President’s Cabinet
Thursday, August 20, 2015
10:00 a.m. - 11:30 a.m.
Hobson Memorial Union – North Conference Room

Attendees:
Richard Hanson       Randy Westhoff       Jeff Ueland
Martin Tadlock       Troy Gilbertson     Mahmoud Al-Odeh
Michelle Frenzel     Tracy Dill         Carolyn Townsend
Karen Snorek         Colleen Greer       Marybeth Christenson-Jones
Jackie Carroll       Shawn Strong       Deb Peterson
Mary Ward            Monte Hegg         Rob Bollinger
Jim Dillemuth        Erika Bailey-Johnson Scott Faust

Dr. Hanson welcomed all in attendance and suggested moving Cabinet meetings to Memorial Hall. Jackie will look into this.

NTC/HLC Update – Bob Griggs
Dr. Hanson provided the update for Bob since he is dealing with a few issues at NTC this morning. Overnight, NTC lost three faculty members for medical reasons.

The enrollment numbers, as taken from Koji’s enrollment report, are at the maximum for our projected enrollment shortfall. When reviewing the budget, we anticipated having a lower enrollment. Right now, we are okay but hope to see a bump once the semester begins.

The HLC accreditation visit is scheduled for the end of September. Many members of the Cabinet will be asked to provide feedback to the accreditation team while they are here.

Bob has worked with a wonderful team – Andy Bartlett, Barb Schueppert and Bernie Bryant – in drafting the Assurance Argument for NTC’s accreditation. The document is well done.

Recruitment, Retention & Graduation – Michelle Frenzel
Our freshman class is around 750 students, which is lower than expected. We are lower than expected in all of our markets – out-of-state, metro, in-state. We will be hiring a 4th recruiter. Seth is working with Deans and Department Chairs to obtain information about our programs for our recruiters. Tracy Dill offered the use of Athletics Recruiters to assist in the recruitment process. Michelle also mentioned contracting with a consultant to do an analysis of the Admissions Office. Martin will be talking with Northland Community regarding dual enrollment and Shawn indicated we should have someone hired very soon to focus on articulation agreements with the two-year schools. This person will be tasked with building relationships between the faculty and the two-year institutions.

Our incoming transfer students account for 540 students, which is up from last year. This increase is largely due to off-campus programs, such as those at North Hennepin.

Freshman Orientation begins tomorrow with Convocation tomorrow night. Convocation will be different this year from past years as it was moved from Sunday evening to Friday evening. Families will be present. The march will begin at Bangsberg, walking under the Alumni Arch, on the way to the Fieldhouse. The focus of Convocation remains an academic introduction to university and not a social introduction.
We are at 86% capacity in the residence halls. Some student athletes are already on-campus. Move-in begins tomorrow at 9:00 a.m.

Still looking for volunteers for Bucky’s Guide Service.

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**BSU Cabinet Clarification of Purposes – Martin Tadlock**

**Attachment:** 1. BSU Cabinet Clarification of Purposes

**Discussion:** During the Dean’s Counsel Retreat this summer, the deans discussed ways to further engage the cabinet with the campus. They came up with several suggestions including having standing agenda items, understanding the purpose and expectation for dialogue and discussion; and making a recommendation as opposed to making a decision. The recommendation from the Cabinet goes to the Executive Leadership Team. Ultimately, it is the president that makes the decision. Martin would like to include departmental chairs on a rotation to promote wider participation. Agenda will be distributed via fac-staff in advance of the meeting. Agenda topics will be broader to encourage better participation.

Dr. Hanson further elaborated and agreed the Cabinet is an open meeting to the campus community and he would like to see better participation from faculty, staff and students.

The Cabinet serves an important advisory function and vetting process. We need to know the opinions of cabinet members, which will be varied. It’s about the conversation.

Dr. Hanson encouraged everyone to review the agenda prior to the meeting and if you have something to contribute be sure to speak up. Your attendance is very important. The schedule for Cabinet for the upcoming year is available online. Be sure to place these meetings on your calendars.

Finally, Dr. Hanson sought feedback for what the standing agenda items might be.

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**Implementation of MAP Priorities this coming academic year – Martin Tadlock**

**Attachment:** 2. Implementation of MAP Priorities

**Discussion:** The MAP is beginning its third year since it was originally implemented. At the Dean’s Counsel Retreat, the deans identified what items have yet to be implemented and proposed the priorities for this upcoming year. These are identified in the attachment, Implementation of MAP priorities. Any questions/comments can be sent to Martin.

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**Policies & Procedures for Grants – Karen Snorek**

**Attachment:** 3. Conflict of Interest Policy

**4. Conflict of Interest Policy Form**

**5. Policies & Procedures for Grants & Sponsored Programs**

**6. Updated Subrecipient Monitoring Policy**

**Discussion:** As a result of a recent grant audit, BSU/NTC needs to formally adopt policy and procedures related to grants. While we currently are doing some of these processes, we have no documentation. We have notified NSF that these policies are in the process of implementation.

