



Pre- and Post-Award Procedures and Responsibilities for Externally Funded Projects

The Office of Institutional Effectiveness (OIE) encourages Martin University personnel to seek external funding for sponsored programs that support the University's mission, goals, and objectives. Martin University has designated procedures and responsibilities regarding externally funded projects. These procedures and responsibilities are divided into pre-award and post-award activities and are presented below.

Pre-Award Procedures and Responsibilities

This section contains procedures and responsibilities that need to be considered prior to or during proposal preparation and submission.

1. Obtaining Initial University Approval to Pursue an Externally Funded Project

Martin University personnel interested in pursuing an externally funded project must receive initial internal approval from University officials to pursue a specific source of external funding for a specific project. This process is designed to ensure that potential externally funded projects are consistent with the University's mission, policies, practices, and capabilities. To receive initial internal approval for an externally funded project:

- Obtain from OIE a copy of the Martin University Sponsored Program Initial Internal Approval Form.
- The proposed Project Director should carefully complete the information requested on the form prior to any formal request (e.g., sponsored program proposal) being submitted to the sponsoring agency.
- Obtain the endorsing signatures on the form. Projects involving faculty, staff, or students from more than one department or school must be endorsed by all involved supervisors as outlined in the above procedure.
- Submit the completed and signed Martin University Sponsored Program Initial Internal Approval Form to the Vice President for Institutional Effectiveness. The Vice President of Institutional Effectiveness will review the completed form and determine whether additional information or signatures are needed before submitting the document to the Martin University President for final review and approval. Allow five (5) working days for processing.
- Once initial University approval is obtained, the proposed Project Director can prepare documents needed to complete the formal submission to the sponsoring agency. These prepared application materials, information, and documents are based on the guidelines provided by the sponsor. Please note that a finalized proposal may not be submitted to a sponsoring agency until it has been reviewed and approved by Martin University officials. Please see Item ten (10) below *Checklist of Procedures for Submitting Proposals for a discussion of the procedures and approvals needed before formally submitting a finalized proposal to a sponsoring agency.*

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2. Released Time

Commitments of Martin University staff and faculty time to work on a sponsored program will be permitted if approved in advance by the direct supervisor of the person requesting release time. In most cases, the sponsored program should fully reimburse the University for that portion of personnel time that is being released. Faculty members are expected to request reimbursement for time allocated to sponsored programs, even though the percentage of time allocated may not call for a further reduction of course load.

3. Overloads

Martin University staff and faculty may not be paid additional sponsored program compensation beyond their salary or rate of pay except in cases where there are clearly defined extra duties.

4. Human Participants

All proposed research involving human participants conducted under the auspices of a department, program, or research project within the University requires approval or exemption from the Martin University Institutional Review Board (IRB) before beginning the research. Research involving human subjects is required by federal regulation [45 CFR 46.102] to be reviewed and approved or declared exempt by the Martin University IRB prior to submitting a proposal for extramural funding to support such research. All protocol and other documentation needed for the review must be submitted to the IRB, which meets on a regular basis. (See IRB Manual for detailed procedures.)

5. Use of Scheduled Substances

Any research project using controlled substances must receive specific clearance. Therefore, if your proposal involves the use of controlled substances, the Vice President of Institutional Effectiveness should be contacted to begin procedures so that Martin University can gain clearance to purchase and maintain the identified controlled substances. Clearance to purchase and maintain controlled substances can take several months.

6. Patent, Copyright and Publication Rights

Martin University's efforts in this regard are aimed at protecting rights of Martin University personnel working on a sponsored program. Martin University personnel rights to patent, copyright and publish the results of research should not be unduly restricted by the terms of the sponsored program. The Vice President of Institutional Effectiveness should be contacted if the Project Director believes that his/her rights to patent, copyright, and/or publish results are being unduly restricted by the sponsor.

7. Cost Sharing and Matching Finds

For those programs that require cost sharing and/or matching funds, appropriate discussions must be concluded prior to proposal submission. Contact the Vice President of Institutional Effectiveness to initiate this discussion. Any type of cost sharing and/or matching fund commitment on the part of the University must be cleared in writing by the Martin University President.

