



Promoting Excellence In Ultrasound

Policies and Statements

E3

ASUM Research and Grants Policy



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Policy and Guidelines

ASUM Research and Grants Committee

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1. INTRODUCTION

The ASUM Research and Grants Committee (RGC) policies and procedures are set out to establish the principles governing research projects sponsored by ASUM. This document is intended to help the new investigator apply for and manage any research grant, as well as the ASUM administration overseeing the process. The manual is available both in hard copy and on the Web (*insert website link*). Changes and updates may occur where Council considers and makes decisions on RGC matters. It is suggested that applicants and grant holders use the Web document as the primary reference since it will be updated on a regular basis. It will be possible to download the manual from the Web if a current hard copy is needed. The Education Officer in the ASUM secretariat will be responsible for providing assistance and information to applicants and grant holders, in regard to questions concerning the administration of sponsored projects. The name of the Education Officers, their e-mail address, and contact details are listed in Appendix 1. They also can be reached at 02 9958 6200.

This guide discusses in detail the policies and procedures of the RGC. However since sponsored project administration may involve other bodies and institutions, sections are included which touch upon the functions and responsibilities of other entities.

The material in this manual is organised in a temporal sequence - from preparing the application, through submission and pre-award administration, to post-award administration and close-out.

Additional information on the fundamental principles governing sponsored projects should be sought from any other body involved directly or indirectly in any application or sponsored project.

2. GENERAL INFORMATION

2.1 Types of Sponsored Projects

Sponsored projects fall into two general categories - grants, and individual fellowships. While the distinction between these categories is generally clear-cut, it is sometimes blurred when dealing with other sponsored project funding sources.

2.1.1 Grants

A grant supports an activity in which the investigator and the sponsoring institution are the primary beneficiaries. The granting agency (ASUM) plays no active role in managing or directing the project and the investigator and institution have considerable discretionary powers with respect to both scientific direction and budgetary flexibility. This funding mechanism is the one most commonly used by agencies which fund biomedical research. Grants may be awarded for different activities.

Some of the most common are:

2.1.1.1 Research

Research grants are financial awards provided to support investigation or experimentation aimed at the discovery and interpretation of facts or the development, application, or revision of theories. Most research grants are awarded to support a single research or project. These are what are commonly called "traditional" research grants. However, the ASUM RGC and some other agencies also award research grants which involve multiple projects and cores (centralised services and/or facilities). These grants' which are called "program project" or "centre" grants, are developed around a central theme and generally are based upon a multi-disciplinary approach to the problem. In addition, research grants may also be awarded for special purposes such as to support new investigators, renovate animal facilities, provide research travel funds, fund research conferences, or provide specialised equipment or facilities.

Some sponsoring institution, do not allow individuals in a training capacity (as opposed to an employee) to be funded on this type of grant. Graduate Research Assistants and Post-doctoral Research Scientists are employees and are therefore allowed to be paid on a research grant; Graduate Students and Post-doctoral Fellows are trainees and are not allowed to be paid on a research grant. However, they can be listed on the grant in an unpaid role. Some non-government sponsoring agencies allow trainee (graduate students or fellows) funding on grants. However, in order to maintain the distinction between training and research grants for government accounting purposes, and between employees and trainees, the ASUM RGC will only allow trainees to be paid from research grants under certain circumstances. The agency announcement must clearly indicate that the award is, in part, intended to support a training mission and the grant proposal and budget can be tailored to distinguish research from training.

2.1.1.2 "Individual" Fellowships

Fellowships are provided to or on behalf of a specific individual for training that will enhance the individual's level of competence. Fellowships are available for individuals with varying degrees of experience. Fellowships provide either salary or stipend support and a minimal allowance for additional expenses (including tuition). The principal difference between a fellowship and a training grant is that the former is awarded for a specific individual and the latter is awarded for the training of unnamed individuals.

2.1.1.3 "Fee for Service" Subcontracts

These agreements are similar to service grants in that they are awarded to perform work in which there is limited intellectual or program involvement such as performing laboratory tests or hiring a firm to conduct interviews. A good rule of thumb in deciding if a subcontract is "fee for service" or a research subcontract is to consider whether you would name the individual performing the work as an author on a paper resulting from the research

2.1.1.4 Cooperative Agreements

A cooperative agreement is similar to a grant except that the degree of involvement by the awarding agency is greater. It is frequently used for government-sponsored, multi-centre, clinical trials or for research areas where the government has funded multiple grants that require cooperative effort to either achieve program goals or to avoid duplication. Administrative rules governing cooperative agreements are similar to those governing grants. However, program officials monitor progress more closely; can strongly suggest research direction; mandate inter-institutional cooperation; and/or adjust funding depending upon progress or program needs. Where specifically directed by ASUM Council, the RGC may seek to use this funding mechanism.

3. PREPARING THE APPLICATION

3.1 Who May Submit an Application?

The principal investigator (the individual submitting the application) on a research, training, or service proposal must be an officer of a body (the 'sponsoring institution') participating in the medical applications of Ultrasound with a formal appointment and employment arrangement.

The principal investigator or project director of a sponsored project must assume full administrative, fiscal, and scientific responsibility for the conduct of the project.

Visiting, supernumerary, or part-time officers of research or instruction may be principal investigators on research grants in exceptional circumstances. In these instances, the Dean/Chairman/Director of the employing body or Imaging service must write a letter to the Chairman of the ASUM RGC requesting a waiver of the policy. The waiver letter, in addition to confirming the researcher's qualifications and the reasons why an exception to the general rule should be considered, must state that the Dean/Chairman/Director of the sponsoring institution is willing to accept full administrative and fiscal responsibility for the project. It should also state that the individual will have a suitable appointment at the employing body for the duration of the current project period of the grant, assuming it is awarded. Sufficient time should be allowed to ensure that the request can be reviewed before the proposal has to be submitted. It should not be assumed that approval will be automatically granted. Annual salaries utilised on proposals for Visiting, supernumerary, or part-time officers should be based on the full-time equivalent salary of that individual.

