

NMSU Research Administration Services Frequently Asked Questions

General

What roles and responsibilities do the Principal Investigator (PI), Dean and Department have toward externally sponsored projects?

PIs identify opportunities for sponsored research and work with their Department Heads and Deans to ensure the proposed research can be supported. Research Administration Services (RAS) assists with proposal preparation, compliance, submission and award management.

When the sponsor asks for the submitting institution's address, do I provide my departmental address?

The address for RAS should be provided as the applicant address. The address is:

New Mexico State University
Research Administration Services
1050 Stewart Street, E2010
Las Cruces, NM 88003-8003

Who can serve as a PI on an externally sponsored project?

Eligibility to serve as a PI on an externally sponsored award is generally limited to those regular employees of the university including: (a) those with faculty rank, including college faculty and research faculty as well as administrators with faculty rank such as (but not limited to) the president, executive vice president and provost, vice presidents, deans, and associate deans, and (b) research and development technical staff. There may be instances when it is in the best interest of the university to have other persons serve as principal investigators, such as temporary employees, affiliated faculty or emeritus faculty. Exceptions to the requirements that a principal investigator must have both (a) regular employee status and (b) either faculty rank or employment as research and development technical staff may be made with written approval of both the relevant dean or director, and the vice president for research. A student may serve as a co-principal investigator but may not serve as the lead principal investigator on a project. See NMSU's Administrative Rules and Procedures (ARP) Section 11.20 <https://arp.nmsu.edu/11-20/>

Can a PI sign an agreement between an outside party and NMSU?

No, the University has delegated signature authority only to certain individuals. The Regents of New Mexico State University has delegated the Vice President for Research and Dean of the Graduate School (VPR) as the Authorized Organizational Representative who can legally commit the university to Proposals, Contracts and Grants. In order to keep the approval and signature of contractual documents moving, the VPR has delegated signature authority to the Assistant Vice President, Research Administration as the Institutional Representative for NMSU.

Where can I find the information related to DUNS, Tax ID Number or Congressional District?

This information can be found on the Frequently Used Information link:

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https://research.nmsu.edu/research_funding/Subpages/References.html

Where can I find information on Laboratory Safety policies?

NMSU's Environmental Health Safety and Risk Management provides guidance and support on laboratory safety policies, training, and compliance with regulations and industry standards, please see the following link for more information: <https://safety.nmsu.edu/lab-safety/>

Proposal Development

What do I need to do to submit a proposal through RAS?

As soon as the PI or designee knows a proposal will be submitted, they should contact their College Research Center and/or RAS.

The College Research Center or PI should provide a copy of the solicitation to the RAS Grants & Contracts Administrator to begin working on the proposal and budget components.

How can I ensure I meet NMSU's 5-day internal deadline?

RAS ensures all proposals receive a full compliance review prior to submission. The internal deadline date is five (5) working days prior to the submission deadline.

The proposal must be in its final version, meaning all required proposal components, as specified by the sponsor, are in "ready-to-submit" format. Best practice is to communicate early and finish key pieces, specifically the budget and budget justification, prior to the 5-day deadline.

RAS implements a standard operating procedure for the 5-day deadline. Emails to the PI and Department head will be distributed five (5) working days prior to the deadline; three (3) days prior to the deadline; and on the due date of the proposal.

Can a PI or departmental administrator send a proposal or quote directly to an external sponsor?

All outgoing proposals or quotes must be submitted through RAS for review and approval. RAS is responsible for ensuring contractual arrangements are in compliance with federal, state and university guidelines. Some proposals, depending on sponsor requirements may require acceptance of specific terms and conditions upon submission of the proposal. Review and involvement at the proposal stage helps to avoid complications at the award stage that may delay or prevent award set-up and acceptance, such as using the correct fringe benefits and F&A rates and avoiding provisions that cannot be accepted by the university.

Can Emeritus Faculty serve as a PI on a sponsored project?

Yes, an Emeritus faculty member may serve as the PI of a sponsored project however, there will need to be a "PI-of-record" (i.e., Department Head or Dean) designated on all internal administrative documents.

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Can affiliate or adjunct faculty serve as a PI or co-PI on a sponsored project?

Yes, adjunct or affiliated faculty may serve as PIs or co-PIs with the approval of their respective department and the Vice President for Research. Please work with your College Research Center and/or RAS to secure approval on the Request for PI Status Form https://research.nmsu.edu/research_funding/Forms.html and forward this to RAS as you continue to work on the proposal.

Can graduate students serve as a PI or co-PI on a sponsored project?