The Conflict of Interest Policy came about from a MnSCU audit of grants. All institutions except Mankato State were flagged for not having a conflict of interest policy. If you are involved in a grant, your spouse, dependents, or anyone living with you should not benefit from the grant.
We will continue to use the “green” sheet for grant authorizations. We will add the Conflict of Interest Policy form to which the grant PI will need to agree which states that he/she will not benefit in excess of $10,000 due to a spouse or dependent affiliated with the grant. Any companies doing business with the grant cannot be more than 5% owned by anyone affiliated with the grant, especially the PI. The document will be housed in the HR office. Once the grant is approved, it will be reviewed for any conflicts of interest. If no conflicts, the grant can proceed. If there are conflicts, an appeal will need to be made to the President.

The policies will be now follow the meet and confer vetting process.

The policies will be available online on the Policy Portal, located on the President’s webpage. The website is ready to launch pending assistance from the Web Development team. That should be completed by the end of the week.

Mary Ward spent approximately 10 months on the project to take our existing policies and format them into a standardized format following ACUPPA standards.

Kelly Knapp has been assigned as the keeper of the Policy Portal. She will complete edits to policy and keep the site updated. Webpages with policies are being asked to link to the policy page.

**Student Success/Services Priorities Summary – Michelle Frenzel and Mary Ward**

**Discussion:** From the Dean’s Retreat, Mary and Michelle brought back priorities for student success and student services.

**First Year Success Coaching program**
This program would identify 260 freshman students and match them with a coach that would engage and mentor the student, making sure the student has access to the resources they need. We would like to assign 20 students to each coach. The idea for this program came about from an iPAS grant. While we were not awarded the grant, we are still able to enact some of the items in the grant. We need to review how we are using technology to reach students. We are still gathering data, but have determined that we can better support students for which we have made an assumption that they will be able to figure things out on their own. We currently support disability students, TRIO and others, but there is a group that has been missed. The intent with this coaching program is to reach them. We will use predictors, such as high school GPA to identify students for the program. The first 3-6 weeks are very critical.

**Create student survey of their expectations, study habits, etc.**
We will develop a set of standardized questions to identify student expectations. In reviewing NSSE data, students are only studying 12+ hours a week. This is insufficient. We need to create a profile unique to that student. We hope to move all students to a standardized assessment.

ASF members can serve as a coach. Training is available through Advising Success Center and they can train amongst themselves. There is written curriculum available as well. This is poised to start now but needs to go through the appropriate channels.

**Provide an exit survey for students leaving BSU**
BSU could work with Distance MN to facilitate an exit survey. We may put a hold on a students’ account preventing him/her from withdrawing completely until they have spoken with someone. We could have on-time/real-time analysis. Presently, we don’t know the student has
left until mid-semester. We can work closely with Res Life and use other Early Alert mechanisms. It is too late to do an intervention after they have left. Many students leave and don’t realize the ramifications – financial aid, student loans, etc. There are so many things that need to be communicated and we make the assumptions that they understand when in reality, they do not.

**Implementation of the Strategic Enrollment Management Plan – President Hanson**

**Discussion:** Dr. Hanson called for volunteers from the Cabinet to lead a task force focusing on the implementation of the Strategic Enrollment Management Plan. We will need to have some additional membership to the Task Force, perhaps inviting participation from the group which drafted the plan.

Dr. Hanson expects that this group will hold limited meetings and will make recommendations for implementation to him.

Deb Peterson, Michelle Frenzel and Mary Ward volunteered, with Mary and Michelle as co-chairs.

**Priorities Assessment 2015 – President Hanson**

**Link:** [http://survey.bemidjistate.edu/cgi-bin/remark/rws5.pl?FORM=bsu_priorities](http://survey.bemidjistate.edu/cgi-bin/remark/rws5.pl?FORM=bsu_priorities)

**Discussion:** President Hanson referenced the email he sent yesterday requesting feedback for the 2015 Priorities Assessment Survey he would like to conduct.

The purpose of the survey is to gauge the priorities of our constituents (faculty, staff, students, and community members).

Please review the survey questions and provide feedback. Any and all comments are appreciated. Please also provide your thoughts on additional reviews of the survey prior to publication; when should it be sent and to whom; and how will we use this data. He also requested ideas for the operationalizing the survey as well.

**Foundation Board-Cabinet relationship – President Hanson**

**Discussion:** The Foundation Board has requested to establish a relationship with the Cabinet. As part of this relationship, the Foundation would like to meet occasionally with the Cabinet to discuss mutual interests. Dr. Hanson is confident the engagement would go both ways with Cabinet members invited to board meetings.

The Foundation Board is interested in helping with admissions, retention, internships, mentoring opportunities. They want to know more about what is happening on campus.

They have proposed a social gathering when the Board meets in November.

Give it some thought and be sure to provide your feedback to President Hanson. If you have any ideas for joint efforts, please forward those to Rob Bollinger or Brett Bahr, Alumni Director.

**Senate Capital Investment Committee Visit – October 1st – President Hanson**

**Discussion:** The Senate Capital Investment Committee will host presentations on the BSU campus on Thursday, October 1st. The visit will be similar to the one conducted by the House Committee but is organized differently. They will want a room on campus to facilitate the presentations.
from BSU and within the community. They have requested a tour of the Hagg-Sauer project. Cabinet members are invited to participate in the meeting.

