

University of North Texas
Office of Grants and Contracts Administration
(OGCA)

Principal Investigator (PI) Handbook

Table of Contents

100.00 Purpose of the Handbook

110.00 Sponsored Project Definition

120.00 Governing Authorities for Sponsored Projects

130.00 Gifts

140.00 Principal Investigator and Co-Principal Investigator Eligibility: Who Can Submit a Proposal for External Support?

150.00 Funding Opportunities

160.00 Private, For-Profit Sponsors of Research

170.00 Foundations and Other Not-for-Profit Sponsors

200.00 University Organization for Research Administration

210.00 General Administrative Structure

220.00 Vice President for Research and Innovation

230.00 Sponsored Projects

230.10 General Information

240.00 Office of Innovation and Commercialization

250.00 Deans, Department Chairs and Center Directors

300.00 Administrative Policy and Roles

310.00 Corporate Responsibility

320.00 Formal Documentation

330.00 Authorized Signatures

340.00 Classified Research

350.00 Endorsement of Research Results

360.00 Ownership of Intellectual Property

370.00 Students in Research

380.00 Administrative Requirements for Sponsored Programs

400.00 Preparation of Proposals

410.00 Preliminaries to Proposal Preparation

415.00 Sponsored Research Agreements with Commercial Entities

420.00 General Requirements

425.00 Content of Proposal

430.00 Proposal Preparation

- [435.00 Role of Grant Officer in Pre-Award Administration](#)
- [440.00 Role of College/Department Research Administrators in Pre-Award Administration](#)
- [445.00 Boiler Plate Information](#)
- [450.00 Preparing Proposal Budgets](#)
- [455.10 Salaries and Wages](#)
- [455.11 Postdoctoral Compensation on Research Grants](#)
- [455.12 Employee Benefit Costs](#)
- [455.13 Graduate Research Assistants](#)
- [455.14 Consultants](#)
- [455.15 Travel](#)
- [455.16 Capital Expenditures/Non Expendable Equipment](#)
- [455.17 Expendable Supplies and Equipment](#)
- [455.18 Publication Costs](#)
- [455.19 Sub-recipients](#)
- [455.20 Other Direct Costs](#)
- [460.00 Representations and Certifications](#)
- [465.00 Facilities and Administrative Costs](#)
- [470.00 Cost Sharing](#)
- [475.00 Deadlines for Proposals](#)
- [480.00 Electronic Submission of Proposals](#)
- [485.00 Required Copies of Proposals](#)
- [490.00 Multiple Solicitations](#)
- [495.00 Review and Approval Channels](#)

500.00 Types of Agreements and Instruments

- [510.00 Grants](#)
- [520.00 Contracts](#)
- [530.00 Cooperative Agreements](#)
- [540.00 Issues Requiring Special Consideration](#)
- [540.10 HIPPA](#)
- [540.20 Export Controls](#)

800.00 Post-Award Administration

- [810.00 Principal Investigator Responsibilities in Post-Award Administration](#)
- [820.00 Role of College/Department Research Administrators in Post-Award Administration](#)
- [830.00 Role of OGCA in Post-Award Administration](#)
- [831.00 Award Notification and Initiation of Account](#)
- [832.00 Anticipated Awards](#)
- [833.00 Expenditure/Encumbrance Tracking](#)

[833.10 Equipment Purchases](#)
[833.20 Personnel Expense](#)
[833.30 Summer Salary](#)
[833.40 Travel](#)
[833.50 Consultants](#)
[834.00 Expanded Authority](#)
[835.00 Federal Demonstration Partnership \(FDP\)](#)
[836.00 Pre-Award Expenditures](#)
[837.00 One Year, No-Cost Extensions](#)
[838.00 Budget Revisions](#)
[839.00 Sub-awards](#)
[840.00 Cost Transfers](#)
[841.00 Program Income](#)
[842.00 Project Reporting](#)
[850.00 PI Termination Checklist](#)
[855.00 Closing a Sponsored Project](#)
[860.00 Audit](#)
[861.00 Time and Effort Reporting](#)
[862.00 Equipment Transfer](#)

[900.00 Research Integrity and Compliance](#)

[910.00 Human Subjects Research](#)
[911.00 Animal Care and Use – Research with Live Vertebrate Animals](#)
[912.00 Financial Conflict of Interest and Sponsored Projects](#)
[913.00 Research Misconduct](#)
[914.00 Export Controls](#)
[915.00 Topics Supported by UNT Risk Management Services Department](#)

Principal Investigator (PI) Handbook

This Handbook is designed to provide investigators at the University of North Texas (UNT) guidance on sponsored project related practices, serve as a quick reference to general questions, and identify resources available to help investigators with their responsibilities in regards to sponsored project activities. All proposals requesting funding from an external sponsor must go through the Office of Grants and Contracts Administration (OGCA), the office on campus with legal authority, delegated by the President, to submit proposals on behalf of the Institution. To aid our progress in reaching national research university status, as defined by the State of Texas, OGCA is adopting a standard of best business practices, typical of our peer institutions and of those we aspire to emulate. OGCA will continue to adopt best practices ensuring outstanding professional service and assistance to PIs, while providing the appropriate level of review of proposals and contracts.

