

***Policies for Proposals, Acceptance, and Use of
Externally Funded Grants and Contracts
and
Policies for the Conduct of Research***

Prepared for
The University of North Alabama

By
The Office of Grants and Sponsored Programs
<http://www.una.edu/sponsored-programs>

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Approved 10/21/2020; updated 11/18/24 (JDG)

Table of Contents

- 1 General Policies 5
 - 1.1 Mission Statement..... 6
 - 1.2 Organization of the Office of Grants and Sponsored Programs.. 6
 - 1.2.1 OGSP Primary Roles and Responsibilities..... 6
 - 1.2.2 Relationship to Grants and Contracts Accounting..... 6
 - 1.2.3 Supplemental Guidance and Official Websites.. 6
 - 1.3 Fidelity to Law, Regulation and Contract Obligations..... 7
 - 1.4 Principal Investigator’s Responsibility for Proposal Development and Award Administration; OGSP and OGCA to Assist..... 7
 - 1.5 Assumption of Responsibility..... 7
 - 1.6 Subrecipient Monitoring..... 7
 - 1.7 Official Communications..... 7
 - 1.8 Compliance Policies..... 8
 - 1.9 Adoption and Amendments..... 8
 - 1.10 Acronyms..... 8
 - 1.11 Definitions..... 8
 - 1.11.1 Principal Investigator (PI), Co-Principal Investigator and Faculty Participants: the Principal Investigator 8
 - 1.11.2 Institutional Base Salary (IBS) 8
 - 1.11.3 Institutional Base Salary Rate..... 9
 - 1.11.4 Extra Service Pay..... 9
 - 1.11.5 Voluntary Committed Cost Share 9
 - 1.11.6 Voluntary Uncommitted Cost Share 9
- 2 Pre-Award Development Policies..... 9
 - 2.1 General Roles and Responsibilities..... 9
 - 2.1.1 OGSP..... 9
 - 2.1.2 The Principal Investigator..... 9
 - 2.1.3 The College Dean and Department Head (or Vice President) 9
 - 2.2 Principal Investigator to Coordinate with OGSP..... 9
 - 2.3 Proposal Approvals Required, OGSP Review and Submission Required..... 9
 - 2.3.1 Full Proposal Deadline..... 10
 - 2.3.2 PI to Remain Available..... 10
 - 2.3.3 Effect of Missed Deadlines. 10
 - 2.4 Budget Preparation..... 10
 - 2.4.1 Budget to Describe Proposal in Detail..... 10

2.4.2	Budgets to Be Approved.	10
2.4.3	Treatment of Direct and Indirect Costs to Be Consistent.	10
2.4.4	Cost Sharing.	10
2.4.5	Cost share in excess of \$250,000 per year (\$500,000 aggregate) per vendor to be approved by the University Board of Trustees.	10
2.4.6	Cost Share Tracking.	11
2.5	Personnel Considerations for Proposals.	11
2.5.1	Salary to Include Allowance for Fringe Benefits.	11
2.5.2	Salary Budgets to Reflect Estimate of Time and Effort and Base Salary Rate.	11
2.5.3	Institutional Base Salary and Institutional Base Salary Rate.	11
2.5.4	Academic Year Defined.	11
2.5.5	Federal Grants Prohibited from Increasing Institutional Base Salary during Academic Year.	11
2.5.6	Payment of Extra Service Pay to Faculty During the Academic Year.	11
2.5.7	Payment of Stipends to Faculty for Periods Outside the Academic Year (Summer Pay).	11
2.5.8	Intra-Institution of Higher Education Consulting.	12
2.5.9	Course Releases.	12
2.5.10	Restrictions on Salary Expenditures by Certain Agencies.	12
2.5.11	Level of Effort Required for Grants and Sponsored Programs Permitting Direct Salary Payments (Cost Share and Voluntary Committed Cost Share).	12
2.5.12	Level of Effort Required for Programs Without Cost Share Requirements or That May Limit Direct Salaries (Voluntary Uncommitted Cost Share).	12
2.5.13	Restrictions on Direct Charges for Clerical and Administrative Staff.	13
2.6	Indirect Cost Considerations for Proposals.	13
2.6.1	Proposals to Include Indirect Cost Recovery.	13
2.6.2	Alternative Indirect Cost Rates and Indirect Cost Recovery.	13
2.6.3	On Campus and Off Campus Indirect Costs.	13
2.6.4	Indirect Cost Distributions.	13
2.6.5	Negotiations Related to Indirect Cost Distributions.	13
2.7	Other Considerations for Proposals.	14
2.7.1	Data Management Plan.	14
2.7.2	Equipment Costs.	14
2.7.3	Computer Equipment Purchases.	14
2.7.4	Certain Direct Charges Disallowed.	14
2.7.5	Travel.	14
2.7.6	Subrecipient Contracts.	14
2.7.7	Program Income.	14

2.7.8	Scholarships.	15
2.7.9	Office of University Advancement and UNA Foundation Involvement in Awards.	15
3	Post Award Management and Compliance Policies	15
	Introduction.	15
	3.1. Establishing a New Award.	15
3.1.1	PI to Notify OGSP of New Award.	15
3.1.2	OGSP to Coordinate Acceptance.....	15
3.1.3	OGSP to Participate in Any Contract Negotiations.....	15
3.1.4	OGSP to Request Banner Account.....	16
3.1.5	PI to Participate in Kickoff Meeting with OGSP and OGCA.....	16
3.1.6	PI to Execute Statement of Agreement or Assignment Approvals.....	16
3.2	Time and Effort Reporting.....	16
3.3	Financial Oversight.....	16
3.3.1	The Principal Investigator to Monitor Budgets, Obligations, and Expenditures.	16
3.3.2	Regular Review of Budgets Required.	17
3.3.3	General Conditions of Fiscal Control.....	17
3.3.4	The Principal Investigator Solely Responsible for Certain Actions.	17
3.3.5	Cost Share Tracking.....	18
3.4	Procurement Actions.	18
3.5	Award Actions Requiring Prior Approval.	18
3.5.1	Budget Changes.....	19
3.5.2	Changes to Scope of Work.	19
3.5.3	Assignment of New Principal Investigator.	19
3.6	Grant Closeout Policies.	19
3.6.1	Indirect Cost Distribution.	19
3.6.2	Residuals.	19
3.6.3	Notifications for Human Subjects Review and Animal Use Committee.	19
3.6.4	Data Management.....	19