For the Good of the Order – ALL

Student Safety Video – President Hanson
Dr. Hanson encouraged members of the Cabinet to watch the Student Safety video which deals with the issues we faced last year – sexual assault, binge drinking, etc. The video was produced by Lakeland. Jay Passa and Scott Faust were involved in its production as well. Dr. Hanson will attend the student safety meeting on Saturday.

CHRO position is posted – Marybeth Christenson-Jones
The Chief Human Resources Officer position has been posted. There are many applications come in. Marybeth is happy to discuss the position with anyone interested in it.

Students – Marybeth Christenson-Jones
The work-study experience for students is critical. It provides students with meaningful and challenging work as well as a professional role model. As supervisors, we need to allow students to be more than just a body at a desk.

Marybeth offered to share the Student Manual for Work-Study students developed by the Human Resources office for your consideration.

ISRS NextGen Listening Session – Jim Dillemuth
The ISRS NextGen Listening Session for BSU/NTC is scheduled for Thursday, September 24th. An outside agency has been contracted through MnSCU to perform the listening sessions. We will want to make sure we have representation across campus.

In preparations for the 2018 budget cycle, MnSCU will likely be asking the legislature for $80-$90 million to replace ISRS or do further enhancements.

Community Appreciation Day – Rob Bollinger
The 10th Annual Community Appreciation Day is Thursday September 3rd. This is an annual event to reach out to the community. There will be free food, games hosted by our athletes, a performance by the jazz band, and free admission to the Women’s Soccer game.

Scholarship Appreciation Breakfast – Rob Bollinger
The 3rd Annual Scholarship Appreciation Breakfast is Saturday, September 19th. All scholarship recipients, their parents and the donors are invited to this event, which will be held in the Fieldhouse this year. Scott is seeking recommendations for student speakers. If you have someone you could refer, please let Scott know.

Homecoming – Rob Bollinger
The Honors Gala is Friday evening, October 2nd. There will be plenty of homecoming activities with the Homecoming Parade and football game on Saturday, October 3rd. More info coming soon.

Meeting adjourned at 11:10.
Minutes submitted by Jackie Carroll.
BSU Cabinet Clarification of Purposes

1. Have standing agenda items:
   a. NTC/HLC
   b. Recruitment, retention, graduation
2. Set purpose of cabinet and expectations
   a. Dialogue and discussion
   b. Not decision making, but recommendation making
3. Invite departmental chairs to attend on a rotation and promote wider participation
4. Get agendas out via fac/staff in advance
5. Use broader agenda items/topics
Implementation of MAP Priorities this coming academic year

1. Complete implementation of a grants office by funding pre-grant position from carry forward
   a. Use carry forward to fund a pre-grant person
   b. Provide duty days for faculty to write grants/pursue grants after pre-grant person is hired
2. Explore development of competency based programs and expansion of prior learning assessment.
   a. Add nursing program as possible pilot for competency based programming
3. Expand the number of BAS degrees articulated with technical colleges and explore the development of
   a College of Applied Technology.
4. Whenever possible, graduate programs will be delivered under the 80/20 budget model, and graduate
   programs, residential or distance-based, will need to demonstrate:
   a. Financial sustainability based on class size, number of graduates, and cost study data.
   b. Attainment of learning outcomes for graduate students.
   c. Graduate programing that meets University and HLC standards that require 50% of courses in a
      graduate program be designed specifically for graduate work (6000 level or above less the
      thesis, research paper, or capstone credits).
   d. Quality of instruction in undergraduate classes taught by graduate assistants.
5. Explore moving the College of Business, Technology, and Communication to a responsibility centered
   budgeting model.
6. Promote and support increasingly flexible course scheduling for students. This will include four year
   course rotations in ISRS for all academic programs.
7. Prepare a ‘writing/reading/speaking/listening across the campus initiative.’
8. Adopt a “two within four” (joint admission program with community colleges in specific program areas)
   to facilitate transfer and encourage students to complete a four year degree at BSU. Start with
9. PROPOSED* new faculty lines needed to support MAP implementation…consider moving ahead on the
   positions not filled in 2013-2015. Contingent upon funding and enrollment/demand
   a. TAD-Design
   b. Psychology
   c. Exercise Science/Exercise Physiology
   d. Liberal Education online
10. 80/20 model support (these areas need to provide evidence of NEW STUDENT ENROLLMENTS before the
    position would be funded)
    a. Accounting
    b. Mass Comm (mkt comm online)
    c. Special Ed
    d. MA teaching
    e. English Tech
    f. Writing
    g. Geography
    h. TAD-Technology
    i. Community Health/Health
    j. Educ MAT/online education
Conflict of Financial Interest Policy for Grants & Sponsored Programs

Effective Date:

Purpose

The objectivity of research is of paramount importance and the basis for obtaining and maintaining public trust. The regulations are designed to promote objectivity in research by establishing standards which provide a reasonable expectation that the design, conduct and reporting of federally funded research will be free from bias resulting from investigator financial conflicts of interest (42 CFR Part 50, Subpart F).

