

**St. Mary's University
San Antonio, Texas**

**Policies and Procedures
Sponsored Projects, Contracts, and Grants**

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POLICIES FOR SPONSORED PROJECTS, GRANTS AND CONTRACTS

■ St. Mary's University encourages faculty and professional staff to pursue external funding, when and where possible and applicable, for projects and programs that support the University's mission and goals and for professional development. The University provides direct support to faculty and professional staff for these activities through the offices of Institutional Grants, Academic Grants, and Law Development. When necessary, decisions about the specific support area for a particular grant will be determined by the President or the appropriate Vice Presidents.

■ Definition of Grants, Sponsored Projects and Contracts:

For the purposes of this document, *grants and sponsored projects* are synonymous and refer to activities or programs for which funding is sought from an agency outside the University for a specific research or scholarly project. *Contracts* refer to projects for which the funding source has usually identified and specified the requirements, needs, and parameters of the project and seeks qualified persons to conduct the research or perform the activities of the project.

Role of Institutional Grants Office

● Institutional Grants supports the process of obtaining external funding for University projects and programs in the areas of endowments, challenge grants, student scholarships, operating and general funding projects, and other activities determined to support the University's mission and purpose. This office supports projects that impact large sectors of the University or the entire University. The University provides support for appropriate activities based upon established priorities and dependent upon formal approval of the project by the appropriate University officials.

Role of the Academic Research and Sponsored Projects

● The Academic Research and Sponsored Projects supports faculty and certain professional staff in efforts to obtain external funding for projects and programs that are concerned with research and development, learning research, faculty development, equipment acquisition supporting curricular/course development, and professional development. This office provides services to all academic areas. The University provides support for appropriate activities based upon established priorities and dependent upon formal approval of the project by department, school, and designated University officials.

Role of the Office of the Associate Dean for Administration, Law School

● While the Academic Research and Sponsored Projects supports the Law School's efforts to obtain external funding for grants and sponsored projects, the responsibility for administrative reporting and compliance is carried out by the Office of the Associate Dean for Administration. The University provides assistance to Law School projects based upon University priorities and goals and contingent upon approval by the Dean and other designated University officials.

Procedures

■ St. Mary's University establishes policies and procedures for externally funded grants and contracts in order to enhance the competitiveness of proposals and to provide an orderly system for discussion and development of projects for which the University provides support. The following general procedures are designed to facilitate and support the policy statements above. Individuals or groups associated with the University who plan to submit grant or contract proposals should be informed about the procedures in effect and communicated in this *Policies and Procedures Statement*. The Grants Offices that support specific areas of the University may provide additional guidelines for preparing proposals and managing grants.

■ Procedures for the proper submission, acceptance, administration, final reporting requirements, and accountability issues associated with externally funded projects, both privately and publicly funded, are specifically provided in this document. Procedures directly related to projects supported by and/or administered by Institutional Grants are provided in the *University Policies and Procedures Manual*. Policies and Procedures related to projects supported by and/or administered by the Academic Research and Sponsored Projects are also provided in *The Faculty Handbook*. A copy of the policies can be obtained from any of the grants offices.

I. Obtaining University Approval to Submit A Grant or Contract Proposal

A. Contact Appropriate Grants Office

- Anyone interested in seeking external funding for a project or in submitting a proposal for a contract must make initial contact with the grants office in the proposal writer's organizational division or unit: e.g. those who work in the academic division should first contact the Academic Research and Sponsored Projects, and all others should contact the Institutional Grants Office. (See grant policies section for definition of grants offices' responsibilities.) At this time, the grants officer will inform the proposal writer about the proper way to proceed with the development of his/her project.

B. The "Blue Form"

- Grants, contracts, and other sponsored projects must be approved by the president and other appropriate University officials before submission of the proposal. Initial approval to develop the project is obtained via a special sign-off sheet referred to as the "Blue Form." (See Appendix A for a sample Blue Form). This is the first step in the approval process.
- To allow for necessary discussion and revision, the completed Blue Form must be submitted in a timely manner (usually a minimum of 30 days prior to proposal deadline) through the appropriate grants office.

- The Blue Form will be used to ensure that the funding prospect for the project is appropriate and does not compete with other university projects or commitments.
- A completed Blue Form (i.e. a form with all necessary signatures) is critical to implementation of all other procedures beyond this point. Specific professional assistance with sponsored projects may begin ONLY AFTER the required signatures are obtained and the Blue Form is submitted to the appropriate grants office.
- All detailed budget preparation must occur AFTER a signed and completed Blue Form has been received by the grants office assigned to the project.
- Identify and note **any** resource commitment expected from the university on the BLUE FORM.
- Faculty, administrators, and staff members may NOT sign the Blue Form, budget, or any other proposal forms for any university official unless authorized to do so.
- Submission of a Blue Form does not imply final approval for the completed proposal.
- After approval to proceed has been gained, proposal development may be reassigned to a different grants office by the vice president(s) in the concerned area if necessary.

