# University of North Texas
## Office of Grants and Contracts Administration
## (OGCA)
# Principal Investigator (PI) Handbook

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# 100.00  Purpose of the Handbook

To ensure that funds provided from external sources to support research and other projects are administered in accordance with established University policies and procedures.  All externally sponsored projects for research or other purposes will be administered through the Office of Grants and Contracts Administration (OGCA). External  sources include both governmental (federal and/or state) and private organizations (not for profits, industry).

Faculty and staff members who conduct sponsored projects under University auspices have an important public, as well as personal, responsibility to manage those projects carefully. The PI Handbook will help research investigators fulfill that responsibility.  Its purpose is to acquaint new investigators with the research policies and procedures of the University, to inform them of the various services available to them, and to serve for all investigators and administrators as a reference and guide to further information and assistance.

The University's principal investigators bear the primary responsibility for success of their sponsored research and training projects. In addition to their academic and scholarly duties, principal investigators must exercise a substantial degree of administrative acumen to enable the research enterprise, of which they are the crucial part, to function successfully. This Handbook is intended as a guide and reference to principal investigators in carrying out their responsibilities.

## 110.1          Sponsored Project Definition

Any project, which meets any of the following criteria, is considered to be a "sponsored project" and will be administered accordingly:

   a.  The project commits the University to a specific line of scholarly or scientific inquiry, typically documented by a statement or scope of work
   b.  A specific commitment is made regarding the level of personnel effort, deliverables, or milestones
   c.  Project activities are budgeted, and the award includes conditions for specific formal fiscal reports, and/or invoicing
   d.  The project requires that unexpended funds be returned to the sponsor at the end of the project period
   e.  The award provides for the disposition of either tangible property (e.g., equipment, records, technical reports, theses or dissertations) or intangible property (e.g., inventions, copyrights or rights in data) which may result from the project
   f.  The sponsor identifies a period of performance as a term and condition.

All research and teaching activities, whether or not considered a sponsored projects, which involve human subjects, laboratory animals, use of radioactive materials, or biohazard activities must be reviewed by the appropriate University committees for compliance with University policies and governmental regulations.

## 120.1          Governing Authorities for Sponsored Projects

Externally sponsored projects are required to follow sponsor, University, federal and state guidelines.
Federal guidelines from the Office of Management and Budget (OMB) can be found at:

   •  A-21 Cost Principles for Educational Institutions
      http://www.whitehouse.gov/omb/circulars_a021_2004
   •  A-110 Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations
      http://www.whitehouse.gov/omb/circulars_a110

- A-133 Audits of States, Local Governments, and Non-Profit Organizations
  http://www.whitehouse.gov/sites/default/files/omb/assets/a133/a133_revised_2007.pdf
- UNT polices are located at: http://policy.unt.edu/

# 130.00     Gifts

Gifts to the University of a restricted or unrestricted nature which do not include any of the above conditions are not viewed as sponsored projects and are not processed through OGCA, but rather through the normal gift transmittal procedures.  Gift solicitation and acceptance should be coordinated with the appropriate development officer in each college.

# 140.00     Principal Investigator and Co-Principal Investigator Eligibility: Who Can Submit a Proposal for External Support?
*(Revision of 11-05-14)*

For the purpose of applying for extramural grants and sponsored projects, a principal investigator (PI) at UNT is the person responsible for executing and financially managing the grant or project and a co-principal investigator (Co-PI) shares the duties of the PI.  The PI and Co-PI are most often full-time, permanent employees, whose official job roles and responsibilities include serving as a PI or Co-PI on extramural grants or sponsored projects. Since a proposal and subsequent award commit UNT in many ways, it is important to establish the qualifications and ability of PI's and Co-PI's to carry out the work on externally funded grants and sponsored projects.

A person holding any of the following academic ranks can serve as a PI or Co-PI: professor, associate professor, assistant professor, librarian, associate librarian, research professor, research associate professor, research assistant professor, research scientist IV, research scientist III, or research scientist II.

Others may request approval to serve as a PI or Co-PI, holding the positions of assistant librarian, postdoctoral research associate, research scientist I, director, lecturer, visiting professor, or adjunct professor.   For persons with these job titles, PI or Co-PI status may be requested by submitting the following to the Office of Research and Economic Development:

 (i)  A memorandum addressed to the Vice President for Research and Economic Development providing justification for the request and summarizing the requestor's qualifications, co-signed by the requestor's unit head (for example, within an academic department, the Department Chair).
 (ii)  The requestor's curriculum vitae.
 (iii) A memorandum from a faculty member (who is a qualified PI or Co-PI as defined here) who will commit to assuming the PI or Co-PI responsibilities should the requestor leave UNT.

Such a request must be made for each proposal submission and will be approved or denied by the Vice President for Research and Economic Development, the Associate Vice President, or their designee.  Approval must be obtained before submitting the proposal package to the Office of Grants and Contracts Administration.

*Important notes regarding the request for PI or Co-PI qualification approval:*

1) **The backup PI or Co-PI should be someone both capable and committed to carrying on the work of the grant or sponsored project should the PI or Co-PI leave the University.** Persons qualified to sign this letter include (a) (if the requestor is in an academic unit) a regular faculty member in the requestor's unit who is otherwise qualified (as defined here) to be a PI or Co-PI and is qualified to manage the project and continue its work, and (b) (if the requestor is in an administrative / non-academic unit) a UNT administrator at the level of Assistant Vice President or above who is qualified to manage the project.

2) The backup PI or Co-PI memorandum must be dated and contain the printed name and signature of the person designated to be the "Backup PI" or "Backup Co-PI".  The backup PI or Co-PI memorandum must be a separate document, preferably on unit stationery. Suggested wording is given below. Please select PI or Co-PI where indicated.

I am aware that _____ has requested permission to serve as Principal Investigator [Co-Principal Investigator] on the project entitled, _____ _____. I support this request and agree to assume responsibility for the project (to the extent allowable by the funder) in the event that the PI [Co-PI] leaves UNT or is otherwise unable to complete it, if the funding is to remain at UNT.  Should my assumption of responsibility be impossible (e.g., if I have left UNT prior to the PI [Co-PI] becoming unable to complete the project), this responsibility will fall to (1) the administrator who assumes my position (if an administrative official) or (2) the chair of my academic unit (if a faculty PI [Co-PI]).

# 150.00 Funding Opportunities

The Research Development Team will assist with locating funding opportunities, long-term proposal planning, develop research partnerships across the UNT colleges and departments, with the UNT Health Science Center, and with other institutions in the DFW area, Texas and the nation. For contact information visit the RDT website: http://research.unt.edu/faculty-resources/research-development.

Once a funding opportunity is identified, submit a request for a Grant Officer http://forms.unt.edu/request-grant-officer-assignment . The Grant Officer will discuss a timeline for submitting documents to Research Services for the administrative review process.

# 160.1 Private, For-Profit Sponsors of Research

Many private companies are interested in finding ways to interact with University faculty researchers. In order to facilitate such arrangements, while avoiding the many pitfalls inherent in these relationships, the following guidance is offered:

a. Interaction between faculty researchers and their counterparts in industry is encouraged.

b. Support of specific research projects by industry is subject to the same policies and procedures as those funded by government agencies.

c. Issues frequently encountered in negotiations with companies include freedom of dissemination of the results of the research, ownership of intellectual property including patents, conflicts of interest, freedom of choice in the selection of research topics and in the conduct of the research, and relevance to the educational mission of the University.

d. In fulfillment of (b) above, the University cannot accept research awards from industrial sponsors until a formal research proposal including a budget has been reviewed and approved by the appropriate department Chair, Dean and OGCA. Compliance with applicable policies for protection of  conflict of interest, human subjects, animal welfare, radiation safety, etc. is required.

e. Proposals for corporate support should provide for full recovery of costs including F&A costs (indirect costs) at the full federally approved research rate. Corporations are fully aware of the reality of F&A costs and should recognize the University's need to recover such costs.

f.  OGCA has developed a model agreement for sponsored research from industry which is available at http://research.unt.edu/sites/default/files/Standardresearchagreement.pdf. Principal Investigators are urged to provide a copy of this agreement to their industry counterparts at an early stage of discussions of research support.  Non-disclosure agreements should be signed with the potential sponsor before having substantial conversations.

g.  Terms and conditions of industry sponsored research agreements (SRA's) without licensing of existing intellectual property are negotiated by OGCA. SRA's involving the licensing of existing intellectual property is jointly negotiated with Economic Development and Technology Transfer (EDTT) and Office of Grants and Contracts Administration (OGCA).

## 170.00    Foundations and Other Not-for-Profit Sponsors

The University receives funds from numerous foundations and other not-for-profit sponsors. The terms and conditions of these awards are widely variable. Principal investigators should review the terms and conditions of awards including the entity's policies on intellectual property prior to submitting applications to these sponsors.

# 200.00    University Organization for Research Administration

## 210.00    General Administrative Structure

The University regards the research and scholarly activities of its faculty as part of their normal academic responsibilities. The primary responsibility for research, therefore, resides in the departments and colleges. A principal investigator is responsible to his/her Chair and Dean for his/her research activities just as for other academic activities.

The Vice President Research and Economic Development (VPRED) is responsible for the administration of the University's research projects and works with the Vice President for Academic Affairs, deans, chairs, and faculty in establishing research policies and procedures. The VPRED is advised by the Faculty Research Council and the Vice President for Finance and Business Administration to provide supporting services to the research community.