8. Indirect Costs

Martin University does not currently have a federally negotiated indirect cost rate. The proposal submitter should refer to submission guidelines of the specific sponsored program to determine the

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indirect cost rate for institutions without a federally negotiated indirect cost rate. If needed, please contact the Vice President of Institutional Effectiveness for assistance with this part of the budget. All sponsored program proposals should contain funding for indirect costs if such costs are allowed by the agency. Deviations from requesting allowable indirect costs must be approved in writing by the Martin University President.

9. Fringe Benefits

Martin University personnel benefits vary but must be charged to the sponsored program in proportion to the salaries that are given. Proposal submitters should request fringe benefit amounts of the personnel proposed to work on the sponsored program from the Martin University Vice President for Fiscal Affairs.

10. Checklist of Procedures for Submitting Proposals

The procedures outlined here are designed to satisfy informational needs within Martin University and to assure that contractual obligations implied in written proposals are in harmony with the University's mission, policies, practices, and capabilities.

In order to gain approval for submission of a finalized proposal to an off-campus sponsoring agency, the submitter must:

- Have received initial University approval to pursue the project and funding by completing the Martin University Sponsored Program Initial Internal Approval Form.
- Submit the original proposal with the guidelines to the Vice President of Institutional Effectiveness, allowing ten (10) working days for review and processing. The purpose of this review is to ensure that the requested information from the sponsor is included, that the proposed program goals, objectives and activities can be appropriately executed and managed by the University, that the proposed program goals and activities are in compliance with University's mission, policies, practices, and capabilities, and the fiscal details of the proposal are in accord with the procedures of the University and of the sponsoring agency. During the review process, the Project Director may be asked to respond to questions, provide additional information, and make revisions to the application materials.
- Once satisfied that the proposal is in order, the original and all signature forms will be forwarded to the Martin University President for final review and approval.
- Once the finalized proposal has been approved by the Martin University President, the Project Director may submit the proposal to the sponsoring agency. Additional consultation related to submission of proposals through federal electronic systems is available by contacting the Vice President for Institutional Effectiveness.

Post-Award Procedures and Responsibilities

This section contains procedures that need to be considered after an externally funded project has been awarded.

1. Notification of the Award

After favorable action on an application, a "Sponsored Program Award" or similar document is ordinarily issued by the sponsor. Notification of Sponsored Program Award, when received, should be brought to the attention of the OIE. Upon receipt of such documents, the OIE, Office of Fiscal Affairs (OFA) and Project Director will collaborate to develop a project budget and sponsored program account that meets all terms and conditions of the sponsoring agent. In most instances, a

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signed document must be returned to the sponsoring agent indicating that the University agrees to the terms and conditions of the award. This document is most often signed by the University President. However, the University President may defer the signing of this document to another appropriate University representative.

2. Role of the Project Director

The Project Director is responsible for the administration of project activities identified in the terms and conditions of the externally funded project. The Project Director is responsible for collecting and warehousing information that documents project activities.

The Project Director is responsible for the expenditure of sponsored program funds. In doing so, the Project Director is responsible for ensuring that purchase requisitions are in compliance with specific sponsored program terms and conditions and for compliance with University, state and federal regulations. The Project Director must sign all purchase requisition forms associated with the funded project.

The Project Director is responsible for the transmittal of all payroll forms on employees who will be paid on the program contract. The University Personnel Policy should be followed when hiring new employees.

The Project Director is responsible for generating and submitting internal and external reports about the project.

