



# **Manual for Principal Investigators**

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## **I Overview of External Funding of MAA Programs**

The Mathematical Association of America relies on members and committees to carry out special projects that are supported by external funding from federal agencies and private foundations. The project leadership team has the opportunity to work with the MAA in launching a national program that can have great impact and serve our community and other stakeholders.

There are fundamental differences in leading an externally supported project for the MAA and being the principal investigator on a project residing at a university or college. The Principal Investigator heading a project whose funding goes to his/her own institution may work in relative isolation fulfilling both personal professional advancement and the greater goals of the university in promoting research. Such a PI may be funded for a project that has implications for the department or whole institution and may be working with a committee and administrators to further departmental and institutional goals.

External funding to the MAA supports projects for the benefit of MAA members and the larger community of stakeholders. The PI is the project leader but is leading an MAA program. Anyone heading an MAA program or project, whether funded or not, works within the governing structure of the MAA. The MAA is not simply a fiscal agent for an individual or group effort.

Often the PI of an MAA externally funded project is an MAA member rather than an MAA staff member. Thus, to ensure smooth operation and financial and managerial accountability an MAA Director will be a member of the project leadership team and one of the project's co-PI's. This person will be referred to as the Staff Principal Investigator, or Staff-PI.

This manual provides information to people wishing to be the Principal Investigator (PI) or co-Principal Investigator (co-PI) on a grant under the auspices of the MAA. MAA uses the term PI for anyone, staff or volunteer, in charge of a grant or a project managed operationally or fiscally by the MAA. This use of the term PI is consistent with usage in federal grants and contracts.

The guidance provided in this Manual is not in any way meant to supersede or contradict federal regulations; rather, the intent is to provide more information specific to the MAA, and direct access to basic grant-management principles that are most relevant to MAA PIs. A fuller explication of applicable regulations is contained in Title 2 (Grants and Agreements) of the Code of Federal Regulations, part 200, "UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS," available at [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl).

Grants and projects under the auspices of the MAA often are initiated by an MAA committee and have a minimum of one volunteer willing to organize and coordinate the writing of the grant proposal and the management of the funded project. This person, the PI, identifies one or more

funding sources for the project with the help of the committee, other MAA volunteers, and/or staff.

The MAA Executive Director selects the appropriate staff member to act as S-PI, who lends support to the PI in the management of the entire process from initial synopsis to final report. The status of the proposal and grant are reported quarterly to the Executive Committee of the MAA.

A master file is created and maintained at the MAA headquarters. It holds all original documents pertaining to the project. Anyone, PI or MAA staff, who originates or receives any document or correspondence concerning the grant should send the original to the staff facilitator for distribution to the master file and all appropriate staff and volunteers. Documents include the synopsis, original full proposal, award letters, reports, requests for extensions and additional or supplemental support, letters responding to these requests, and other pertinent materials and correspondence.

This Manual provides a description of the internal policies and procedures necessary for the approval and implementation of a project. It details the process and necessary interactions with the staff and committees as well as the timing of these interactions.

## **II Proposal Development and Approval Process**

### **II.A Concept Development**

A project, to be funded through the MAA, must pass through several stages. The first is an appraisal to ensure that the aims and goals of the project are consistent with the mission, goals, and priorities of MAA. A prospective PI should first present a brief (1-2 page) prospectus of his/her project to the MAA Deputy Executive Director along with a copy of the grant program solicitation. This prospectus should include the background, rationale, a description of the proposed project and its activities. A budget of estimated expenses should also be submitted. Remember that there are usually costs for MAA staff and services as well as the MAA indirect cost rate and fringe benefits, which are calculated annually during the MAA audit review. Please contact the MAA Deputy Executive Director for help in writing this prospectus.

The prospectus is submitted to the Deputy Executive Director for distribution to the MAA Secretary, the Executive Director, and other appropriate personnel. The Deputy Executive Director or designated S-PI will present it to the Executive Committee for review and approval. If any member of the Executive Committee is senior personnel on a potentially competing proposal, they should recuse themselves from participation in the approval process. The Executive Committee can approve the prospectus by email or, if a more in-depth discussion is necessary, at a quarterly meeting. A decision may take several weeks depending upon the amount of discussion the Executive Committee needs to make a decision.

The prospectus should be submitted to the Deputy Executive Director as early as possible in the grant proposal process to allow for meaningful feedback and so that the Executive Committee can make a timely decision as to whether the PI should continue to work on a full proposal. The optimum lead-time is at least ten weeks before the grant agency's proposal deadline. The S-PI will try very hard to expedite this process, but the PI should be aware that without adequate lead time, concerns regarding the prospectus might delay the project until a later grant cycle.