An emeritus faculty member may serve as a principal investigator on a sponsored project only with the written permission of the Departmental Chairman, the Dean, the Vice Chancellor or equivalent officer of the sponsoring institution/University. This requirement applies whether the faculty member is currently emeritus or will assume that title at some point during the project period. The letter requesting approval should indicate what the individual's duties will be after becoming emeritus and the space and resources that will be available for the conduct of the research. Annual salary calculations will be based upon the salary at the time of retirement together with standard institutional salary escalations.

Post-doctoral Fellows and Graduate Students can submit fellowship applications if an appropriate faculty member is willing to serve as a mentor.

Wherever applicable, the applicant must comply with all relevant sponsoring institution policies including the "Policy on Externally Funded Research and Instruction" and the "Statement on Conflict of Interest". Special conflict of interest and misconduct of science policies may apply to members of the sponsoring institution. It remains the responsibility of the sponsoring institution at all times to ensure compliance with applicable policies.

3.2 Types of Applications

Applications for grants, contracts, or cooperative agreements can differ depending upon whether they are for new, competing continuation (or renewal) or non-competitive proposals.

3.2.1 New Applications

These applications are for new projects that must compete against all other new or renewal applications. Within this category, proposals can be submitted in response to the general mandate of ASUM or in response to a special announcement from ASUM. In the case of a grant or cooperative agreement, the special announcement is often either an RFA (Request for Application) or an Ongoing Program Announcement (PA). In the case of a contract, the special announcement is called an RFP (Request for Proposal). Proposals submitted under the contract mechanism which are not in response to an RFP are considered "unsolicited".

Typically an application submitted in response to an RFA or an RFP has to compete with only those proposals submitted in response to that particular announcement. Those submitted in response to an Ongoing Program Announcement typically have to compete with the general pool but may receive special consideration for funding. Proposals submitted in response to RFAs (grants) or RFPs (contracts) are typically reviewed separately and compete for a pool of money which has been committed for this particular research program.

New applications are generally for several years or budget periods. While budget periods are typically of one year duration, depending upon the agency, the announcement, and the nature of the program, they can extend for a greater or lesser period of time.

The total period of time for which the agency indicates that it will award funds for the project is called the project period.

For new applications, a grace period of three months is given after the submission date in order for the investigator to obtain necessary human subject, animal, biohazard, etc. clearance from the sponsoring institution. Please check your sponsoring institution guidelines to determine if a grace period is offered. In all cases, it is required that such approvals be in place prior to the start of funding and be maintained during the research period of performance.

3.2.2 Competing Continuation or Renewal

Competing continuation proposals (also called renewal proposals) are applications that are submitted to obtain funds to continue a project beyond the currently funded project period. This proposal has to compete to receive the additional funding against other new and renewal applications.

For competing applications the sponsoring institution may not allow a grace period after the submission deadline date in order for the investigator to obtain extensions of the necessary human subject, animal, biohazard, etc. clearance. Specific application guidelines should be checked to determine if a grace period is offered. In all cases, it is expected that such approvals must be in place prior to the start of funding and must be maintained for the research period of performance.

3.2.3 Resubmission or Amended Applications

Not infrequently, new proposals or renewal applications are not approved for funding. In many cases, the investigator chooses to modify the proposal based upon the reviewers' comments and submit it again. These proposals are called amended applications or resubmissions. If, in the case of a rejected renewal, the investigator has funds remaining in the current budget period, he/she can frequently request a no cost extension of the end date of the grant. During this period, the amended application is prepared, submitted, reviewed, and hopefully, awarded for funding. Occasionally, ASUM GRC may provide a funded extension to cover the interim period. This is more likely to occur in the case of a multi-project grant such as a centre grant.

3.2.4 Non-competing Continuation

After a project is approved, the funds are often awarded on a yearly basis even though the GRC indicates that it plans to support the research for several years. Each year (or budget period) throughout the project period, a non-competing continuation application or progress report must be submitted to receive the additional funds which have been committed or "obligated". These applications do not compete for the funds and are typically only reviewed by the program officer at the agency. It is very rare for a non-competing continuation to not be funded.

For non-competing applications, some agencies (e.g. Public Health Service), may require that certain approvals such as those concerning human subjects be in place prior to the submission of the proposal. Please check specific agency policies. In all cases, it is expected that such approvals must be received prior to the start of funding.

3.2.5 Supplemental Applications, Extensions and No Fund Extensions

A supplemental application is a request for an increase in support for the expansion of a project or to meet unforeseen administrative costs (e.g. an increase in animal care costs). An extension is to fund the research for an additional period, generally of short duration. Depending on the nature of the request and the agency, supplemental applications or extensions are considered either competitive or non-competitive (administrative). If the former, the application receives a regular review; if the latter, the request is reviewed by GRC administrative staff.

A "no fund extension" is a request to the GRC for additional time to complete the research without requesting additional funds. All extensions for awards must be approved by the GRC.

3.2.6 Transfer of an Ongoing Sponsored Project

Policies governing the transfer on-going sponsored projects vary from one sponsoring institution to another and by type of project. It is best to consult with the RGC concerning its particular requirements.

Transference of Public Health Service grants requires submissions on the part of both institutions - the relinquishment of the grant by the original institution and the acceptance of the grant by the other. The relinquishing institution must complete a relinquishment form indicating **(a)** the date of relinquishment, **(b)** the estimated amount of funding to be transferred, and **(c)** equipment purchased on that grant which will be transferred. The new sponsoring institution must send the RGC **(a)** a new grant face page, **(b)** budget and justification, **(c)** a statement concerning any changes in program direction, **(d)** new "resources and environment" and "other" support pages, and **(e)** a new checklist. The investigator also will be required to submit an Internal Cover Sheet (See 4.5.) and a list of all equipment being transferred the incoming sponsoring institution to the Office of RGC. If any of the work involves human subjects, animal subjects, radioactive materials, recombinant DNA and/or biohazards, approvals must be obtained from the appropriate offices. If the budget period at the old institution was longer than six months old, the RGC has the option of starting the grant at the new institution at the start of the next budget period. However, this rarely occurs. Similarly, the RGC is not required to transfer grants during an extension period.