3. Role of the Office of Fiscal Affairs

The OFA is responsible to the University for the financial administration of all sponsored programs awarded to the University. This responsibility includes the following duties:

a. Establishing an Account

When the OIE receives formal notice of award from the sponsoring agency, the OFA processes this information according to the following steps:

- Establishes a sponsored program account number,
- Works with the Project Director and OIE to prepare a certified budget to be entered into the University accounting system,
- Develops a sponsored program file.

b. Depositing or Electronically Transferring Funds from the Sponsoring Agency

The OFA is responsible for depositing funds and electronically drawing down funds for externally funded projects. Received paper checks for externally funded projects should be submitted to the OFA for processing and deposit. When needed, the Project Director and OIE will work with the OFA to establish the capability to electronically draw down funds. Funds that require paperwork to be submitted for Martin University to have access to the funds are on scheduled draw down days. See Budget Director for information on calendar of draws for each individual sponsored program.

c. Exercising Fiscal Oversight of Sponsored Program Funds

The OFA provides an additional level of budgetary oversight by insuring that requested funds are available in the existing budget, allowable under the existing terms of the program, and a reasonable expenditure of funds.

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(1) Purchase Requisition:

All purchase requisitions for sponsored program accounts must follow the procedures set by the University. All purchase requisition forms require three signatures, one of which must be the Project Director. The second signature must be made by the Budget Director working on the funded project and the third by the Vice President for Fiscal Affairs. If a purchase exceeds \$10,000, the form must also be signed by the President. The completed purchase requisition forms are to be forwarded to the Budget Director for processing. The Budget Director has two (2) business days to forward the purchase requisition to Accounts Payable. Accounts Payable has three (3) business days to enter the information into the University accounting system. All purchase requisitions must be received at least fourteen (14) business days prior to required payment date. If the purchase requisition is reimbursable directly to the faculty or staff member an expense report and receipt(s) are required in addition to the purchase requisition. Personal reimbursements are due to the Budget Director within seven (7) business days of the expense. In general the University discourages the use of personal credit cards. However, if the use of a personal credit card is necessary to make a purchase it requires prior authorization by completing the purchase requisition with best estimate on total amount and signed by the Budget Director. If prior authorization by the Budget Director is not obtained, it is at the University's discretion if reimbursement will be granted.

(2) Payroll Authorizations:

Personnel commitments are handled in accordance with established University salary and wage procedures. Requests for employment are submitted to the Human Resources Department for approval. Once approved the request will be forwarded to the OFA for processing. The Project Director is responsible for ensuring that personnel commitments are within the terms of the award and allowable costs under the sponsored program.

(3) Cost Sharing, In-Kind and Matching:

The Project Director must report to the OFA, with accompanying documentation, all cost sharing, in-kind, or matching fund expenditures obligated to the sponsored program. These records must show how the value placed on the contribution was calculated. The contribution must be verifiable and documented. The OFA will record, track, and verify the cost sharing, in-kind, and matching fund expenditures obligated to the sponsored program.

(4) Budget Revisions and Transfers:

Requests for budget transfers and revisions must be initiated by the Project Director and submitted to the OIE and the OFA for internal approval. Once this approval is obtained, the requested budget transfers and revisions may need approval by the sponsoring agency. It is the responsibility of the Project Director to obtain and document this approval. Upon approval by the OIE, the OFA, and if needed, the external funding agency, the request is entered into the University accounting system. Please see Item 4 below *Sponsored Program Modifications Post-Award* for a more detailed discussion of the procedures and approvals needed for budget revisions.

d. Preparing and submitting financial reports and invoices

When requested, the OFA will provide financial reports associated with externally funded projects for internal and external use. These requests will typically be made by the Project Director or OIE.

e. Providing support to faculty, staff, students and the University business offices for the financial administration of sponsored programs.

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4. Role of Office of Institutional Effectiveness

Once a project is externally funded, the OIE will provide oversight and support of activities supporting the project and its budget administrated by the Project Director. In this sense, the OIE will serve in a sponsored program management capacity. The OIE will also provide support to program personnel and the OFA on program related issues.

5. Sponsored Program Modifications Post-Award

All requests for modifications to externally funded sponsored programs post-award must receive internal approval. Such requests are processed through the OIE.