C. Approval for Matching Funds/New Budget Allocations

- Proposals that require another funding source to provide a certain amount of money for a project, or matching funds, OR proposals that require new budget allocations above \$2,500 must be approved by the Executive Council and/or the Board of Trustees before submission.
- Requests for matching funds or new budget allocations must be submitted at least 90 days prior to the deadline established by the funding source requesting the match and must be coordinated through one of the grants offices.

D. Future Funding

- Provisions for continuing the project beyond the funded period should be included in the initial planning and budgeting process.

II. Preparing a Proposal for External Funding

A. Project Director (PD)/Principal Investigator (PI) Responsibilities and Grant Office Roles

- The designated grants office will assist the PD/PI in identifying potential funding sources and will coordinate communication with the funding sources.
- The designated grants office will assist the PD/PI in obtaining information needed by funding sources for proposal submission.
- The designated grants director and the PD/PI will determine internal timelines and responsibilities for the submission of proposals.

B. Research and University Assurances

- Proposals for sponsored projects and conditions of contract agreements for research or professional services supported by the University must comply with all University, State, and Federal regulations for the safety and the well being of researchers, research participants, and the community in general. Project Directors must consult with the appropriate grants office to ensure compliance for individual projects in regard to the following assurances:
 - Human Subjects Policy
 - Vertebrate Animal Research Policy
 - Drug-free Workplace Certification
 - Environmental Hazards Policy
- Project directors/principal investigators and co-principal investigators are required to complete a Conflict of Interest form prior to proposal submission. These forms are available in the grants offices. Please refer to the *Faculty Handbook* and *The Policies and Procedures Manual* for the university's policy regarding Conflict of Interest.
- Proposals for sponsored projects and conditions of contract agreements for conducting research or for providing professional services supported by the University must make assurances to Federal, State, and some private agencies that the University is in compliance with all relevant regulations.

The president of the University certifies by his signature on proposals and some contracts that certain federal conditions and requirements are met by the University. The following are common examples:

- Scientific Misconduct Statement
- Intellectual Property Statement
- Debarment and Suspension Certification

- Lobbying Certification
- Civil Rights Certification
- Project Directors and Principal Investigators must be aware of the conditions of these regulations and ensure compliance at all times during the research or contract activity.

C. Budget Items

1. Personnel

- All full-time University employees dedicate 100% of time to the duties determined by their job descriptions and are paid by the University accordingly; therefore, any budgeted grant or contract activity must reflect either (a) release time from specific regular duties to perform grant-related activities; or (b) activities that are contracted outside of regular working hours. Additional hours must conform to University personnel procedures. Release time funded through grants or contracts is reimbursed to the University, not the employee. Time logs must account for grant-funded activities and must be signed by the PD/PI. Logs become part of the grant award financial documents and are subject to audit.
- Records must be maintained on all activities involving time expenditures on all grant activities by key personnel when designated percentages of time are part of the grant requirements.
- The University Grants Accountant will require a signature from the PD/PI at least every semester certifying time dedicated to the funded project for all personnel assigned to the project.

2. Equipment

- The project director or principal investigator will ensure that the budget contains bids or price estimates for all equipment necessary to the project.
- Major purchases (goods or services exceeding \$1,000) should be approved by the appropriate Vice President and Dean/Director before they are included in the proposal's budget.
- If computer equipment is a part of the equipment needed, the PD or PI must comply with at least the minimum standards established by the university. (Contact the Academic Technology Services Director for current information.)

3. Indirect Costs

- Indirect Costs for federal, state and private sources are always negotiated at the University level, not by the individual submitting the grant request.
- If the funding source does not allow indirect costs or has a limit lower than the University's approved rate, permission must be obtained from the President or the Vice President for Finance and Administration to waive or negotiate the indirect cost.
- The comptroller is responsible for negotiating federal indirect cost agreements and for maintaining the currency of those documents.

3. Cost Sharing/In-Kind Costs

- All known cost-sharing or in-kind commitment needed from the university to support the project must be noted when the Blue Form is initially completed to alert University officials to the financial obligations contained in the proposal request.
- Initial support of University cost-sharing on the Blue Form does not imply approval of the completed budget.

