

Title: Administration of Grants and Contracts in Support of Sponsored Projects and Research Policy

Policy Abstract: This document provides an overview of the responsibilities for preparation and submission of grant and contract proposals to sponsoring agencies and the post-award administration of sponsored agreements.

Responsible Office: Office of Sponsored Programs

Official: Provost, Chief Financial Officer

Contact(s): Office of Sponsored Programs

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Applies to: This policy applies to any BSC faculty, staff, or organization seeking or awarded an externally funded project, whether federal or non-federal in source, on behalf of BSC.

Effective Date: November 6, 2013

Revision Date(s): September 20, 2016, August 6, 2019 (minor update and web-link corrections), September 15, 2022 (personnel and redirection of previous OMB circulars to Code of Federal Regulations, Title 2, Subtitle A, Chapter II, Part 200 as applicable [2 CFR 200]).

Introduction and Background: Research and other extramural funding from outside organizations is an important financial resource to the College. In order to maintain and grow this type of funding, the College must administer grants and contracts in an appropriate manner consistent with federal regulations and the terms and conditions of the agreements.

Purpose: This policy establishes the requirements and parameters for the College's administration of grants and contracts, application procedures, and responsibilities of component offices.

Applicable Regulations: Other College policy, state and federal law, sponsor restrictions, and sponsored programs' regulations (in compliance with current 2 CFR 200).

Policy Statement: A sponsored program is an award from an external source (the "sponsor") for an agreed upon purpose with sufficient custodial responsibility to warrant unique administrative accountability. It is established by an agreement, usually called a contract, cooperative agreement, grant, purchase order, or other document decided upon between the College and the sponsor.

Sponsored programs are undertaken, in accordance with the College's mission, to augment institutional resources to enhance the College's research and educational programming and to facilitate the ability of faculty members, staff members, and students to develop and achieve their goals in educational programming, research, and service delivery through successful competition for external funding.

Effective grants and contracts administration requires collaboration between the faculty and staff members submitting the application and the support service areas responsible for oversight of the agreement once it is awarded to the College.

Responsibilities:

Office of the Provost: The Office of the Provost has responsibility for approval, oversight and general policies concerning research and sponsored programs and acts along with the faculty as an advocate and spokesperson for the College research community. The Office of Sponsored Programs serves under the direction of the Office of the Provost.

Office of Finance: The Office of Finance, Vice President for Finance/ Chief Financial Officer, is responsible for fiscal management policies governing Birmingham-Southern College's sponsored programs. The Vice President for Finance/Chief Financial Officer is the signatory authority who may approve and execute contracts and agreements on behalf of the College. The Office of Finance provides institutional oversight and guidance with regard to federal cost accounting standards, indirect costs, and compliance with federal effort reporting and audit requirements.

Office of Sponsored Programs: Sponsored programs administration at Birmingham-Southern College is a partnership forged between the College faculty, administrators, and departments. The Office of Sponsored Programs facilitates the operation of this cooperative network of stakeholders by providing a spectrum of support services to the faculty researcher or project director.

The Office of Sponsored Programs assists faculty and staff in obtaining external funding to support their creative and scholarly activities in support of the instructional mission of the College. Accordingly, the Office of Sponsored Programs plays a role in support of the College in the fulfillment of its research, instructional, and service missions. The Office of Sponsored Programs assists departments, faculty, and staff members in the preparation of proposals, review of proposals, negotiation of agreements, and administration of awards. The Office of Sponsored Programs is Birmingham-Southern College's Authorized Organizational Representative to submit proposals to external entities for financial support in the form of a contract, grant, or agreement upon approval of both the Provost and the Chief Financial Officer (Institutional Signatory Authority), the latter of whom has the authority to commit the College in the event an award is made in accordance with grant and contract submission and acceptance.

The Office of Sponsored Programs has a primary responsibility to ensure that grant and contract agreements protect the College's interest and integrity and uphold the institutional mission and goals to support research, scholarship, and other College priorities.

Principal Investigator (PI)/Project Director (PD): Although, in most grants and contracts, the College is legally responsible to the sponsor as the recipient of a grant or contract, the Principal Investigator (PI)/Project Director (PD) is accountable for the proper fiscal management and conduct of the project. This includes managing the project within funding limitations and all of the terms of the award, assuring that the sponsor is notified when significant conditions related to project status change, and ensuring that all programmatic reporting requirements are met in a timely fashion. While responsibility for the day-to-day management of project finances may be delegated to administrative or other staff, accountability for compliance with federal requirements, College policies, and sponsor requirements ultimately rests with the PI/PD. Similarly, PI/PDs have primary responsibility for planning and carrying out the preparation and submission of proposals for external support. Although PIs may work with others in the proposal development process, they are ultimately responsible for the quality and

academic integrity of the proposal, and for understanding and complying with all Birmingham-Southern College's academic and fiscal management policies for managing external support.

Details:

Pre-Award/Proposal Development: The faculty, staff member, or department seeking funding, with the consultation of the department chair or director, will submit an Intent to Submit form to the Office of Sponsored Programs for institutional approval prior to the commencement of proposal writing and well in advance of the proposal due date. Approval criteria include compatibility with the College's mission, department staffing, programs, and institutional support commitments. The PI/PD will establish an appropriate budget for the project or program, complete the Grantor requirements and gain final approval, evidenced by a completed Proposal Internal Approval Form, to submit the proposal to the granting agency. The Office of Sponsored Programs will work with appropriate parties to research, prepare, and submit the application in accordance with the Grantor's requirements and will inform relevant parties, including College leadership, of the Grantor's response to the application and of receipt of payment.

