Governing Principles of Externally Sponsored Programs

1.0 INTRODUCTION

Arkansas State University (A-State) is committed to the pursuit of discovery and innovation that enhances understanding of the universe and improves the lives of people, particularly Arkansans. In pursuing this goal, the University has designated the Office of Research and Technology Transfer (RTT) to assist its personnel in securing and managing external funding to support research and other scholarly activities.

In the pursuit of its research mission, A-State affirms that it does not discriminate against prospective or current students, prospective or current employees, or against individuals in affiliated organizations. A-State likewise affirms its commitment to an open research environment whenever practical, supporting the principle of freedom of access to data, processes, and results of research and preserves the faculty's right to select the best qualified employees and students to participate in sponsored research.

2.0 PURPOSE

The purpose of these principles is to: 1) affirm A-State's commitment to maintaining an open and non-discriminatory research environment; 2) identify RTT as the office designated to manage the institution's research effort; 3) establish eligibility standards for principal investigators, co-principal investigators, and project directors; 4) to facilitate preparation and submission of grants and contracts to external sponsors; and 5) ensure compliance with regulations prior to submission.

3.0 DEFINITIONS

Authorized Organizational Representative: An employee who is recognized by A-State as an official signatory to approve all grant, contract, and other agreement activity with external sponsors.

Business Day: The standard University administrative workday (8:00 a.m. – 5:00 p.m.) that is not a national or University holiday or a weekend.

Co-Principal Investigators: Co-Principal Investigators are individuals who share responsibility for the scientific or technical direction of all or a portion of a project.

Cost Sharing or Matching: For cost sharing or matching, the institution shares the expense of a sponsored project. Cost sharing must be funded from non-federal sources and charged to separate cost sharing accounts. Gift funds may be used to meet a cost sharing commitment on a sponsored project if the purpose of the gift so allows. Cost sharing represents a commitment that, once made, represents a binding obligation and is considered an auditable expense.

Electronic Submission: Delivery of a proposal to a sponsor using sponsor or institutional Electronic Research Administration (eRA) submission portals.

Equipment Loan Agreements: Equipment loans agreements are negotiated when a sponsor lends equipment to the University for research purposes. This type of agreement usually does not involve the exchange of funds but enables A-State and industry researchers the opportunity to use each other's facilities.

Facilities and Administrative Costs (F&As): F&As, also known as Indirect Costs (IDCs), are broad categories of costs that are incurred for common or joint objectives and cannot be identified readily and specifically with a sponsored project, an instructional activity, or any other institutional activity. “Facilities” refers to depreciation and use allowances, interest or debt associated with certain buildings, equipment and capital improvements, and operation and maintenance expenses. “Administration” is defined as general administration and expenses, departmental administration, sponsored projects administration, student administration and services, and all other types of expenditures not listed specifically in one of the subcategories of Facilities (including cross allocations from other pools).[1]

Institution: Any domestic or foreign, public, or private entity or organization excluding a federal agency. For the purposes of this policy, the term Institution refers to A-State.

Material Transfer Agreements. (MTAs): MTAs are contracts by which tangible research property (e.g., biological organisms) is provided by external sources to A-State investigators for research, or by A-State investigators to external researchers. Material Transfer Agreements are processed as sponsored research projects.

Organized Research: Organized research activities are funded by both external sponsors (Sponsored Research) and by the University (University Research) and must be separately budgeted and accounted for. Together, these categories comprise the Organized Research distribution base, used to calculate the Organized Research F&A rate.

Principal Investigator (PI)/Project Director (PD): Often used interchangeably, these two terms refer to an individual who assumes full technical and fiscal responsibility for a sponsored project, including the supervision of other key personnel, research assistants, students, and staff. A Principal Investigator must have sufficient experience to responsibly manage the project and must be an employee of the University. Throughout this policy, the term *Principal Investigator (PI)* will also refer to the term *Project Director (PD)*.