100.00 Purpose of the Handbook

To ensure that funds provided from external sources to support research and other projects are administered in accordance with established University policies and procedures. Externally sponsored projects for research or other purposes will be administered through the Office of Grants and Contracts Administration (OGCA). External sources include both governmental (federal and/or state) and private organizations (not-for-profits and industry). OGCA is the university unit responsible for review and submission of grant and contract proposals to federal agencies and other sponsors.

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

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

In any oral or written communication intended for public consumption or distribution – including but not limited to presentations and PowerPoint presentations, testimony, journal article or other types of printed material, news stories, and posting information on a website – the content of which is based on the results of sponsored research, a faculty member or other employee or appointee of an institution of higher education who conducted or participated in conducting the research shall conspicuously disclose the identity of each sponsor of the research.

110.00 Sponsored Project Definition

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

- a. The project commits the University to a specific line of scholarly or scientific inquiry, typically documented by a statement or scope of work
- b. A specific commitment is made regarding the level of personnel effort, deliverables, or milestones

- c. Project activities are budgeted, and the award includes conditions for specific formal fiscal reports, and/or invoicing
- d. The project requires that unexpended funds be returned to the sponsor at the end of the project period
- e. The award provides for the disposition of either tangible property (e.g., equipment, records, technical reports, theses or dissertations) or intangible property (e.g., inventions, copyrights or rights in data) which may result from the project
- f. The sponsor identifies a period of performance as a term and condition

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

120.00 Governing Authorities for Sponsored Projects

Externally sponsored projects are required to follow sponsor, University, and federal / state guidelines. Federal guidance from the Office of Management and Budget (OMB) has been issued that supersedes requirements from OMB Circulars.

- Federal Uniform Guidance for Grants and Agreements is located at: https://www.whitehouse.gov/omb/grants_docs
- UNT policies are located at: <http://policy.unt.edu/>

130.00 Gifts

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

140.00 Principal Investigator and Co-Principal Investigator Eligibility: Who May Submit a Proposal for External Support?

(Revision of 07-10-17)

For the purpose of applying for extramural grants and sponsored projects, a principal investigator (PI) at UNT is the person who, in the event of an award from an external funding entity, has the full and final responsibility for the conduct of the project as proposed and as set forth in the contract or grant. The PI must have an active appointment with UNT and is responsible for executing and financially managing the grant or project. The PI and Co-PI are most often full-time, permanent employees, whose official job roles and responsibilities include serving as a PI or Co-PI on extramural grants or sponsored projects. Since a proposal and subsequent award commit UNT in many ways, it is important to establish the qualifications and ability of PI's and Co-PI's to carry out the work on externally funded grants and sponsored projects.

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

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

and Contracts Administration (OGCA), who will coordinate the process with the Office of Research and Innovation:

- (i) A memorandum addressed to the Vice President for Research and Innovation providing justification for the request and summarizing the requestor's qualifications, co-signed by the requestor's unit head (for example, within an academic department, the Department Chair). The justification must include confirmation by the requestor's unit head that the person requesting PI or Co-PI eligibility status will, pending award, have assignable workload available for the specified scope of project activities (e.g. lecturer teaching load will be modified for assignable sponsored project workload)
- (ii) The requestor's curriculum vitae
- (iii) A memorandum from a faculty member (who is a qualified PI or Co-PI, as defined above) who will commit to assuming the PI or Co-PI responsibilities should the requestor leave UNT or otherwise be unable to remain as PI or Co-PI on the project

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

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

- 1) **The backup PI or Co-PI should be someone both capable and committed to carrying on the work of the grant or sponsored project should the PI or Co-PI leave the University.** Persons qualified to sign this letter include (a) (if the requestor is in an academic unit) a regular faculty member in the requestor's unit who is otherwise qualified (as defined here) to be a PI or Co-PI and is qualified to manage the project and continue its work, and (b) (if the requestor is in an administrative / non-academic unit) a UNT administrator at the level of Assistant Vice President or above who is qualified to manage the project.
- 2) The backup PI or Co-PI memorandum must be dated and contain the printed name and signature of the person designated to be the "Backup PI" or "Backup Co-PI". The backup PI or Co-PI memorandum must be a separate document, preferably on unit stationery. Suggested wording is given below. Please select PI or Co-PI where indicated.

