about how to provide the goods or services.
Will be trained by one of the College's experienced employees. Training indicates that the employer wants the services performed in a certain manner.	___ or ___	Uses his or her own methods, is hired for his or her expertise, and receives no training from the College.
Provides services that are an integral part of the College's operations. Integration of services into business operation occurs when the success or continuation of a business depends to an appreciable degree on the performance of services that are difficult to separate from business operation.	___ or ___	Provides services that can usually stand alone and are not when the success or continuation of a business depends to an appreciable degree on the performance of services that are difficult to separate from business operation.
Is hired to render services personally. If the College is interested in who does the job as well as in getting the job done, it indicates that the College is concerned about the methods used as well as the results of services performed.	___ or ___	Is hired to provide a service and the College does not care who performs that job.
Has little control over the hiring, supervising, and payment of assistants. Such action by an employer generally shows control over people on the job with whom assistants work.	___ or ___	Hires, supervises, and pays other workers under a contract in which he or she agrees to provide materials and labor and is responsible for the attainment of a given result.
College has a continuing relationship with the person performing the services. (Services may be continuing even though they are performed at irregular intervals, on a part-time basis, seasonally, or over a short term.)	___ or ___	Has a defined relationship that typically ends when the services are completed.
Has set hours of work established by the College.	___ or ___	Sets own work schedule.
Devotes full time to the business of the College. Full time does not necessarily mean an eight-hour day or a five-day week.	___ or ___	Is free to work when, for whom, and for as many employers as desired.
Does his or her work on the College's premises. However, performance of work off-site does not, of itself, mean that no right to control exists.	___ or ___	Does work that can be completed on or off the employer's premises.
Must perform services in a prescribed sequence. The right to set the sequence, not the exercise of that right, is the key	___ or ___	Is free to perform services in any manner that produces desired results.

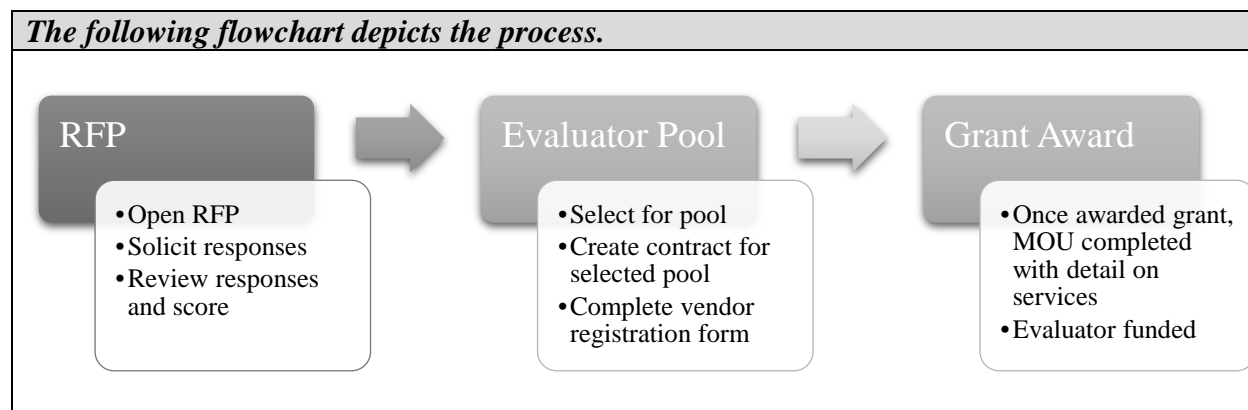
Matrix for Determining if an Individual is an Employee or an Independent Contractor		
An Employee . . .	Check One	A Consultant . . .
Will submit or provide regular written or oral reports.	___ or ___	Submits reports as specified by the contract and may provide them in the broadest of terms and with less frequency than an employee would.
Will be paid by the hour, week, or month.	___ or ___	Will be paid by the job in a lump sum or on a commission.
College will reimburse or pay for business and traveling expenses.	___ or ___	Will be paid on a job basis and will assume all expenses except those specified by contract.
College will furnish tools and materials needed.	___ or ___	Will supply his/her own tools and equipment needed to complete the job (such as computers, software, etc.).
Does not have a significant investment in the facilities that will be used in the job.	___ or ___	Has a significant investment in facilities used in performing services. Facilities generally include equipment or premises necessary for the work.
Will not realize a profit or suffer a loss as a result of the service provided.	___ or ___	Is in a position to realize a profit or suffer a loss as a result of services provided.
Performs services for one person, or simultaneously for more than one person if such persons are part of the same service arrangement.	___ or ___	Performs services for multiple businesses simultaneously.
Performs services exclusively for the College rather than working for a number of companies at the same time.	___ or ___	Makes services available to the general public. "Making services available" may include hanging out a shingle, holding a business license, and having advertising and telephone directory listings.
College has the ability to discharge.	___ or ___	Cannot be fired so long as results produced measure up to contract specifications.
Individual has the right to end the employment relationship at any time without incurring liability.	___ or ___	Agrees to complete a specific job and is responsible for its satisfactory completion or is legally obligated to make good for failure to complete the job.
From Internal Revenue Service: <i>Present Law and Background Relating to Worker Classification for Federal Tax Purposes</i> , JCX-26-07, May 7, 2007		