Contracts, grants, research agreements, and sponsored-award documents are legal instruments that bind the parties to the stated terms. Therefore, state and federal laws as well as Birmingham-Southern College policies and regulations must be followed when preparing, accepting, signing, and executing documents related to sponsored programs. All proposals, whether new or continuing, must be approved by appropriate College administrators. This is accomplished using the Proposal Internal Approval Form.

The Office of Sponsored Programs is responsible for assuring that all proposals and awards are consistent with sponsor requirements and with Birmingham-Southern College's academic and fiscal policies. In carrying out this responsibility, the Office of Sponsored Programs coordinates internal reviews where necessary and seeks required approval of the Provost and the Chief Financial Officer, who is the signatory authority who may execute contracts and agreements on behalf of the College.

During the proposal preparation and review process, Office of Sponsored Programs administrators coordinate with the PI/PD to:

- receive and process the Intent to Submit (Extramurally Funded Project) form which, upon approval, officially begins the pre-award process;
- provide guidance as needed to PI/PDs and others in the preparation of budgets and other sponsor required forms;
- check the final application for completeness and conformity with all sponsor requirements;
- review the proposed budget for cost/allowable activity, reasonableness, application of correct indirect cost rates, and the appropriateness of any cost sharing or contributed effort;
- review and negotiate all proposed research contracts and subcontracts;
- review direct cost and indirect cost calculations;
- check the Proposal Internal Approval Form to ensure necessary approvals, to include Provost and Chief Financial Officer approvals, and completion of all regulatory and grantor compliance requirements;

- ensure that compliance with the Institutional Review Board, where applicable, has been met prior to submission.

Post-Award: All funds received for sponsored programs are under the fiscal control of the Chief Financial Officer. These funds must be receipted and disbursed in accordance with College policy, state and federal law, and sponsored programs' regulations in compliance with CFR200.

Upon receipt of award, the PI/PD must ensure that the research or project commitments are accomplished in accordance with the contract agreement, project, and reporting schedule.

Project Administration: The Office of Sponsored Programs is responsible for providing guidance for and facilitating actions requiring formal submission to a sponsor or subcontractor. The Office of Sponsored Programs also assures that all sponsor requirements relating to reporting and closeout are met. The Office of Finance provides oversight and collaborates with the Office of Sponsored Programs to assist the PI/PD in re-budgeting and other post-award administrative activities in accordance with sponsoring agency guidelines.

The Office of Finance provides timely and accurate financial information and reports on sponsored project expenditures and commitments to sponsors, the PI, and appropriate administrators as required.

The Office of Sponsored Programs and the Office of Finance work closely with PIs/PDs to provide processing of post-award activities ensuring compliance and consistency with overall fiscal management. The Office of Finance provides oversight with regard to sponsored program accounting and financial management functions, time and effort certifications, indirect cost rate calculation and negotiations, coordination of the annual audit conducted in accordance with Subpart F of the Office of Management and Budget (OMB) Uniform Guidance (formerly the OMB Circular A-133 audit), and periodic agency audits and the creation and implementation of related policies and business processes.

Conduct and Management of Award: The Principal Investigator/Project Director is responsible for all actions required to manage and complete the programmatic aspects of the sponsored project, including performance of subcontracts and compliance with interim and final technical reporting. The PI/PD is also responsible for the management of the award budget and expenditures in accordance with the sponsor's requirements. This includes attesting that all expenditures are allocable, allowable and reasonable at the time expenditures are requested, as well as monitoring the status of grant accounts to prevent overdrafts and incorrect charges.

Definitions:

Contract: A mechanism for procuring a product or service with specific obligations for both sponsor and recipient. Typically, a research topic and the methods for conducting the research are specified in detail by the sponsor, although some sponsors award contracts in response to unsolicited proposals. A contract is a legally binding document.

Cooperative Agreement: An award similar to a grant, but in which the sponsor's staff may be actively involved in proposal preparation and anticipates having substantial involvement in research activities after the award has been made.

Facilities and Administrative Costs (F&A): Incurred for common or joint objectives and, therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity or any other institutional activity. Facilities and administrative costs are synonymous with indirect costs.

Grant: A type of financial assistance awarded to an organization to conduct research or other programs as specified in an approved proposal. A grant, as opposed to a cooperative agreement, is used whenever the awarding office anticipates no substantial programmatic involvement with the recipient during the performance of the activities.

Principal Investigator/Project Director: The individual with the responsibility for conducting the research or other activity described in a proposal for an award. The terms "principal investigator" or "project director" may be used interchangeably in accordance to the agency's program language.

Proposal: A formal written description concerning the conduct of research, training or technical assistance with the support of an external sponsor. The proposal represents an offer by the College to perform the activities specified and contains all information necessary to describe project plans, staff capabilities, and funds requested. The College's review and approval process assures compliance with both sponsor and College policies.

Sponsored Programs: Programs or projects that are conducted by faculty member(s) and/or administrative staff member(s) and are supported-fully or in part-by external restricted funding awarded to the College. Sponsored programs may support research, instruction, or service. In sponsored programs, the College has obligations to the funder in accordance with the terms of a proposal or agreement.

Sponsor/Funding Agency: Federal, state, or private agencies external to the College who provide support for a program or project at the College.

References:

Intent to Submit (Extramurally Funded Project) Form

<https://www.bsc.edu/policies/academics/INTENT%20TO%20SUBMIT%20FORM.docx>

Proposal Internal Approval Form

<https://www.bsc.edu/policies/academics/PROPOSAL%20INTERNAL%20APPROVAL%20FORM.docx>

Code of Federal Regulations Title 2, Subtitle A, Chapter II, Part 200

<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>

OMB Circular A-133

https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/circulars/A133/a133.pdf