4. Contract Proposals

- The preferred method of payment for all contracts is cost reimbursement. All other payment methods must be approved through the Grants Office and the Comptroller.
- All contract budgets pertaining to academic projects are negotiated through the Academic Research and Sponsored Projects.

III. Obtaining Final Approval

A. Approval from Grants Office

- The final draft of a proposal (including budget) must be submitted to the appropriate grants office by the established internal deadline (determined on an individual basis in initial conversations about the project).

B. Presidential Approval

- Final administrative approval for any project will come from the University president, who will sign all cover sheets and assurances AFTER the proposal

has been reviewed and forwarded by the appropriate grants office to the University president's office.

- Failure to obtain approval from the appropriate grant office and the president OR failure to reveal, in the early stages of planning, the full extent of the University's required support of the project may result in the project not being submitted or the award not being accepted by the University.
- No change in the proposal may be made after final approval.

IV. Accepting Awards and Contracts

A. University Acceptance of Awards

- Acceptance of awards to the University rests solely with the president of St. Mary's University.

B. Project Ownership

- All grants received through St. Mary's University are the property of St. Mary's. Therefore, research results, patents, equipment, and all other grant-supported real and intellectual property that result from activities attributed to the grant project belong to St. Mary's University, unless otherwise stipulated in other university policies or specifically in official contracts. Please refer to the Intellectual Property Statement ("Interest in Creative Works" *Faculty Handbook*) for details. Personnel, procurement, equipment, and inventory procedures and policies are in effect for all grant activities.

C. Amending the Award or Contract

- Changes to a proposal or contract required/requested by a funding entity must be negotiated by the assigned grants officer, in consultation with the PD/PI, and approved by appropriate University officials. Faculty and staff are not authorized to negotiate terms or costs of an agreement.
- Once accepted, all activities and commitments stipulated in the final award document and the accepted grant project or contract award must be adhered to unless changes are agreed to in an amendment agreement by the PD, the funding agency administrator, and appropriate University officials.

V. Managing Awards

In order to assist with the management of awards and comply with federal requirements, grant directors and other administrative officers have developed protocols for the smooth administration of all grants.

Overall Grant Administration

- Project Directors and Principle Investigators are responsible for the proper administration of grant awards. This responsibility includes all Terms and Conditions of Award, federal and state compliance requirements, and University requirements.
- University Prior Approval System
- Project Directors and Principal Investigators shall adhere to the University's Prior Approval System. This procedure requires grantees to obtain prior approval for administrative changes such as the following:
 - the expenditure of project funds for items that, under the applicable cost principles, normally require prior agency or contractor approval;
 - the one-time extension of a grant period;
 - the incurring of project costs prior to the beginning date of an award;
 - budget revisions that involve the transfer of funds among certain budget categories.
- A Prior Approval Form (see attached) must be completed and forwarded to the appropriate Grants officer when any of the above changes are desired.
- Changes that affect the scope of the project require university and agency/contractor approvals. Proposed changes must be submitted on a Prior Approval Form to the appropriate grants office.

C. Grant Administration/Reporting

- Project directors must submit a request for a restricted account budget in order to activate a grant award or contract. Accounts are established through the Comptroller's Office.
- A complete and final copy of all grant awards, along with negotiated changes, performance reports, and financial reports, will be kept on file in the specified Grants Office for University reference and audit purposes.
- PDs are responsible for forwarding copies of all grant-related reports to the appropriate Grants Office. Although grant awards/contracts may not require interim and final reports, PDs/PIs may be required to submit such reports to the supporting grants office.
- Financial Administration will forward copies of all financial reports to the designated grants office for filing.

- The Chief Accountant in the Comptroller's Office is the person officially designated to file financial reports and is responsible for the accuracy of budgets.
- The Chief Accountant will maintain financial records in regard to indirect cost charges.

D. Close Out Procedures for Grants and Contracts

- The Comptroller's Office will automatically close out budgets 60 days after the project end date. Requests for extensions, if allowed, must be on file prior to that time and must conform to the Prior Approval System. Grants and contracts may not be extended simply for the purpose of expending remaining funds. Unless the Terms and Conditions of the grant/contract direct otherwise, unencumbered funds will be transferred to the General Operating Fund after 60 days.

E. Communication with Funding Agency (Post Award)

- The PD or designated Grant Administrator is the only person authorized to contact any funding agency regarding information or materials for the administration of the grant or for purposes of disseminating or requesting information about the grant award.

F. Public Relations Related to Grant Awards

- The specified grants office will serve as the University contact point for authorization to release public affairs information regarding grant awards.

Appendices:

- A. Notice of Intent to Submit Proposal ("Blue Form")
- B. Conflict of Interest Form
- C. University Prior Approval Form