

Policies of the University of North Texas at Dallas	Chapter 13
13.003 Sponsored Project Awards	Research

Policy Statement. In accepting a sponsored project award, UNT Dallas is legally committing itself to fulfill the purposes and requirements of the sponsored project through use of University personnel, resources, and facilities. This policy sets out requirements for the negotiation and acceptance of grants and contracts related to sponsored project awards.

Application of Policy. Faculty and staff engaged in sponsored project activities.

Definitions.

1. **Award.** “Award” means a grant, contract, subcontract, subgrant, or cooperative agreement that provides funding from an external sponsor of a sponsored project and is entered into between the sponsor and UNT Dallas.
2. **Contract.** “Contract” means any written agreement or other document that creates a legally binding obligation, financial or otherwise, for UNT Dallas. Contracts related to sponsored project activity can include, but are not limited to: documents with the title of contract, agreement, memorandum of understanding, affiliation agreement, cooperative agreement, grant, interagency contract, professional services agreement, letter agreement, letter of intent, nondisclosure agreement, material transfer agreement, or a purchase order.
3. **Cooperative Agreement.** “Cooperative Agreement” means a contract between the sponsor and UNT Dallas that provides funding when substantial interaction between the sponsor and UNT Dallas is anticipated during the performance period.
4. **Funding.** “Funding” means financial support for a sponsored project, including money, property, services, or anything of value in lieu of money.
5. **Gift.** “Gift” means a voluntary, philanthropic transfer of assets received from an individual, a corporation, a foundation, or other organization. A gift may be made through a number of vehicles, including but not limited to cash, stock, estates, trusts, in-kind, and real estate. Outside parties often use the terms gift and grant synonymously. UNT Dallas shall interpret the use of these terms by outside parties in a manner that will accomplish the intent or purpose for which funds are given (funds designated as a grant by a donor shall be treated as gift funds if they meet the definition of a gift).
6. **Grant.** “Grant” means an award of financial or other type of funding assistance to accomplish a public purpose. In the context of sponsored projects, the funding

provided by a grant is designated by the external sponsor to be used for a specific sponsored project activity, thus serving a specific interest or objective of the sponsor.

7. OMB Circular A-21. “OMB Circular A-21” means United States Office of Management and Budget (OMB) Circular A-21, “Cost Principles for Educational Institutions,” relocated to 2CFR, Part 220, as revised or superseded.
8. OMB Circular A-110. “OMB Circular A-110” means United States Office of Management and Budget (OMB) Circular A-110, “Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations,” relocated to 2 CFR, Part 215, as revised or superseded.
9. OMB Circular A-133. “OMB Circular A-133” means United States Office of Management and Budget (OMB) Circular A-133, “Audits of States, Local Governments and Non-Profit Organizations” and August 2017 Compliance Supplement, as revised or superseded.
10. Instruction Project. “Instruction Project” means any project involving teaching or training activities funded by an externally sponsored grant or contract, excluding research training activities, which are considered “Research” projects.
11. Principal Investigator (PI). “Principal Investigator” or “PI” means a single individual who, in the event of an award from an external funding agency, shall have the full and final responsibility for the conduct of the project as proposed and as set forth in the award.
12. Public Service Project. “Public Service Project” means any project involving activities other than instruction or research such as public health and community service projects.
13. Research Project. “Research Project” means a systematic study directed toward a fuller scientific knowledge or understanding of the subject studied. It also involves the training of individuals in research techniques where such activities utilize the same facilities as other research activities.
14. Sponsor. “Sponsor” means any external entity that provides funding to UNT Dallas for sponsored projects. Sponsors may be (i) governmental agencies (for example, federal, state, or local governments or their administrative organizations); (ii) nonprofit organizations (for example, universities, nonprofit corporations, foundations, or associations); (iii) for profit organizations (for example, corporations, partnerships, sole proprietorships, and other business entities); or (iv) individuals. Governmental, nonprofit, and for profit sponsors are sometimes referred to by themselves and others as “agencies”.