3.3 How to obtain Information on Funding Sources

Each agency and foundation has its own guidelines, policies, and application forms. The Project Officer who handles this matter in the applicant's sponsoring institution is the first point of contact to assist you in obtaining information. If this avenue is not available ASUM GRC will help you obtain the necessary information and applications from other agencies.

Most approaches to commercial sources of funding are made via personal contact. If you have a project which is suitable for commercial funding, ASUM GRC will endeavour to provide you with assistance. If you are interested in participating in clinical trials, the sponsoring institution Ethics Committee secretariat is the starting point for developing an application and funding plan.

3.4 How to Write an Application

Several sources are available from the Office of the RGC to help a researcher prepare a proposal. If received early enough, the ASUM Project Officer RGC maybe able to also provide helpful comments on the budget, budget justification, and other issues pertinent to providing the general information required in the application.

Those new to proposal writing should keep the following in mind:

- * Be sure to follow funding source guidelines and tailor your abstract, hypothesis, and specific aims to highlight the ASUM's area of interest. Keep in mind how the funder reaches funding decisions.
- * Try to have the application reviewed by an experienced investigator, preferably one who has had success with the potential funding source.
- * Make sure the scope of the work and the budget is in line with the size of a typical award from the RGC.
- * The following are some of the most common causes for rejection:
 - The hypothesis is poorly defined or too diffuse.
 - The research problem is unlikely to provide new information, is unimaginative, or is overly ambitious for the project period.
 - The experimental design has inappropriate controls either in composition, number, or characteristics.
 - The methodology is questionable, unsuited, or defective.
 - Alternative approaches to potential problems are not addressed.
 - The data collection procedures have a confused design, use inappropriate instruments, or poor timing.
 - The data management and analysis are vague or unlikely to provide accurate and clear-cut results.

3.5 Special Approvals and Sign-offs

The RGC requires various approvals or sign-offs to be obtained prior to the submission of any government or non-government sponsored project. These approvals can be related to the use of other Schools'/Departments'/Institutes'/Centres' or institutions' personnel, space, equipment, or facilities. They can be necessary if there are space renovations or special insurance requirements. Similarly, the involvement of human subjects, vertebrate animals, radioactive materials, recombinant DNA, or biohazards may require the principal investigator to obtain approvals prior to or immediately following the submission of a research proposal.

If you are unsure of what approvals or sign-offs may be necessary, please contact the RGC Project Officer. Obtaining these approvals and sign-offs can be time consuming and if not obtained in a timely fashion, may lead to a delay in the submission of your proposal.

3.5.1 Preliminary Proposals and Letters of Intent

A preliminary proposal typically is a letter sent to the RGC in which the investigator presents a brief outline of planned work to determine if the agency is interested in receiving a detailed application. A letter of this type does not require approval and sign-off by the sponsoring institution as long as it is short in length (one to two pages) and does not contain budgetary detail or a commitment of the part of the institution. A statement that provides a single figure, bottom-line budgetary estimate is acceptable. Please be aware that ASUM does not view these letters as binding with respect to budget, personnel, or facilities. The CEO, ASUM would appreciate receiving a copy of such letters as a courtesy.

A letter of intent generally is requested by RGC when trying to determine the number of applicants there may be in response to a program announcement. It also helps the RGC make a preliminary determination as to the number and type of reviewers that will be necessary for proposal review. This letter generally does not contain any budgetary information and is generally non-binding. A letter of intent does not require sign-off by the sponsoring institution unless such a sign-off is requested by the RGC.

3.5.2 Schools, Departments, Centres, or Institutes

The approval and signature of the head of principal investigator's administrative unit must be obtained in all circumstances in the case of the Schools of Medicine, Public Health, Nursing, and Dental and Oral Surgery. The signature(s) from the administrative unit(s) supporting the investigator's salary and providing the space for the research project are required. The approvals and signatures of the appropriate Deans/Chairmen/Directors or their authorised representatives are required on the Internal Cover Sheet (see 4.6) for projects which involve either the personnel, space, equipment, or facilities of administrative units other than that of the principal investigator. These signatures must be obtained prior to submission of a sponsored project proposal. RGC suggests that duplicate copies of the cover sheet be sent to the various administrative units so that several signatures can be obtained simultaneously. The RGC will also accept "e-mail approvals" and faxed approvals. Approvals transmitted verbally to the office are not acceptable unless followed by a written, e-mail, or faxed approval.

Signatory approvals are *not* required for submission of non-competing proposals *except* when there are substantive program or budgetary changes from the previous year. In those circumstances, the signature of the head of your primary administrative unit and that of any other affected units is required

3.5.3 Facilities, Renovations, and Space

Most applications require a description of the facilities available to the project. If additional space is required for the project, the issue should be discussed with your departmental/institute/centre administrator and Dean/Chairman/Director as soon as possible. The Dean/Chairman/Director or administrator is required to "sign-off" on the Internal Cover Sheet accompanying the proposal indicating that he/she agrees with the facilities statement. Similarly, use of central core facilities or equipment must first be approved by the director of that facility.

If the project requires the rental of space, the matter must first be discussed with your Dean/Chairman/Director and must be approved by the sponsoring institution.

If renovations or new construction is required to conduct the project, the matter should be discussed with your administrator or Dean/Chairman/Director and a feasibility study and price quotation must be obtained. Renovations unless of a minor nature are unlikely to receive approval from RGC.