I. POLICIES FOR PROPOSALS, ACCEPTANCE AND USE OF EXTERNALLY FUNDED GRANTS AND SPONSORED PROGRAMS

1 General Policies

Introduction:

The University of North Alabama, through the [Office of Grants and Sponsored Programs](#) (OGSP), supports the acquisition of external grants and contracts to help University faculty and staff fully participate in research and service activities. The OGSP helps faculty and staff with associated grant and contract pre-award activities such as locating funding sources, reviewing proposals, obtaining appropriate endorsements, and other related efforts. The OGSP also participates in the post-award administration of grants and contracts as well as maintaining and administering such institutional policies as the Intellectual Property Policy, policies of the Institutional Review Board for research involving human subjects, Research Misconduct and Conflict of Interest policies, and the Animal Care and Use Policy. Federal and state agencies require these programs, which provide the ethical framework within which the University of North Alabama manages research and related results. In addition, this office provides guidance on meeting requirements for fiscal compliance, record keeping, reporting and evaluation.

The [Office of Grants and Sponsored Programs](#) (OGSP) can assist faculty to [secure external funds](#) that will advance the University of North Alabama's mission as a teaching, research, and service institution. This includes research to advance understanding of education, pedagogy, and educational processes; research to expand the scientific and technological base and to support both basic and applied research; and proposals that extend the service reach of the University to adjacent communities and beyond. These efforts include opportunities for community service, collaboration in pursuit of economic, community, and workforce development as well as proposals that extend the academic expertise of the University outward for the benefit of the State of Alabama, local communities and the public at large. The [Office of Grants and Sponsored Programs](#) assists faculty to [identify funding opportunities](#), [develop proposals](#), [prepare budgets](#), and to strengthen proposals. The OGSP will also submit proposals requiring an organizational account and centralize proposal review and submission processes. The office can serve as a liaison between the principal investigator and various stakeholders and assist with research compliance including [human subjects \(IRB\) reviews](#), conflict of interest, and other research policies.

The University of North Alabama and its external grants and sponsored programs are governed by numerous laws and regulations. These include the requirements of federal grants imposed by law and regulation of the U.S. Government and its various departments, the laws of the State of Alabama, and the contractual obligations, terms, and conditions of respective grant agreements. Each award of funds from external sources carries with it a contractual obligation to obey the terms and conditions specified by the external funder. The [Office of Grants and Sponsored Programs](#) will assist to administer these as they may apply, separately or collectively, to each award.

In addition to external authority, OGSP actions are subject to all internal UNA policies. This includes all policies related to human resources and financial management, including the [Faculty Handbook](#), [Staff Handbook](#), and the financial management policies of the Office of Business and Financial Affairs, [Controller's Office](#), and Office of [Purchasing/Grants & Contracts Accounting](#) of the University. Although the infusion of grant management and oversight requirements may alter procedures to the extent necessary to adequately and accountably administer external funds, procedural decisions shall be guided by the appropriate policies, and deviations in procedure shall be allowed only when approved by

appropriate legal, administrative, or financial personnel. While procedures may vary in some circumstances, deviations from UNA policy will not be allowed.

1.1 Mission Statement. To promote a culture connecting the University of North Alabama to external supporters sharing the University's mission and values of teaching, research, and service.

1.2 Organization of the Office of Grants and Sponsored Programs. The Office of Grants and Sponsored Programs (OGSP) is located in the Academic Affairs Division of the University of North Alabama. The OGSP is headed by the Director of Grants and Sponsored Programs, who is the principal administrative representative of the University of North Alabama for grants and sponsored programs. The Director of OGSP acts as the University's Authorized Organizational Representative, or equivalent, for each grant-making agency with which the University of North Alabama may contract. The Director of OGSP is the principal contact for all activities related to pre-award proposal development. The Office of Grants & Contracts Accounting is the principal contact for post-award financial activities, and OGSP assists to administer awards and to develop policies related to grants and sponsored programs at the University of North Alabama.

1.2.1 OGSP Primary Roles and Responsibilities. The Office of Grants and Sponsored Programs will help UNA faculty and staff to prepare grants for submission, assisting to develop proposal budgets and proposal content, to complete administrative, technical, and financial reviews, to assist the Institutional Review Board (IRB) or equivalent to conduct human subjects reviews, to submit completed proposals, and to administer funded projects. The OGSP endeavors to maintain accurate and timely communications with potential applicants regarding the availability of funding opportunities. In addition, the OGSP coordinates policies related to the pursuit of grant funds, compliance with regulation and contractual obligations of funders, and the integration of external requirements with the internal processes necessary for accountability and efficiency in the conduct of research and service activities funded by external sponsors.