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

150.00 Funding Opportunities

The Office of Office of Grants and Contracts Administration (OGCA) is available to assist faculty with creating a personalized profile in PIVOT, and to assist with locating funding opportunities through use of the PIVOT funding database, accessed at: http://pivot.cos.com/funding_main.

Once a funding opportunity is identified, submit a request for a Grants and Contracts Specialist at <http://forms.unt.edu/request-grant-officer-assignment>. The Grants and Contracts Specialist will discuss a

timeline for submitting documents to the Office of Grants and Contracts Administration (OGCA) for the administrative review process.

160.00 Private, For-Profit Sponsors of Research

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

- a. Interaction between faculty researchers and their counterparts in industry is encouraged.
- b. Support of specific research projects by industry is subject to the same policies and procedures as those funded by government agencies.
- c. Issues frequently encountered in negotiations with companies include freedom of dissemination of the results of the research, ownership of intellectual property including patents, conflicts of interest, freedom of choice in the selection of research topics and in the conduct of the research, and relevance to the educational mission of the University.
- d. In fulfillment of (b) above, the University cannot accept research awards from industrial sponsors until a formal research proposal including a budget has been reviewed and approved, as applicable, by the appropriate department Chair, Dean and OGCA. Compliance with applicable policies for conflict of interest, export control, protection of human subjects, animal welfare, radiation safety, etc. is required.
- e. Proposals for corporate support should provide for full recovery of costs including F&A costs (indirect costs) at the full federally approved research rate. Corporations are fully aware of the reality of F&A costs and should recognize the University's need to recover such costs.
- f. The Office of Grants and Contracts Administration (OGCA) has developed a model agreement for sponsored research from industry which is available upon request, and as applicable, may be provided to industry counterparts. Non-disclosure agreements should be signed with the potential sponsor before having substantial conversations.
- g. Terms and conditions of an industry sponsored research agreement (SRA) without licensing of existing intellectual property are negotiated by OGCA. Any SRA involving the licensing of existing intellectual property is jointly negotiated with Office of Innovation and Commercialization and Office of Grants and Contracts Administration (OGCA).

170.00 Foundations and Other Not-for-Profit Sponsors

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

200.00 University Organization for Research Administration

210.00 General Administrative Structure

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

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

220.00 Vice President for Research and Innovation

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

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

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

230.00 Sponsored Projects

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

The functions of OGCA include the following:

- Formulating grant and contract administration policies and procedures
- Overseeing the negotiation, execution and administration of sponsored project grants and contracts throughout the University from inception through closeout
- Assuring timely receipt of and proper fiscal stewardship for sponsor funds
- Negotiating University-wide F&A costs
- Maintaining liaison with sponsoring agencies concerning University organization, policies and procedures; representing the University in negotiations with sponsoring agencies to assure consistent contract and grant provisions and policies; resolving problems and settling disputes
- In cooperation with other University offices, assuring compliance with sponsor's policies,

e.g., fiscal, property, intellectual property, human and animal subjects

- In cooperation with other University offices, maintain official records concerning sponsored projects including official grant and contract files
- Assisting faculty and department/college staff in the preparation of the proposals and other administrative aspects of sponsored projects as needed
- Training of PI and research administrative staff

230.10 General Information

Campus/Overnight Delivery Address	University of North Texas Office of Grants and Contracts Administration Hurley Administration Building, Suite 160 1501 Chestnut Avenue Denton, TX 76203-5017
Mailing Address	University of North Texas Office of Grants and Contracts Administration 1155 Union Circle, #305250 Denton, TX 76203-5017
Web Page URL	http://research.unt.edu/ogca/index.htm
Telephone Number	(940) 565-3940
Fax Number	(940) 565-4277

240.00 Office of Innovation and Commercialization

Office of Innovation and Commercialization is responsible for the identification, protection and commercialization of the intellectual property generated by the faculty and staff of the University. In this capacity, the Associate Vice President for Office of Innovation and Commercialization acts as the University Patent and Copyright Officer and is responsible for accepting all disclosures of new inventions and other discoveries. Office of Innovation and Commercialization staffs evaluate disclosures and work with inventors to develop a strategy to protect the intellectual property and to license the discovery for commercial development. Office of Innovation and Commercialization is responsible for complying with sponsor terms and conditions related to the management of intellectual property.

250.00 Deans, Department Chairs and Center Directors

The department chairs have a general responsibility for promoting the scholarly and research activities of their departments, as well as fostering sound stewardship of funds. They review applications, as applicable, for research projects and transmit those approved through the appropriate dean to OGCA, ensuring that faculty

assignments and release time, recognition distributions, administrative support, F&A (IDC) allocations, cost share (matching) commitments, and space demands of all such projects are in the best interests of both their department and the University as a whole.