3.5.4 Research Involving Special Liabilities or Requiring Insurance

If a project poses special liabilities, special insurance coverage must be confirmed prior to approval. For projects which involve potential liability risk to the sponsoring institution, it may also be necessary to obtain the approval of the sponsoring institution after discussions with the sponsoring institution's Risk Management Office.

3.5.5 Research Involving Human Subjects

The sponsoring institution's Human Ethics committee must approve all research proposals involving human subjects. No human subject research is allowable on a project if Ethics Committee approval has lapsed or has not been obtained.

Failure to have current approval may lead to a project account number being suspended or not issued until approval is obtained.

Since the protocol review procedure involves review at the sponsoring institution level, any investigator contemplating research involving human subjects should submit a protocol as soon as possible. All protocol approvals are for the applicable period only. An approved protocol can be used for more than one proposal if the aims and methodology are the same.

3.5.6 Research Involving Animals

All proposals involving vertebrate animals must be approved by the sponsoring institution's Animal Ethics Committee or equivalent body. This requires that protocols concerning the utilisation of animals must be submitted prior to application to RGC. As part of the approval process, all personnel listed on the protocol must have completed a certification course on the basic principles underlying the humane care and use of laboratory animals.

RGC allows a grace period of 60 days from the time of submission for renewal proposals. No grace period is allowed for non-competing continuations. An approved protocol can be used for more than one proposal if the aims and methodology are the same.

No sponsored project involving animals shall be conducted without a protocol having a current approval. No animals shall be housed, or survival surgery (animals are alive after the operation) performed, in a facility which is not approved. Failure to have current approval may lead to a project account number being suspended or not issued until approval is obtained.

All animals must be housed in facilities that are approved by, or are part of, the sponsoring institution. If a project is planned which utilises large numbers of animals or an unusual species, or requires special handling or facilities, the handling facility should be consulted to ensure that the requirements can be accommodated. This is especially important for investigators who have not previously housed animals.

3.5.7 Research Involving Hazardous Materials

The relevant sponsoring institution resource should be consulted for information on chemical, biological, and fire safety, industrial hygiene, regulatory compliance, and other occupational health concerns. The applicant must be aware of regulatory obligations such as responding to emergencies involving hazardous materials; investigating environmental health concerns; and assessing the efficiency of safety devices and other engineering controls.

3.6 Preparing the Budget

In preparing the budget for an application, two factors should be carefully considered: **(1)** the needs of the project, and **(2)** the funding limitations imposed by the RGC (either explicit or customary). The requested amount should not be so small as to preclude successful completion of the stated goals nor so large that the RGC will not seriously consider funding the proposal. A project should be tailored to fit the constraints imposed by aims of ASUM. Any questions concerning budgetary matters can be discussed with the RGC project officer. In many cases, the Project Officer can provide you with information concerning the size of previous proposals submitted to the RGC by investigators and the amount of funds actually awarded.

There will be no routine escalation for future years. In determining the total for each budget year, applicants should first consider the direct cost of the entire project period. Well-justified modular increments or decrements in the total direct costs for any year of the project that reflect substantial changes in expected future activities may be requested. For example, purchase of major equipment in the first year may justify a higher overall budget in the first, but not in succeeding years".

The RGC Review Group will evaluate the budget on the basis of a general, expert estimate of the total effort and resources required to carry out the proposed research, rather than on the basis of detailed categorical costs. Reviewers also may comment on the requested budget without making specific recommendations. Additional budget information will be requested only under special circumstances. Every attempt will be made to fund these grants at a level at or close to the recommended total direct costs.

For Consortium/Contractual costs, provide an estimate of total costs (direct plus facilities and administrative) for each year, each rounded to the nearest \$100. List the individuals/organisations with which consortium or contractual arrangements have been made, the percent effort of key personnel, and the role on the project. Indicate whether the collaborating institution is foreign or domestic. The total cost for a consortium/contractual arrangement is included in the overall requested direct cost amount.

3.6.1 Cost-Sharing

Cost-sharing on a proposal is when you state in your proposal that you are planning to subsidise the budget of the proposal with funds from another source. This can take several forms. When the RGC requires the sponsoring institution to share a proportion of the total cost of the project or when certain costs are "capped", this is considered cost-sharing. Cost-sharing can also occur when you reduce your proposal costs to increase your competitiveness, e.g., not requesting full compensation for personnel effort. It also occurs when a portion of the expenses to conduct the sponsored project will be coming from other sources. Any funds which are offered as cost-sharing are considered part of the institution's obligation if the proposal is awarded. Both the RGC (and the sponsoring institution) will expect that specific funding sources be identified to fund the cost-sharing portions. This will allow for the clear identification of expenditures supporting the project.

3.6.2 Personnel

The sponsoring institution's administrator or investigator should carefully include personnel who fulfil the needs of the project with respect to experience and expertise, and effort. Each individual should be listed separately by name and title - either University title, (at the time of the award) or, for some agencies, the research-related title. If a position is to be filled by someone who is not currently employed, that position should be listed as "to be named" or "tbn" together with the position title. If an individual is going to be promoted prior to or at the start of an award, the title and salary should reflect the appropriate title and salary. The signature of the head of the sponsoring institution Administrative Unit or the authorised representative will be accepted as verification of the title and salary. It will also be accepted as verification of a new hire.

3.6.2.1 Effort

The effort of professional and support personnel should be listed in accordance with sponsoring institution policy. . If the investigator has administrative and/or teaching duties, this effort should be considered when deciding how much effort is available for research.

Principal Investigators cannot be listed on an "as needed" basis without permission from the Chairman of the RGC. Project Directors of an individual project in a multi-project program can be listed on an "as needed" basis if they devote less than 1% of time to the project.

All effort of administrative and clerical staff should normally be treated as indirect costs. However, direct charging of these costs may be appropriate where a major project or activity explicitly budgets for administrative or clerical services.