## 220.00    Vice President for Research and Economic Development

The VPRED is the University official responsible for the development and implementation of policies and procedures relating to extramurally sponsored projects.

The VPRED is also the University official responsible for policies and procedures concerning the care, maintenance and use of all vertebrate animals in research, research training and biological testing activities, in compliance with the rules of regulatory authorities. Details of the policies and procedures are included on the Research Compliance Home page at http://research.unt.edu/faculty-resources/research-integrity-and-compliance .

The VPRED is responsible for assuring the protection of human subjects in compliance with federal law. For this purpose, the VPRED has established an Institutional Review Board (IRB). The University requires that, prior to initiation, all research projects involving humans as subjects must be reviewed by the IRB. This policy applies, regardless of the source of funding and location of the study, to all biomedical and behavioral research involving human subjects conducted by the University's faculty, staff and students. Information about the IRB can be found at http://research.unt.edu/ors/compliance/human.htm.

## 230.1　　　　Sponsored Projects

The Office of Grants and Contracts Administration (OGCA) serves as the coordinating office for externally sponsored projects.  The goal of OGCA is to assist faculty and professional staff in their efforts to secure external funding and  administer awards received by the University. OGCA reports to the VPRED.

The functions of OGCA include the following:
- Formulating grant and contract administration policies and procedures
- Overseeing the negotiation, execution and administration of sponsored project grants and contracts  throughout the University from inception through closeout
- Assuring timely receipt of and proper fiscal stewardship for sponsor funds
- Negotiating University-wide F&A costs
- Maintaining liaison with sponsoring agencies concerning University organization, policies and procedures; representing the University in negotiations with sponsoring agencies to assure consistent contract and grant provisions and policies; resolving problems and settling disputes
- In cooperation with other University offices, assuring compliance with sponsor's policies, e.g.,  fiscal, property, intellectual property, human and animal subjects
- In cooperation with other University offices, maintain official records concerning sponsored projects including official grant and contract files
- Assisting faculty and department/college staff in the preparation of the proposals and other  administrative aspects of sponsored projects as needed
- Training of PI and research administrative staff

## 203.10　　　　General Information

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| Campus/Overnight Delivery Address | University of North Texas Office of Grants and Contracts Administration Administration Building Room 160 1501 Chestnut Avenue |
| Mailing Address | University of North Texas Office of Grants and Contracts Administration 1155 Union Circle, #305250 |
| Web Page URL | http://research.unt.edu/ogca/index.htm |
| Telephone Number | (940) 565-3940 |
| Fax Number | (940) 565-4277 |

## 240.00      Economic Development and Technology Transfer

EDTT is responsible for the identification, protection and commercialization of the intellectual property generated by the faculty and staff of the University. In this capacity, the Director of EDTT acts as the University Patent and Copyright Officer and is responsible for accepting all disclosures of new inventions and other discoveries. EDTT staff evaluates disclosures and works with inventors to develop a strategy to protect the intellectual property and to license the discovery for commercial development. EDTT is responsible for complying with sponsor terms and conditions related to the management of intellectual property.

## 250.00      Deans, Department Chairs and Center Directors

The department chairs have a general responsibility for promoting the scholarly and research activities of their departments, as well as fostering sound stewardship of funds. They review applications for research projects for their appropriateness and transmit those approved through the appropriate dean to OGCA, making  sure that the faculty assignments and release time, administrative support, matching commitments, IDC  allocations, recognition distributions, and space demands of all such projects are in the best interests of both  their department and the University as a whole.

Deans should review for eligibility of PI and Co-PI, and agree with the matching commitments, IDC allocations, and Recognition Distributions.

# 300.00      <u>Administrative Policy and Roles</u>

## 310.00      Corporate Responsibility

Extramurally sponsored projects are made to the University in its corporate name, University of North Texas. Therefore, awards of funds for sponsored projects are awards to the University and commitments under agreements are commitments of the University. Any work performed by a faculty member of the University under such a project must be considered as work performed for the University.

## 320.00      Formal Documentation

Every research agreement must be evidenced by a formal document that outlines the research objectives and administrative requirements of the project. Informal (oral) agreements are the personal responsibility of the individual faculty member making such arrangements and may not be binding on the University.

## 330.00      Authorized Signatures

In accordance with the Board of Regents Rule 3.900 authority has been delegated to the Vice President for Research and Economic Development to accept and sign sponsored research related proposals, contracts and agreements to legally bind the university.  The Director of Research Services, Pre award Manager and Senior Contract Manager are authorized to sign non-binding proposal documents. The Director of the EDTT is similarly authorized to sign documents related to patents, copyrights, and trademarks.  The Director of Research Integrity and Compliance is also authorized to sign documents related to approval of human subjects and animal research.

## 340.1      Classified Research

The University does not possess a government security clearance and cannot act as a corporate entity to possess classified material. It is the policy of the University not to accept agreements which require access to classified data, require University employees to obtain security clearances, or restrict the dissemination of the results. Rare exceptions to this general policy with respect to classified research may be made only with prior approval of the VPRED.  In such cases, the following additional considerations apply:

- All such exceptions must be reported in writing to the VPRED prior to execution of a contract or acceptance of a grant
- Whenever possible, the University shall retain the right to disclose the existence of the proposed research and the identity of the sponsor
- Students may participate in approved classified research, as long as this participation does not significantly impede their progress toward a degree. No thesis or dissertation submitted in fulfillment of degree requirements may be classified, in whole or part
- Consulting and other external activities involving classified research are not prohibited, as long as they are consistent with the University's Policy on External Professional Activities for Pay
- In times of national emergency, rapid access to campus expertise or facilities may be required by government agencies for purposes other than long-term research. Permission for such short-term access may be granted by the VPRED

## 350.00    Endorsement of Research Results

Because the University imposes no limitation on the freedom of the faculty in the choice of fields of inquiry or the media of public dissemination of the results obtained, any results obtained and disseminated are the sole responsibility of the principal investigator and do not carry the institutional endorsement of the University. Consequently, the University does not permit the use of its name in advertising or promotional material related to the results of sponsored projects without the prior written approval of an officer of the University. In addition, the University will neither guarantee nor warrant the results of sponsored projects.

## 360.00    Ownership of Intellectual Property

Ownership of any intellectual property developed during a sponsored project, including inventions, whether or not patentable, copyrightable materials, including computer software, and tangible research materials, is governed by the terms of the sponsored research agreement and the University's policies on these issues.

## 370.00    Students in Research

Traditionally, graduate students have played a significant role in the conduct of sponsored research. Undergraduate students are also becoming increasingly involved in research activities. For all students participating in sponsored research projects, it is important to assure that the terms of sponsored research agreements will not conflict with a student's academic progress and that students have the right to refuse to participate in a particular project if they so choose.

## 380.1    Administrative Requirements for Sponsored Programs

The following conditions must govern any research agreement entered into by the University and a sponsor in order for a favorable evaluation to be made.
- Open identification of sponsors and the actual sources of funding must be present in the agreement. Exception is made for anonymous sponsorship when in the judgment of the VPRED such a condition is not harmful to the University or to the integrity of the research and is essential for the award to be given.
- Unrestricted dissemination of all findings and conclusions derived from the project must be an integral part of the agreement, except where the privacy of an individual is concerned. The University regards any infringement on complete access to research findings as detrimental to free inquiry. It therefore neither seeks nor accepts security clearance for itself or any administrative unit. The decision whether to seek clearance is an individual one to be made by each faculty member according to his or her judgment. Such decisions will not be influenced or judged in any way by the University and must be made in each instance on the basis that the benefits of clearance balance its academic shortcomings. Exception may be granted by the VPRED for privileged information but only in the form of a delay in the release of such information. The delay will only on rare occasions exceed three months.

- The resources or data sources on which research is wholly dependent must be free of control by the sponsor. The University views such control as incompatible with free inquiry and encourages acceptance of this condition only when no alternative source exits. Exception may be granted by the VPRED for projects which are conducted abroad and subject to the legal restraints of foreign governments and their agencies.
- No conditions may be attached to the gift, grant or contract that would in any way jeopardize the University's commitment to the principle of nondiscrimination on the basis of race, color, sex, sexual or affectional preference, age, religion, national or ethnic origin or handicap.
- Academic appointments made with the support of gifts, grants, or contracts shall be made only in accord with established University procedures. A sponsor shall not ordinarily participate in the selection of persons to work on a project, and individuals employed by the University shall not be excluded by a sponsor from participation in a project for any reason other than when necessary because of insufficient competence or when required to protect privileged information.
- No financial obligations by the University in the present or any time in the future can be implied other than those stated in the contract. When uncertainty exists in his judgment, the VPRED or a designated member of the VPRED's staff shall consult with appropriate officers of the University to assure that this condition is met prior to the final approval of the agreement.
- The University relies primarily on the discretion of its faculty to limit the commercial aspects of research sponsorship, such as advertising and publicity. Contracts must not allow the use of the University's name for commercial purposes unless such use has been specifically approved by the President of the University. Agreements must not permit the names of University investigators to be exploited for advertising purposes or permit reprint distribution to be made part of a publicity campaign.