15. Sponsored Project. “Sponsored Project” means a project funded by an external sponsor through an award with UNT Dallas, where one or more of the following obligations apply (examples of sponsored projects include but are not limited to instruction projects, public service projects, or research projects):
- a. Financial Obligation – UNT Dallas is required to comply with conditions imposed when a sponsor awards funding for the performance of services or delivery of products described in a statement of work;
 - b. Regulatory Obligation – UNT Dallas is required to comply with sponsor regulations, which may include federal or state regulations;
 - c. Reporting Obligation – UNT Dallas is required to provide to the sponsor technical performance reports or regulatory or administrative reports;
 - d. Performance Obligation – UNT Dallas is required to perform within a certain period and may be required to meet other specified requirements related to performance;
 - e. Accounting Obligation – UNT Dallas is required to establish a separate accounting record of project accountability, to provide financial reports to the sponsor, and to preserve appropriate records for audit purposes.
16. Uniform Guidance. “Uniform Guidance” means *OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR Part 200, et al.* The Office of Management and Budget (OMB) issued *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* in the *Federal Register*. The Uniform Guidance replaces the administrative, accounting, and audit rules and principles currently promulgated in the OMB Circulars, including A-21, A-110, and A-133. The Uniform Guidance took effect on December 26, 2014.

Procedures and Responsibilities.

1. Faculty and staff members interested in engaging in sponsored project activities shall ensure completion of the proposal submission process set forth in UNT Dallas Policy 13.002, *Sponsored Project Proposals*, prior to the initiation of negotiation of a grant or contract with an external sponsor.

Responsible Party: Faculty and staff members engaged in sponsored project activities

2. An external sponsor normally notifies the Office of Sponsored Projects of a sponsored project award. In the event that such notification is provided to faculty and staff members engaged in sponsored project activities, they shall be responsible for

forwarding the award information to the Office of Sponsored Projects. Faculty and staff members engaged in sponsored project activities must allow the Office of Sponsored Projects to take the lead in review and negotiation of the grant or contract for the sponsored project award.

Responsible Party: Principal Investigators; Faculty and staff members engaged in sponsored project activities; Office of Sponsored Projects

3. The Office of Sponsored Projects is the administrative office responsible for reviewing, negotiating, and submitting grants and contracts related to sponsored project awards for signature by external sponsors and the appropriate representative for UNT Dallas. In performing these responsibilities, the Office of Sponsored Projects shall ensure compliance with federal and state laws and regulations, institutional policies, and UNT System Regents Rules.

Responsible Party: Office of Sponsored Projects

4. In accepting and executing a grant or contract related to a sponsored project award, UNT Dallas is obligated to fulfill the purposes and to meet the requirements of the grant or contract. Grants and contracts related to sponsored projects shall be accepted and entered into in accordance with UNT System Regents Rule 03.900, *Delegation of Authority for Contracts and Agreements* and UNT Dallas Policy 4.002, *Contracts and Agreements*. Sponsored project activity related to a grant or contract shall be conducted in accordance with the terms and conditions of the applicable grant or contract.

Responsible Party: Office of Sponsored Projects; Principal Investigators; Faculty and staff engaged in sponsored project activities

5. Terminology used in a document from an outside party may differ from definitions provided in UNT Dallas policies. In general, regardless of terminology that may be used in any funding document entered into between another party and UNT Dallas, a funding award shall be classified and treated as a grant or contract coming under this policy when one or more of the following characteristics exist:
 - a. Funding received is for an activity that meets the definition of a sponsored project as provided in this policy and in Office of Sponsored Projects guidelines;
 - b. Funding includes federal or state funding or pass-through funds from a federal or state entity;
 - c. The funding award refers to specific protocols or regulations that involve the use of human subjects, vertebrate animals, radioisotopes on humans, hazardous

waste, recombinant DNA, human body parts, or substances or etiologic agents or proprietary materials.