Policy

When the University engages in or intends to engage in a sponsored project with an external organization or has subcontracted or intends to subcontract with an external organization under a sponsored project, a significant conflict of financial interest may occur when the affiliation of the project director/principal investigator (PI/PD) with the external organization meets any of the following criteria:

- The PI/PD, spouse, or dependent is an officer, director, partner, trustee, employee, advisory board member, or agent of the external organization, agency, or corporation either funding a sponsored project or providing goods and services under a sponsored project on which the PI/PD is participating in any capacity.
- The PI/PD, spouse, or dependent children is the actual or beneficial owner and has equity interest, that when aggregated for the investigator and the investigator’s spouse and dependent children, meets both of the following tests: does not exceed $10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and does not represent more than a 5% ownership interest in any single entity.
- The PI/PD has salary and any payment for services (consulting fees, honoraria, paid authorship, etc.) from a public or non-public traded entity when aggregated for the
investigator and the investigator’s spouse and dependent children, are not expected to exceed $10,000 during the twelve month period.

Per Title 42 Code of Federal Regulations (CFR) Part 50 Subpart F (grant and cooperative agreements) and Title 45 CFR Part 94 (research contracts), the University must:

- Create and maintain a written and enforced policy stating the procedures for implementing the regulations.
- Inform each PI/PD of the financial conflict of interest (FCOI) regulations, of the University’s policy, and of the PI/PD disclosure responsibilities under the regulation and the policy.

Violations of this policy, such as willful concealment of financial interests or failure to comply with agreed-upon modifications to manage, reduce, or eliminate conflicts of financial interest, may result in sanctions being imposed upon the violation individual in accordance with the appropriate collective bargaining agreement.

**Procedures**

Each PI/PD and co-applicant participating in a sponsored project covered by this policy must disclose whether or not they have external affiliation that may constitute a conflict of interest described in the policy above. A disclosure form is to be completed and submitted at the same time the “Review for External Funding Request” form (Green Sheet) is submitted for approval. The form must be updated annually or whenever new significant financial interests relevant to the project are secured.

**Disclosures**

**Negative disclosures** will be filed with the Grant Accountant in the permanent file with the grant, with no further review requires.

**Positive disclosures** forms will be held by the Human Resources office as sealed confidential material while a proposal is pending and will be reviewed by a Review Committee if the proposal is accepted. The review of the positive disclosure must be completed prior to the University’s acceptance of the sponsored project or issuance of purchase orders or subcontract for the acquisition of goods and services.

In reviewing positive disclosures, the Review Committee will be guided by the following:

- Adherence to relevant state law and University policies, bargaining agreements provisions on Ethical Standards and Outside (External) Employment, and other University documents that may be appropriate.
• Nature and extent of the financial interest of the PI/PD, co-applicants, and their spouses or dependents to the external organization.
• Obtain additional information as needed from the PI/PD or co-applicant in resolving the actual or potential conflicts.
• Act in a timely manner so as not to delay the sponsored project.
• Identify possible actions the University might take to ensure that financial interest will be managed, reduced, or the conflict eliminated.

Based on the Review Committee’s recommendation, the University administration may take the following action:

• Accept the sponsored project award.
• Not accept the sponsored project award.
• Accept the sponsored project award subject to conditions or restriction that would manage, reduce, or eliminate the conflict of interest. Such modification might include:
  o Appropriate public disclosure of significant financial interests.
  o Monitoring of the research by independent reviewers
  o Modification of the research plan.
  o Disqualification from participation in a portion of the research that would be affected by the significant financial interests.
  o Divestiture of the significant financial interests.
  o Severance of the relationships that create actual or potential conflicts.

**Appeal Process**

If the PI/PD or co-applicant(s) are dissatisfied with the Review Committee’s findings, an appeal may be made to the President, who will consult with the PI/PD and the Review Committee as deemed necessary and appropriate to the particular circumstance. The decision of the President upon appeal shall be final.

The Human Resources office shall maintain records pertaining to each disclosure in accordance with the requirements of the Minnesota Data Practices Act. Access to such records will be limited to the PI/PD(s), the Review Committee, the President, and other who have legal right to review the records, in accordance to the appropriate collective bargaining agreements. Certain sponsors, particularly federal agencies, may establish requirements that differ from this policy with regard to the timing and frequency of disclosures and other conflict considerations as well. In the case of such discrepancies, the sponsors’ requirements will generally prevail.

**Rationale:**

**Introduction**
This policy sets forth procedures and guidelines to be followed to resolve actual and potential conflicts of financial interest pertaining to grants and sponsored projects funded by 1) commercial sponsors, 2) federal agencies having specific conflicts of interest requirements, such as the National Science Foundation and the Public Health Service, and 3) purchase orders and subcontracts issued by Bemidji State University for such projects regardless of the source of funds.

Bemidji State University benefits from faculty and staff participation in grants and sponsored projects and in other public and private activities. The University has no interest in setting forth detailed rules that may interfere with faculty and staff outside interests. However full-time and part-time faculty and staff must ensure that their outside financial interests, and participation in outside activities, do not conflict or interfere with their obligations to the University.