# 400.00 Preparation of Proposals

The submission of a proposal is the usual manner of approaching potential sponsors for support of research or other projects. Writing proposals in a manner which clearly defines the ideas, concepts and solutions, as well as the problem, and states the advantages or benefits to be gained as a result of the efforts proposed, is an important task. The burden of proposal writing rests with the faculty member who will be designated as the principal investigator or project director and who will be responsible for the project upon award. Prior to preparation of a formal proposal there is a considerable amount of preliminary work which should be accomplished to avoid unnecessary effort.

## 410.00 Preliminaries to Proposal Preparation

Roughly develop the proposed project, its scope, methods, and objectives, to the point where personnel, equipment, facility and other support requirements can be estimated. If appropriate, discuss these plans with the department chair in order to assure consistency with departmental objectives and availability of necessary resources. This may also require discussions with the dean of the school, and, if the project is interdisciplinary, with other department chairs and college deans.

Frequently, the PI may have informal contact with representatives of an outside sponsor to explore the possibility of receiving the sponsor's support. While such contacts are encouraged, no commitments binding the University may be made until a formal proposal has been processed and approved by OGCA.

## 415.00 Sponsored Research Agreements with Commercial Entities

OGCA has developed a standard Sponsored Research Agreement (SRA) for use with industry. PIs are urged to provide a copy of the SRA to their industry counterparts when initially discussing possible research collaborations. PIs should sign a non-disclosure agreement (NDA) prior to any substantial conversations.

Negotiations of SRAs should consider the various stakeholder groups involved in the process. The interests  and needs of the University from the perspective of a non-profit, tax-exempt research and educational  institution, with a mission of public service are to be contrasted with the commercial, for-profit goals of the  corporate sponsors. Yet, the SRA is beneficial to both in the resulting research collaboration: Faculty  members learn about industrial technologies, their research receives substantial support, and they contribute  to the development and transfer of technologies that benefit the public. In addition, sponsors gain access to  the expertise of the faculty and facilities of the University.

Prior to preliminary proposal discussions, an OGCA grant officer assignment should be requested http://forms.unt.edu/request-grant-officer-assignment to assist with the administrative review process.  It is  best to refrain from delving into budget details any more than necessary to define the general or tentative cost  of the project during preliminary proposal discussions. In estimating the total cost, be sure to include both  direct and F&A costs at the current federally negotiated research rate.

It is helpful if OGCA is made aware of informal proposals (white papers) or correspondence being exchanged  with potential sponsors. This may be accomplished by sending information copies to OGCA. This is  particularly true when large or complex projects are being discussed or there are unusual aspects to a  proposal which may require University consideration prior to approval.

## 420.00 General Requirements

The requirements for content and format of proposals differ markedly among the various sponsoring agencies. Some require the use of preprinted agency forms; others will accept a proposal in any format as long as it presents all of the required information. Many sponsors make their proposal guidelines and forms  available electronically. Other sponsors should be contacted prior to writing the proposal. Whatever its form,  the proposal document is a communication instrument which will be evaluated by the proposed sponsor to  determine whether or not the project merits support.

## 425.1 Content of Proposal

The PI is responsible for the technical content of the proposal and for compatibility of the proposed  research, with his/her other professional duties. It is important to remember that if a project is   funded the sponsor will expect the work to be carried out substantially as proposed with any  significant deviations requiring prior approval.

Generally, every proposal should include the following:

1. **Title Page** – Unless a specific format is supplied by a sponsor, the following format should be used:

   a. The name of the entity to which the proposal is being submitted

   b. The name of the university, The University of North Texas

   c. The title of the proposed project

   d. The name of the principal investigator and any co-investigators, with the schools and  departmental affiliation of each

   e. A place for the principal investigator's signature, a place for the signature of the an  authorized University official

   f. The date of submission, and the proposed project period

   g. Certain standard information about the University, e.g. legal name, taxpayer identification number, DUNs number, can be obtained from an OGCA Grant Officer

2. **Technical Abstract** – Depending on the scope and complexity of a project, an abstract may be of assistance to a prospective sponsor. The technical abstract should be a condensed version of the project, usually no more than 200 to 250 words. State concisely the significance of the project, what is expected to be accomplish and how, and the period of performance of the project. The abstract is extremely important in creating a favorable first impression of the proposal.
3. Table of contents (optional)
4. List of tables (optional)
5. List of figures (optional)
6. **Introduction** – The introduction, or statement of need, emphasizes the importance of the project. The proposal should be set within a background framework of previous related research and have a theoretical orientation. The relationship of the project to the interests of the funding agency may be stressed tactfully. The introduction sets forth the focus of the proposal.
7. **Objectives** – The problem should be stated as specifically as possible and should be related to the background information provided. The importance and rationale of the proposed research should be well specified. It is important that the objectives, both general and specific, are well conceived. If they are poorly defined, it may be found that the timeframe is unrealistic or that the budget is inadequate.
8. **Methods and procedures** – This section details how the research will be carried out. The procedures may be written in several different ways: by activities tied to specific procedures, by functional categories such as planning, development, and implementation, or by major time blocks. If the procedural section takes up an undue number of pages, the narrative can be reduced considerably through the judicious use of appendices, tables, and illustrations. If the agency limits the number of narrative pages, these devices can be particularly useful. Be mindful, however, that some sponsors have limitations on use of appendices and what they may contain. Although requests for equipment are usually described in a separate section, additional justification for unusually expensive or specialized equipment can be stated in this section to reinforce the budget request.
9. **Dissemination of findings** - While projects generally result in published papers in professional journals, many agencies require additional means of disseminating the results of the research. A statement of how this is to be done should be included. Some projects may require inclusion of a plan for evaluation of the success or progress of the project.
10. **Equipment and facilities** – Most proposals should include a section on equipment and facilities available to the research project. It is extremely important that major items of equipment which are being requested are clearly identified and their need described.
11. **Budget and budget narrative** (include subcontract and consultant narrative as applicable) – The principal investigator must estimate with reasonable accuracy the costs of performing the research and provide adequate justification and documentation of those costs. The RA and CA in OGCA are available to assist and/or advise the principal investigator in preparing the budget. For more details regarding proposal budget preparation see the section on Budget Development.
12. **Bio Sketch** – These data should be submitted with every proposal to indicate the background, areas of interest, research capabilities, and publications of the principal investigator and other professional investigators.
13. **Current and Pending** – This section of the proposal calls for required information on all current and pending support for ongoing projects and proposals, including subsequent funding in the case of continuing grants.
14. **References** – Proposals should include a list of references to pertinent literature in the field. The list should be as current as possible at the time the proposal is prepared, and should cite the most recent advances in the field.
15. **Supplemental page or appendices** – Appendices may be used to indicate data of peripheral benefit to the research, e.g., reprints of articles, letters of support (as required by the RFP), tabular data, and graphs. The use of appendices is recommended, particularly when a sponsor limits the length of the proposal to a specified number of pages.

16. **Certifications** – Federal agencies require a number of representations and certifications from the University which must accompany each proposal. Some agencies such as NIH and NSF have incorporated these in their forms while others such as DOD, NASA, DOE and EPA have separate certification forms which must be completed by OGCA.

# 430.1      Proposal Preparation

The primary responsibility for the origination, development and preparation of proposals rests with the Principal Investigator (PI). The development of the proposed project, its scope, methods and objects, personnel, equipment, facility and other support requirements should be estimated by the PI and discussed, when appropriate, with the department chair in order to assure consistency with departmental and university objectives and availability of necessary resources. This may also require discussions with the dean of the college, and if the project is interdisciplinary, with other department chairs and deans.

The Principal Investigator (PI) is responsible for:

- Identifying funding sources and
- Responding to a specific funding opportunity
- Developing and preparing proposals for extramural funding in accordance with sponsor guidelines and University policies
- Fill out the Request for Grant Officer Assignment at http://forms.unt.edu/request-grant-officer-assignment to be assigned a Grant Officer.
- Preparing a draft version of the following documents **to be sent to the Office of Grants and Contracts Administration  (OGCA) 5 days prior** to the proposal submission deadline:  project narrative, budget builder,  supporting documents as applicable (cost share form, subcontract form, significant financial interest   disclosure form)

# 435.1      Role of Grant Officer in Pre-Award Administration

Upon submission of a draft proposal, budget builder, and routing form to OGCA, the assigned Grant Officer   will initiate the administrative review to ensure compliance with university, sponsor, federal and state  guidelines.

- *Proposal review*
    - o Review , edit, and advise on formatting according to RFP guidelines
    - o Coordinate with subcontract institutions or organizations to obtain Letter of Commitment (LOC), budget, and statement of work (SOW)
    - o Advise PI to ensure receipt of support letters from consultants and/or institutional letters as required by the RFP guidelines
- *Budget review*
    - o Advise PI regarding F&A rate; ensure we have written documentation of any reduced F&A rate
    - o Advise PI the definitions of each budget category
    - o Advise PI on Cost Principles according to OMB A-21 section J (allowable vs. unallowable)
    - o If budget includes subcontract, advise PI that F&A is assessed on the first $25K only
    - o Identify in RFP and/or budget narrative if cost sharing is voluntary or required
- *Overall proposal compliance review*
    - o Review to ensure compliance with University, Sponsor, Federal, and State guidelines
    - o Identify unique and/or unusual items required by the sponsor
    - o Review according to OMB A-21 to ensure budget is reasonable, allowable, allocable, and  consistent
    - o Review proposal and identify if any research compliance is required (e.g. IRB, IACUC, laser/radiation, bio hazardous agents and/or recombinant DNA)
    - o OGCA will review RFP and proposal to determine if an NDA is required to protect IP

- *Proposal submission*
  - Advise PI on timeline of when we need to receive draft and final copies of the proposal document and administrative forms
  - If proposal submission is other than NSF Fastlane or Grants.gov, ensure UNT is registered with the sponsor to submit proposals online

## 440.00 Role of College/Department Research Administrators in Pre-Award Administration

To be completed.