Research Participation Agreements: A Research Participation Agreement (RPA) is a type of sponsored program in which services of institutional personnel, academic facilities, and/or

laboratory equipment are employed on behalf of parties not otherwise affiliated with the University. In many cases, a significant portion of the responsibility for the intellectual direction, interpretation, and/or outcome of the work rests with the outside user.

Scope of Work: A written statement specifying the tasks (including deliverables) to be completed for a specific project, cost, and period of performance.

Sponsor: Any governmental agency, private foundation, corporation, or association that provides financial project support.

Sponsored Program: A research project, program, scholarly activity, or public service project for which an external agency has provided financial support and for which a formal written agreement exists, specific outcomes or deliverables are expected, and technical and financial reports are required.

Subcontract: A subcontract is a formal contractual agreement with a participating organization for research collaboration and/or services under sponsored-program projects. The term does not apply to the normal procurement of supplies and research equipment.

University Research: University Research is scholarship and/or creative activities that are paid for with institutional funds. Institutional funding may include funds with the following origin source: state appropriation funds, tuition and fees, gifts, endowment income, interest income, and technology licensing income.

[1] *OMB 2 CFR 200.414*

4.0 APPLICABILITY

This policy applies to all A-State faculty, staff, and administrators who seek external support for research grants, contracts, and agreements from external sponsors. It does not govern the receipt of philanthropic contributions or clinical trial agreements.

5.0 APPLICABLE REGULATIONS

University Conflict of Interest/Commitment Policy
Governing Principles for University Effort Reporting

6.0 GOVERNING PRINCIPLES

6.1 Non-Discrimination and Openness in Research

A-State does not discriminate against students, employees, or individuals in affiliated organizations on the basis of race, religious creed, color, national origin, ancestry, physical or mental disability, medical condition, marital status, sex, age, sexual orientation, gender identity, veteran status, or

any other characteristic protected by law. The University is likewise committed to an open, non-discriminatory research environment that supports freedom of access by all interested persons to data, processes, and results of research whenever practical.

6.2 Project Submission

Proposals for extramural support of research, training, or public service projects may be submitted on behalf of A-State employees who:

A. have primary responsibility for design, execution, and management of the project,

B. will be involved in the project in a significant manner, and

C. will serve as the Principal Investigator, Co-Principal Investigator, or Project Director for a research, training, or public service project.

All requests for support and award acceptance from external sponsors must be submitted to and approved by one of the Authorized Organizational Representatives (AOR), which includes the Vice Provost for Research, Innovation, and Discovery and the Executive Director for Research Development. Deans, Department Chairs, and individual faculty or staff members are not authorized to submit applications, pre-applications, or letters of intent or their equivalent for grants or contracts, nor accept awards, contracts, subcontracts, or agreements on behalf of the University. **All proposals must be submitted in accordance with the following timelines.**

Category	**Deadline for Submission to RTT**
Matching Fund Requests	**Minimum fifteen (15) business days prior** to sponsor deadline. This extended timeline allows RTT staff to navigate the financial obligations of the sponsor's requirement for matching funds. This includes working with the PI to identify possible sources of funding and liaising with university leadership to make the request where necessary.
Electronic and Paper Submissions	Proposals must be provided to RTT for submission **no later than ten (10) business days** before the sponsor deadline for full review and compliance check. Once provided to RTT, proposals typically will be submitted in the order they are received. RTT staff need time to review the proposal for necessary files, provide suggested or required edits, repair corrupted files, and overcome other problems that may preclude timely submission. Proposals received after the 10-business day deadline are not guaranteed submission to the sponsor. This is dependent upon the RTT staff's capacity to provide a full review and the state in which the proposal is received. Submissions requiring significant revisions after the 10-business day deadline may be turned away.

6.3 Eligibility Criteria for Principal Investigators

Individuals recommended for principal investigator or co-principal investigator status on a research, training, or public service project must possess qualifications that satisfy the general standards of research competence. Individuals recommended as project directors must be competent in the project area.