The Executive Committee will consider the project's fit with the mission, scope, and strategic priorities of the MAA; the fit of the proposal with the funding agency's solicitation; and an assessment of the program within the criteria for comparability used to evaluate all new MAA programs. Once the prospectus is approved by the Executive Committee, the PI working with the S-PI prepares a full draft proposal (see next section) in accordance with the granting source's requirements and submits it to the Deputy Executive Director. Optimally, this should be done at least 4 weeks prior to the funding source's deadline. The S-PI and/or the ED will work with the PI and the Executive Committee to revise the proposal in time for the application deadline. If the PI has worked closely with the S-PI throughout the proposal development process, this part of the process will go more smoothly and quickly.

The Executive Committee of the Board of Governors approves proposals for all federal grants. In addition, the related budgets are approved by the Treasurer. Subsequently, the Deputy

Executive Director represents the MAA in the submission and negotiation of grants with the granting agency on behalf of the MAA.

## II.B Proposal Development Process

A process to assist the MAA carry out appropriate program evaluation is outlined in the Appendix, *Criteria for Review of New and Existing Programs*. Some of the criteria most important for potential PIs to consider are offered below:

- Is the program in line with the organizational mission and its stated priorities?
- Does the program enhance the public perception of the MAA or further name recognition?
- Is the program meeting needs of the mathematical community, general public, or other constituencies that are not being met by others?

The PI ascertains the granting source requirements and format for a proposal. The PI should work with the S-PI during the grant proposal development stage. This collaborative effort will speed the approval process. The PI should submit the completed full proposal to the S-PI according to the optimal schedule in the preceding section if at all possible. A proposal submitted with less time before the deadline may not be able to clear the editing process and final approval in time. The PI, staff facilitator, and appropriate MAA staff and volunteers work together to edit the proposal to assure that it is clear, consistent with the MAA mission, and all budget items are in accordance with agency and MAA regulations.

The S-PI distributes copies of a full draft proposal package to the appropriate officers and staff. The Deputy Executive Director or staff facilitator will make every effort to respond to the PI at least one week before the funder's deadline. The PI will then have adequate time to make revisions as required by this review.

Items to be included in the entire package depend on the specifications in the program solicitation and usually include:

- Cover letter or sheet
- Abstract
- Narrative
- Vitae
- Completed subcontracts and accompanying documentation
- Letters of support and/or acceptance from:
  - o subcontracting organizations
  - o individuals
  - o other organizations
- Budget and budget justification including the results of any competitive bidding process that is required by the funding agency (see Appendices C and D: Purchasing of Goods and Services, and Sole Source Justification).

Proposals to National Science Foundation must be submitted via FastLane and may also be prepared in FastLane. PIs and co-PIs who are contributing to the preparation of the proposal should get registered in FastLane by their institution. Those PIs who are not affiliated with an institution can get registered in FastLane by contacting the S-PI or the staff facilitator. PIs and co-PIs must be members of the MAA. An exception can be made for those whose discipline is outside of the mathematical sciences. This exception needs the approval of the MAA Executive Director.

If the proposal includes subcontracts, a letter of commitment from the subcontracting organization or a full subcontract proposal should be submitted with the full proposal and the subcontract budget should be a part of the full budget. The process of getting a letter of agreement should usually begin at least 4 weeks prior to the deadline. Some funding agencies may require that the subcontract be submitted at the same time as the proposal; others permit the completion of the subcontract after the grant is awarded. This depends on the program. If a full subcontract proposal is to be submitted with the proposal, the timeline for development and approval by MAA is the same as for the main proposal. NSF requires the subcontractor to submit the subcontract as a part of the FastLane submission of the grant proposal.

Reviews and revisions continue until all issues are resolved to the satisfaction of the Executive Director, Executive Committee, and the PI.

The PI completes the final documents including all forms and documents required by the granting agency. Once finalized, the full proposal package is given to the Deputy Executive Director a minimum of 3 days prior to the deadline. The Deputy Executive Director will not make any significant changes to the proposal or the budget without getting the approval of the PI. The Executive Director will review the proposal and officially submits it to the funding agency on behalf of the MAA.

If the funding agency, prior to awarding the grant, requires modifications that result in changes to the project activities and/or budget, the Deputy Executive Director and S-PI will work with the PI to expedite approvals as needed.

The granting agency will determine whether it will award or decline the funds or require modification to the proposal, and will send notification by mail or email. Most often, this notification will be sent to MAA staff; sometimes it is sent to the PI. Whoever receives it must send the original to the Deputy Executive Director for distribution, tracking, and reporting. If the budgeted amount of any subawards/contract for goods or services is in excess of \$3,000 per item and is not part of the original submission to the federal agency, the PI must submit all related documentation (see appendices: Purchasing of Goods and Services, and Sole Source Justification).

## II.C Budget Guidelines

The PI should work with the Deputy Executive Director or S-PI in constructing the budget. Budget items must conform to the stipulations of the funding agency and MAA financial operations. All budgetary items, both requested and offered as cost sharing by any agency or individual, must be documentable expenditures. During the operation of the grant-supported activities, this documentation must be provided in a timely basis to the MAA. These considerations may affect budgetary items to be included in the budget. Consultant fees must be explained in detail, with a daily or hourly rate and the number of days or hours to be supported. The rate cannot exceed the allowable rate specified by the funding agency.