For example, this might be appropriate for projects whose principal focus is the preparation and production of manuals and large reports, books, and manuscripts. Also, consideration will be given to projects that are geographically inaccessible to normal departmental administrative services; and individual projects requiring project-specific database management, individualised graphics or manuscript preparation; human or animal protocol and/or other project-specific regulatory protocols; and multiple project-related investigator coordination and communications.

These examples are not exhaustive nor are they intended to imply that direct charging would always be appropriate for the situations described above. Where direct charges for administrative and clerical salaries are made, care must be exercised to fully justify the charges in the proposal. Care also must be exercised to assure that costs incurred for the same purpose in like circumstances are consistently treated.

3.6.2.2 Compensation

It is a requirement of the RGC that investigators indicate where full compensation for the effort of any of the personnel listed in the proposal is sought. Hence, if an individual is listed at 20% effort, 20% of the sponsoring institution salary may be requested in the proposal. However, cost sharing or alternate allocation of these costs is recommended where appropriate. For example, where:

- (1) The sponsoring institution agency's specific written policy does not allow such payments.
- (2) If the individual is receiving a fellowship or career award which precludes requesting salary on other grant applications.
- (3) If the individual is participating in a sponsored project in which his/her effort is duplicative of effort being funded by another sponsored project - for example, if two awards are supporting sections of the same project.

3.6.2.3 Fringe Benefits

Fringe benefits will not normally be funded in applications assessed by RGC.

3.6.2.4 Part-time, Casual, and Work-Study

Sponsoring institution employees who are paid participants must be listed as "personnel" on project proposals. Sponsoring institution employees who will not be paid as part of a project may be listed as unpaid "personnel", unpaid consultants, or can indicate the extent of their participation by submitting letters of collaboration.

Casual employees can be listed on sponsored projects.

3.6.2.5 Graduate Student Researchers

Graduate students should not be listed on research grant applications for stipends where their trainee status precludes such payments. They can be listed in an unpaid role. Graduate research assistants and post-doctoral research scientists are considered employees and can be paid from research grants.

3.6.2.6 Foreign Nationals and Residents

Only Australian or New Zealand citizens, and foreign nationals who possess permanent residence status may submit applications for RGC sponsorship.

3.6.2.7 Alterations and Renovations

Alterations and renovations are defined as work required to change the configuration of installed equipment or alter interior arrangements of an existing facility so that it may be more effectively utilised. Limited costs may be included in a Grant application.

3.6.2.8 Consultants, Consulting Fees, and Honoraria

The primary investigator may include costs for Consultant services when factors such as timing, costs, qualifications or the nature of the service to be rendered make it more beneficial for such services to be acquired outside of the project rather than to be performed by the investigators. A Consultant is defined as a firm or individual with whom the sponsoring institution enters into a Consultant Service Contract for a specialised type of service. The contract is for the primary purpose of obtaining the benefit of the consultant's knowledge, skills, or expertise. It contains a scope of work which clearly defines the goods or services being procured and addresses the needs of the user. This can be done either through performance specifications or through a description of the tasks to be performed. Honoraria (for example, for Advisory Board participation) and human subject reimbursement are exempt and not considered consultants.

3.6.3 Equipment

Equipment is defined as an item having a unit value of \$2,000 as well as a useful life of two or more years. It is important to adhere to this definition when preparing sponsored project budgets. For items such as computers with varying component parts, the unit value is the *sum* of the cost of the base unit and its components at the time of the acquisition of the base unit.

Equipment is further categorised as "special purpose" or "general purpose". Special purpose equipment is usually considered to be items which only can be used for research. General purpose equipment has utility which is not limited to research.

It is important that each item of equipment being requested is clearly identified and priced (including shipping and installation) in the proposal. (If possible, specific manufacturers and model numbers should be used.) However, the investigator has the discretion to utilise more general listings. If a piece of equipment requires major installation renovations, the proposal is unlikely to be approved. The cost of the renovation must be included in the budget unless otherwise already the subject of approval and committed funding.

3.6.4 Supplies

Supplies, animals, and expendable equipment (property which does not meet the definition of equipment, see 3.6.2.5) fall into this category. Major cost items in this category should be itemised - for example: animals, glassware, animal care costs, tissue culture media, radioisotopes, antibodies, etc. Costing should be based upon either experience or actual price quotations. However, the investigator has the discretion to utilise more general listings.

3.6.5 Travel

Travel costs should be divided into two categories: domestic travel and foreign travel. Funds can be requested for travel to scientific meetings, to collaborating laboratories, and for consultation with the funding agency or with colleagues concerning project research.

The basic policy governing travel expense reimbursement is that an individual travelling on University business should be reimbursed for actual cost. It is required that each trip requested in the budget should be specifically identified as to location and length of stay. Per diem, travel, and registration expenses should be itemised. Trips approved as part of the awarded budget do not require further approval. Some sponsoring institutions require prior approval for travel interstate or to foreign countries.

3.6.6 Patient Costs

Patient care costs are allowable for routine and ancillary medical services required as part of the research protocol. However specialised tests not done in a hospital laboratory or a licensed, commercial testing laboratory are not considered patient care costs and must be included under "Other Direct Costs". Reimbursement of personal expenses such as patient travel, patient honoraria, consulting physician fees, etc. is not allowable in this category. Priority is given to peer reviewed research.

3.6.7 Other Direct Costs

This category is used to delineate costs not specified in any other category. Examples would be animal care costs, specialised tests, central computer charges, shop charges, core facility charges, publication costs, copying and telephone charges, maintenance contracts, service agreements, payments to volunteers or patients, patient travel, student tuition charges, student health and computer fees, seminar costs, typing services, etc. In certain circumstances, space rental, the rental of equipment, and the purchase of insurance may be also allowable. Costs associated with radioactive waste, chemical, and bio-hazardous materials disposal are currently not treated as direct costs. These costs are recovered as part of our indirect costs.

To determine the costs of this section, it is best to itemise each cost. Since many of these costs are incurred in the general operation of the laboratory, it should be kept in mind that only that proportion of the total cost that is related to this specific proposal should be included.