Individuals with faculty rank or other qualified A-State employees may serve as principal investigators, co-principal investigators, or project directors on proposals submitted to any outside funding agency in support of research, training, or other sponsored activities. Candidates for these leadership roles must have appropriate academic or experiential credentials and must have primary responsibility for the design, execution, and management of the project.

Candidates for principal investigator must obtain the approval of the Department Chair and the Dean or equivalent administrators to serve in a leadership capacity during the grant or contract submission process. Candidates are strongly encouraged to talk to their chairs or comparable administrators well in advance of grant submission. Chairs should encourage their faculty to submit grant proposals. When discussing proposal ideas with faculty members, chairs should include consideration of the overall merits of the proposed project and whether it: 1) assists the department and the University to achieve their educational, research, or public service goals; and 2) makes use of University resources in a manner that is consistent with departmental goals and objectives.

6.4 Delegation of Principal Investigator Responsibilities

Primary responsibility for a project is vested in principal investigators, co-principal investigators, and project directors and may not be relinquished nor delegated explicitly or implicitly without the support and direction of the Vice Provost for Research, Innovation, and Discovery and the sponsoring agency.

6.5 Cost Sharing/Matching

A-State recognizes that certain grant, contract, and cooperative agreement awards may require cost sharing, either through the use of internal funds, in-kind resources, or other external sources.

Including cost sharing in a proposal may increase the likelihood that a project will be funded and demonstrates the University's commitment to the project. However, cost sharing implies at least some redistribution of department or college resources to support a specific sponsored agreement. Because these resources are often scarce, it is important not to over-commit funds when the sponsor does not require them and when the project can be completed without them. It should also be noted that cost sharing commitments have an effect on calculation of the A-State’s Facilities and Administration rate, since they are included in the research base and excluded from F&A recovery.

To be included as cost share, proposed expenses must be:

- allowable and allocable under the federal regulations and the terms of the sponsoring agency;
- necessary, reasonable, and directly related to the project objectives;
- verified and recorded in the University's accounting records.

Commitment of University funds or in-kind resources for cost-sharing purposes must be approved, in writing, by the department chair, dean, or official in charge of the funding source before submission. Waived F&A requests must be approved in writing by the Vice Provost for Research, Innovation, and Discovery before a proposal is submitted.

6.6 Research Expenditure Classifications

A-State is classified as a Research 2 "R2": High Spending and Doctorate Production institution, designated by the Carnegie Classification of Institutions of Higher Education. There are two significant benchmarks that universities must meet to attain this status; one of which is research expenditures over a three-year period, determined by reports made to the National Science Foundation's Higher Education Research and Development (HERD) survey. There are five categories of expenditures in this report:

- Basic research: Experimental or theoretical work undertaken primarily to acquire new knowledge of the underlying foundations of phenomena and observable facts, without any specific application or use in view.
- Applied research: Original investigation undertaken to acquire new knowledge. It is directed primarily towards a specific, practical aim or objective.
- Experimental development: Systematic work, drawing on knowledge gained from research and practical experience and producing additional knowledge, which is directed to producing new products or processes or to improving existing products or processes.
- Capital improvements: Activities related to the construction or renovation of research facilities.
- Public service: Activities including community engagement or outreach programs, non-research training grants, routine work or “fee-for-service” activities done to support communities or external companies.

When an award is made, Research and Technology Transfer will email the principal investigator to confirm receipt of the award and confirm how this award's activities should be classified. This email will be kept on file in the PI's award documents folder. A percentage of the award's activity can be distributed across multiple areas listed above. If more than 50% of the activities are classified in one of the three research categories (basic, applied, or experimental), then all of the award's expenditures will be classified as research. If some smaller percentage of the award's activities are classified as research, then that percentage will be used in calculating the expenditures that can be included in these categories on the HERD survey.

Example 1:
PI Smith has categorized Project ABC as:

Basic research: 20%
Capital improvement: 80%
Therefore, 20% of the project's expenditures are categorized as research on the HERD survey.