Anyone compensated by project funding who is not a staff member must be paid either through their employer or as a consultant on the project. In the first case, the compensation must represent a portion of salary equivalent to the time devoted to the project. In the second case, compensation must be supported by a formula included in the proposed budget that shows days to be devoted to the project and the daily rate of pay. Consultants must report their days devoted to the project in order to receive compensation in a timely manner and no later than one month after the close of the grant year. No reimbursements can be made after a grant has been closed. For those grants developed with multi-year funding for PI compensation, each budget may be developed with a reasonable annual percentage increase.

## II.D Timeline

DEADLINE	ACTION
<b>10 weeks before deadline</b>	2-3 page prospectus along with budget information to DED or S-PI if identified. Prospectus submitted to EC.
<b>8 weeks before deadline</b>	Formal approval or disapproval of the prospectus given by DED / S-PI to PI
<b>4 weeks before deadline</b>	If prospectus approved, PI submits first full draft proposal. If needed, begin process of getting letters of commitment or subcontracts from subcontractor(s).
<b>2 weeks before deadline</b>	Edited full draft proposal along with budget must be in to DED.
<b>3 days before deadline</b>	Final version of full proposal submitted to DED or S-PI.
<b>By deadline</b>	DED approves proposal for submission, MAA Authorized Organizational Representative to NSF. DED submits proposal to the funding agency if it is not NSF.

## III Project Management

### III.A Funded Project Management

Once funded, the project is managed using the following procedures:

1. The Executive Director sends a copy of the award letter to the S-PI, PI, and staff facilitator.



2. The project is forwarded to the MAA Secretary to determine the relevant committee or council that would oversee the project.
3. The project is assigned a grant identification number by the Finance Department.
4. The staff facilitator sends the PI information and forms to be used in requesting payment of project expenses. The procedures, forms, etc. of the Finance Department will have a more detailed explanation in Section B.
5. The PI begins implementation of the project and, in a timely fashion, prepares all reports as required by the grantor and MAA. Reports to agencies other than NSF must be given to the Deputy Executive Director for submission and distribution. Reports to NSF are prepared by the PI and submitted by the S-PI.
6. The Finance Department, in coordination with the S-PI, reviews project budgets and expenditures and the reviewed data are sent to external PIs on a monthly basis.
7. The Treasurer approves the budget. Any request for supplementary funding for additional activities must be approved by the Treasurer.
8. The S-PI will be responsible for and manage all staff support of the project. He/she oversees the portion of the budget that goes directly to the MAA. All staff compensation is calculated on actual hours worked and individual salary rates. Staff time devoted to a project is reported on weekly time sheets. The S-PI assists the Finance Department so that MAA financial management runs smoothly and efficiently.
9. The S-PI is either a lead or co-PI on the project and represents the Executive Committee and Board in project oversight. If the volunteer leaders of the project are no longer active in management, the S-PI will be able to process unresolved financial obligations, write required reports, and close out the project. The S-PI is a member of the project management team.
10. Disputes among project PIs or with the MAA staff should be reported to the MAA Executive Director, President, Secretary or Treasurer.
11. Any products, including, but not limited to handouts, posters, Web pages, must conform to the MAA visual identity standards.

### III.B Whistle Blower Protection Policy

The Whistle Blower policy is designed to provide a mechanism for grant personnel to raise good faith concerns regarding suspected violations of law, grant federal regulations, or MAA policy; to facilitate cooperation in any inquiry or investigation by any court, agency, law enforcement, or other governmental body; and to protect individuals who take such action from retaliation or any threat of retaliation by any other employee or agent of the MAA.

#### **Policy**

The MAA is committed to maintaining a work environment where personnel are free to raise good faith concerns regarding MAA's business practices. Both MAA and non-MAA grant personnel should be encouraged to report suspected violations of the law or federal policies on the part of the MAA; to identify potential violations of relevant federal policies; and to provide

truthful information in connection with any official inquiry or investigation. The MAA expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against project personnel who raise suspected violations of law, cooperate in inquiries or investigations, or identify potential violations of federal policies. Any MAA employee who engages in retaliation will be subject to discipline, up to and including termination.

### **Procedure**

Reports of suspected violations of law or policies and reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality. If non-MAA project personnel have knowledge of or a concern of illegal or dishonest fraudulent activity, they should take the following steps:

- Report to the S-PI, unless S-PI is involved.
- Report any non-financial violation to the MAA Sponsored Programs staff, unless they are involved.
- Report any financial violation to the MAA grants accounting staff, unless they are involved.
- Report to the MAA Executive Director, unless the ED is involved.

Should the MAA executive staff be involved or should the non-employee project personnel wish to appeal a previous investigation by the MAA staff, they should contact the MAA compliance officer (MAA Associate Treasurer).