## 445.00 Boiler Plate Information

| When applications request: | OGCA provides the following responses: |
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| **Submitting Organization** | University of North Texas |
| Address for all Official Correspondence | University of North Texas<br>Office of Grants & Contracts Administration<br>1155 Union Circle, #305250<br>Denton, TX 76203-5017 |
| Type of Organization | State Related Institution of Higher Education |
| Congressional District<br><br>Texas Senatorial District<br><br>Texas House of Representatives District | $26^{th}$<br>$12^{th}$ and $30^{th}$<br>$64^{th}$ |
| Authorized University Official for Proposals | Ann Rodela<br>Asst. Vice President Research/Sponsored Programs<br>Office of Grants & Contracts Administration<br>Ann.Rodela@unt.edu |
| Authorized University Official for Financial Certifications | Britt Krhovjak<br>Assoc. Director Research Accounting<br>Office of Grants & Contracts Administration<br>Britt@unt.edu |
| Authorized University Official for Compliance Certifications | Boyd Herndon, JD<br>Director of Research Compliance<br>Office of Research Integrity & Compliance<br>Boyd.Herndon@unt.edu |
| Principal Investigator | Faculty Name (or investigator to serve as project correspondent if there are co-investigators) |

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| Federal Entity ID Number | 756002149 |
| DUNS Number | 614168995 |
| Contractor Establishment Code | 78-764-557B |
| Cage Code | 6B783 |
| FICE | 003594 |
| Texas State Vendor Number | 37527527529035 |
| Human Subjects DHHS Assurance Number IRB ID | FWA00007479 756002149 |
| NIH/OLAQ Animal Welfare Assurance Number | A3841-01 |
| USDA/APHIS | 74-R-0033 |
| Cognizant Agency/Contract Administration Office | Department of Health and Human Services Division of Cost Allocations Central States Field Office 1301 Young Street, Room 732 Dallas, TX 75202 (214) 767-3261 (Phone) (214) 767-3264 (Fax) |

## 450.00     Preparing Proposal Budgets

Preparation of the budget is an important part of the proposal preparation process. Sponsors and peer reviewers are responsible for comparing the level of funding requested to the work proposed. Therefore, the budget section of the proposal should reflect, as accurately as possible, the funding needed to carry out the project. Use the latest version of Budget Builder to accurately calculate fringe benefits and indirect costs. http://research.unt.edu/faculty-resources/research-services

## 455.10     Salaries and Wages

To determine total salaries and wages, list the percentage of effort to be spent by each faculty, staff and students. Effort should be shown in terms of percentage of full-time effort and person-months. For individuals paid on an academic year basis, show a breakdown between academic year and summer effort.

**PI's may not budget any individual in excess of 100% of effort including all sponsored projects, instruction and other University activities.**

It is important to consider each individual's other commitments to other sponsored projects since most sponsors will review an individual's total committed effort to funded and pending project support.

Sponsored activities may not result in any employee receiving compensation in excess of his/her authorized salary.

The federal government will not pay the salaries of clerical and administrative personnel since they are included in the F&A costs. Faculty members are paid by state funds to perform research, instruction and public service activities.  Subsequently, state funds are provided to pay administrative support for these activities in the offices of the department chair and dean.   The department chair or dean may choose to use indirect cost recovery funds to support additional administrative support.

Compensation levels and new job classifications must conform to the University Personnel Classification Guide. Include incremental increases for professional and nonprofessional personnel on proposals extending more than one year. If specific incremental increase figures are not available, estimate the increase at 3% per year.

## 455.11 Postdoctoral Compensation on Research Grants

The tax treatment of compensation and the applicability of employee benefits to postdoctoral researchers are dependent on specific circumstances and the nature of services performed or expected.

## 455.12 Employee Benefit Costs

Employee benefit rates are calculated as a percentage of employee salaries and wages, and are established by the State of Texas. Budget Builder automatically calculates the accurate fringe benefit amount based of selection of roles.

## 455.13 Graduate Research Assistants

Salaries for Graduate Research Assistants/Fellows (i.e., graduate students) should be budgeted to include employee benefit costs according to the HR Fringe Benefit Component form. The maximum use of Graduate Research Assistants (graduate students) is encouraged. The budget support should be shown as two separate items:

- Graduate Research Assistant Salary
- Tuition charges - for graduate students supported on sponsored research grants and contracts, the proposal budget should include the full costs of tuition and fees

Tuition charges should be listed under "Participant Costs" in Budget Builder so it will be excluded from the Modified Total Direct Cost for F&A cost calculations.

## 455.14 Consultants

The use of paid consultants may be justified when the project calls for expertise of a well-defined nature for a fixed period of time. By definition, consultants are not employees of the University. Consultants should be budgeted only for tasks where on-campus expertise does not exist or is not readily available.

Normally, consultants are paid a fee plus travel and other expenses. Some sponsors do not permit payments to consultants and some restrict or limit such payments. If in doubt as to the allowability of or rates paid to consultants, check the sponsor's program literature or contact OGCA.

On rare occasions University employees from other departments may act as consultants on a project. These types of "consultants" should be included in the salaries and wages portion of the budget and, consequently, included in the base for calculation of employee benefits.

## 455.15 Proposal Requirements for Use of Consultants

Principal investigators are expected to anticipate and indicate the need for consultants in grant applications or contract proposals. The proposal should therefore include the following:

- Consultant name
- Description of services to be provided
- Number of days of anticipated consultation
- Expected rate of compensation, travel, per diem, etc.
- Curriculum vita for the consultant

In addition, many sponsors require a letter from the consultant confirming their role in the project.

It is incumbent upon PIs to ensure the following conditions are met when considering a consultant:

- The services the consultant will provide are essential to the project and cannot be provided by persons receiving salary support under the grant or contract or who are otherwise compensated for their services;
- A selection process has been employed to secure the best-qualified consultant available to perform the required tasks;
- The fee is commensurate with the qualifications of the consultant and the nature of the services rendered; and
- The consultant meets the requirement of an independent contractor as defined by the Internal Revenue Service.

## 455.16 Travel

Reimbursement for travel expenses is subject to University policies and sponsor regulations. Include specific data on each proposed trip, including destination, transportation costs, number of days of travel, and purpose of each trip. "Domestic" and "foreign" travel should be separately identified and budgeted. "Domestic" travel includes trips within the U.S. and Canada. On federally funded projects all foreign travel, including that which is cost shared, should utilize US flag air-carriers whenever possible and regardless of cost or convenience. These costs need to be fully justified in the proposal budget and any exceptions to the "Fly America Act" requirements can only occur under exceptional circumstances and must be documented in advance.
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## 455.17 Capital Expenditures/Non Expendable Equipment

Non expendable equipment is defined by the University as personal property having a unit acquisition cost of $5,000 or more and a useful life of one year or more. Items having a unit cost of less than $5,000 should be budgeted as "Expendable Supplies and Minor Equipment."

Budget all equipment needed to perform the proposed tasks (including estimated freight and installation) that is not available to the investigator from University resources. Most sponsors will not support the purchase of general purpose equipment, such as office furniture and equipment, laboratory furniture, computers, etc. Sponsors expect the University to provide the basic laboratory and administrative working environment.

List each specific item in the budget, justify the need for the equipment and provide information on how the amount requested was derived, i.e., catalogue prices, quotes or bids. In some cases, doing so will avoid the need to receive sponsor approval when required.

## 455.18 Expendable Supplies and Equipment

A research project will usually consume expendable supplies and minor equipment such as laboratory items, teaching materials, animals, laboratory notebooks, etc. A reasonable amount should be budgeted for these items. **Note**: Office supplies are typically not allowable.

## 455.19 Publication Costs

Budget the anticipated cost of publishing the results of the research, keeping in mind that page charges may vary from journal to journal. Consider both page charges and reprint costs. It is important to justify the need for these costs so that sponsors will continue to support these costs.

## 455.20 Sub-recipients

When investigators from another organization participate in the research, the cooperating institution or sub recipient, as it is known, must provide a sub-proposal. A subcontract agreement is required whenever a substantial portion of the research will be performed at another institution. The sub-recipient's proposal (i.e., the sub-proposal) must contain, at a minimum, the following:

- Statement or scope of work
- Budget
- Period of performance
- Signature of a representative authorized to contractually commit the institution
- Negotiated F&A Cost Agreement if not already on file at OGCA

The sub recipient's budget should include applicable F&A costs. The sub recipient should also provide its Federal Employer Identification Number and required certifications.

The PI must submit a statement disclosing any direct or indirect financial interest in the sub recipient's organization (see Conflict of Interest Policies, the Faculty Handbook and the Policy on "Purchases from Related Parties").

The sub-proposal is then incorporated into UNT's primary proposal. A list of the sub recipient's total costs should be included in the Subcontract category of UNT's budget depending on the sponsor's requirements. The first $25,000 of the first year of sub recipient costs will be included in UNT's base for F&A costs.