3.5.9 External Evaluators

External evaluators are required on major programs—such as those submitted to the National Science Foundation or the U.S. Department of Labor. In order to obtain the best review possible, an external evaluator must be engaged during the pre-award to develop the overall evaluation plan and write the evaluation section of the proposal. These pre-award services must be provided at no cost to Columbus State.

The Columbus State Community College Grants Office developed an Independent Evaluator Profile to directing the vetting of the evaluation capabilities of organizations. Since external evaluation service expenses are all typically capped at 10% of the total project budget and evaluators scale services to meet this cap, costs were not included in Independent Evaluator Profile. External evaluators completed the Independent Evaluator Profile, and these were scored using a bid tabulation matrix. Those evaluators scoring high were added to a pool of pre-approved evaluators.

A memorandum of understanding (MOU) that is binding for seven years will be signed with each pre-approved evaluator consultant. The evaluator has the option to create an addendum for additional years if the relationship is successful. There is no need for a further bidding process for contracts under \$50,000 annually.



During the pre-award process, the Grants Office will help select an external evaluator with the best capabilities based on each project's goals, objectives, activities, and scope. The Grants Office will engage the external evaluator to write the evaluation section, submit a statement of work, and line item budget that are included in the proposal. If the project is awarded, the evaluator will sign a contract (if a non-profit agency or consultant) or a sub-award (if a college or university) with the statement of work and line item to accomplish work during the respective project period.

3.5.10 Publication Costs

The costs for publications (paper-based documents, digital e-books, and websites) must be in the approved budget and are allowable only when specifically approved by the sponsor. Contact the Marketing & Communications Department or Print Services for assistance in developing costs

for each item such as writing, editing, designing, printing, programming, developing websites or e-books. Any needed faculty and/or staff time to author the item will be included in Personnel Costs.

3.5.11 Participant Support Costs

Participant support costs are funds to incentivize an individual to participate in grant-supported activities (for example, a faculty member or high school teacher participating in professional development) and include the following:

- **Stipends**—funds paid directly to participants; the National Science Foundation limits stipends to \$100/day. Participants must be set up as vendors to be paid.
- **Meals**—during activities directly related to grant activities such as training events.
- **Lodging**—during activities directly related to grant activities such as training events.
- **Incidental equipment, supplies, and materials**—items the participant uses that support the project goal and objectives; examples of such items are safety goggles, safety gloves, training books, etc.

Note that the Participant Support Costs budget must be carefully developed during pre-award. The National Science Foundation requires extensive documentation and communications to move funds into and out of the Participant Support Costs line item.

Note that NSF rarely permits such budget transfers to or from the Participant Support Cost line item. Therefore, carefully estimate such costs during pre-award.