Per NMSU's Administrative Rules and Procedures (ARP) Section 11.20, <https://arp.nmsu.edu/11-20/> a student may serve as a co-principal investigator, but may not serve as the lead principal investigator on a project. The exception to this policy would be a specific requirement by a sponsor that the graduate student serve as the lead PI on a proposal.

What is cost sharing?

Cost sharing defined as a portion of project costs not borne by the sponsor.

What items can be used as cost share?

Cost share must be met by non-Federal funding and must be incurred during the period of performance and be directly related to the project. (i.e., a graduate assistant cannot be fully supported as cost share to one project but working on another).

In general, if it is an unallowable cost on the sponsor budget, it is generally unallowable to use as cost share. Typically, PI salary and fringe are the most frequently used source of cost share as these costs can be accurately tracked and reported in Banner.

When is cost sharing appropriate?

Cost sharing is appropriate when it is a mandatory requirement of the sponsor as a condition for submitting an application and receiving an award.

What is a Limited Submission Opportunity?

Limited submissions refer to funding opportunities that have a limit to the number of applications an organization can submit. These opportunities require internal selection through an internal review process to determine which proposals can move forward with an application. For more information, on the limited submission process, please contact the RAS Proposal Development Group at ls-ras@nmsu.edu.

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Budget Preparation

What are direct costs?

Direct Costs are costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

What are the current fringe benefit rates?

Current fringe rates are available at <https://af.nmsu.edu/cost-accounting-rates/>.

What are participant support costs?

Participant support costs provide for items such as stipends, per diem, travel costs and/or fees paid to or on behalf of participants or trainees in connection with meetings, conferences, symposia, or training projects. Participant support must be included in the award budget. These expenses do not incur F&A and employees are not able to be designated as participant support.

NMSU is required by federal regulations to track these funds separately. If the university receives an award that includes this line item, a separate Fund will be established in Banner for isolating and tracking these costs.

What is a Conflict of Interest?

A conflict of interest occurs when an individual's personal interests, such as family, friendships, and financial matters have the potential to compromise his or her judgment, decisions or actions in the workplace. For more information on the university's policy, please see NMSU's Conflict of Interest Policies: https://research.nmsu.edu/compliance_and_ethics/subpages/RPolicies/COI/COI.pdf

What are Facilities & Administrative (F&A) costs?

F&A or indirect costs are expenses that are not able to be directly allocated to a specific project (i.e., general office supplies, clerical support, facility costs) The University has a negotiated indirect cost rate agreement with the Office of Naval Research, our cognizant agency, to be applied to all sponsored research budgets. The current indirect cost rate agreement is located <https://af.nmsu.edu/cost-accounting-rates/>.

What items are excluded from F&A costs in a proposal budget/project?

In accordance with NMSU's negotiated F&A cost structure, the following costs are excluded from the F&A calculation: equipment, capital expenditures, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of any subcontract in excess of \$25,000. The current indirect cost rate agreement is located at <https://af.nmsu.edu/cost-accounting-rates/>.

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How do I know when to use the off-campus F&A rate?

The off-campus rate is used if more than 50% of the project effort exerted by the PI on a specific project is carried out off-campus and will take place in a location that is not owned or rented by NMSU.

Do I have to budget the full F&A rate that the University is authorized to include?

F&A costs are real costs and the reimbursement received by the University is used to pay for actual expenses such as buildings, utilities and other research support expenses. Unless the sponsor has a written policy that limits the amount or percentage of F&A costs that can be recovered, the University will propose its applicable federally-negotiated rate. If there is a need to request a waiver or reduction in F&A, the PI should complete the Waiver of F&A Form and have it approved by his Department Head and Dean. The approved form should be sent to RAS for review by the Vice President for Research. Please access the form here: https://research.nmsu.edu/research_funding/Subpages/Forms/Request-for-.pdf

My sponsor will not pay indirect/ F&A costs. Am I still able to submit, does a F&A waiver form need to be submitted to RAS?

If the sponsor has a written policy that limits or prohibits the recovery of F&A allowable on the budget, NMSU is able to proceed without a F&A waiver form.

After Proposal Submission

My proposal has been submitted, what are the next steps?

Accept the proposal record in the Academic Research & Grants Information System (ARGIS); check the record for accuracy of information and attached documents. Accepting the record as the PI moves the routing process onto your Co-PIs, Department Head, Dean and RAS.

If the proposed project involves human subjects, animal subjects or hazardous substances, approval by the relevant committee is required prior to award setup. Please see the following link for more information: https://research.nmsu.edu/compliance_and_ethics/CEOversight.html

Award Setup

I received a Notice of Award from the sponsor, what are the next steps?