This policy specifically addresses Conflict of Financial Interests situations in which applicants for grants and contracts may have the opportunity to influence the University’s business decisions in ways that could lead to personal gain or give improper advantage to themselves or co-applicants (anyone involved in the design, conduct, and reporting of the research results), or their spouses or dependents. Such conflicts could affect the design, conduct, or reporting of research and project results.

Definitions:

- **Significant financial interest**: anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interest (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The monetary value would exceed $10,000 (per year) in terms of income, or would represent more than five percent (5%) ownership in a given organization (42 CFR Part 50, Subpart F).
- **Negative Disclosure**: a good faith revelation of a fact (or an item of information that is not generally known) on a disclosure form that does not lend itself to further review.
- **Positive Disclosure**: a good faith revelation of a fact (or an item of information that is not generally known) on a disclosure form that may lend itself to further review.
- **Investigator**: the principal investigator, co-principal investigators, and any other person at the institution who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by any federal agency such as the National Science Foundation and Public Health Service.
- **Dependents**: dependent children or relatives living in the same household

Examples of Potential Financial Conflict of Interest

- Activities that are clearly permissible
  - Outside employment, services on boards and committees of public or private organizations, service as a consultant to outside organization, or other outside activities as allowed by the terms of the appropriate collective bargaining
agreement, provided that income generated from any organization through such activities does not exceed the $10,000 threshold.

- Acceptance of royalties for published works and patents, payment for the creation of computer software or artistic works, or of honoraria for occasional speeches.
- Acceptance of income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities.
- Service on boards and committees of public or private organizations and acceptance of income for service on advisory committees or review panels of public or nonprofit entities.

- Activities that present the potential for conflict of interests
  - Relationships that might enable a PI/PD or co-applicant to influence the University’s dealing with an outside organization in ways leading to personal gain or improper advantage for the PI/PD or co-applicant’s spouses or dependents (Note: Making full disclosure of such relationships and making appropriate arrangements to manage, reduce, or eliminate potential conflicts would resolve such potential problems.)

- Activities that are very likely to be unacceptable
  - Use for personal profit of unpublished information emanating from sponsored agreements or confidential university sources, or assisting an outside organization by giving it exclusive access to such information, or consulting with outside organization that impose obligations upon the PI/PD or co-applicant that conflict with the University’s patents and intellectual property policies or the University’s obligation under sponsored project agreements.
  - The PI/PD or co-applicant or their spouses or dependents is the actual or beneficial owner of more than five percent (5%) of the voting stock or controlling interest of such organization or corporation.
  - The PI/PD co-applicant or their spouses or dependents has dealings with such organization or corporation from which he or she derives income of more than $10,000 per year, exclusive of dividends and interest.
Bemidji State University
Review for External Funding Requests
(For use with requests for outside funding from government or independent sources.)

INTERNAL DEADLINE: To ensure that you will get approval prior to the grant deadline, please submit to your Dean or Director at least 10 days in advance of the grant due date.

SIGNATURES: The Proposer obtains the chair’s, the dean’s/supervisor’s, and the grant officer’s signatures. It is the Proposer’s responsibility to retrieve and submit the grant to meet grant deadlines.

Proposal and Contact Information
Proposed Title ___________________________ Today’s Date ___________________________
Short Description:
Principal Investigator(s)/Proposer(s) ___________________________ Date to Submit Deadline ___________________________
Principal Investigator’s Telephone Number/Location ___________________________
Department Name(s) ___________________________ College Name(s) ___________________________
Please indicate what type of proposal this is: ___________research ___________teaching ___________service
Project Beginning Date ___________________________ and Ending Date ___________________________

External Funding Sources
Amount of Direct Funds being requested from grantor ___________________________
Amount of Indirect Funds being requested from grantor ___________________________
  30.7% federal
  Other rate List ___________________________
If the indirect costs are provided at a rate below the federal rate, correspondence or other documentation from the granting agency must be attached indicating that the indirect cost rate:
1. is an agency-wide policy; and
2. That the policy is consistently applied by that organization to all of its outside grants and contracts with educational institutions
or
That the funding is either a gift or an unrestricted grant, as detailed in the Bemidji State University grant guidelines. A separate sheet should be attached indicating that the funds conform to either the gift or unrestricted grant guidelines.
Name of Primary Agency ___________________________
Mailing Address of Primary Agency ___________________________
Please identify all partners to grant ___________________________

University Funding Source
Are University matching funds required? □YES □NO
If “YES”, does match require dollars or in-kind? DOLLARS (Amt. _________) IN-KIND (Amt. _________)
If “YES”, please indicate the source of funds? __________ approved college budget __________ department budget
___________ summer school profits __________ other grant funds __________ other (specify)
If this proposal is funded (Answer all questions):
Will any additional University space be required? (Where? Identify.) ___________________________ □YES □NO
Will facilities modifications for laboratories, computer technology, etc. be required? □YES □NO
Will re-assigned time for faculty or staff be required? (What %? _____________) □YES □NO
  If yes, please indicate if cost is covered by external funding source
Will human subjects be involved? (Date of Review _____________ Outcome _____________) □YES □NO

DRAFT
Will animal subjects be involved? (Date of Review __________ Outcome __________) □ YES □ NO □
Will hazardous materials be involved? (Date of Review __________ Outcome __________) □ YES □ NO □
If “YES” to any of these items, please elaborate (use additional sheet if necessary):

"The information on this form is complete, accurate and fairly represents the intent and scope of this proposal."