The technical section of the proposal must include a statement explaining the need for a sub award and the method(s) used to select the sub recipient. Many sponsors require the sub recipient's budget be appended to the proposal.

Research Services' review of the primary proposal will include an assessment of the sub-proposal. In addition to evaluating the sub recipient's budget and legal standing, Research Services will consider such matters as the sub recipient's integrity, record of past performance, financial and technical resources, and avoidance of conflict of interest as it relates to UNT's investigators.

## 455.21 Other Direct Costs

Other legitimate direct costs may include vendor services such as surveys or routine analytical services, equipment maintenance, reference books and materials (not available in the department or University libraries), library search services, etc.

## 460.00 Representations and Certifications

For some proposals, special representations, certifications and acknowledgments may be required. OGCA will complete these forms.

## 465.1 Facilities and Administrative Costs

Facilities and Administrative (F&A) costs, also called overhead or indirect costs, reimburse the University for laboratory and office space, utilities, administrative services (e.g., Department and Dean Administrators, Purchasing, Accounting, Research Administration, Human Resources, Security), custodial services, and building, grounds, street and parking lot maintenance. In other words, they include those things essential to support sponsored activities which cannot be specifically identified and directly charged to a specific research grant or contract. F&A cost percentages are determined periodically from actual cost records through a detailed cost accounting procedure and are audited and approved by the federal government.

Full F&A costs should be charged on all projects, the only exceptions being for those sponsors that have a published policy that limits indirect cost recovery. Any exceptions to full F&A cost recovery must be approved by the VPRED or his/her designee. The F&A amount is calculated by multiplying the modified total direct costs (MTDC) by the F&A rate.

The MTDC is determined by subtracting the following costs, if any, from the total direct costs.

- Capital Equipment (any non-expendable equipment estimated to cost $5,000 or more and with a useful life or one year or more);
- The amount of each research sub award in excess of the first $25,000 of the first year of the project;
- Alterations or renovations of facilities;
- Graduate research assistant tuition costs charged directly to the project.
- Rental costs of outside facilities
- Scholarships and Fellowships

An off-campus F&A cost rate is available for those projects which more than 50% of the activity will be performed in non-university owned space during the performance period of the project.

If a project is carried out in space leased by the University and the rent is not charged to the grant or contract the on-campus rate prevails.

## 470.00     Cost Sharing

Some sponsors require the University to contribute to the cost of the project and will require a financial accounting of the University's contribution. In addition to such mandated cost sharing, any contribution to a project included in the proposal, either in the budget or the text will be considered voluntary committed cost-sharing which the University must document. The University account(s) to which such cost sharing will be charged must be identified prior to approval of the sponsored project budget.

University contributions in terms of personnel effort and the associated employee benefit costs, other direct expenses and the F&A cost calculated on these expenses at the approved F&A cost rate can be shown as cost sharing. Any difference between F&A costs at the sponsor limited rate and the University's negotiated rate can also be used as cost sharing if permitted by the sponsor. The University discourages cost sharing unless mandated by the sponsor. All proposed cost-sharing must be approved by the responsible Chair and Dean. For further information on cost sharing see the OGCA Cost Sharing Form.

## 475.00     Deadlines for Proposals

The University review process takes time. Therefore, in those cases where there is a sponsor established deadline date, a proposal should be submitted according to Proposal Timelines. OGCA will review proposals for which the scientific or technical portions are still in draft provided that the budget has been finalized, no significant changes will be made, no cost sharing will be embedded in the body of the proposal, and that it has been approved by the appropriate department chair(s) and dean(s).

Proposals will normally be processed in order of receipt. Exceptions may be made for proposals with impending deadlines.

It is the responsibility of the PI to ensure that a proposal reaches the sponsor in time to meet any established deadline. A final copy of the proposal must be provided to OGCA.

## 480.00       Electronic Submission of Proposals

A number of sponsors require electronic submission of proposals. The NSF requires that all proposals be submitted electronically via FastLane. Additional information on FastLane is available on the NSF web page at https://www.fastlane.nsf.gov/a0/about/10steps.htm.

The electronic proposal submission process can be demanding, particularly the first time a principal investigator uses it. Prior to the first submission of a proposal using any form of electronic proposal submission, the principal investigator MUST contact OGCA. In addition, the principal investigator may need to have Adobe Acrobat and PDF capability on his or her computer.

For every electronic submission, OGCA needs a fully signed Proposal Routing Form. OGCA must approve the proposal before it can be submitted, so allow time for its review and approval. OGCA reviews a very large volume of proposals at deadline dates, therefore it is imperative to submit applications well before the deadline to allow for sufficient review. Failure to do so may jeopardize the timely submission of the application.

## 485.00       Required Copies of Proposals

The number of copies of proposals required by sponsors varies. In addition to the copies to be submitted to the sponsoring agency, one copy **is required** for the official file maintained by OGCA. The PI should review available proposal instructions or contact OGCA to determine the number of copies required by the proposed sponsor. **Note**: OGCA does not make copies of proposals.

## 490.00       Multiple Solicitations

Multiple solicitations, that is, the submission of the same proposal to two or more sponsors, may be made provided this fact is clearly disclosed in the text of the proposal. However, some agencies may not accept proposals submitted to other potential sponsors.

## 495.1       Review and Approval Channels

The principal investigator must channel his/her proposal through a series of officials whose review and approval are required before it is submitted to the sponsor. Their review will be concerned with:

- The substance and merit of the proposal, including the academic appropriateness and desirability of the proposed research or other sponsored activity
- Commitments of faculty and staff time and the possible effects on the teaching and other obligations of the personnel involved
- Salary arrangements, e.g., reimbursement of appropriate academic year salaries and provision for summer support
- Requirements for space and facilities
- The budget, especially a verification that all costs, including F&A costs, are provided for, that all needs are realistically estimated and stated, that items included are not contrary to the policies of the University or the sponsor, and that funds are available when a University contribution is included and required by the sponsor
- The identification of special conditions requiring further review, such as use of human subjects, animals, biohazards, radioactive materials, radioactive drugs, intellectual property concerns, etc.
- The disclosure of any potential financial conflicts of interest of the PI or any other person responsible for the design, conduct or reporting of the proposed project.

Listed below are the steps by which a proposal is processed:

1. **Department Chair**

   Approval by the chair constitutes endorsement attesting to the academic purposes of the proposed research or other sponsored activity, its departmental compatibility, and its appropriateness in the context of budget, the time available to the faculty member to carry out the project and the availability of space and research equipment. If approved by the chair, the proposal is then submitted to the dean of the college for review and approval.

2. **Dean**

   The dean's review relates to the substance and merit of the proposal as well as the budget, the salaries and employment of present and proposed personnel, and any other aspect of the proposal which may affect the teaching, research, and use of space and facilities of the school and the University. The dean's approval of less than the negotiated F&A rate indicates his/her acceptance of reduced F&A cost recovery to the school. Having been approved and endorsed by the dean, the proposal is transmitted to OGCA.

3. **Office of Grants and Contracts Administration**

   The purpose of review by OGCA is to determine that the proposal complies with University and sponsor policies, that the proposal is complete, and that approvals are in order. OGCA will see to it that unusual requirements are met. At this point, proposals that are routine and present no policy or procedural problems are signed for the University and submitted. The official (complete) University file copy is retained in OGCA.

4. **Vice President for Research and Economic Development**

   Proposals that appear to deviate from University policy are submitted by OGCA to the Vice President for Research (VPRED) for review. If the VPRED finds the proposal acceptable, it is approved and returned to OGCA for submission to the sponsor. If questions exist as to possible noncompliance with University policy, the VPRED will contact the PI or Dean for recommendation.

# 500.00     Types of Agreements and Instruments

Award documents are legal agreements between the University and the sponsor. Notices of award can be formal contracts, grants, or cooperative agreements. Before accepting an award, ORS must review the formal document for compliance with University policy. Only Research Services is authorized to accept and sign notices of award on behalf of the University of North Texas.

# 510.00     Grants

Grants constitute the majority of awards received by the University and constitute a less restrictive award category. Sponsors often do not require the University to countersign grants because the terms and conditions are agreed upon by submitting an authorized signed proposal. Federal grants are governed by the administrative terms and condition found in the grants administration manuals or handbooks of the sponsoring agency. Always check program announcements and similar documents for embedded terms and conditions.

# 520.1     Contracts

Contracts are usually awards that are more restrictive. Typically, contracts must be signed by both the sponsor and the University before they become binding and they may require defined deliverables, on specified schedules.

There are two types of contracts:
- **Fixed-Price**

  Contracts are made at a set amount, regardless of the actual costs for completing a set scope of work. The University is paid this set amount. If the Principal investigator (PI) completes the work for less, the University retains the additional funding. If it costs more than the contract value to finish the work, the University must do so at its own expense, and the PI is responsible for paying the difference.
- **Cost Reimbursement**

  This type of agreement specifically defines the maximum level of support a sponsor will provide. If actual project costs are less, the University will only be reimbursed its actual costs. If research costs exceed the proposed estimate, the University must report only on the amount incurred, not exceeding the maximum level of support completed.

## 530.00     Cooperative Agreements

Cooperative Agreements are used when federal sponsors want to retain more active involvement in the conduct of the project. This active oversight may be evidenced by a higher level of agency program advising on the direction of the project, more frequent reporting, etc.