1. Most sponsors contact RAS with award letters, but on occasion the PI is contacted directly. Forward award notices from the sponsor to ras@nmsu.edu and copy your College Research Center/Unit, who will initiate the award setup process.
2. Before an award can be accepted on behalf of the university, RAS will review all terms and conditions of the award agreement. Award notices require approval/signature by the university's Authorized Organizational Representative.

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3. If the project involves human subjects, animal subjects or hazardous substances, approval by the relevant committee is required prior to award setup. More information is provided on the committee websites: https://research.nmsu.edu/compliance_and_ethics/CEOversight.html

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I anticipate receiving a new award but have not received the Agreement yet. Can RAS set-up an index in anticipation of this fully executed agreement?

A waiver setup on an index is an option in cases where the PI/College is confident funding will be received and the PI requires an index number to process personnel paperwork and initiate spending. In these cases, the PI and College/Unit official can provide the Waiver Account Request for New Index Form https://research.nmsu.edu/research_funding/Subpages/Forms/Forms-04-Waiver-Account-Request.pdf. RAS will work with Sponsored Projects Accounting to establish an index on a waiver status. The proposal must complete the ARGIS routing process and any required approvals (e.g., human subjects, export control) must be in place before setting up an index on waiver.

I have been awarded a sponsored project that starts in the future, but I need to acquire a major piece of equipment for the project now. Is this allowable?

Some projects allow for pre-award expenses. However, any costs incurred prior to the award are incurred at the PI's risk and may not be reimbursed if the sponsor does not allow pre-award spending. A request will need to be made to the sponsor if the award terms do not specify pre-award expenses are allowable. To request sponsor approval of pre-award expenses, contact the RAS Grants & Contracts Administrator assigned to your College/Unit.

Award Management (Labor)

How do I determine my GA's salary?

Current salary for Graduate Assistants is located at this link: https://hr.nmsu.edu/wp-content/uploads/2019/06/Graduate-Assistants-Salary-Table_Effective-7.1.19.pdf

Under what circumstances can I charge administrative and clerical salaries to a sponsored project?

On federally sponsored projects, the salaries of administrative and clerical staff should normally be treated as F&A costs according to OMB Uniform Guidance. Direct charging of these costs may be appropriate where a major project explicitly budgets for administrative or clerical services, and individuals

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can be specifically identified with the project or activity with a high degree of accuracy (OMB Uniform Guidance section §200.413(c).

What are the sponsored award requirements when a PI goes on sabbatical or a long-term leave?

This is dependent on the funding agency and if this is considered a long-term absence. Formal notification may be required to be submitted to the sponsor and approval may be needed. Contact the RAS Grants & Contracts Administrator assigned to your College/Unit.

Award Management (Non-Labor)

How do I get ARGIS access?

Contact Research Administration Services at 575-646-1590 or ras@nmsu.edu to request ARGIS access.

If I will not be able to complete the project within the period of performance what do I need to do to request a no-cost extension?

The PI works with their College's Research Center/Unit and RAS for this type of request. The PI should provide a justification why additional time is required. A no-cost extension is not appropriate solely for the use of unspent funds; it should be used when more time is necessary to complete the scope of work and original project goals. Sponsor requirements may vary regarding what is required for a no-cost extension request, RAS is available to assist in this process.

Training

How do I register for training?

PI training is offered biannually in the Spring and Fall semesters. Registration will be announced via NMSU's Training Central and Hotline email. Registration information will be provided at that time.

The RAS Proposal Development Group also provides training and proposal writing workshops. Please contact ras@nmsu.edu / 575-646-1590 for more information.

Can I request a training session for a group (i.e., department PIs, college administrators)?

Yes, please email ras@nmsu.edu or call 575-646-1590 to schedule a customized workshop for your group.

Contracts

What is the difference between cost reimbursable and fixed price awards?

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Cost reimbursable awards are invoiced based on actual costs incurred in the performance of the project. If the total award amount is not fully expended, NMSU will not invoice for, nor receive, those unspent funds. A fixed price award is a Grant or Contract for which one party pays the other party a pre-determined price, regardless of the actual costs for services rendered. The risks associated with a fixed price award must be closely assessed; this type of award is most common in Contracts.

Are there terms and conditions that NMSU cannot accept in its contracts?

Yes, because of the university's unique status as a state-controlled institution of higher education, and a political subdivision of the State of New Mexico, NMSU is subject to the immunities and limitations of the New Mexico Torts Claim Act, NMSA 1978 41-4-1 and its amendments, where applicable. The RAS Grants & Contracts Administrator assigned to the project will negotiate terms and conditions that NMSU cannot accept on behalf of the PI.