3.5.12 Sub-awards with Colleges, Universities, and other Partners

A project partner can be listed as a sub-awardee, sub-recipient, or a vendor depending upon the project and the work accomplished. Sub-awards, generally awarded to college and university partners, are listed as sub-awards in the project budget. If the project is funded, the sub-awardee signs an agreement. Other partners are generally listed as vendors or contractors as Other Costs in budget and, if the project, is funded, sign a contract. The following defines the difference between the two categories.

A sub-award relationship is appropriate when:⁴

- Substantive, programmatic work or an important or significant portion of the program or project is undertaken by the other entity.
- The program or project is within the objectives of the entity.
- The entity participates in a creative way in designing and/or conducting the project.
- The entity retains some element of programmatic control and discretion over how the work is carried out.
- The entity commits to a good faith effort to complete the design or conduct of the project.

⁴ Adapted from the Office for Sponsored Programs at Harvard University.

A sub-award relationship is appropriate when:⁴

- The entity makes independent decisions regarding how to implement the requested activities.
- An individual has been identified at the entity and functions as a Co-Principal Investigator.
- There is the expectation that the entity will retain ownership rights in potentially patentable or copyrightable technology or products that it produces in the course of fulfilling its scope of work.
- Publications may be created or co-authored at the entity.
- The entity provides cost sharing or matching funds for which it is not reimbursed by Columbus State.
- The entity regards itself, and/or is regarded by Columbus State, as “engaged in research” involving human subjects under the Common Rule and therefore requires approval for its interactions with human subjects.

A vendor relationship (including that of an individual acting as a vendor of consulting services) is appropriate when:

- The entity is providing specified services in support of the program.
- The entity has not significantly participated in the design of the project research itself, but is implementing the plan of the Columbus State Principal Investigator.
- The entity is not directly responsible to the sponsor for the project or for determining results.
- The entity markets its services to a range of customers, including those in non-academic fields.
- Little or no independent decision-making is involved in the design and conduct of the project work being completed.
- The agreement specifies only the type of goods/services provided and the associated costs.
- The entity commits to deliverable goods or services which, if not satisfactorily completed, will result in nonpayment or requirement to redo deliverables.
- The entity does not expect to have its employees or executives credited as co-authors on papers that emerge from the project.
- The expectation is that the work will not result in patentable or copyrightable materials or products that would be owned by the entity.
- In the case of an individual vendor of consulting services, the person has no employment relationship with Columbus State, either academic or administrative in nature.

It is essential in pre-award to vet the sub-awardee to make sure it has had a clean audit, has the capacity for restricted fund accounting (isolating expenditures from the general fund), can track all expenditures, can track the time and effort of personnel, and can submit invoices of actual project expenditures.

The following items are required from sub-awardees at the pre-award proposal stage:

1. Copy of their latest financial statement and A133 audit reports
2. Agency registration in FastLane (if an NSF proposal)

3. Statement of work
4. Partner line item budget and budget justification
5. Signed letter indicating the agency will enter into a sub-award if the project is funded
6. Co-PI biographical sketch (if applicable)
7. Copy of negotiated F&A Cost Rate Agreement.

3.5.13 Scholarships and Financial Aid

In general, scholarships and financial aid are unallowable unless the grant is specifically designated for scholarships and/or financial aid.

3.5.14 Other Costs

When the full F&A rate is used, postage, local telephone costs, and memberships will not be included in proposal budgets.

<i>Postage</i> [59010]	College IS entitled to take full F&A rate	<i>Cannot</i> pay for postage other than program-specific major projects. Ask Chair or Director to purchase those items from an Operating Budget account.
<i>Postage</i> [59010]	College IS NOT entitled to take full F&A rate	<i>Can</i> pay for postage for program specific major projects and items such as mailing completion certificates, participant surveys, and instructions to parents, etc.

Other costs in a budget may also include such items as creating a booth for National Science Foundation PI conferences.