3.6.8 Research Subcontracts or Consortium Agreements

This category in a proposal budget is set aside for the summary of the budgets from secondary participants. If it has been decided that a subcontractual or consortium agreement will be established with another institution, the administrator and/or investigator should establish a working relationship with their counterpart as soon as possible. This individual will be required to submit for inclusion in the proposal: **(1)** a budget approved by his/her institution; **(2)** a letter from an authorised official indicating that they are willing to participate in a consortium/subcontractual arrangement if funding is approved; **(3)** a statement of work or the "research plan"; and **(4)** a statement concerning the facilities and resources available for the project. These statements can either be a separate section of the proposal or incorporated into the proposal as a whole depending upon the wishes of the principal and participating investigators. In addition, for many sponsoring agencies, information on "other support" and on various approvals or assurances, so-called "checklist" pages will also be required. As a general rule, the information requested of the primary institution "flows down"; that is, anything requested of the prime institution is generally also requested from the subcontractor.

3.6.9 Indirect Costs

Indirect costs are costs which are real costs associated with doing research but are difficult to quantify with respect to any given project. For example, heat, maintenance, building depreciation, administrative expenses, and library use. Funds received as indirect costs are reimbursement for funds expended for central and departmental administration, buildings and grounds, and library costs.

Indirect costs should not generally be included. In rare cases, RGC will not include the indirect cost reimbursement request as part of the application budget but reimburse the institution separately.

3.6.10 Future Year Budgets

If the proposal requests more than one year of support, RGC will require a separate budget for each year. Each budget category can be developed in two different ways. If the costs in a given category differ in any of the subsequent years (e.g., unusual salary increases, programmatic changes, additional equipment needs, etc.) either a detailed breakdown should be provided or a detailed explanation given in the budget justification. Cost estimates should incorporate either actual prices or cost-of-living increases. An RGC administrator not familiar with the research may have the final say as to the extent of future years' budgets reductions so justifications are important. (RGC requires that such changes be marked with an asterisk.)

If the costs in the future years' budgets are essentially the same, an alternative approach is to apply a simple escalation factor to the category. Please indicate any escalation factors that are being utilised.

3.6.11 Budget Justification

The budget justification is an important section in any proposal. It should be used not only to state why an item costs what it does, but to indicate how it relates to the research plan. The information should be sufficiently detailed to address all concerns with respect to cost and need. In general, explanations should be more detailed for competing than for non-competing applications.

Key points with regard to the budget justification include:

Additional budget information will be requested only under special circumstances. All necessary detail should be included in the submission to allow a decision to be made on that basis.

For Consortium/Contractual costs, provide an estimate of total costs (direct plus facilities and administrative) for each year, each rounded to the nearest \$100. List the individuals/organisations with which consortium or contractual arrangements have been made, the percent effort of key personnel, and the role on the project. Indicate whether the collaborating institution is foreign or domestic. The total cost for a consortium/contractual arrangement is included in the overall requested modular direct cost amount.

3.6.11.1 Personnel

Each person's role in accomplishing the specific aims of the proposal should be adequately discussed. Particular emphasis should be given to the justification of technical positions and positions listed as "to be named". If an application is a competing or non-competing renewal, changes in personnel effort should be noted and justified. Salary and fringe benefit escalation rates for future years should also be noted.

Remember: If you include clerical and administrative personnel as part of your budget in a proposal, special care must be given to justify their positions with respect to the specific goals of the project.

3.6.11.2 Alterations and Renovations

If a large scale alteration or renovation is planned, it is appropriate to incorporate its significance to the research into the body of the proposal. When this is done, it should also be summarised and referenced in the budget justification. Less significant alterations and renovations should be fully discussed in the justification. It is often helpful to provide a written cost estimate for the renovation and "before and after" line diagrams.

3.6.11.3 Consultants and Honoraria

The justification should include an explanation as to why the *individual* is crucial to the project and what the consultant *specifically* will do. The reasons for the number and length of the trips should also be stated. If the amount requested is large, the cost must be itemised with respect to fees, travel, and other expenses.

3.6.11.4 Equipment

Each item should be justified in detail. If a portion of the cost of an item is to be charged elsewhere, this should be stated. If you wish to purchase a particularly expensive model, an explanation should be given as to why that particular model is crucial. If the item might reasonably be expected to be already available to the investigator, care should be taken to explain the need for another - i.e. over utilisation, age of current equipment, new laboratory, etc. In the case of contracts, it is required to provide a written cost estimate.

3.6.11.5 Supplies

Brief explanations are generally acceptable unless the cost of a particular item "stands out". These items should have separate justifications. Such items as animals, radioactive supplies, and tissue culture supplies are often justified individually. If a supply budget is relatively large with respect to the total proposal budget, it is also useful to "breakout" the costs and justifications of categories of supply items.

3.6.11.6 Travel

The travel justification should include who will be going on the trip, the destination, and the purpose of the trip. The number of trips and the length of stay for each should also be expressed. Many contracts require more detailed information such as how the cost of the various travel components (tickets, hotel rooms, cab fares, etc.) were determined.

3.6.11.7 Patient Costs

The need for these costs is often fully explained in the research protocols and should be referenced. The cost of each type of test should be itemised. If these costs vary in future years due to recruitment, drop-out, changes in lengths of stay, study phases, or types of testing, it is useful to provide a referenced table with this information. In most cases, the professional fee for test interpretation should not be included if these qualified individuals are being requested in the personnel category of the budget. If professional interpretation fees are to be charged, they should be thoroughly justified. In some cases, it is also useful to provide information on the total cost per patient per phase of the study. Information on how the various scientific phases relate to the budget periods is also useful if not provided elsewhere.

3.6.11.8 Consortium/Subcontracts

These costs do have to be justified unless the sponsoring institution has submitted its own budget justification with its budget. However, the reasons why a consortium/contract is necessary or desirable should be carefully spelled out either here or in the body of the proposal.