### III.C Grant Modifications

Any significant changes in activities or scope during the implementation stage must be approved by the Executive Committee. Any requests for additional or supplemental support must be approved by the Treasurer subsequent to the following:

1. The PI ascertains the granting source requirements and format for a request, writes the request, and submits it to the S-PI for distribution to the Deputy Executive Director and other appropriate staff and volunteers for review and approval. The Deputy Executive Director will determine if the request should be reviewed by officers. Requests should be made at least 60 days prior to the granting source's deadline and can be made in the following areas depending upon the granting source:
  - a. Extensions: the S-PI can request an extension (either funded or unfunded) of the annual or final deadline if the work is not completed. It should be noted whether the request is for an extension of payments or just more time to complete the project activities. **Note: the NSF deadline for requests for funded extensions and notifications of no-cost extensions is 45 days before the grant termination date.**
  - b. More financial support: the S-PI can request further financial support from the granting agency to continue or extend the activities of the project.
  - c. Budget revisions: the S-PI can request major revisions in budget line items based

upon changes made in the activities needed to complete the project.

2. The granting agency will either award or decline the requested modification and should send notification by mail or email. Most often, it will be sent to MAA staff; sometimes it is sent to the PI. Whoever receives it will send the original to the Deputy Executive Director for distribution, tracking, and reporting.

## IV Grants Financial Management

### IV.A Budgets

The PI of any externally funded project is welcome to contact the S-PI, the Executive Director, or the MAA Grants Accounting Manager (GAM) for financial assistance or advice. As soon as notification is received from the funding agency that the grant has been awarded and the final budget approved, the MAA Finance Office will assign a grant number to the project, and send the PI appropriate forms, including the Grant Expense Reporting Form and Grant Personnel Activity Form with Time and Attendance (see appendix B).

The PI is responsible for and has control over expenditures in each line item and is generally more familiar with where certain expenditures fit into the grant budget. The PI will review and approve all grant expenditures. For many externally-funded projects, there are classes of expenses which are a routine part of the project (e.g. travel expenses for a group of workshop or conference participants, all subject to the same guidelines) that may be pre-approved by the PI through a standing agreement with the S-PI. Once a PI-approved request for an expenditure or reimbursement under the grant arrives at the MAA offices, staff under the direction of the S-PI will add internal MAA accounting codes to the documentation and forward to the GAM.

Although the PI is responsible for assigning expenses to appropriate grant budget categories, the GAM will review all expenses submitted against the grant budget. The GAM ensures:

- 1) a) The expense is allowable per the funding agency, b) the expense has been coded to the appropriate budget line item per the approved budget, and c) the appropriate budget line item has a sufficient balance to cover the expense.
- 2) If there are any questions or problems with the expenditures submitted, the GAM will contact the PI to resolve the matter.
- 3) If the PI finds more funds have been spent than anticipated in the budgeted amount for a specific task, the PI may request that funds be transferred from another line item provided the proper approval has been obtained from the funding agency if prior approval is necessary. Budget transfer requests should be made to the S-PI and GAM. The GAM, in coordination with the S-PI, will amend and update the budget with the approved transfers prior to the distribution of the next monthly report.
- 4) Budget changes/readjustments:
  - a. The PI may request the MAA GAM to readjust budget lines within federal guidelines.
  - b. To adjust budget line items that require federal approval, the PI must work with the S-PI to seek that approval prior to any expenditure being incurred that would exceed the current budget levels. Any departure from this procedure must be rectified within 30 days of the submission of the expenditure to the GAM by request of the GAM.
  - c. Adjustments to the budget as a result of 4a. or 4b. will be reflected in the next

monthly report.

- d. In the event that an expenditure would exceed current budget levels and federal approval is not granted for an adjustment, the MAA will not charge that portion of the expenditure that exceeds the approved amount to the grant and that amount becomes the PI's responsibility.

#### IV.B Reimbursement of Expenditures

MAA disburses all grant funds on a reimbursement, direct billing, or direct payment basis. This means that an expense has to have been incurred before reimbursement can be requested. The PI is required to authorize all submitted expenses. Policies for processing payments of authorized expenses will be developed by the PI, S-PI, and GAM. The appropriate forms consist of the MAA Grant Expense Reporting Form (always needs to be submitted) and the MAA Grant Personnel Activity Form (submitted in addition to the Grant Expense Reporting Form only when requesting any type of time-based compensation). Compensation such as stipend or honoraria based on specific deliverables do not require submission of the Personnel Activity Form.

All requests for reimbursement or payment of expenses are to be submitted on an MAA Grant Expense Reporting Form. This form has prelisted some of the most often used budget expense items and account codes. The Form should be filled out completely, signed by the requestor, and then sent to the S-PI. Proper documentation (receipts, invoices, etc.) is needed for all expenses of \$25 or more and must accompany the MAA Grant Expense Reporting Form.

For travel, actual expenses are reimbursed but per diem may be used if budgeted and approved as such by the funding agency. Airplane flights should always be booked at coach rate and reimbursement requests should include the passenger receipt ticket showing the airfare, flight class, and airline carrier. The current government mileage reimbursement is the current federal rate. Any international travel must be approved in advance if required by the funding agency and is subject to U.S.-flag carrier regulations.