## 540.00     Issues Requiring Special Consideration

## 540.10     HIPAA

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) is a federal law which went into effect April 14, 2003. The law includes provisions designed to protect the privacy of individually identifiable patient health information.

According to the final regulations, healthcare providers such as the University of North Texas Health System can use and disclose protected health information (PHI) only for certain specific functions: treatment, payment and healthcare operations purposes. For all other purposes, such as research purposes, PHI may only be used or released with the written consent of the impacted individual (authorization) or by application of a specific exception.

Certain parts or "regulated entities" within the University, as part of their integral function, provide healthcare or health plan services and will need to use and disclose PHI on a routine basis These regulated entities include UPHS/SOM, the Nursing Clinic LIFE, SODM, Student Health and the employee health plan. Accordingly, specific policies and procedures have been developed and implemented for any use or disclosure  of PHI by these entities.

Proposals which anticipate the use of PHI or otherwise implicate HIPAA concerns should be carefully reviewed. In such cases, faculty should identify any research proposals being submitted to OGCA that do contain PHI so that these may be given special attention and handled in accordance with HIPAA regulations.

## 540.20     Export Controls

Export Administration Regulations (EAR, enforced by the Department of Commerce) and International Traffic in Arms Regulations (ITAR, enforced by the Department of State) are Federal regulations which, for reasons of national security or protection of trade, prohibit the "export" (defined very broadly as any oral, written, electronic or visual disclosure, shipment, transfer or transmission of a commodity, technology or software/code) of certain technologies without a license, unless an exception applies. If research at UNT involves such technologies, these regulations may require UNT to obtain prior approval from the State or U.S. Department of Commerce before:
- Involving foreign students or faculty in the research;
- Working with foreign companies; and
- Sharing research results with persons who are not U.S. citizens or permanent resident aliens

These restrictions apply to work actually done on site at UNT.

These requirements may undermine publication rights, dissemination of research results, and international collaboration. Violations of the regulations may result in severe penalties.

Proposals and awards containing such terms and conditions, or involving research implicated by export control laws should be identified as early as possible.

# 800.00 Post Award Administration
The process of managing sponsored research funds is a shared responsibility among the PI, the college or department research administrator and OGCA; each has unique areas of primary responsibility.

## 810.1 Principal Investigator Responsibilities in Post-Award Administration
The Principal Investigator (PI) has primary responsibility for following award terms and conditions, complying with the financial and administrative policies and regulations associated with the award, directing the technical aspects of the project and coordination with departmental personnel to define administrative support.  The PI is also responsible for hiring, training and managing project personnel. Although PIs may have administrative staff to assist them with the management of project funds, the ultimate responsibility for the management of the sponsored research project work and funds rests with the PI including following UNT guidelines for expenditure approvals, closely monitoring encumbrances and direct expenditures using COGNOS reporting. The fundamental responsibility of the PI during the performance of the research post-award is to:

- Execute the project as outlined in the funded proposal and the terms and conditions of the award, using sound management techniques.
- Authorize only those expenditures that are reasonable and necessary to accomplish the project goals and that are consistent with the sponsor's terms and conditions.
- Spend no more than the amount authorized by the sponsor for the project period.
- Carry out the project's financial plan as presented in the funded proposal.
- Notify OGCA of any proposed changes in the scope of work, the PI or other key research personnel,  the budget, or the period of performance.
- Follow all applicable University policies and procedures such as travel, purchasing, employment, contracted services, and compensation policies.
- Assure that cost-sharing or matching commitments are fulfilled and reported to OGCA in a timely  manner.
- Assure that Time and Effort Reports for the funded project are completed accurately and timely.
- Oversee the care and maintenance of property procured with project funds in accordance with sponsor guidelines.
- Report any intellectual property development which relates to the project to the Technology Transfer Office
- Report project progress, including final reports as required by the terms of the award.
- Review project expenditures reflected in COGNOS regularly and in a timely fashion to assure they are correct and appropriate.
- Expenditures or services rendered must directly relate to the scope of work and budget, be incurred within the award period and approved by the PI.
- Sufficient funds must be available at the time of purchase to ensure overspending doesn't occur.

## 820.1 Role of College/Department Research Administrators in Post-Award Administration

The college/department research administrator (CRO/DRA) plays a key role in the financial management of a project, acting as a liaison between the PI and OGCA. While the university places the prime responsibility for the conduct of the sponsored projects in all aspects on the Principal Investigator, the CRO/DRA is involved in the day-to-day operations of the project. Therefore, it is imperative that the PI and the CRO/DRA interact closely and frequently to review and discuss financial and administrative matters. Although responsibilities can vary by department, typically their responsibilities include:

- Having knowledge of and understanding UNT policies and procedures related to grant management, as well as the terms and conditions that apply to individual awards.
- Assisting the PI in maintaining budgetary control, including preparing ongoing budget revisions for OGCA review as needed.
- Assisting the PI in assuring expenditures or services rendered directly relate to the scope of work and budget, are incurred within the award period and approved by the PI.
- Sufficient funds must be available at the time of purchase to ensure overspending doesn't occur.
- Assisting the PI in all business aspects of grant management.
- Ensure that awards and related budgets are created accurately in the University's financial systems in agreement with the approved award.
- Awards are monitored through COGNOS.
- Charges to awards are appropriate.
- Ensure F&A cost rates are accurately charged against the direct cost budget.
- Discuss with the PI reporting obligations and schedule.
- Ensure sub-awards are managed properly including working with OGCA on issuing the sub-award, establishing the Purchase Order, and along with the PI, monitoring sub-recipient expenditures and work.
- Ensure cost sharing is properly documented and reported.
- Discuss with the PI any special award terms or conditions (for example, the award may have been made on a fixed-price basis or may specify special deliverables).
- With the PI, jointly plan for successful project close several months before the end date.
- Assist the PI with confirmation of Effort Reports.

## 830.1 Role of OGCA in Post-Award Administration

OGCA acts as the primary administrative liaison between PI, sponsors, and other University central administrative offices. The primary responsibilities of OGCA during the post-award phase of a sponsored research project include:

- As new awards are received, establishing an account (Proj ID) in the University financial system.
- Advising PIs regarding sponsor guidelines and regulations.
- Facilitating good project management techniques by disseminating information and providing training to PIs on a wide range of topics related to sponsored activities.
- Serving as the primary interface between the PI and the sponsor in all areas requiring sponsor prior approval, including changes to scope, budget, key personnel, and project end dates.
- Maintaining project files and records and the PeopleSoft grants information system.
- Financial reporting to sponsors. OGCA prepares the required financial reports that are sent to sponsors.
- Receivables, billings, and collections. OGCA manages the collection of grant funds and maintains account records for each sponsor. OGCA draws funds under federal letters of credit as costs are incurred, issues billings to sponsors and follows up with sponsors on payments as required by the terms of agreements.

- For federal funds, OSP administers the effort reporting function that provides the required documentation for employee salary charges to federal grants.
- Assists PIs with monitoring for overspending.
- Coordinates audits.
- Develops and negotiates federal facilities and administrative agreements.
- Conducts space use surveys.

## 831.00   Award Notification and Initiation of Account

Sponsor award notifications can take many forms. These documents require review and signature by the authorized institutional authority to sign on behalf of UNT. Authority to accept awards has been granted by the Board of Regents and President to OGCA and such signature authority delegated to the Director of Sponsored Projects.  If the PI receives a notice directly, OGCA should be immediately contacted.  Many awards are received which require both sponsor and University signatures.  PI's are not authorized to sign award documents on behalf of the University.

Upon receipt of a fully executed award document or executed contract, OGCA assigns a Proj ID number and notifies the PI, Chair, Dean, and college/department research administrator and provides a copy of the award agreement which includes sponsor terms and conditions and sponsor approved budget.

## 832.00       Anticipated Awards

If a project needs to be started prior to the receipt of formal sponsor notification, a Proj ID number may be requested from OGCA by submitting a completed Departmental Commitment Agreement letter and budget. If  the award is not ultimately received or if sponsor conditions preclude pre-award spending, the department is  responsible for covering any unreimbursed expenses.

## 833.00   Expenditure/Encumbrance Tracking

Once a Proj ID has been established, project expenditures can begin. Charging expenses to a sponsored project is initiated by the PIs or other person authorized by the PI to spend funds.  Expenditures must be consistent with award requirements and purchasing procedures.

## 833.10       Equipment Purchases

BSC must be notified prior to purchase of equipment on a Proj ID of $25,000 or greater.  PPS is responsible for the bid process as required by federal and state purchasing guidelines.

Capital equipment is defined by the State of Texas as any single item costing $5,000 or greater.  Multiple items of lesser value that are added to another piece of equipment are also considered capital equipment if the combined cost is over $5,000. The federal definition of capital equipment is an item costing $5,000 or more and with a useful life of more than two years. General purpose equipment and all items over $5,000 need to be specifically identified in the budget (general purpose items are things used for purposes other than scientific research).  Equipment is typically not included in the modified total cost base thus indirect cost is not allowed.

The UNT Asset Management Office tracks and reports capital equipment purchases in accordance with state and federal guidelines and assists the PI with disposition of federally purchased and owned equipment in accordance with OMB Circular A-110.

## 833.20 Personnel Expense

An electronic e-Par must be submitted to pay personnel from a Proj IDs. e-Pars are typically submitted by the departmental administrator upon request from the PI. Typically, only positions listed in the sponsor approved budget can be paid from a Proj ID.