3.6.11.9 Other

The justifications in this section should be developed using the same principles as those for the "supply" category. Costs which are being shared with other proposals should be identified. If costs are included which appear general in nature, such as copying or publication costs, indicate why they are necessary with respect to the particular proposal.

3.7 Other Support

Many agencies including ASUM RGC require information concerning sponsored projects that the investigators in the proposal are planning, have pending, or have been awarded. The following information is typically requested:

- (1) title of the proposal,
- (2) sponsoring agency and grant number,
- (3) effort of the investigator,
- (4) budget and project periods,
- (5) amount of funds available to the investigator for the budget and project period,
- (6) a brief (several sentence) description of the project,
- (7) a statement concerning the relationship of the award in question and the current proposal and whether any scientific or budgetary overlap exists, and
- (8) a plan for rectifying any scientific or budgetary overlap.

3.8 Resources and Environment

This section of a proposal typically is concerned with the resources and environment which directly impact the work described in the proposal. If it is felt that a reviewer might question the availability of certain specialised equipment or other resources, this should be discussed here (and in the body of the text, if appropriate). Proximity to supporting collaborators, availability of shared core facilities, and a discussion of how ASUM promotes intellectual stimulation in your scientific area can be discussed, if desired.

3.9 Miscellaneous Information/Documentation Requested by Agencies

Given the number of agencies that support biomedical research, it is not unusual that an investigator or administrator might come across a proposal requirement that is unfamiliar. Please contact the RGC Project Officer / Education Manager concerning such requirements.

4. APPLICATION SUBMISSION PROCEDURES

All sponsored project proposals must be reviewed and approved by the RGC. All sponsored project proposals are submitted through the ASUM secretariat.

- (1) The RGC is authorised to submit, negotiate, and sign all sponsored project agreements for ASUM after ratification by ASUM Council. In addition, RGC provides assistance in identifying funding sources and in preparing sponsored project proposals. With the exception of commercial proposals and government and non-government clinical trials, RGC acts as a liaison between ASUM the sponsoring institution. In all cases, it is charged with the responsibility of ensuring that the terms of the award are fulfilled. RGC also has responsibility for those aspects of post-award administration which do not involve financial accounting.
- (2) Other functions of the RGC include maintenance of the computerised proposed project system for ASUM, establishment of ASUM sponsored projects, budget monitoring, identification and dissemination of funding opportunities, fostering grantsmanship, and coordinating educational efforts to promote the proper conduct of science.

5. POST-AWARD ADMINISTRATION

5.1 Office of the Administrative Officer, RGC

The Administrative Office, (AO, RGC) is responsible for administrative aspects of the post-award administration of sponsored projects.

5.2 Issuing a Consortium or Subcontractual Agreement

If a proposal approved by ASUM contains a subcontract, (AO, RGC) prepares a subcontractual agreement and submits it to the investigator for review. After review and comment, it is sent to the sponsoring institution for review and signature by their institutional official. Once signed by that institution, it is re-reviewed by the AO, RGC for any changes. If the changes are substantial, it may be sent back to the investigator for re-review. If satisfactory, the investigator prepares a Contract Purchase (CP) requisition which the AO, RGC will forward to ASUM secretariat. Once the CP is issued, the subcontractor may start billing ASUM for services. The investigator is responsible for approving all payments. In addition, most subcontracts will contain a clause stating that ASUM will withhold 10% of the funds pending receipt of any final reports or "deliverables". It is the responsibility of the investigator to inform (AO, RGC) when those funds can be released. If at any time, the subcontractor's performance is not satisfactory, the AO, RGC should be notified immediately. For a complete copy of the procedures and samples of a subcontract and a CP requisition, please contact the AO, RGC.

Please note that if a new subcontractual agreement (as opposed to an amendment) must be issued for each year of a project, the subcontract from the prior year must be "closed out" before a new subcontract is issued.

5.3 Rebudgeting of Funds

Rebudgeting is the utilisation of funds in a way that differs from that proposed in the budget approved by the RGC. Approval of rebudgeting of funds on a sponsored project is the prerogative of the RGC. In some instances, specified rebudgeting authorisations may be granted to the institution or to the investigators by RGC. If the rebudgeting approval rests with the sponsoring institution, the investigator should write a letter to RGC, countersigned by the Dean/Chairman/Director or Administrator, indicating:

- (1) which category to withdraw funds from;
- (2) which category to add funds to;
- (3) why the transfer of funds is needed;
- (4) why funds can be taken from that particular category; and
- (5) how the need relates to the project.

5.4 Role of the Principal Investigator in Budget Monitoring

Although the Principal Investigator may delegate responsibility for handling the day to day financial administration of a grant or a contract (e.g. bookkeeping, ordering supplies, processing payroll) to others within the department or unit, the Principal Investigator must exercise appropriate oversight of the overall finances of the project. This is necessary in order to ensure:

- (1) that personnel charges to the grant or contract are consistent with the effort expended by those engaged in the work funded by the project,
- (2) that other than personnel expenses are appropriately charged and allocated to the sponsored project,
- (3) that charges to the grant or contract do not exceed the funds awarded,

- (4) that the charges allocated to the project are in compliance with federal and University policies and procedures, and
- (5) that if significant rebudgeting occurs (25% rebudgeting of direct costs) which may result in an impact on the scientific program proposed in the awarded application, it is reported to the RGC.

5.5 Patents and Inventions

Inventions developed utilizing the resources and activities of ASUM are a potential resource of great value to the public. Unless agreed to the contrary or required by Statute ASUM retains title to inventions developed or reduced to practice under sponsored projects.

Sponsored personnel must inform ASUM of any potential inventions. The inventor will be required to complete an invention disclosure form which will help RGC decide if ASUM will develop the invention or allow the inventor to retain title. It is the responsibility of the principal investigator to notify the sponsoring institution of any inventions and to keep them apprised of any patent development.