1.2.2 Relationship to Grants and Contracts Accounting. The Office of Grants & Contracts Accounting is the division within the Office of Business and Financial Affairs that is primarily responsible for the financial and accounting functions necessary for the administration of grants and sponsored programs. Most post-award actions are reviewed by both OGSP and OGCA and move from the Principal Investigator in charge of the grant award through the Office of Grants and Sponsored Programs and to the Office of Grants & Contracts Accounting. In addition, the Vice President of Business and Financial Affairs requires the OGCA to review all pre-award budgets before submitting to the funding agency. The grants accounting staff is available to assist with pre-award proposal development questions related to the administration of a proposed grant-funded activity. Separate lines of authority, roles and responsibilities, exist between the administrative (OGSP) and post-award financial accounting (OGCA) functions of grant-funded projects, with both units working as seamlessly as possible to serve and protect the interests of the Principal Investigator, the University, and the funding agent.

1.2.3 Supplemental Guidance and Official Websites. Supplemental guidance may be published periodically to the official websites of the [Office of Grants and Sponsored Programs](#), [Office of Grants & Contracts Accounting](#), and other business offices including

procurement and the Controller to be subsequently incorporated, as appropriate, into these policies and procedures.

- 1.3 Fidelity to Law, Regulation and Contract Obligations.** The UNA OGSP will operate within the authority provided by federal, state, and local law and regulation and the requirements of contractual obligations within awards. The OGSP will not deviate from the requirements of applicable laws and regulations in the course of business. The OGSP staff will not approve the submission of documents or any proposed activity that is in violation of any law or regulation, including but not limited to, financial transactions and reimbursement of expenditures by UNA personnel, or any third party under contract to UNA to perform grant funded activities, that do not comply with policy and regulation. Under rare circumstances, where a question arises regarding the interpretation of these requirements, OGSP policy will be first to seek guidance from internal subject matter experts before seeking guidance from external funders. The OGSP will authorize deviations from policy as interpreted by OGSP in rare circumstances, with written permission from the funder, and only with the concurrence of appropriate UNA legal, administrative, or financial personnel.
- 1.4 Principal Investigator's Responsibility for Proposal Development and Award Administration; OGSP and OGCA to Assist.** Although the OGSP's role is to assist with the development of proposals and the administration of awards, and the execution of that responsibility entails certain checks and balances, the ultimate responsibility for adequately understanding and applying agency rules and regulations in the development of proposals and the administration of awards resides with the project's principal investigator. OGSP has a responsibility to research and resolve questions related to the application of policies and regulations, including the development of policy and policy interpretations to assist the PI, and has an obligation to apply these to the administration of awards. OGCA provides financial management and ensures compliance with contract requirements and university policies prior to authorizing financial transactions related to grants and contracts.
- 1.5 Assumption of Responsibility.** In the event the PIs are unable to complete the terms of an agreement, the funder will be notified to determine if the project can be completed by another PI at the University, or whether the award may be transferred in whole or in part, or cancelled.
- 1.6 Subrecipient Monitoring.** UNA shall be responsible for monitoring performance under external awards and ensuring that all project activity, including that of subrecipients, is compliant with award terms, conditions, and applicable regulations. OGSP shall be responsible for oversight of subrecipient monitoring. In some cases, it may be necessary to determine whether the University's relationship with a third party is that of a contractor-vendor or a recipient-subrecipient to ensure compliance with policies, and OGSP shall assist to determine when subrecipient monitoring is required. OGSP will ensure the subrecipient or its principal agents are not debarred or suspended from receiving federal funds, ensuring the identification of federal awards in subagreements, assist to advise subrecipients of requirements imposed on them by receipt of federal funds for the subaward; requiring access to subrecipient records, monitoring compliance with the terms of the subagreement, and assisting to assess and mitigate the risk of contracting with subrecipients.
- 1.7 Official Communications.** Official communication with regard to grants and sponsored programs shall be by University email or by memo on University letterhead and signed by the appropriate official. Communications by other means, including telephone calls, text messaging, instant messaging applications, or personal communication may be used to communicate informally and expediently, but shall not be considered official communications for the purposes of

documentation or recordkeeping responsibilities of the OGSP and OGCA. The Office of Grants and Contracts Accounting shall receive and transmit all financial reporting. Other official communication will be transmitted by the Director of Grants and Sponsored Programs. PIs are encouraged to include OGSP in routine communications affecting award administration, as well as OGCA in correspondence affecting budgets and financial affairs.

- 1.8 Compliance Policies.** All grants and sponsored programs will follow The University of North Alabama's Drug-Free Workplace Policy; Policy on Conflict of Interest/Financial Disclosures in Research and Other Sponsored Programs; Human Subjects Research Policy; Animal Use Policy; Policy for Record Retention, Data Management, and Ownership; Research Misconduct; and Research Ethics Policy.
- 1.9 Covered Activities, Adoption and Amendments.** This policy shall be in effect for all externally funded grants and sponsored programs proposed, awarded, or accepted by the University of North Alabama. Gifts and donations without contracts and compliance requirements shall be exempt from this policy. This policy shall be in effect from the date of adoption by Shared Governance of the University of North Alabama. Any changes required by law may be approved by the General Counsel and updated with appropriate date of effect without approval by Shared Governance. Other changes that, in the opinion of General Counsel and with approval of the appropriate member(s) of the Executive Council, do not have substantive impact on the rights and responsibilities of employees, may be approved as editorial changes in accordance with the Shared Governance Document of the University of North Alabama.

1.10 Acronyms.

- 1.10.1** Code of Federal Regulations (CFR)
- 1.10.2** Institutional Base Salary (IBS)
- 1.10.3** Institutional Review Board (IRB)
- 1.10.4** Office of Grants and Contracts Accounting (OGCA)
- 1.10.5** Office of Grants and Sponsored Programs (OGSP)
- 1.10.6** Principal Investigator (PI)
- 1.10.7** University of North Alabama (UNA)

1.11 Definitions

- 1.11.1 Principal Investigator (PI), Co-Principal Investigator and Faculty Participants:** The **Principal Investigator** is the primary individual responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service project, contract, or other sponsored project in compliance with applicable laws and regulations and institutional policies. **Co-Principal Investigators (Co-PIs)** are key personnel who may share responsibilities similar to the Principal Investigator while the PI has primary responsibility for the project, Co-PIs are also responsible for compliance. **Faculty Participants** are individuals who may participate in the project but who do not bear direct responsibility for compliance.
- 1.11.2 Institutional Base Salary (IBS)** is the total compensation provided to University personnel for the period of their annual employment contract (typically 9-months or 12-months). IBS includes any administrative supplements such as compensation received as chair of a department but excludes any overload,

overtime, or other additional pay and compensation. See 2.5.3.