Signature of Principal Investigator/Proposer ____________________________________________ Date __________
Chair’s Signature ____________________________________________ Date __________
Dean’s/Supervisor’s Signature ____________________________________________ Date __________
Signature of Grants Accounting Officer (Monte Hegg) ________________________________ Date __________
Signature of Vice President for Finance and Administration ** ________________________ Date __________
Signature of Provost & Vice President for Academic Affairs** or
Signature of Vice President for Student Development and Enrollment ______________________ Date __________
Signature of the President ** ____________________________________________ Date __________
(If the President is not available to sign this form prior to the grant deadline, the appropriate Vice President will sign, and a copy of this form and the grant will be forwarded to the President for his information.)

(The fully-signed form is returned to Monte Hegg and kept on file in the Grants Accounting Office. Blank forms can be found online on the Academic Affairs web site at http://www.bemidjistate.edu/academics/affairs/forms.html. Please print this form on green paper.)

Revised 7/12
Financial Conflict of Interest  
Statement of Disclosure

Investigator:  

Project Title:  

Funding Agency:  

Check the appropriate responses:

NOTE: Any necessary attachments may be submitted in a sealed envelope until funding decisions are made.

☐ YES  NO  1. Are you or your spouse or dependents (dependent children or other relatives living at the same address as the investigator or co-investigators) an officer, director, partner, trustee, employee, advisory board member, or agent of the external organization from which goods and services will be obtained under the sponsored project? If yes, please attach an explanation on a separate sheet.

☐ YES  NO  2. Are you or your spouse or dependents derived income within the past year, or do you or any member of your immediate family, anticipate deriving income exceeding $10,000 per year from the external organization funding this sponsored project or any external organization from which goods and services will be obtained under this sponsored project? If yes, please attach an explanation on a separate sheet.

☐ YES  NO  3. Have you or your spouse or dependents derived income within the past year, or do you or any member of your immediate family, anticipate deriving income exceeding $10,000 per year from the external organization funding this sponsored project or any external organization from which goods and services will be obtained under this sponsored project? If yes, please attach an explanation on a separate sheet.

☐ YES  NO  4. Do you have significant financial conflicts of interest with the organization to which you are applying that you would like to make known to the conflict of interest reviewers? If yes, please attach an explanation on a separate sheet.

Certification
I have read and understand the Bemidji State University, Conflict of Interest Policy pertaining to grant proposals and sponsored research projects; have made all financial disclosures required by the policy; will comply with any conditions or restrictions imposed by the institution to manage, reduce or eliminate actual or potential conflicts of interest should I decide to proceed with the project; and will make the Bemidji State University's Business Services office aware in writing of any new financial conflicts of interest that arise during the period of the award, should such an award be received.

Signature: _______________________________ Date: ___________________
Policies & Procedures for
Grants & Sponsored Programs

Effective Date:

Purpose

The purpose of these Policies & Procedures is to insure that grants and sponsored program funds follow the OMB “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (also known as “Uniform Guidance” or “2 CFR 200”) and other Federal requirements of the awarding agency concerning the accountability requirements associated with Federal awards. Also, these rules and regulation are to ensure that the Federal Government bear its fair share of the total costs in accordance with generally accepted accounting principles, except where restricted or prohibited by law. All federal awards made on or after December 26, 2014 are subject to the OMB Uniform Guidance. The Uniform Guidance replaces A-21, A-110 and A-133. Per the OMB webpage this guidance “will supersed all requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in 2 C.F.R. Parts 220, 225, 215, and 230); Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up.” In the cases where there was a substantial change in the guidance, existing awards before December 26, 2014, will remain subject to A-21 and A-110 (Higher Education Institutions). For the purpose of these “Policies and Procedures”, the records of Bemidji State University and Northwest Technical College are combined and referred to within this document as the University unless specifically noted.

Cost Transfers

Cost transfers occur when costs are inadvertently charged to an incorrect cost center, an incorrect amount, or the costs are unallowable. In accordance with OMB, it is necessary to explain and justify transfers of charges onto federally-funded sponsored awards, where the original charge was previously recorded elsewhere on Bemidji State University’s General Ledger. Timeliness and completeness of the explanation of the transfer are important factors in supporting allowability and allocability in accordance with federal requirements.

1. When purchasing an item or when transferring a cost, the Principle Investigator (PI), Office & Admin Specialist, and the Grant Accountant should ensure the item/cost will directly benefit the project onto which the expenditure will be charged.
2. Unusual expenses are flagged and investigated by the PI, Office & Admin Specialist, or the Grant Accountant and that person will initiate a budget transaction form if the expense being charged is due to an error or unallowable cost.