How long does it take to finalize a contract with a sponsor?

Award negotiations depend on a variety of factors, many of which are outside the control of the Grants & Contracts Administrators performing the negotiation. Some contributing factors are: receipt of information from the PI and/or College Research Center/Unit, responsiveness of sponsors, complexity of legal issues involved and the type of sponsor, changes or updates to PI and/or administrators.

Please note that if you are in conversations with a sponsor and have not notified RAS prior to your discussions, this may cause delays in processing any award or contract. Please contact RAS when you begin to engage, or consider engaging, a sponsor for funding.

What responsibilities does a PI have to monitor Subrecipient?

NMSU's Subaward Policy and Procedures sets forth the requirements of a PI to monitor their Subrecipient's technical and programmatic activities. It states that throughout the duration of the subaward, the PI should maintain regular contact, perform site visits, review all technical reports, and review financial and programmatic records to ensure appropriate progress and to ensure compliance with subaward terms and conditions. The PI is also responsible for reviewing and approving all Subrecipient invoices. The PI verifies that invoice amounts are consistent with technical progress and that the costs are allowable according to federal, state, university and sponsor requirements.

What determines if an entity is a contractor or subrecipient?

A **contractor (vendor/purchased service)** provides ancillary goods and services that the PI needs to conduct the research effort. They are not responsible for the research results nor do they make programmatic decisions. A contractor typically provides these goods or services as part of their normal business operations to many different purchasers in a competitive environment.

A **consultant** provides review and analytical services as a one-time event, rather than establishing an ongoing relationship with the university. They provide expertise that is not otherwise available within the university and can be either an individual or a consulting firm. They do not have the ability to influence

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the direction of the research or the ability to make programmatic decisions. Their role is to produce a work product under the direction of the PI without having a named scientific role in the overall project.

A **subrecipient** carries out a portion of the prime award and has their performance measured against whether the programmatic objectives of the project were met. They are subject to all requirements specified in the prime award and responsible for programmatic decision-making. A subrecipient may also be identified as a Co-Investigator. Please see https://research.nmsu.edu/research_funding/Subpages/Subcontracts/NMSU-Subaward-Policy-May-2018.pdf for additional information on NMSU's Subaward Policy and Procedures.

What if a contract involves classified work or work with an export controlled technology, a foreign researcher, or a foreign sponsor?

If a contract involves classified work, or work with an export controlled technology, a foreign researcher or a foreign sponsor, please visit the Research and Creativity website at https://research.nmsu.edu/compliance_and_ethics/subpages/RPolicies/Export/Home.html for additional guidance. PIs will work closely with this office to ensure that all required safeguards are in place and that the university and researchers are in compliance with all federal export control laws before any research may begin. **Compliance with these laws is essential as the criminal penalties for a violation are severe.**

Subcontracts and Subrecipient Monitoring

How is a Subcontract created and setup?

Once the prime award has been fully executed, the College Research Center/Unit will prompt the RAS Grants & Contracts Administrator that a subcontract will need to be initiated. All documentation will be provided to the RAS Grants & Contracts Administrator so they are able to reach out to the subrecipient to begin negotiations. Once the subcontract is fully executed it is then encumbered in Banner on the prime index assigned.

I received a subcontract invoice, what do I do?

In coordination with the College Research Center/Unit, the PI should verify that the invoice amounts are consistent with technical progress and that the costs are allowable according to federal, state, university, and sponsor requirements. The PI review should take place within 15 days of receipt and if any discrepancies are identified the PI should contact the College Research Center/Unit.

Can a faculty member serve as a Professional Services Contractor or subcontractor on a grant held by another faculty member?

No, an NMSU faculty member cannot serve as a Professional Services Contractor or subcontractor on a sponsored project awarded to NMSU, but may serve in other capacities, such as a Co-PI. It is important to note the role of all personnel who are named on projects and determine whether their role meets the definition of significant contributor/investigator. *“Investigator”* means any individual, regardless of his or

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her title or position, whether faculty, staff, or student, who has the ability to make independent decisions related to the design, conduct or reporting of University Research, but not including individuals who perform only incidental or isolated tasks related to a research project.

What is required to include a subcontractor on a proposal?

An organization will need to provide a signed letter of commitment, scope of work, budget, budget justification and indirect rate agreement. Depending on the sponsor and solicitation other forms may be required such as biosketches, current and pending forms, etc. Please work with your Research Center/Unit and RAS to ensure proper documentation is obtained during the proposal preparation process.