1.11.3 Institutional Base Salary Rate is the proportionate share of IBS for the period during which an employee works on an award.

1.11.4 Extra Service Pay is compensation subject to University compensation policies for services above and beyond Institutional Base Salary.

1.11.5 Voluntary Committed Cost Share additional resources voluntarily provided as a commitment to match an award, which become a contractual obligation of the University.

1.11.6 Voluntary Uncommitted Cost Share additional resources voluntarily provided in support of an award, which are not a contractual obligation of the University.

2 Pre-Award Development Policies.

Introduction.

A proposal for external funding has many requirements and commitments that the University must review for compliance with University policies and for feasibility within constraints of current or projected operational needs. Budgets, work plans and proposals, cost sharing requirements, and faculty course releases, in particular, are of concern to financial and administrative officials and, therefore, appropriate personnel must be afforded time to review details regarding these and other aspects of the proposal prior to submission

2.1 General Roles and Responsibilities. Responsibility for preparing a proposal rests with the faculty/staff acting as the Principal Investigator(s), along with the administrators of the University's Departments, Offices, Colleges and Divisions, whose work will be affected by the proposed activities. Prior approval is required by all parties affected by participation in a grant proposal.

2.1.1 OGSP will assist to locate funding and to coordinate planning and resources for grant proposals.

2.1.2 The Principal Investigator is responsible for the proposal and all of the content.

2.1.3 The College Dean and Department Head (or Vice President) must approve the use of resources within their division, including the use of space and financial resources awarded under a grant agreement.

2.2 Principal Investigator to Coordinate with OGSP. The principal investigator is required to coordinate with OGSP for completing the budget and submitting the application. The PI has sole responsibility for the contents of the application and for developing all required supporting documents. However, PIs are strongly encouraged to notify OGSP of their research and grant interest well in advance of the submission deadline, as soon as possible, so that OGSP may assist with researching grant opportunities and help coordinate the planning necessary for the proposal. Beyond reviewing budgets and submitting the proposal, OGSP will assist with the review of proposals and preparing supporting documents at the request of the PI, subject to time and expertise available from OGSP.

2.3 Proposal Approvals Required, OGSP Review and Submission Required. Administrative and financial staff must approve proposed use of University resources prior to submission to funding agencies. Where feasible, OGSP will submit all proposals regardless of the agency to which the proposal will be submitted. The Vice-President of Business and Financial Affairs must authorize the acceptance of all funding prior to submission to funding agencies. PIs are encouraged to

schedule a time for submission and to be present during submission by OGSP. Where direct submission is required or more practical, PIs must still provide copies of all proposal materials and proposal budgets to OGSP for review.

2.3.1 Full Proposal Deadline. Full proposals including final budgets and all supporting documentation must be received by OGSP at least 7 business days prior to the proposal deadline. OGSP staff will submit proposals at least 48 hours in advance of proposal deadline.

2.3.2 PI to Remain Available. The PI must remain available to answer questions between submission of the proposal to OGSP and the final submission to the funder. At their request, the PI may be present for a final review of documents and the final submission. For last minute changes, OGSP will attempt to coordinate revisions with the PI and to resolve any issues identified during submission and final review; however, OGSP cannot be responsible for last minute changes, and may not always be able to accommodate these.

2.3.3 Effect of Missed Deadlines. Failure to meet deadlines for submitting documents to OGSP may affect the submission of the proposal.

2.4 Budget Preparation. The following policies relate to the preparation of the proposal budget.

2.4.1 Budget to Describe Proposal in Detail. All proposal budgets must specify with sufficient detail the proposed activities by the University of North Alabama, its faculty and staff, or any contracts necessary to completing the scope of work.

2.4.2 Budgets to Be Approved. Budgets must be approved by OGSP, OGCA, and the Vice-President of Business and Financial Affairs in advance of submission to the funding agency regardless of the agency to which the proposal will be submitted. A Request for External Funding Proposal Routing Form must be received not less than 7 business days in advance of the proposal deadline.

2.4.3 Treatment of Direct and Indirect Costs to Be Consistent. Federal guidelines require the University to account for charges consistently. With rare exceptions, all charges that are considered direct or indirect costs will be treated consistently as direct or indirect costs. The only exceptions will be those narrowly allowed by federal guidelines and provided for in the written contract or agreement.

2.4.4 Cost Sharing. Cost sharing provided by the University of North Alabama must be approved by the appropriate cost center head and the Vice-President of Business and Financial Affairs prior to submission of any proposal. The university does not normally provide voluntary committed cost share above the committed cost share that is required by a program sponsor, but may do so in circumstances where it favors the University, for example, when additional cost share results in greater competitiveness.

2.4.5 Cost share in excess of \$250,000 per year (\$500,000 aggregate) per vendor to be approved by the University Board of Trustees. The UNA Board of Trustees must approve all contractual relationships and other legal obligations with an annual expenditure of \$250,000 or more per vendor or of \$500,000 total aggregate per vendor executed in the name of the University of North Alabama. Notice of cost share in excess of these thresholds must be provided at least 90 days in advance of the proposal deadline, or with sufficient time to obtain approval. PIs must plan well in advance for programs with this magnitude of cost

sharing required.