#### IV.C Reimbursements for Salaries / Personnel Expenses

Anyone compensated by project funding who is not a staff member must be paid either through their employer as part of their salary or as a consultant on the project. In the first case, the employer will bill the MAA for reimbursement. In the second case, the MAA Grant Personnel Activity Form must be filled out completely, signed by the requestor and the PI, then sent to the S-PI to authorize payment to any personnel whether stipend or honorarium. Compensation must adhere to the formula included in the project, and use the contracted rate of pay. Consultants must report days worked on the project in a timely manner (within a month is desirable) and no later than one month after the close of the grant year. No reimbursements can be made after a grant has been closed.

The PI is responsible for verifying that each person compensated under the grant did, in fact, attend the meeting or did perform the agreed-upon service. Government auditors expect to have

contracts or letters of agreement for every honorarium/stipend that is paid, even if only for one day. For amounts of \$3,000 or less, a letter of invitation with terms of agreement is acceptable. For amounts greater than \$3,000, a full consultant agreement is required. When payment is requested, all available letters of invitation or announcements of meetings should be attached to demonstrate that the honorarium/stipend to each person was agreed upon as part of attending a meeting or other function, and that it is part of the grant budget.

#### IV.D MAA Financial Reports

After the Finance Office has received and processed all financial data to close a month, each PI will receive a MAA financial report that shows the budgeted amount for each budget line item and the actual expenditures year to date. The PI will also receive a copy of the general ledger detail that reports all the transactions by budget line item.

By using these reports, the PI can track the grant budget to see if it is on schedule and to check that the details in the MAA's records are correct. If any errors are found the PI should notify the S-PI and GAM immediately so that they can be corrected.

#### IV.E Subawards

Grant proposals that include subawards should have letters of commitment from the subaward institution. In addition to the letters of commitment, the person who will direct that subaward should submit to the S-PI and the PI a statement of the work to be performed, a budget with a budget explanation and confirmation of current indirect cost rate. Note that sub-award costs in excess of \$25,000 per subaward are excluded from the calculation of MAA Facilities and Administration (F&A) Costs per the indirect cost rate agreement negotiated by MAA.

If the project is funded, the MAA staff will prepare the subaward agreement and forward the copies to be signed to the appropriate official of the subaward institution. If a subaward needs to be added after the project is funded, prior approval from the Federal awarding agency must be received.

Subawardees on NSF grants must provide one copy (or web link) of the Subawardee's annual Single Audit Report to MAA Accounting-Grants Management, in accordance with Audit Requirements of 2 CFR 200.501. In addition, the subaward agreement will include the following general provisions:

- Any Special Terms and Agreements of the award
- NSF Grant General Conditions, GC-1
- NSF Grant Policy Manual
- The Research Terms and Conditions (RTC) and NSF RTC Agency Specific Requirements

The subawardee must recognize that all work products produced under this agreement are the property of the MAA, and the MAA is required to meet its obligations to NSF under its Prime

Award.

The subaward agent will be reimbursed for expenses upon submission of appropriate documentation, invoices and/or receipts. Reimbursement requests for work under a subaward should be sent directly to the S-PI. Subaward agencies must comply with the same grant general terms and conditions as the MAA.

The MAA must monitor all subawardees, subcontractors, and subrecipients. Monitoring procedures include: verifying that subawardee hasn't been debarred or suspended, collecting and reviewing audit reports, receiving updates of indirect costs rates, reviewing invoices, completing annual desk audits, and having access to subawardee financial records. Additional monitoring procedures appropriate to each project may be included in the subcontract agreement or memorandum of understanding.

The MAA treats sub-award costs in excess of \$25K per subaward to be excluded from the calculation of F&A per the negotiated indirect cost rate agreement.

#### IV.F Equipment

It is MAA policy not to purchase equipment as part of federally funded projects. However, in the case that this policy is overridden, equipment will be treated in accordance with 2 CFR 200.313 - 316 to address bi-annual inventory requirements, tagging of equipment in the name of the sponsoring agency that provided the funding, and that depreciation is unallowable to be charged to a federal grant either as a direct charge or indirect allocation when the equipment in question is federally acquired, except for special purpose equipment, per 2 CFR 200.436 and 200.439.

#### IV.G Miscellaneous Items

Occasionally a grant may call for special arrangements such as travel advances, direct billing, etc. Each of these will be handled on a case-by-case basis. Please contact the S-PI directly to discuss these items.