Example 2:
PI Jones has categorized Project XYZ as:
Applied research: 30%
Experimental development: 30%
Public service: 40%

Therefore, all of the project's expenditures are categorized as research on the HERD survey.

7.0 RESPONSIBLITIES

7.1 Proposal Preparation and Grant/Contract Administration

7.1.1 Research and Technology Transfer (RTT) responsibilities include:

- Reviewing all proposals for external support to ensure compliance with University policies and sponsor regulations,
- Obtaining all necessary institutional approvals for submission of a proposal (e.g., Chair, Dean, RTT, Finance, and any other required approvals);
- Authorizing proposal submissions, as long as their submission is consistent with the timelines set forth in this document,
- If paper submissions are required by the sponsor, assuming responsibility for submitting the correct number of copies to the agency and mailing/delivering the application by the agency deadline.
- Negotiating award conditions with external sponsor representatives, and
- Accepting awards on behalf of A-State.

7.1.2 Principal Investigator Responsibilities

The Principal Investigator’s pre-award responsibilities include:

- Notifying the appropriate personnel in RTT as early as possible prior to submission of proposals to external agencies by utilizing the Proposal Notice form found on the RTT website;
- Completing proposal/application in compliance with sponsor’s guidelines and requirements;
- Developing project design;
- Attending to all compliance issues including, but not limited to transportation limitations and export controls; protection of human research subjects; animal care and use; all safety concerns (e.g., radiation, biohazards, laser; and general laboratory); and disclosure of potential or real conflicts of interest in research;

- Submitting annual conflict of interest in research disclosure materials and update any apparent or actual conflict of interest in research issues that may arise between annual disclosures;
- Developing accurate proposal budgets containing only allowable, allocable, and essential expense items;
- Determining effort for key personnel;
- Notifying the Chair and Dean of any released time or absences that will result if the proposal is funded, and obtain appropriate approvals for this time;
- Coordinating required cost sharing or matching funds (including tuition waivers) with RTT, and obtain appropriate approvals;
- Obtaining scope of work, budget, and institutional approval from any external subcontractors fifteen (15) business days in advance of the sponsor's deadline date;
- Submitting proposals and subcontract documentation to RTT for review and approval in accordance with the timelines specified in Section 6.2 of this document; and

The Principal Investigator's post-award responsibilities include:

- Supervising and maintaining progress of the technical aspects of the project to ensure the responsible and ethical conduct of activities according to award document and in compliance with University, sponsor, and local, state, and federal government requirements;
- Devoting effort to the project at the level agreed to with the sponsor;
- Ensuring all compliance issues are met for all key personnel including, but not limited to, conflict of interest in research reporting; effort reporting, and training in the protection of human subjects, animal care and use, and environmental safety;
- Maintaining high-quality, accurate records of research for a period not less than the period of time that the sponsor requires;
- Maintaining research integrity, including the management of activities of project personnel;
- Ensuring responsible management of expenditures in accordance with awarded budget that are allowable, allocable, and essential, and ensuring that any budget changes or alterations are consistent with sponsor and University guidelines (expenditures that exceed the sponsored project budget are the responsibility of the PI/PD and will be charged to a departmental account);
- Selecting, training, and evaluating project staff and providing necessary input and guidance to all students, post-doctoral fellows, staff, and research assistants to ensure the integrity of the project and compliance with sponsor and federal guidelines;
- Informing staff of all University and sponsor guidelines and regulations;
- Ensuring that project staff have the knowledge, resources, and tools necessary for the responsible conduct of research and the technical needs of the project;
- Managing acquisition of equipment, supplies, and personnel according to sponsor guidelines and University policies and procedures;
- Disclosing and managing intellectual property in collaboration with Research and Technology Transfer;
- Fulfilling all reporting requirements, both University and sponsor, in a timely manner, including:

- Certifying time and effort on quarterly basis,
- Approving expenditures,
- Submitting annual conflict of interest disclosures,
- Monitoring conflicts of interest in research and immediately disclosing changes in actual or apparent conflicts,
- Fulfilling sponsor reporting requirements, including technical progress and final reports,
- Working with the Office of Sponsored Programs to close the project at the end of the grant period; and
- Analyzing and publishing findings.