- 2.4.6 **Cost Share Tracking.** Salaries and other costs provided as mandatory committed or voluntary committed cost share shall be documented and accounted separately from other departmental expenditures.

2.5 Personnel Considerations for Proposals. The following policies relate to personnel costs included in proposals, including financial and administrative requirements for funding personnel costs in grants and sponsored programs. **(See CFR 200.430)**

- 2.5.1 **Salary to Include Allowance for Fringe Benefits.** All salary budgets must include an allowance for a proportionate share of fringe benefits to be paid as direct costs from grant direct funds.
- 2.5.2 **Salary Budgets to Reflect Estimate of Time and Effort and Base Salary Rate.** All salary budgets are to reflect the employee's effort to be compensated from grant funds as a proportionate share of the employee's institutional base salary.
- 2.5.3 **Institutional Base Salary and Institutional Base Salary Rate.** Institutional base salary (IBS) is the total compensation provided to University personnel for the period of their annual employment contract (typically 9-months or 12-months). IBS includes any administrative supplements such as compensation received as chair of a department but excludes any overload, overtime, or other additional pay and compensation. Institutional base salary rate shall be the proportionate share of the IBS for the period during which the employee worked on an award.
- 2.5.4 **Academic Year Defined.** The academic year shall reflect the contract period for each employee, which is typically either 9 months or 12 months for faculty and 12 months for staff employees.
- 2.5.5 **Grants Prohibited from Increasing Institutional Base Salary.** Direct salary charges to federally funded grants and sponsored research awards will be proportionate to the share of time and effort expended and will be compensated at a rate that does not exceed the employee's institutional base salary rate, except as permitted for interdepartmental consultation. The acquisition or use of grant funds may not solely justify an increase the institutional base salary of employees.
- 2.5.6 **Payment of Extra Service Pay to Faculty During the Academic Year.** Extra service pay is allowed during the academic year, which is normally the full 9 or 12 month period of appointment, and will be paid out at a rate not to exceed institutional base salary rate proportionate to the time and effort expended outside of normal business hours. Faculty on either 9-month or 12-month appointment must certify normal business hours upon request for payment of stipends for extra service pay.
- 2.5.7 **Payment of Stipends to Faculty for Periods Outside the Academic Year (Summer Pay).** Faculty on 9-month appointments may be compensated in excess of normal academic year institutional base salary for sponsored research and grant funded activities that take place outside of the academic year, typically during summer months. A faculty member on 9-month appointment may request up to 50% of the academic year institutional base salary to be compensated outside of the academic year. Total income earned as extra compensation for periods outside of the academic year, including pay for

summer teaching, may not exceed 50% of the academic year institutional base salary. Compensation received for course overloads, online course development, and large class overloads are not counted in the 50% salary cap.

- 2.5.8 Intra-Institution of Higher Education Consulting.** Intra-Institution of Higher Education (IHE) consulting is assumed to be undertaken as an obligation requiring no additional compensation for faculty or staff. However, in unusual cases where the IHE consulting takes place across departmental lines and the work performed is in addition to regular responsibilities and has received approval from the funder, charges for consulting will be allowed at the IBS rate and in addition to normal compensation provided charges are reasonable in comparison to charges for similar services.
- 2.5.9 Course Releases.** A faculty member may request a course release to provide time to work on an externally funded research project or grant. The Department Chair and Dean must approve all course releases whether they are to be paid from grant funds or from internal resources. Course releases included in a proposal budget shall be estimated at a rate of 1/8th of the faculty member's institutional base salary, plus a proportionate share of the cost of fringe benefits, for each course release during the academic year. Funds for releases may be provided from grant or institutional funds. Funds from the same grant may not normally be used for both course release and extra service pay for the same individual at the same time.
- 2.5.10 Restrictions on Salary Expenditures by Certain Agencies.** Certain agencies restrict the amount of grant funds that can be expended on salaries, e.g. NSF restricts total salary compensation to 2 months of an investigator's Institutional Base Salary. Responsibility for budgeting appropriately for the program rests with the application's principal investigator. OGSP will assist to estimate costs and to develop budgets in compliance with all applicable requirements the application's principal investigator.
- 2.5.11 Level of Effort Required for Grants and Sponsored Programs Permitting Direct Salary Payments (Cost Share and Voluntary Committed Cost Share).** Each funded project will require some effort from the principal investigator and other personnel. Where programs permit direct salary charges, the budget proposal shall reflect the level of effort required to conduct program activities and shall include any effort contributed as cost share. Level of effort provided to support grants and sponsored projects is generally aligned with the level of direct salary funding available within the award. However, there are circumstances where cost sharing is a mandatory feature of an award. When this level of effort will be provided as salaries, fringe benefits, or indirect costs that are paid by UNA and provided as cost share or matching funds, then the cost share shall be approved prior to the submission of the proposal, and it shall be included within the proposal or grant agreement. Salaries and other costs provided as mandatory cost share or voluntary committed cost share shall be documented and tracked separately from other departmental expenditures and shall be included in time and effort reported.
- 2.5.12 Level of Effort Required for Programs Without Cost Share Requirements or That May Limit Direct Salaries (Voluntary Uncommitted Cost Share).** If direct salary

payments are restricted by the funder or no cost share is required, then effort may not be committed as voluntary committed cost share above that which is required by the sponsor. The effort actually provided in support of an award then becomes voluntary uncommitted cost share, and the University does not require tracking such contributions as cost share, nor are these considered within time and effort reporting.

2.5.13 Restrictions on Direct Charges for Clerical and Administrative Staff. The salaries of clerical and administrative staff should normally be treated as indirect costs. Direct charges for these costs may be appropriate if *all* of the following conditions are met: the services are integral to the project, the personnel involved can be specifically identified with the project or activity, such costs are explicitly allowed in the federal award or contract, and the costs are not included or recovered through indirect costs.