## V Appendices

### V.A Criteria for Review of New and Existing Programs

As decisions for funding new initiatives and general allocation of resources are made, MAA should have in place criteria against which all programs are measured. There are often competing goals between the need to operate a profitable program and the need to bring to the community valuable programs that do not have profit potential. A process that assists in analyzing programs against a pre-determined set of financial and non-financial criteria can assist the MAA in ensuring its valuable resources go to those programs that can benefit the MAA and its mission the most. This is not an attempt to be specific about fund-raising methodologies or objectives. Rather, it offers a structure to assist in ensuring that the worthiest programs rise to the top after applying criteria that allow for objective analysis. There are many benefits to establishing criteria against which all programs can be measured, both on a financial and non-financial basis. For example, historical trends become more apparent when measured against pre-determined criteria. A uniform, unbiased process to analyze programs also helps eliminate the possibility of conflicts of interest.

- 1) Establish the criteria, both financial and non-financial, that will be used across programs to afford comparable assessment of new and existing programs in order to determine continued or new support and make informed decisions on whether to maintain, expand, establish, or eliminate programs.
- 2) Review all programs over an appropriate timeframe that coincides with the strategic planning process. New initiatives would be examined as they arise, in sufficient time to affect the outcome.
- 3) Evaluate all programs using the common criteria to verify that the MAA is getting the best value for its financial, time, and personnel commitments.

Many criteria are worthy of being considered as the basis for analyzing the financial and programmatic strength of any new or existing initiative; a few are offered below:

- Is the program in line with the organizational mission and its stated priorities?
- Does the program enhance the public perception of the MAA or further name recognition?
- Is the program meeting the needs of the mathematical community, general public, or other constituencies that are not being met by others?
- Does the program require additional infrastructure which may not have residual use?
- Is the program being considered for its fund-raising capabilities? If so, how much net



income can it generate over the long-term, is matching or in-kind funding required, does the program take advantage of excess capacity which offers a cost-saving advantage?

- Does this program leverage funding for other programs, is this a new type of program which will increase the diversity of funding, can indirect rates be charged against the program?

## V.B Reimbursement Forms

**MAA Grant Expense Reimbursement Form** is available at <http://www.maa.org/sites/default/files/2017%20Grant%20Expense%20Reporting%20Form%20-%20PI%20Manual.pdf>

**MAA Grant Personnel Activity Form** is available at <http://www.maa.org/sites/default/files/2017%20Grant%20Personnel%20Activity%20Form%20-%20PI%20Manual.pdf>

## V.C Purchasing of Goods and Services for Federal Grants

### *Policies*

All item purchases or sub-awards are subject to PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS.

### *Procedures*

- Sufficient documentation must be submitted by the PI to enable the MAA to ensure that all federal procurement policies are met including:
  - The most economical and practical goods and/or services are being solicited;
  - The goods and/or services being solicited are necessary for the successful completion of the program;
  - A clear and accurate description of the technical requirements for the goods and/or services is being provided.
- Every effort should be made to get the lowest cost for all purchases without sacrificing utility. The procuring agent should keep in mind that the MAA is exempt from DC sales tax for purchases which would normally be subject to sales tax.
- The S-PI may approve a sole source justification for goods and services as a substitute for competitive bidding, where competitive bidding is impractical or impossible (see Sole Source Justification).

- Budgeted items falling within the scope of this policy, and for which a sole source justification is not being sought, must be accompanied by written quotes obtained from businesses/persons who normally provide such goods or services.
- If the quotes were solicited based on an RFP, that document should also be submitted.
- The competitive pricing process is initiated by the PI in conjunction with the S-PI. The PI may also submit an accompanying memo addressing the programmatic and financial strengths and weaknesses of the respondents, and his/her resulting preferences. Once the request is reviewed, decided and approved by the S-PI or their designees, all related documentation becomes a permanent part of the grant record and will become part of the budget submittal to the funding agency as appropriate.
- Transactions between the MAA and outside contractors should be arms-length transactions with no favoritism towards parties having any financial interest in the transaction. Any actual or perceived relationship between any of the parties involved must be disclosed.
- Small purchase means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the small purchase threshold. Small purchase procedures comprise a subset of a MAA's purchase procedures. The MAA uses such procedures in order to expedite the completion of its lowest-dollar small purchase transactions and minimize the associated administrative burden and cost. The small purchase threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions). It is \$3,000 except as otherwise discussed in Subpart 2.1 of that regulation, but this threshold is periodically adjusted for inflation.

#### V.D Sole Source Justification Request For Federal Grants

To: MAA Deputy Executive Director  
 From: \_\_\_\_\_, authorized individual is the PI  
 Date: \_\_\_\_\_, must be submitted prior to any related expense being incurred  
 Re: Sole Source Justification on Contract for \_\_\_\_\_

This executed document becomes a permanent part of the grant record and will be forwarded to the granting agency if so warranted.

This memo is to support the request for a sole source contract for the purpose of \_\_\_\_\_. This request for a sole source justification is in accordance with the purchasing policies and procedures of MAA. The exercise of this option is fully within the purview of the Deputy Executive Director and is only to be used when other options are impractical or impossible.

A sole source justification cannot be used to supersede federal regulations that govern programs that are funded exclusively through government funding. The applicable regulations concerning the expenditures in those programs will govern in the event of a discrepancy existing between the policies of the MAA and those of the granting agency.