5.6 Human Subject and Animal Assurances, Radiation Safety, Conduct of Science, and Conflict of Interest Policies

Investigators conducting either animal or human subject research are required to have their protocols approved by the appropriate committees and kept current. They must be renewed annually. All individuals wishing to be principal investigators of protocols are encouraged to undertake appropriate "Human Subjects in Research" study. In addition, all researchers utilizing animals are required to have training in handling animals. All laboratories in which animals are utilised are subject to inspection.

Conflict of Interest declarations should be completed annually or more frequently as the situation warrants.

Investigators planning to use radioactive materials are required to submit protocols for approval to the relevant Radiation Safety Committee. In addition, they must participate in a course given by the Radiation Safety Office, be listed as radiation users, and obtain badges necessary to measure exposure to radioactivity.

5.7 Extensions

5.7.1 No Fund Extensions

No fund extensions are utilised when additional time is required to adequately fulfil the obligations of an award. Requests for this extension should be addressed to the RGC, signed by the investigator and countersigned by the Dean/Chairman/Director. The letter should state the reason for the request and the amount of additional time needed, and should be received by the RGC office before the expiration of the budget period in question. If approved by RGC, the letter will be countersigned and forwarded to the sponsoring institution.

RGC has the authority to issue one extension for up to twelve months as long as the agency is notified within 10 days of the end of the project period. A form is available in RGC to request this extension. If a second extension is need, it must be requested from the ASUM council.

Where an investigator receives funding for the renewal of a project with a project start date which occurs before the end of the no cost extension, the RGC should be immediately informed, requesting that the extension be terminated as of the start date of the renewal. The end date for the no-cost extension will be adjusted so that the overlap is eliminated.

5.7.2 Funded Extensions

In most cases, agencies require that requests for extensions with funds be submitted as competitive applications or supplements (depending upon whether the extension is for the whole project or one segment). However under certain circumstances, a letter explaining the circumstances and countersigned by the Dean/Chairman/Director and OGC is sufficient to obtain an administrative supplement.

5.8 Changes in Key Personnel, Substantial Changes in the Effort of Key Personnel, or Changes in Program Direction

ASUM require that the RGC is notified at least 30 days prior to any anticipated change which will have a major impact on the sponsored project. The notification should be in writing and countersigned by the Dean/Chairman/Director of the sponsoring institution. If the investigator believes that this change might be sensitive in nature, it is best to discuss it with RGC personnel prior to writing the letter.

Reductions in the effort of key personnel or re-budgeting of more than 25%, in aggregate, of the direct costs of an award will be construed as a program change.

5.9 Transfer, Sale, Discard, or Theft of Equipment

ASUM requires state that the title of equipment purchased on a sponsored project vests in ASUM after the project is completed. However, some sponsoring institutions state that equipment purchased by the investigator remains the property of the sponsoring institution. Similarly, some contracts or subcontractual agreements indicate that equipment purchased with funds from the agreement is the property of the sponsoring institution. If any question arises concerning ownership, ASUM will provide the necessary policy information.

5.9.1 Transfer of Equipment

ASUM may permit an investigator to transfer equipment to the sponsoring institution, even if the title resides with ASUM. This is often the case when the equipment is essential for the continued conduct of the sponsored research. However, if a piece of equipment is shared with other investigators or is necessary for the conduct of on-going research which will remain at the sponsoring institution, it is possible that permission may not be granted. Equipment, which was purchased on an active grant, after release is granted by ASUM, may be transferred by the principal investigator to another institution.

If an investigator wishes to transfer equipment to another institution, the matter should be discussed with his/her Dean/Chairman/Director. A request for the transfer of equipment should be submitted to the RGC. Once it is signed by the investigator and the Dean/Chairman/Director, the RGC Chairman will review and countersign the request and forward a copy to the AO, RGC, the investigator, and the Dean/Chairman/Director.

Equipment being transferred to the sponsoring institution must be removed from the equipment inventory system of ASUM. Acknowledgment will be sent by AO, RGC to the investigator and the appropriate Dean/Chairman/Director.

5.9.2 Sale or Discarding of Equipment

The procedure and guiding principle for the sale or discard of equipment is basically the same as for the transfer of equipment. However, prior to equipment being discarded or sold, a notice at no cost may be placed in the ASUM Bulletin describing the item and the terms under which it is available. The dissemination of this information provides other members of the ASUM community with the opportunity to obtain equipment which might be useful to their projects either for free or at a reasonable price.

If equipment is sold, the investigator must deposit the funds in an account which is dedicated to research support. A copy of the sales receipt should be forwarded to RGC.

5.9.3 Theft of Equipment

The theft of equipment should be reported to the ASUM Office. The AO, RGC should ensure that the item is removed from the ASUM inventory by submitting advice in writing after having it countersigned by the Dean/Chairman/Director and forwarding it to the ASUM secretariat. A confirmation copy of the form will be returned to the investigator.

6. CLOSE-OUT

6.1 Transfer to Another Institution or Early Project Termination

If an investigator wishes to leave the sponsoring institution and transfer a sponsored project to the new institution, he/she must consult with the RGC and the sponsoring institution concerning the correct procedure. In general, the sponsoring institution would have to agree in writing to relinquish the project and provide an estimate of the funds remaining in the budget.

This is followed at a later date by the Financial Status Report which provides the final accounting and may lead to an adjustment in the new institution's Notice of Grant Award. The new institution would have to indicate in writing that it is willing to accept the project. The investigator will be required to write a progress report and indicate how the change would affect the resources available for the conduct of the project. *Some agencies do not allow the transfer of projects awarded under special funding mechanisms.* If an investigator wishes to terminate a project prior to the official termination date, a letter countersigned by the Dean/Chairman/Director should be forwarded to the RGC. ASUM requires the submission of a final progress report and a financial statement indicating whether any funds remain. ASUM also requires a final invention statement.

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