3. The budget transaction form will be signed by the person initiating the form and the PI. The form is sent to the Business Office for approval and processing the cost transfer. Only the Business Office can process the cost transfer.

4. All cost transfers will be processed in a timely manner, if possible, within 90 days of the original entry.

5. The cost transfer will have the supporting documentation (original entry, receipt, etc.) and written justification for the transfer.

6. The cost transfer completed forms are retained and filed in the Accounts Payable department.

Unallowable Costs

Unallowable costs are any cost which (whether stated to be unallowable or mutually agreed to be unallowable) under the provisions of any pertinent law, regulation, or sponsored agreement, cannot be included in prices, cost reimbursements, or settlements under a government sponsored agreement to which it is allocable.

1. Reconciling accounts on a regular basis will help manage sponsored funds to ensure that expenditures and revenues are within appropriate limits and guidelines.

2. The PI, Office of Admin Specialist, and Grant Accounting Officer should be familiar with the complete list of unallowable costs for the Federal agency administering the award. The complete list of costs (the Uniform Guidance) is located at: 2 CFR 200, Uniform Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), and can include other federal requirements from the awarding agency. A few examples of categories of unallowable costs are included below from the National Science Foundation-Grant Proposal Guide found at: http://www.nsf.gov/pubs/policydocs/pappguide/nsf15001/gpg_index.jsp
   a. Entertainment
   b. Meals and Coffee Breaks
   c. Alcoholic Beverages

3. At the end of each month, the PI, Office & Admin Specialist, and the Grant Accounting Officer examine the monthly reports and if unallowable costs are identified in the award, whether a direct or indirect cost, they are moved to the PI’s cost center.

4. If there are unallowable indirect costs identified, the direct costs associated with those indirect costs are excluded from the indirect cost calculation.
Budget Revisions

Budget revisions, if they are necessary, will be in compliance with 2 CFR 215.25, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations, found at: https://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a110/2cfr215-0.pdf, and may include other federal requirements from the awarding agency.

1. Any budget revision (external or internal) will be initiated by the PI or the Grant Accounting Officer.
2. External budget revisions that require prior sponsor agency approval will be completed according to the awarding agency guidelines. Since each awarding agency has different policies regarding the need for a budget revision (i.e. no need for a budget revision if within 10% per budget line item), the PI and/or Grant Accounting Officer will review the awarding agency policies concerning budget revisions.
3. If there is a need requiring the sponsored agency approval for a budget revision, the PI or Grant Accounting Officer will initiate the request and the Grant Accounting Officer will make the request to the sponsoring agency using the required forms. When the sponsoring agency approves the request, the Grant Accounting Officer will make the budget revisions in the accounting system and file the form in the grant folder.
4. If there are insufficient funds noted in the processing of a purchase order, the PI or designee must notify the Grant Accounting Officer of the request for the transfer of funds based on grant regulations. The request will be made on the Budget Transaction Form or e-mail and sent to the Business Office for processing and filing. These adjustments will be kept electronically and/or hard copy.
5. The reasons for a budget revision to be denied internally would be the timing of the request, budget issues, or the budget request is for an unallowable cost.

Cost Principles

All expenditures will follow and be in compliance with the Uniform Guidance 2 CFR 200.402-200.405 found at: 2 CFR 200, Uniform Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), and may include other federal requirements from the awarding agency.

1. All expenditures must follow the guidelines of the awarding agency and MnSCU Board Policies and Procedures found at: http://www.mns cu.edu/board/policy/index.html
2. The PI is responsible for compliance of respective grantor policies and regulations.
3. The PI or designee is responsible for all purchases made against the grant/contract cost center and must ensure correct coding. Also, the PI or designee is responsible for ensuring that expenditures are necessary, reasonable, allocable, and allowable under the applicable cost
principles and the grantor’s policies. Additionally, the grant expenditures must be within the budget parameters.

4. The accounts payable staff in the business office ensures the disbursements are recorded in Accounting on the Web in the correct period based on the documentation using established conventions for occurrence dates. These documents are matched with purchase orders, contracts and receipt of goods documents (if applicable).

5. The payment documents are filed in the Accounts Payable department.

**Grant Reporting (Drawdown of Funds)**

All drawdown of funds will follow and be in compliance with the Uniform Guidance 2 CFR 200.305 found at: 2 CFR 200, Uniform Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), and may include other federal requirements from the awarding agency.

1. Payment methods must minimize the time elapsing between the transfer of funds from the awarding agency and the disbursement of those funds by Bemidji State University/Northwest Technical College.
2. Advances of grant funds will be receipted by the cashiers in the Business Office in the proper cost center.
3. Reimbursement requests will be calculated by Bemidji State University’s Business Office manager or the Grant Accounting Officer, if applicable, reviewed and approved by the Business Office manager. These are the steps to prepare the reimbursements:
   a. Run a grant summary report (AC0570CP) for the expenditures to date
   b. Run a general ledger monthly report (AC0542CP) for cash on hand
   c. Enter the information on the spreadsheet for the selected awarding agency
   d. If applicable, reviewed and approved by the Business Office manager
   e. Order negative cash amount from the selected awarding agency
4. Bemidji State University’s Business Office staff (cashiers) will properly receipt reimbursement funds.
5. The receipt will go to the Grant’s Accounting Officer for review and filing.