7.1.3 Departmental Chair and School/College Dean Responsibilities

The Department Chair and College Dean, or other appropriate unit head, review and approve the proposal in a timely manner, paying particular attention to any cost sharing that is included in the proposed budget, especially as it relates to the percentage of effort that a faculty member is devoting to the project. By approving in Cayuse, unit heads certify that they approve of the project, the involvement of the PI, other investigators, and students (including release time), the budget, cost sharing, and any other considerations described in the proposal and the project summary in Cayuse.

7.2 Awards Not Reviewed Prior to Submission

Awards for proposals that have not undergone proper review may encounter compliance problems with University or sponsor policies. The University reserves the right to decline an award that is not compliant with institutional, sponsor, or government regulations.

7.3 Authorized Organizational Representative (AOR) Signatory

The Vice Provost for Research, Innovation, and Discovery and designees are the official University signatories. **Deans, Department Chairs, and individual faculty and staff are not authorized to sign application forms on behalf of the University**.

8.0 PROCEDURES

8.1 Proposal Submission

8.1.1 Contact Research and Technology Transfer (RTT)

PIs should contact RTT as early as possible prior to submission of proposals to external agencies. RTT staff review proposals to ensure compliance with University policy and sponsor regulations.

PIs must fill out the proposal notice form available on RTT's website to provide the following information:

- A summary of the proposed project
- The name of the funding agency and program
- Copies of program guidelines (RFPs, RFAs, etc.)
- The deadline for submission
- Special needs such as matching funds, tuition waivers, or use of institutional resources
- The need for protection of human subjects, animal care and use, biohazards, or other safety approval, and a plan for obtaining that approval

PIs must develop budgets that are accurate, reasonable, and adequate for the proposed project. The budget must follow A-State and sponsor budget guidelines, and where applicable, all federal and state regulations. Investigators should work closely with RTT staff in this process. RTT must approve budgets to both federal and private sources of research support.

8.1.2 Obtain Institutional Review and Approvals

PIs and Co-Investigators for both paper and electronic proposal submissions must work with RTT to upload their submissions and all appropriate documentation to the electronic repository, Cayuse, and submit the package to their chair or equivalent administrator for approval. Once the chair or equivalent administrator has approved, the package will be transmitted to the Dean or equivalent, and then to RTT for final approval and submission.

8.1.3 Submit the Proposal to the Agency

The authorized organizational representative (AOR) has authority for and responsibility to submit proposals. If an agency requires that a principal investigator submit their proposal directly, the PI is responsible for ensuring that they have obtained all appropriate approvals, including approval of the AOR.

8.2 Award Acceptance

Usually, notification of an award is sent to the University. However, if an award notice is sent directly to the PI, a copy must be sent immediately to RTT for processing. **PIs cannot incur expenses without a University-assigned fund number and budget for a grant or contract. All external funds within the scope of this policy must be set up in a sponsored program account.**

In most cases, a grant or contract award is made to the University on behalf of the researcher. An authorized organizational representative must sign a contract to accept the award. Deans,

Department Chairs, and individual faculty or staff members are not authorized to sign award documents.

RTT will work with Sponsored Programs Accounting to establish a new fund number for a newly awarded grant or contract. The fund will include a line-item budget in accordance with the award budget, funding agency requirements, and University guidelines.
To fulfill audit requirements, all official correspondence or contact with the sponsor normally will be made through RTT or Sponsored Programs Accounting.

Any significant changes to awarded grants need to be brought to the attention of RTT and Sponsored Programs Accounting. Significant changes include but are not limited to:

- Changes in PI or PD
- Changes in effort devoted to the project
- Budget revisions
- Extension of grant period
- Change in scope of the project

Any questions regarding this policy or the procedures mentioned herein should be directed to RTT personnel (research@astate.edu; 870-972-2694).

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