Sponsored projects should be charged with a portion of each employee's salary equal to the effort devoted directly to that project. For faculty with nine-month appointments, one month of effort is one-ninth of the academic year salary. Sponsor funds may not be used to pay a PI above the full-time base salary. Fringe benefits are budgeted as an estimated percentage of salaries, but are charged directly as an actual expense.

## 833.30 Summer Salary

Most sponsors provide compensation for faculty with nine-month salary bases during the summer months at their regular monthly salary rate when included as part of the sponsor approved budget. Submission of a proposal that includes summer salary does not imply a University commitment to pay such salaries in the event the proposal is not awarded.

## 833.40 Travel

Travel requests and reimbursements for sponsored projects are processed in accordance with University travel procedures as defined in http://policy.unt.edu. Each travel request should clearly state the relationship of the trip to the sponsored project effort.

*Domestic travel* in support of sponsored projects must follow the State of Texas per diem amounts for in-state and out-of-state. Actual expenditures in excess of these amounts can typically only be paid when specifically approved by the sponsor in the award agreement.

*Foreign travel* must be approved by the sponsor in advance of the trip. Federal funds cannot be used for foreign trips where the primary purpose is to secure new or additional research.

## 833.50 Consultants

A consulting agreement is required in most cases and is always required by federal sponsors. Such services are approved on a case-by-case basis provided that the charges are reasonable, and a selection process has been employed to secure the most qualified individual available. Payment for consulting services may be charged to sponsored projects if allowed by the terms of the specific award and UNT policy. Payments can only be made for work completed, must be supported by a Consulting Agreement and by an invoice signed by the consultant for the work performed.

UNT employees should only be paid as a consultant if the sponsor approves the payment, the employee is from a different departmental or involves a remote operation, and the work is performed in addition to regular duties.

## 834.00 Expanded Authority

Many federal agencies have waived approval of certain post award changes under "expanded authorities" granted to the local institution. These expanded authorities *do not apply to contracts*. However, grantees must still assure proper stewardship over these funds and that all costs are allowable, allocable and reasonable.

## 835.00 Federal Demonstration Partnership (FDP)

Many federal agencies and universities and hospitals participate in the FDP. As a participant in the FDP, the University receives the most favorable grant terms and conditions from FDP participating federal agencies. The award notice will specify whether the project is covered under the expanded approval authorities granted under FDP.

## 836.00        Pre-Award Expenditures

Most federal grants permit the incurrence of pre-award costs, and UNT permits pre-award expenditures which conform to UNT's cost transfer policy. If the PI needs to commit funds or order equipment within the ninety (90) days preceding the award start date, a Departmental Commitment Agreement for pre-award spending may be submitted to OGCA. Upon verification of the expected award (and if allowed by the sponsor),  a Proj ID number will be assigned by OGCA. However, if funding is not ultimately available, the PI and  Department will be responsible for all expenses posted to the Proj ID.

## 837.00        One Year, No-Cost Extensions

For Federal awards that allow Federal Demonstration Partnership (FDP) authority, OGCA has the option of extending the project end date for a period up to 12 months without sponsor approval.  These sponsors usually include NSF, NIH, NASA, Department of Energy and EPA. Subsequent extension requests after the first extension OR all other non-FDP requests require sponsor approval and must be submitted through OGCA.  The request should be in writing, provide a justification related to the completion of the remaining project objectives and include an explanation of how the remaining funds will be spent.  All no-cost extension requests should be submitted to OGCA 60 days prior to the expiration date of the award.

## 838.00        Budget Revisions

 Occasionally, a project's financial resources need to be reallocated due to the nature and progress of the research. For example a piece of equipment may become unnecessary, while another expense becomes necessary, or the scope of the project might change due to unforeseen circumstances. In these cases, re-budgeting may be required.

Re-budgeting will be allowed only to the extent the terms of the award or contract allow it.  Therefore, before any attempt to re-budget, the PI should review the terms of the specific award.  The PI should also assess the potential impacts of the proposed re-budgeting (e.g. shifting an expense from one budget category to another or shifting expenses from direct costs which may result in adjustment to the F&A cost collection). Depending on the terms of the agreement, re-budgeting may require sponsor approval.

## 839.1        Sub-awards

Sub-awards are negotiated by the OGCA and are typically written as cost-reimbursable with detailed invoices required. UNT typically earns indirect cost on the first $25,000 of a subcontract.  Sub-awards usually comply with all terms and conditions of the prime award. After the sub-award agreement is fully executed and work has started, it is the PI's responsibility to:

- Review and approve all invoices from the sub-recipient to ensure funds are spent appropriately and within the approved budget
- Review and approve budget revision requests from the sub recipient
- Monitor the progress of the sub-award and obtain all required deliverables

When the subcontractor submits an invoice for reimbursement, the invoice must be signed by an authorized official of the subcontractor.  Final invoices should be received from the sub recipient within 30 days after the sub-award end date.

## 840.00        Cost Transfers

A cost transfer is any adjustment or transfer of expenditure to/from an externally funded contract or grant. Cost transfers include reclassification of salary, wages and other direct costs (goods and services and travel). Diligent review of financial records should prevent the necessity for cost transfers; however, transfers may be appropriate under certain circumstances.

Costs directly charged to sponsored awards must comply with the cost principles outlined in the Office of Management and Budget (OMB) Circular A-21. The circular explicitly states that expenses "....may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored agreement, or for other reasons of convenience." Expenditures should be direct charged to the project account. If overspending occurs, a cost transfer should immediately be processed to move the error to a different account.

## 841.1      Program Income

Program Income is defined in OMB Circular A110 as "Gross income earned by the University that is directly generated by a sponsored activity or earned as a result of an award." Examples include:

- Fees for services, such as laboratory tests
- Receipts from the sale, use or rental of equipment purchased with project funds
- Royalties from patents and copyrights

UNT may be required to credit program income to the award, and, therefore, OGCA should always be consulted for advice if any income is generated by work under a grant.

## 842.1      Project Reporting

Certain sponsor prescribed actions are required to ensure timely reporting of an award. While requirements vary by sponsor, the following reporting is needed for most projects:

- **Financial Reporting** - OGCA has primary responsibility for preparing and submitting all interim and final financial reports; however, timely reporting usually requires assistance from the PI through their input prior to the reporting deadline. The PI is responsible for ensuring that all expenses charged are accurate and allowable under the terms of the award. For final reports, the PI plays a vital role in assuring that the report (and final invoice) is accurate and submitted by the deadline. Any trailing charges not included in the final invoice will become the responsibility of the PI.

- **Progress Reporting (interim and final)** - Most awards require submission of interim and final progress reports covering the technical aspects of the award. Such reports can vary from a brief summary and list of publications to a complete compilation of project results. The specific reporting requirements are stipulated in the award agreement. The PI is responsible for preparing and submitting progress reports in the correct form (manual or electronic) and by the prescribed deadline. OGCA requests that a copy of the report be forwarded to our office for placement in the award file.

## 850.00      PI Termination Checklist

If you are the PI on any current or ongoing awards and you are leaving employment at UNT, the following steps should be taken.

### Grant Closeout

If you are transferring to another institution and desiring to move grant/contracts(s) to the new institution you should contact your department head to initiate this discussion. Since the award is issued to UNT, whether a transfer will be allowed is determined by the institution and in conjunction with the sponsoring agency. After

the transfer has been approved by the department head, contact OGCA to identify the specific transfer requirements for your project's sponsor. Most frequently on federal awards a final financial report should be submitted that reflects the unexpended balance that could be moved to your new institution. Please work with the OGCA accountant assigned to your award to finalize this balance.

If the grant/contract is to remain at UNT, a new PI must be identified and the sponsoring agency must approve this person. Typically this is accomplished with a letter requesting the change and a copy of the new PI's vitae. A signature from the authorized representative for UNT may be required, depending on the sponsoring agency requirements.

### Equipment

If you are transferring to a new institution, you may want to request transfer of any equipment purchased with grant funding during your employment at UNT. In order to initiate this process you must prepare a listing to be presented to your department head for approval. Any release of equipment will be at the discretion of the department head. A copy of the approved list will need to be supplied to the UNT Fixed Assets Manager so that accurate inventory records can be maintained and the UNT property control tags get removed. For government owned equipment, the underlying grant/contract document will provide the disposition instructions to follow.

### Final Reports and Deliverables

As the PI on a grant/contract it is your responsibility to ensure that the final technical report and any other deliverables as required under the contract documents are delivered to the sponsor within the allowable time frame and prior to your departure from UNT.

### Facilities and Administrative (or IDC) Balances

Once the PI terminates from their position at the university any unexpended funds in the PI's F&A account will revert to the Vice President for Research. If there are ongoing obligations it will be the responsibility of the department to request retention of these funds by supplying an outline of how the funds are to be utilized. The decision to release these funds to the department will be made at the discretion of the VPRED

## 855.00    Closing a Sponsored Project Research Account

### Close-out Notification

Preparing for close-out actually begins upon receipt of an award. The award agreement and prescribed terms and conditions must be reviewed to ensure accuracy throughout the life of the award. Expenditures should be reviewed at least monthly to ensure all charges are appropriate and allowable. Final corrections must be identified and adjusted within 90 days of the award end for most sponsors; however, some sponsors only allow 30 or 60 days.