The justification of this work being contracted using sole source, non-competitive bidding is as follows:

*The person completing the sole source justification should list the reasons for undertaking a sole source contract including any of those listed below, or any other reasons that may pertain to this instance. Be as specific as possible regarding the situation at hand, using as many reasons as are applicable.*

Examples of justifications for pursuing a sole source contract:

- The work to be undertaken is a continuation of work begun previously, which was competitively bid;
- The contractor being called upon to perform the work has expertise that cannot be substituted or easily replaced in the market place;
- The contractor being called upon to perform the work has familiarity with the work of the MAA to the extent that purchasing these services from any other contractor would not be cost effective;
- The contractor being called upon to perform the work is offering their services at a price substantially below what which would be expected on the market;

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
Deputy Executive Director

#### V.E. Additional Procedures for Grants Financial Management

1. Background Information
2. Federal Financial Reporting procedures
3. Program Income Treatment policy
4. Consultants and Sub-awardees: Selection procedures
5. Participant Support Costs: Policies and procedures
6. Record Retention
7. Grants Closeout

#### 1. **Background Information**

The following policies and procedures are meant to describe our current practices, and reflect our intent to meet (1) funding agency guidelines, and (2) the policies set forth in this Manual for PIs,

with some amplification to emphasize internal procedures used to implement the policies set forth in the Manual.

## **2. Federal Financial Reporting (FFR) procedures**

The MAA shall submit all financial reports to the funding agency in a timely manner on the basis of reporting schedules and requirements. Financial reports will be submitted after close of reporting period.

### **2.a. Due Dates**

The schedule of due dates will be made on the basis of award agreements, the funding agency's reporting requirements, and report submission dates.

For National Science Foundation: Reports are due by the 30th day following the end of each quarter (i.e. January 30, April 30, July 30, and October 30). All FFRs must be submitted electronically using either Research.gov or SF-270 as a primary financial reporting form, due by the date given in award agreement. (Standard due dates the same as NSF reporting deadlines).

### **2.b. Reporting formats**

SF-270 – Financial reporting form – NSF and other federal agencies require financial reports in SF-270 format. (It can be submitted in paper format as well as electronically.)

### **2.c. Reporting Program Income**

Program income is gross income received that is directly generated by the federally-funded project during the grant period. Program income includes, but is not limited to, income from fees for services performed, meeting registration fees, the use or rental of real or personal property acquired with grant funds, the sale of commodities, or items fabricated under a grant agreement.

All Program income earned during the life of the project must be reported using the appropriate financial reporting forms (e.g., SF-270).

### **2.d. Cash Request - Reimbursements for Federal Award expenditures**

Final cash request amounts should reflect earned program income during reporting period (if applicable).

## **3. Program Income Treatment policy**

### **3.a. PROGRAM INCOME**

Program income is gross income earned by the grantee that is directly generated by a supported activity or earned as a result of the grant. Program income includes, but is not limited to, income from fees for services performed, meeting registration fees, the use or rental of real or personal property acquired under the grant, the sale of commodities or items fabricated under the grant, license fees for, and royalties on, copyrights, and interest on loans made with grant funds. Interest earned on advances of Federal funds is not program income. Program income does not include the receipt of principal on loans, rebates, credits, discounts, etc., or interest earned on any of them.

The MAA's treatment of program income on federal awards is guided by the requirements of the funding agency. Similarly, non-federal sponsors may have terms and conditions that govern the treatment of program income. However, MAA policy requires that all program income be used to support the project generating the income, thereby increasing the total funds available to support the project. As noted in Section 3.4, estimated project revenue will be considered during project (proposal) development, and specific intentions for use of such revenue to support the project will be outlined in the proposal.

Program income earned during a project period shall be retained by the MAA and will be reported to the funding agency in a manner consistent with that entity's guidelines. In particular, program income will be used to offset expenses incurred during the reporting period in which it was generated, and thus reduce any reimbursement request for that period.

PIs on MAA projects should consider whether any program income will be generated during the project period and develop the proposal budget according to funding agency guidelines, including sources and estimates of revenue and how these funds will be used to support the project.

It is MAA policy that project revenue generated after the close of any grant period be used to carry out or extend appropriate elements of the project, e.g., dissemination of project results. However, all program income earned after the end date of a project is under no obligation to the sponsor, unless the funding agency regulations or the terms and conditions of the award provide otherwise.

Total program income received should be reported to funder in accordance with the terms of the grant agreement.

#### **4. Consultants and Sub-awardees: Selection procedures**

*Review by the Executive Committee (EC) of the MAA*

All grants being considered for federal funding are reviewed by the EC of the MAA. Project budgets must have the approval of the Treasurer prior to submission of any grant proposal. This review includes a review of all consultants being considered for critical roles in the project. Prior to EC review, any project under consideration is assigned a

Director who, if the project proceeds, will serve as what MAA designates as S-PI (included as co-PI on NSF grants, and analogous designation for other funding agencies).