2.6 Indirect Cost Considerations for Proposals. The following policies apply to indirect cost recovery in grant and sponsored program proposals.

2.6.1 Proposals to Include Indirect Cost Recovery. All grant proposals are to include the full negotiated cost recovery rate currently in effect for the university of North Alabama unless specific rules for the funder do not allow for full cost recovery or approval has been obtained from the funder and the University to utilize indirect cost as cost sharing for a proposal.

2.6.2 Alternative Indirect Cost Rates and Indirect Cost Recovery. Alternative indirect cost recovery must be disclosed as part of the grant budget. Alternative indirect cost considerations may affect the rate of indirect cost distributed to principal investigators and other recipients of indirect cost share upon completion of a project.

2.6.3 On Campus and Off Campus Indirect Costs. Where program activities take place substantially on campus (including within any facility owned by UNA), the proposal budget shall use the indirect cost rate for on campus activities. Where program activities take place substantially off campus, the proposal budget may use the off campus indirect cost rate. Where activities take place on campus and off campus, the proposal shall use the single rate that represents the greatest share of the indirect basis (typically salary and fringe benefits paid) paid at that location. Rates are available on the OGCA website.

2.6.4 Indirect Cost Distributions. At the conclusion of a grant, accrued indirect costs shall be allocated per the Indirect Cost Distribution Policy.

2.6.5 Negotiations Related to Indirect Cost Distributions. Any recipient of indirect cost recovery funds may notify OGSP of their desire to forgo a portion or all of the indirect cost recovered under a grant award. Any changes to indirect cost where a portion of the cost would be voluntarily waived must be approved by the appropriate stakeholder including the Vice-President of Business Affairs, Dean, and Department head. Where indirect cost rates are reduced or are entirely disallowed by the funder, the University reserves the right to reduce indirect cost disbursements for that program or contract in the following order of priority, from first to be reduced to last: Principal Investigator, Department, College Dean, Office of Grants and Sponsored Programs, Office of Business and Financial

Affairs. Where indirect costs are reduced or disallowed, the Department Chair or Dean or Cost Center Head may authorize OGSP to capture and transfer a portion of the PIs indirect cost share from any program in order to pay departmental overhead and indirect costs of grants.

- 2.7 Other Considerations for Proposals.** The following policies apply to other considerations which may be important for proposal development.
- 2.7.1 Data Management Plan.** Every proposal must anticipate the data collection, storage, and retention needs of the project. Federal regulations require retention of financial and research data for a minimum of 3 years; however, agency or research-specific aims may require longer periods, and specific events may trigger longer retention requirements. Many proposals require a formal data management plan. Regardless of the requirement to submit a data management plan, each proposal should anticipate the requirements of the funder and the university about the physical, digital, or other storage of financial and other related data, as well as the retention of results upon separation of the PI from UNA service. All data management shall be compliant with the UNA Policy for Record Retention, Data Management, and Ownership.
 - 2.7.2 Equipment Costs.** Items of equipment (as defined by UNA policy, see purchasing website) require special consideration. Questions related to equipment purchases may be addressed to purchasing@una.edu
 - 2.7.3 Computer Equipment Purchases.** Computer equipment purchases must be coordinated with the UNA Information Technology Services; therefore, prior review of proposed computer equipment purchases is required.
 - 2.7.4 Certain Direct Charges Disallowed.** Items such as office supplies, postage, local telephone costs, and memberships are normally treated as indirect costs in federal awards. However, narrow circumstances may exist where these and similar charges are permitted when those costs are above normal costs and can be directly allocated to an award. Exceptions must be in writing and included in the grant agreement from the funding agency.
 - 2.7.5 Travel.** All travel expensed to grants and sponsored awards must follow the University of North Alabama's Travel Policies. Exceptions may be authorized by certain funders for certain subrecipients and contractors, however, these must be specified in the grant agreement. In certain circumstances, a funding agency may apply a stricter standard than the University, in which case reimbursement will be limited to the amount allowable by the award, except where separate funds are committed (e.g. from departmental resources) to pay the difference in costs allowable by funder and those allowable by UNA.
 - 2.7.6 Subrecipient Contracts.** Costs specified for subrecipient contracts must be included in the proposal budget and the award or agreement. Subrecipients and contractors are governed by the terms and conditions of grants and sponsored agreements and must demonstrate compliance. Subrecipient contracts must be properly procured even when specific vendors or subrecipients are specified within the award.
 - 2.7.7 Program Income.** Income generated by the grant must be considered carefully in its application to the award. For many awards, program income may not be used

as match or cost share against the award that generated it and must be reduced from the total of funds to be reimbursed by the funder. Where income will be generated by an award, contact OGSP for guidance on budgeting and managing the funds.

- 2.7.8 Scholarships.** The cost of scholarships is allowed if the purpose of the program is to provide training; however, scholarships and tuition payments are allowed as compensation for graduate students in certain circumstances (2 CFR § 200.466).
- 2.7.9 Office of University Advancement and UNA Foundation Involvement in Awards.** Where UNA Foundation is engaged as part of an award, all proposals must have approval of the UNA Office of University Advancement. Prior to submission of a proposal requiring the participation of the UNA Foundation, OGSP and the Office of University Advancement must determine the responsibility for managing the award, the location of accounts for funding, and the stipulations for UNA Foundation's participation.

3 Post Award Management and Compliance Policies

Introduction.