**Effort Reporting**

As a recipient of federal funding Bemidji State University/Northwest Technical College are required to comply with the Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance") and may include other federal requirements from the awarding agency for certifying effort expended on sponsored awards. The requirements for effort reporting (2 CFR 200.430) are located at: 2 CFR 200, Uniform Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)
1. Bemidji State University/Northwest Technical College requires all individuals who receive federal sponsored funding to comply with University policies and sponsoring agency regulations regarding the proposing, charging, and reporting of effort on those awards.

2. University faculty and staff are expected to charge their time to sponsored awards commensurate with the committed effort expended on all activities they perform. Payroll charges to sponsored awards and cost sharing recorded for faculty and staff, serve as the initial data points for the University’s effort reporting system.

3. The Uniform Guidance Subpart E §200.430 contains the federal regulatory requirements for internal controls over certifying time expended on sponsored projects. The University’s practice is to utilize an after-the-fact effort reporting system to certify that salaries charged, or cost shared to sponsored awards, are reasonable and consistent with the work performed.

4. The individual’s effort is first assigned to specific awards in the payroll system based on anticipated activities.

5. Actual effort expended on each project is certified by a responsible person with suitable means of verification that the work was performed, generally the principal investigator, at the end of specified reporting periods. The effort certification should be a reasonable estimate of how time was expended. Uniform Guidance Section §200.430(c) states, “It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards for IHEs [Institutes of Higher Education], a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.”

6. All employees that work on and charge payroll cost to a Federal grant must complete one of the forms listed below:
   a. Monthly Time & Effort After-the-Fact Activity Reporting Certification
   b. Timesheet
   c. Request for Faculty Extra Duty Days

7. All the activity for the period must be reported on one of the forms listed above. The document is signed by the employee and by the PI or a responsible official with first-hand knowledge of the work performed.

8. The document is forwarded to the Grant Accounting Officer and used as a basis to periodically adjust the salary cost if there is a significant variation from the original salary assignment.

9. The effort reporting document is filed in the grant file and kept in the Grants Accounting Office.
Subrecipient Monitoring Policy

Effective Date:

Policy Statement

Bemidji State University is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of sponsor funds. This policy addresses institutional responsibilities and assists Principal Investigators (PI) and staff to ensure that, in addition to achieving performance goals, subrecipients comply with Federal laws and regulations and with the provisions of any agreements that govern the subaward.

Determination of Subrecipient

OMB Circular A-133 Section 105 & 210 provides guidance in determining whether a subaward is a subrecipient, or a vendor (or consultant). In general, a vendor provides goods or services in a competitive environment as its normal course of business. A subrecipient has programmatic decision-making responsibilities for performance in carrying out a portion of the research or project. Subrecipient monitoring policies do not apply to vendors.

Roles and Responsibilities

Bemidji State University must ensure that its subrecipients comply with the Uniform Guidance administrative requirements, cost principles and audit requirements. The Bemidji State University’s responsibilities include:

- Informing the subrecipient of all applicable federal laws and regulations of the agreement
- Establishing a system to monitor the performance and activities of the subrecipients’
- Making sure that all costs of the subaward are in accordance with the cost principles and procedures applicable to the award agreement (cost are necessary, reasonable, allocable, and allowable),
- All questioned costs will require additional information from the subrecipient.

Principal Investigators (PIs) have the primary responsibility for monitoring subrecipients’ progress, and ensuring compliance with Federal regulations and both prime and subrecipient award terms and conditions. In addition, the PI or designate will review subrecipient invoices, identifying and following up on questionable expenditures, if necessary, and maintaining documentation of monitoring efforts. The PI may provide further training and guidance in interpreting regulations and subrecipient award terms and conditions.
Grants Accounting Officer will ensure that the University’s subrecipient monitoring policies and procedures comply with federal and other applicable regulations and are applied consistently.

Procedures

The frequency and scope of monitoring procedures should be determined by the responsible PI. The Principal Investigator (PI) should use the following subrecipient monitoring procedures when appropriate:

1. The PI should review technical performance reports or other specified deliverables on a timely basis. Any unforeseen issues should be documented, investigated and addressed by the appropriate authority.

2. The PI and/or designee should perform an expense to budget comparison for cost-reimbursement subagreements. The subrecipient’s invoices must be itemized with the description that includes dates of travel and expense and also include Time & Effort report documentation.

3. The PI and/or designee should review invoices regularly and document their review. Such documentation should include: PI initials or authorizing signature on invoices.

4. The PI and/or designee should request the subrecipient to provide clarification of invoiced charges that appear unusual, excessive, or otherwise questionable. Examples of detailed justifications include:
   - Time & Effort reports
   - Copies of paid invoices showing itemized cost
   - Details of incurred travel charges stating the purpose of the travel

5. The PI may, at their discretion, facilitate on-site visits to evaluate compliance with regulations and award terms. This evaluation may include a review of the project’s scientific objectives, and the appropriateness of the subrecipient’s administrative systems, processes and charges.