The S-PI provides preliminary review of the project concept/proposal, makes recommendations to the Executive Director of the MAA and the EC as to whether the project should be pursued, and, if a positive determination is made, works with the PI to develop and submit a full proposal.

The review process has many elements. In particular, the following elements are critical:

**Mission:** Any project considered must be in line with MAA's mission, and should be assessed according to Appendix A: Criteria for Review of New and Existing Programs. The appropriate MAA staff director will discuss the concept with the originator of the program prospectus and encourage or discourage the idea, based on MAA's assessment of the merit of the idea and its alignment with the MAA mission.

**Credentials and history of performance:** Potential PIs, consultants, and sub-awardees (referenced subsequently as consultant for the sake of brevity) of MAA federally-funded programs must have demonstrated professional familiarity with the technical subject matter of the MAA project under review. The consultant's history of performance will also be a factor in their selection. For a project that could result in a grant with a significant budget, the consultant should have prior experience in administering federal grants. For small projects that become funded, the MAA will ensure that the consultant receives appropriate instruction in administering a federal grant and that they have access to all resource materials needed to ensure compliance on pertinent federal guidelines and regulations. See also section IV.E Sub-awards of the MAA Manual for PIs.

**Availability:** The consultant should be able to demonstrate that their schedule will allow for the completion of the work within the designated timeframe being considered. An academician or other professional who cannot demonstrate that their schedule will allow sufficient time to enable completion of the project in a timely manner should not be considered for a critical role in the project.

**Ability to Mobilize Math Community:** Many grants have a significant outreach or participant component. For those projects that are being considered that do have such a component, the consultant must be able to demonstrate that they have access to participants and/or to the broader community who are necessary for the fulfillment of the project's outreach objectives.

Additional technical considerations are managed primarily by the MAA's Chief Financial Officer.

**System for Award Management (SAM):** Prior to any consultant being hired to conduct

a federally funded project of the MAA, the MAA verifies that the consultant is not listed on the SAM which would indicate that the consultant is not entitled to receive remuneration from a federal source.

**Conflict of Interest:** As part of any Memo of Understanding or other agreement, consultants will be provided the [MAA Conflict of Interest policy](#). Any consultant indicating that they have or will have a conflict of interest with any aspect of the work to be conducted within the project will not be considered an appropriate candidate for work on that project. The Conflict of Interest policy is available at:

<http://www.maa.org/about-maa/policies-and-procedures/policy-on-conflict-of-interest>

## **5. Participant Support Costs: Policies and procedures**

### **5.a. Definition**

Participant Support Costs are “direct costs for items such as stipends, honoraria, or subsistence allowances, travel allowances, and registration fees paid to, or on behalf of, participants, trainees, (but not employees) in connection with workshops, meetings, conferences, symposia, or training projects. These costs are allowable with the prior approval of the awarding agency.” In order for non-employee travel to be classified as Participant Support Cost, the sole purpose of the trip must be to participate in a workshop, meeting, conference, symposia, or training project.

### **5.b. Background Information**

According to NSF requirements, in general, participants are the recipients of service or training provided at a workshop, conference, seminar, symposia, or other short-term instructional or information sharing activity.

Participants may include students, national scholars and scientists, private sector representatives, agency personnel, teachers, and others who attend and participate in the conference, workshop, or training activity. Unless specifically provided for in the award document, MAA staff members are not eligible for participant support.

### **5.c. Purpose**

The purpose of this policy is to comply with federal regulations, ensuring that funds provided for participant costs are separately accounted for, and expended for appropriate and intended objectives.

### **5.d. Procedures and Accounting for Participant Support Cost**

- Budgeting for Participant Support Cost

Whenever Participant Support Costs are proposed in a budget, a justification will be

required that describes the purpose for the costs and the way in which they will directly benefit the proposed project's scope of work.

- **Accounting for Participant Support Cost**

When an award provides funding for participant support, the MAA Finance Department will establish separate coding to ensure that participant support expenses are tracked independently.

5.e. **Monitoring a Project with Participant Support Cost**

The Senior Principal Investigator, Staff Principal Investigator, and Program Officer in collaboration with the Grants Accountant and Chief Financial Officer will ensure that:

- Participant support costs are paid to (or on behalf of) participants or trainees (but not employees) in connection with formal meetings, workshops, conferences, symposia, or training programs.
- All transactions categorized as Participant Support Costs are allowable.
- Each transaction has sufficient supporting documentation.
- Participants must sign an attendance log sheet to justify attendance at workshop or other grant-funded venue.

Participant Support Costs are only used as specified in the approved budget and in accordance with the statement of work.

**6. Record Retention**

Financial records, supporting documents, statistical records and all other records pertinent to federal grants are retained for a period of three years from award financial closeout, except as noted in 2 CFR § 200.333.

**7. Grants Closeout**

All obligations incurred under the award are liquidated and all required reports are submitted to funding agencies within 90 days after the grant end date.