Responsibility for administering an award is shared by OGSP, the Office of Grants & Contracts Accounting (OGCA), and faculty/staff acting as the Principal Investigator(s), along with the administrators of the University's Departments, Offices, Colleges and Divisions, whose authorization is required for the administration of financial and other tasks associated with a grant's scope of work. The Office of Grants & Contracts Accounting is responsible for monitoring and oversight of all post-award financial transactions. Grant administration, potentially, interacts with every aspects of University administration, from finance, purchasing and procurement, human resources, facilities administration, to public relations and marketing, and many more. The role of the PI is to have overall responsibility for the award, while OGSP serves as a resource to both navigate the University's administrative processes and to enforce policies that protect the University in cooperation with the Office of Grants & Contracts Accounting. The website of the [Office of Grants & Contracts Accounting](#) maintains an up to date list of post-award finance procedures, which should be monitored by PIs.

- 3.1 Establishing a New Award.** Prior to commencing any funded activities under a new award, the award must be officially accepted and established within the University's financial management system.
 - 3.1.1 PI to Notify OGSP of New Award.** As soon as practicable upon being notified that an award has been approved by the funder, the Principal Investigator shall notify OGSP. The PI should be aware of any contracting requirements, signatures to be obtained, and deadlines to be met to accept the award.
 - 3.1.2 OGSP to Coordinate Acceptance.** The OGSP will obtain all necessary signatures and, if required, will provide an official acceptance to the funding agency. Authorization of the Vice President of Business and Financial Affairs or President of the University are required for the acceptance of all external funding.
 - 3.1.3 OGSP to Participate in Any Contract Negotiations.** The OGSP must participate in contract negotiations, sharing responsibility with the PI to ensure that no contract clauses are beyond the capacity of the University.

3.1.4 OGSP to Request Banner Account. Upon acceptance of an award, OGSP will provide a copy of the signed contract or award agreement, a copy of the award budget, budget narrative, and a request to establish an account for financial management in Banner to the Controller's Office, which will initiate the establishment of the fund by OGCA.

3.1.4.1 Negotiated Indirect Costs. Indirect costs that have been negotiated with the sponsor or internally must be indicated prior to the establishment of a new Banner account.

3.1.5 PI to Participate in Kickoff Meeting with OGSP and OGCA. As soon as practicable following the establishment of a new award, the PI and his/her administrative assistants, if any, as well as any other person to be involved in the management of the award, shall meet with the Director of OGSP and the Office of Grants & Contracts Accounting to hold a kickoff meeting. The kickoff meeting will provide an orientation of the project scope of work, contractual requirements, likely expenditures, budget constraints, and review other compliance and financial management requirements anticipated in the execution of the award.

3.1.6 PI to Execute Statement of Agreement or Assignment Approvals. In accordance with the University's policies for faculty and staff research and consulting activities, the PI shall ensure that the appropriate Statement of Agreement or other assignment approvals are secured prior to commencing any work on a grant or sponsored project.

3.2 Time and Effort Reporting. The use of federal funds in grants and sponsored programs at the University of North Alabama carries the federal requirement (2 CFR 200.430) to maintain adequate internal controls to ensure that the compensation from federal funds is no greater than the proportionate share of the employee's salary earned in devotion to the sponsored or grant funded program. UNA uses an after-the-fact reporting system to certify effort expended on all sponsored projects, including non-federal programs. Each employee compensated with any funds from grants and sponsored programs first assigns effort as a payroll distribution based on anticipated activities or one-time pay request based on services performed. Responsible parties (typically employee and principal investigator) then certify the time and effort after they have been compensated from the project. Time and effort certification need not be perfect, but it must be a reasonable estimate of the time and effort expended. Additional guidance on Time and Effort Certification procedures can be found on the website of the [Office of Grants & Contracts Accounting](#).

3.3 Financial Oversight. The Principal Investigator is to maintain direct oversight of all activities and expenditures for awards and contracts. The Principal Investigator is the individual primarily responsible for the management of the grant award or sponsored research project, including financial management. While the PI may have assistance, the PI must maintain oversight of all activities and expenditures; therefore, the delegation of financial responsibility is not allowed. To ensure fiscal control, the PI will be required to provide direct approvals, either electronically by approved methods or by direct signature, of all activities and expenditures related to grants and sponsored research.

3.3.1 The Principal Investigator to Monitor Budgets, Obligations, and Expenditures. The PI is responsible for monitoring and oversight of expenditures and must review budgets, financial obligations, and expenditures to ensure conformity with approved budgets and to detect errors and irregularities.

3.3.2 Regular Review of Budgets Required. The PI shall monitor budgets and expenditures regularly, preferably once each month, but no less frequently than each quarter, to ensure conformity, identify irregularities, and to evaluate progress toward completion of the terms of the award within the period of performance.

3.3.3 General Conditions of Fiscal Control. Grant awards shall be managed in accordance with the following policies:

3.3.3.1 All expenditures made under grant awards or contract, including under subrecipient contracts, shall be necessary, reasonable, and allocable in accordance with federal regulations and the terms and conditions of an approved contract. No expenditures of funds shall be made under a grant award or contract until a valid contract has been executed and a fund has been established in Banner, unless prior authorization for pre-award costs has been approved by the funder and the Vice President of Business and Financial Affairs.

3.3.3.2 All subrecipient expenditures shall be made on a cost reimbursable basis.

3.3.3.3 All expenditures shall be made during the period of performance of the contract. All invoices from vendors or subrecipients shall be presented for goods purchased or services rendered during the term of an approved contract.

3.3.3.4 All expenditures shall be made within the terms of an approved budget.

3.3.3.5 Requests for reimbursement of any expenditures, including travel, purchase card, purchase orders, payment requisitions, and personnel action forms, must be submitted within 60 days of expenditure and/or effort date, except that the following shall apply within the final month of a contract:

- All non-payroll related expenditures are due within 3 days of project end.
- In the event that a personnel action is for the PI, certification must come from a Co-PI or the PIs supervisor.
- Requests submitted after the policy deadlines are subject to non-payment due to reporting restrictions from funding agencies.