60 days prior to the end of an award, a notification is sent to the PI by an OGCA requesting that that all required activities be completed to ensure an efficient and timely close out of the project. At this time, a full review of all direct cost categories (salaries, P-Card, equipment, supplies, tuition, etc.) should be completed in preparation for close-out. Generally, all materials and supplies must be received and services rendered prior to the expiration date of the project. It is the PI's responsibility to carefully review the related COGNOS report to verify accuracy of all expenses. All accounts payable and payroll encumbrances must be liquidated prior to the award end date. Vendors should be contacted regarding the status of any unpaid invoices.

PI salary/effort should be reviewed to ensure it has been charged according to the sponsor authorized budget. Payroll appointments that continue past the award end date should be transferred to a different funding source. Verify that hourly employees have been fully paid. Cost sharing should also be reviewed to ensure that the fully committed amount will be expended by the aware end date.

Sub-awards are usually concurrent with the award period of the prime award. The PI is responsible for ensuring that the final invoice is received by the date specified in the award agreement. Sub-recipient invoices that are not received, approved and paid by the required deadline are subject to non-payment and de-obligation.

## 860.00       Audit

When UNT accepts funds from external sponsors, those organizations presume the University will expend the funds for the purposes for which they were given and in accordance with any terms and conditions set forth in the award agreement. OGCA is responsible for coordination of all audits related to externally sponsored awards. The PI may be called upon to participate in the audit as necessary and appropriate. If the PI is contacted directly regarding an audit, OGCA should be notified.

## 861.00       Time and Effort Reporting

Effort reporting is a method of documenting the work time devoted to an externally sponsored grant or contract and is expressed as a percentage of professional activity devoted to a particular account. All individuals who devote effort to grants or contracts, whether or not they are paid, are subject to effort reporting. Effort reporting is required by Federal regulations (OMB Circular A-21) for all compensation/salary costs charged to federal grants and contracts. The regulations require UNT to have a system in place for certifying the allocation of salaries and wages associated with sponsored agreements. UNT employs after-the-fact certification to confirm and substantiate that the activity of an employee supports the compensation charged to federal awards. After each significant term (fall, spring and summer) a time and effort report is submitted by all employees who perform work on the award. Each person must provide a reasonable estimate of the time actually spent working on the project. PIs are responsible for reviewing all time and effort reports to ensure accurate accountability of their own effort and the effort of their staff in a prompt and timely manner. Certifiers must have suitable means of verification regarding the effort expended on the activities they are certifying.

PIs are responsible for understanding and complying with sponsor requirements for notifications regarding changes in personnel and effort. The PI is responsible for ensuring commitments of effort to awards are met within the flexibility allowed in the sponsor's guidelines and in a timely manner. ORS provides training to PI's and departmental research staff on UNT's process for effort reporting as well as on the PI's role and obligations for effort reporting.

When assessing percentage of activity expended on a sponsored project, total effort is defined as actual effort devoted to all the activities for which UNT compensates an employee for their appointment. For faculty, total effort includes instructional activities, public services and research activities. The federal government guidelines acknowledge that, in an academic setting, teaching, research and public service are often inextricably intermingled. A precise assessment of factors that contribute to costs is not always feasible, nor is it expected. Reliance is placed on reasonable estimates in which a degree of tolerance is appropriate. However, the percentage of compensation charged to a federal award during a reporting period can never exceed the percentage of total effort associated with the award. If the percentages shown on the report are inaccurate, the PI must initiate a request to the department administrator to process a prior year salary re-distribution.

# 900.00      Research Integrity and Compliance

The Research Integrity & Compliance unit within the Office of Research & Economic Development (ORED) provides regulatory compliance reviews and interpretive support for the topics described below. Links to the ORED website are included below for each topic, except for two topics (Biosafety and Radiation Safety) which are supported by the UNT Risk Management Services Department; the links for those topics direct you to the RMS website.

## 910.00      Human Subjects Research
The UNT Institutional Review Board (IRB) reviews all proposed research projects involving human subjects to be conducted at UNT or to be conducted at any location by UNT faculty, staff, and students in connection with their institutional responsibilities. Operating under a Federalwide Assurance (FWA) issued by the Office for Human Research Protections (part of the U.S. Department of Health and Human Services), the UNT IRB's primary mandate is to minimize the safety and privacy risks for human participants in research studies, while supporting UNT faculty, staff and students in the conduct of ethical research.  Link to UNT IRB website:  http://research.unt.edu/faculty-resources/research-integrity-and-compliance/use-of-humans-in-research

## 911.00      Animal Care and Use – Research with Live Vertebrate Animals
The primary responsibilities of the UNT Institutional Animal Care and Use Committee (IACUC) are to review all proposed research projects involving the use of live vertebrate animals and to ensure that all personnel involved in animal research have received proper training in the care and use of laboratory or field animals. The IACUC meets several times per year to review all proposed uses of live vertebrates for research and instructional purposes and to inspect (at least semi-annually) all UNT laboratories where live vertebrates are housed for these purposes.  The primary regulators of the UNT IACUC are the Animal and Plant Health Inspection Service (APHIS, part of the U.S. Department of Agriculture) and the Office for Laboratory Animal Welfare (OLAW, part of the U.S. Department of Health and Human Services).  Link to UNT IACUC website:  http://research.unt.edu/faculty-resources/research-integrity-and-compliance/use-animals-research-iacuc

## 912.00      Financial Conflict of Interest for Sponsored Projects
Federal regulations require the university to establish a conflict of interest review procedure with the goal of promoting objectivity in funded research. An annual online disclosure by all Principal Investigators, Co-Investigators, and other key personnel involved in proposed or awarded externally sponsored research projects is reviewed by the Research Integrity Officer, who determines if referral to the Conflict of Interest Review Committee is needed.  The Conflict of Interest Review Committee, composed of five UNT faculty members, reviews investigators' disclosures to determine whether a researcher's Significant Financial Interest could affect the design, conduct, or reporting of the research activities funded or proposed for such funding, and determines what conditions or restrictions, if any, should be imposed to manage such interests. Link to financial conflict of interest website:  http://research.unt.edu/faculty-resources/research-integrity-and-compliance/financial-conflict-interest

# 913.00       Research Misconduct

Federal regulations require that UNT assume primary responsibility for the investigation of allegations of research misconduct and that UNT adequately protect the rights of those who report allegations of research misconduct as well as those who are accused of such misconduct.  The UNT Research Misconduct Policy describes the roles of the Deciding Official, the Research Integrity Officer, the Inquiry Committee, and the Investigation Committee in the review and investigation of such allegations.  The Vice President for Research & Economic Development serves as the Deciding Official and appoints the members of each Inquiry Committee and Investigation Committee.  The Associate Vice President for Research serves as the Research Integrity Officer to administer the procedures set forth in the Research Misconduct Policy.  Link to Research Misconduct website:  [http://research.unt.edu/faculty-resources/research-integrity-and-compliance/research-misconduct](http://research.unt.edu/faculty-resources/research-integrity-and-compliance/research-misconduct)

# 914.00       Export Controls

Export controls laws are federal statutes that control the conditions under which certain information, technologies, and commodities can be transmitted overseas to anyone, including U.S. citizens, or to a foreign national here in the U.S.  These statutes are implemented by the U.S. Department of Commerce through its Export Administration Regulations (EAR), by the U.S. Department of State through its International Traffic in Arms Regulations (ITAR), and by the U.S. Department of the Treasury through its Office of Foreign Assets Control (OFAC).

Export control laws have the potential to impact any researcher at UNT, but export control issues arise most frequently in physical sciences, biological sciences, and engineering.  If a research project involves certain types of technologies as specified in the regulations, the EAR and/or ITAR may require UNT to obtain prior federal approval and licensing before allowing foreign nationals to participate in the research, before partnering with a foreign company, or before sharing research results in any manner (including by publication or presentation at academic conferences) with persons who are not U.S. citizens or permanent resident aliens.  Travel to sanctioned countries or contracting with persons or entities in sanctioned countries or individuals on denied parties lists may be prohibited or limited by OFAC's regulations.  Link to Export Controls website:  [http://research.unt.edu/faculty-resources/research-integrity-and-compliance/export-controls](http://research.unt.edu/faculty-resources/research-integrity-and-compliance/export-controls)

# 915.00       Topics Supported by UNT Risk Management Services Department

## Biosafety

The UNT Institutional Biosafety Committee (IBC) is responsible for reviewing proposed uses of bio hazardous agents, human materials, and recombinant DNA molecules to assess compliance with applicable regulatory guidelines, including the NIH Guidelines for Research Involving Recombinant DNA Molecules.  Uses of these materials must be registered with the Biosafety Officer, and some uses will require IBC review.  Link to Biosafety page on the Risk Management Services Department website:  [https://wiki.unt.edu/display/RMS/Institutional+Biosafety+Committee](https://wiki.unt.edu/display/RMS/Institutional+Biosafety+Committee)

## Radiation and Laser Safety

The UNT Radiation Safety Committee has responsibility for policies and practices regarding the receipt, use, monitoring, and disposal of radioactive material, radiation producing devices, and lasers. Link to Radiation Safety page on the Risk Management Services Department website:  [https://wiki.unt.edu/display/RMS/Radiation+Safety+Committee#RadiationSafetyCommittee-forms](https://wiki.unt.edu/display/RMS/Radiation+Safety+Committee#RadiationSafetyCommittee-forms)