Internally, all personnel and time commitment changes must be approved by the appropriate supervisor, Human Resources Department, and the OIE. Proposed budget reallocations or changes must be approved by the OFA and the OIE, prior to the expenditure, *not after the fact*. Proposed changes must be submitted to the OIE in writing and should contain the following:

- The nature of the requested change (i.e., budget transfer, change of personnel),
- A detailed justification for the proposed changes(s),
- A signed endorsement by the Project Director and in the case of personnel changes, all other appropriate supervisors.

After review by the OIE, if the request can be approved internally, it will be forwarded to the Martin University President for final review and approval.

The extent to which modification may occur in funded project's activities, paid personnel, or budget after an award vary widely from sponsor to sponsor. Prior approval for changes may need to be obtained from the sponsoring agency. The Project Director will work with the sponsoring agency to determine if a proposed change needs prior approval, and if so, the Project Director will complete the necessary steps to obtain change approval from the sponsoring agency.

If sponsor approval is required, internal approval must first be obtained before requesting a change to the sponsor. Once internal approval is obtained, a written request to the sponsor for approval of changes to approved budgets, personnel, project timelines or other project needs should be sent to the sponsor through the Project Director. The requests should include a detailed statement of justification and a copy of a revised budget when appropriate. When written approval is received from the sponsor, the Project Director will forward a copy of the approval to the OIE.

6. Changes in Human Subjects Protocol

Changes in Human Subject Protocol must be approved by the IRB for the Protection of Human Subjects from Research Risks.

7. Human Resources

Contact the Human Resources Department for established University procedures which must be used in hiring all persons to be supported with sponsored program funds.

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Remember: Project Directors should have all payroll authorizations approved before an employee starts to work. Questions regarding position classifications and salary and wage procedures should be discussed with the Human Resources Department.

8. Documentation

The Project Director is responsible for maintaining adequate documentation associated with all aspects of the sponsored program. This documentation includes but is not necessarily limited to:

- The execution of specific program activities (e.g., logs, publications, press releases),
- All obligated cost sharing required by the sponsoring agency,
- Budget expenditures for supplies, materials, travel, professional development and services,
- Participation in professional development activities.

9. Reporting

Practically all sponsors require a final, comprehensive report upon completion of a project. The one exception is when a project is continued, in which case an interim report may also be required. There is ordinarily a firm due date for final reports, and sponsors properly expect to receive the report on or before that date. If, for reasons beyond the Project Director's control, the report will be delayed, a letter should be transmitted to the sponsor explaining the reasons for delay and requesting a time extension. The formal response from the sponsoring agency regarding the time extension request should be kept by the Project Director and a copy forwarded to the OIE. Please be mindful that a delay in submission of the final report may delay payment to the University by the sponsoring agency and thus create a financial hardship for the University. It is also a very real probability that both the Project Director's and the University's image with the sponsor may be damaged by a delay in a final report. Therefore, delays in final report submission are strongly discouraged.

10. Program Income

For sponsored programs with income, please consult the OIE.

11. Closing Sponsored Program Account

Prior to the termination of a sponsored program, the Project Director, the OFA and the OIE should review the program for available funds, deficit balances, accuracy of the account and outstanding encumbrances. If an extension of the program beyond the ending date is needed, a written request should be submitted to the funding agency by the Project Director after consultation with the OIE. The formal response from the funding agency to the extension request should be kept by the Project Director, and a copy should be forwarded to the OIE.

12. University Commitments after Sponsored Program Expiration

Any commitment of the University to support a program at any level after expiration of the program period must be cleared in writing by the Martin University President. Upon expiration of a sponsored program the Project Director must follow the rules and regulations outlined for federally sponsored programs for use and disposition of materials, supplies and equipment. If no such rules and regulations exist is up to the Martin University President's discretion how best to utilize these resources.

13. If a Proposal Is Not Funded

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If a submitted proposal is not funded, you are entitled to know why funding was denied. Some agencies include reviewers' comments with the declination notice and others will provide them when requested by the Project Director. Many agencies permit resubmissions and some even encourage them with proposals having a basically sound idea but a design that may require some revision.