3.3.3.6 All required cost share shall be committed to the project prior to expenditure of any funds for which cost share is required.

3.3.4 The Principal Investigator Solely Responsible for Certain Actions. The Principal Investigator is solely responsible for initiating certain actions taken with respect to awards and contract for grants and sponsored research. These include initiating and approving the following:

3.3.4.1 Personnel Action Forms. A PAF is used to establish or change a payroll distribution. PAFs are used to set up payroll assignments, which are recurring charges for salaries that are distributed across one or more programs in regular, established percentages, and to request one-time payments for stipends to be paid from grant funds. PAFs must be approved by OGSP and OGCA. In the event a PAF is for the PI, the PAF must also be approved by the PI's supervisor.

3.3.4.2 Time and Effort Reporting. The PI is responsible for certifying all time and effort reports for grant funded projects.

- 3.3.4.3 Payment Requisitions.** The PI is responsible for initiating all payment requisitions. Guidelines and forms for Payment Requisitions can be found at the website of the UNA [Controller's Office](#).
- 3.3.4.4 Purchasing Card Payment Requisitions.** PIs are responsible for managing purchases made with a P Card issued for an account using grants or sponsored programs. The PI is solely authorized to make purchases with the P Card. Proxies may be allowed to upload supporting documents, but these must bear the signature or electronic approval of the PI to ensure the charges were properly authorized.
- 3.3.4.5 Purchase Order Requisitions.** The PI is responsible for authorizing Purchase Order Requisitions. Procedures for Purchase Order Requisitions may be found on the website of the UNA [Purchasing Office](#).
- 3.3.4.6 Payment for Invoices.** Invoices must be approved by the PI prior to payment. Procedures for the Payment of Invoices may be found on the website of the UNA [Purchasing Office](#).
- 3.3.4.7 Travel Requests.** The PI's signature must accompany all travel requests along with the signature of the traveler (if other than the PI) and all supporting documents. UNA travel policies apply to all travel, regardless of funding source. In the event a travel request is for the UNA personnel, the request must also be approved by the individual's supervisor.
- 3.3.4.8 Budget Adjustments.** Requests for adjustments to budgets must be made by the PI and must be accompanied by a contract authorizing the adjustment or the approval of the funder to reallocate funds within the project budget and must be submitted to the Office of Grants & Contracts Accounting.
- 3.3.4.9 Cost Reallocation.** Requests to reallocate costs to or from a grant or sponsored program must come from the PI and must be submitted to the Office of Grants & Contracts Accounting. Reallocation should be rare and exceptional with proper oversight and financial management.
- 3.3.4.10 No Cost Extensions.** The PI must originate requests for time extensions.
- 3.3.4.11 Progress Reports.** The PI is responsible for agency progress reports. The Office of Grants & Contracts Accounting will perform financial reporting to request reimbursements on behalf of the University; however, PIs are required to maintain adequate progress reporting to funders in order to maintain compliance and documentation for regular reimbursement requests.

3.3.5 Cost Share Tracking. Salaries and other costs provided as cost share shall be documented and accounted separately from other departmental expenditures.

3.4 Procurement Actions. Purchases are subject to the UNA Procurement Policies and any additional requirements of the grant agreement. Specific procurement related policies may be found on the website of UNA [Purchasing Office](#).

3.5 Award Actions Requiring Prior Approval. Many actions may require prior approval of the funder prior to being allowed within a grant or sponsored program. A list of common actions is provided below. However, check with the funder to ensure a proposed activity does not require approval. For any action requiring prior approval, OGSP must be notified of the action and must certify that all of the University's

internal approvals have been granted for that action. Activities affecting budgets, whether or not these require prior approval, must be disclosed to OGSP prior to authorizing any expenditure of funds.

- 3.5.1 Budget Changes.** Recipients are often allowed to make minor revisions to budgets under agency's standard terms and conditions or as a result of agency policy. Changes outside of the allowable alterations require prior approval of the funder.
- 3.5.2 Changes to Scope of Work.** Changes that affect the scope of work, period of performance, or the projects results or outcomes of the project may require prior approval.
- 3.5.3 Assignment of New Principal Investigator.** The removal or replacement of PI or senior personnel from a grant or sponsored program will typically require the approval of the funding agency.

3.6 Grant Closeout Policies. Closeout policies may vary by funder and will be determined on a project basis and reviewed with PIs. As a courtesy, OGCA monitors contract end dates, provides notices of upcoming closing dates to PIs at 90 and 30 days from the end of the period of performance, and initiates project closeout at the end of the award. The PI must notify OGCA of any events that would affect closeout such as early completion of grant activities. Additional information on the closeout process may be found at the website of the [Office of Grants & Contracts Accounting](#).

- 3.6.1 Indirect Cost Distribution.** Indirect cost (if applicable) will be allocated to the home department of the grant at the termination of the award as part of the closeout procedures. At the completion of the grant, accrued indirect cost recovery will be allocated as follows: Vice President of Business and Financial Affairs (50%), Office of Grants and Sponsored Programs (10%), Principal Investigator (15%), Department (15%), and Dean (10%). Indirect costs may be allocated differently with prior approval of authorized personnel.
- 3.6.2 Residuals.** Upon request, any unused funds that the University may be allowed to retain shall be placed in a fund to be used for the original grant's purposes. Funds not expended by the PI within 2 years shall be allocated to the Dean of the College.
- 3.6.3 Notifications for Human Subjects Review and Animal Use Committee.** For research involving human subjects or animals, the PI must notify the chair of the human Subjects Review Committee and the Animal Use Committee of project completion.
- 3.6.4 Data Management.** The PI must ensure that data storage, retention, and access is compliant with all UNA and other policies. Retention is required for a minimum of 3 years; however, certain circumstances may lengthen this requirement.