Responsible Party: Office of Sponsored Projects; Principal Investigators; Faculty and staff engaged in sponsored project activities

6. Federally sponsored agreements issued prior to December 26, 2014 are subject to OMB Circulars A-21, OMB Circular A-110, and OMB Circular A-133 . Federally sponsored agreements issued December 26, 2014 and later are subject to the Uniform Guidance. A federal sponsor may require adoption of the Uniform Guidance for awards made prior to December 26, 2014, in which case the Uniform Guidance shall apply.

Responsible Party: Office of Sponsored Projects; Principal Investigators; Faculty and staff engaged in sponsored project activities

7. Pre-award costs are allowed by most agencies. If a PI determines that pre-award costs are necessary for the project, the PI will initiate the Prior Approval Form for Pre-Award Costs. If costs incurred prior to the start date are disallowed by the granting agency or an auditing agency, the Principal Investigator, Department Chair, and Dean shall be responsible for finding an alternative source of funds to cover the costs incurred. .

Responsible Party: Office of Sponsored Projects

8. Prior to the acceptance or execution of a grant or contract related to a sponsored project, the PI and the Office of Sponsored Projects share responsibility for determining whether a sponsored project and restrictions imposed on the University by the award are consistent with the University's policies, its mission, its capabilities and capacity, and its commitment to free and open inquiry. The PI and the Office of Sponsored Projects share responsibility for reviewing the grant or contract for accuracy, validity, and conformity with federal, state, System, institutional, and sponsor rules, regulations, policies, and guidelines with respect to the administrative, fiscal, and scientific information included in the grant or contract. Finally, the PI and the Office of Sponsored Projects share responsibility for determining that UNT Dallas is able to comply with its obligations as set forth in the grant and contract; and ensuring conflicts of interest related to the grant or contract have been disclosed and mitigated in accordance with applicable institutional policies. The Office of Sponsored Projects shall provide the PI with a copy of a draft of the grant or contract related to a sponsored project activity for review and comment prior to execution of the grant or contract. The PI shall review the grant or contract to identify any problematic terms or conditions and to ensure the PI's ability to perform in accordance with the terms and conditions of the grant or contract.

Responsible Party: Principal Investigators, Office of Sponsored Projects

9. In accordance with Regents Rule 03.900 *Delegation of Authority for Contracts and Agreements* and UNT Dallas Policy 4.002 *Contracts and Agreements*, the Office of Sponsored Projects shall obtain authorized signatures on the final grant or contract from the appropriate representative for UNT Dallas and the external sponsor. The Office of Sponsored Projects shall provide a copy of the fully executed grant or contract to the PI.

Responsible Party: Office of Sponsored Projects

10. The Office of Sponsored Projects shall maintain official files of each sponsored project award, which shall include the applicable grant or contract, in accordance with the terms of the grant or contract, UNT Dallas Policy 4.003 *Records and Information Management*, and applicable federal and state regulations; and shall continue to do so until conclusion of the sponsor audit or audit vulnerability period and the conclusion of the record retention period set out in UNT Dallas Policy 4.003 *Records and Information Management*. During this period, the Office of Sponsored Projects Accounting shall maintain the accounting records and documentation of expenditures for a grant or contract related to a Sponsored Project award.

Responsible Party: Office of Sponsored Projects, Office of Sponsored Projects Accounting

References and Cross-references.

UNT System Regents Rule 03.900, Delegation of Authority for Contracts and Agreements
UNT System Regents Rule 09.100, Gifts and Grants
UNTD Policy 4.002, Contracts and Agreements
UNTD Policy 4.003, Records and Information Management
UNTD Policy 9.002, Fundraising and Private Support
UNTD Policy 13.001, Sponsored Projects
UNT Policy 13.002, Sponsored Project Proposals

Forms and Tools.

Office of Sponsored Projects Standard Agreement Forms
Principal Investigator Handbook

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