Deans should review for eligibility of PI and Co-PI, recognition distributions, F&A (IDC) allocations, and availability of cost share (matching) commitments.

300.00 Administrative Policy and Roles

310.00 Corporate Responsibility

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

320.00 Formal Documentation

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

330.00 Authorized Signatures

In accordance with the Board of Regents Rule 3.900 authority has been delegated to the Vice President for Research and Innovation to accept and sign sponsored research related proposals, contracts and agreements to legally bind the university. The Associate Directors of OGCA are authorized to sign sponsored project related documents. The Director of Research Integrity and Compliance is authorized to sign documents related to approval of human subjects and animal research.

340.00 Classified Research

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

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

350.00 Endorsement of Research Results

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

360.00 Ownership of Intellectual Property

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

370.00 Students in Research

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

380.00 Administrative Requirements for Sponsored Programs

The following conditions must govern any research agreement entered into by the University and a sponsor in order for a favorable evaluation to be made.

- Open identification of sponsors and the actual sources of funding must be present in the agreement. Exception is made for anonymous sponsorship when in the judgment of the VPRI such a condition is not harmful to the University or to the integrity of the research and is essential for the award to be given.
- Unrestricted dissemination of all findings and conclusions derived from the project must be an integral part of the agreement, except where the privacy of an individual is concerned. The University regards any infringement on complete access to research findings as detrimental to free inquiry. It therefore neither seeks nor accepts security clearance for itself or any administrative unit. The decision whether to seek clearance is an individual one to be made by each faculty member according to his or her judgment. Such decisions will not be influenced or judged in any way by the University and must be made in each instance on the basis that the benefits of clearance balance its academic shortcomings. Exception may be granted by the VPRI for privileged information but only in the form of a delay in the release of such information. The delay will only on rare occasions exceed three months.
- The resources or data sources on which research is wholly dependent must be free of control by the sponsor. The University views such control as incompatible with free inquiry and encourages acceptance of this condition only when no alternative source exists. Exception may be granted by the VPRI for projects which are conducted abroad and subject to the legal restraints of foreign governments and their agencies.
- No conditions may be attached to the gift, grant or contract that would in any way jeopardize the University's commitment to the principle of nondiscrimination on the basis of race, color, sex, sexual or affectional preference, age, religion, national or ethnic origin or handicap.
- Academic appointments made with the support of gifts, grants, or contracts shall be made only in accord with established University procedures. A sponsor shall not ordinarily participate in the selection of persons to work on a project, and individuals employed by the University shall not be excluded by a

sponsor from participation in a project for any reason other than when necessary because of insufficient competence or when required to protect privileged information.

- No financial obligations by the University in the present or any time in the future can be implied other than those stated in the contract. When uncertainty exists in his judgment, the VPRI or a designated member of the VPRI's staff shall consult with appropriate officers of the University to assure that this condition is met prior to the final approval of the agreement.
- The University relies primarily on the discretion of its faculty to limit the commercial aspects of research sponsorship, such as advertising and publicity. Contracts must not allow the use of the University's name for commercial purposes unless such use has been specifically approved by the President of the University. Agreements must not permit the names of University investigators to be exploited for advertising purposes or permit reprint distribution to be made part of a publicity campaign.

400.00 Preparation of Proposals

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

OGCA does not guarantee the submission of proposals that do not allow for sufficient time to complete the necessary review and navigate an appropriate proposal submission. If an award is made based on a late submission of a proposal, the PI and the department or other university unit will be responsible for covering costs incurred by UNT as a result of any proposal errors. Such costs might include cost sharing commitments, inaccurate rate calculations for indirect costs, or unallowable commitments of UNT resources. UNT reserves the right to review and request changes prior to acceptance of an award or to decline an award, if the budget or other commitments contained in the proposal do not conform to UNT specifications or requirements.

410.00 Preliminaries to Proposal Preparation

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

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

415.00 Sponsored Research Agreements with Commercial Entities

OGCA has developed a standard Sponsored Research Agreement (SRA) for use with industry which is available upon request, and as applicable, may be provided to industry counterparts. PIs should sign a non-disclosure agreement (NDA) prior to any substantial conversations. Negotiation of a SRA should consider the various stakeholder groups involved in the process. The interests and needs of the University from the perspective of a non-profit, tax-exempt research and educational institution, with a mission of public service are to be contrasted with the commercial, for-profit goals of corporate sponsors. The SRA is beneficial to both

parties participating in research collaboration. Faculty members learn about industrial technologies, their research receives substantial support, and they contribute to the development and transfer of technologies that benefit the public. Sponsors gain access to the expertise of the faculty and the facilities of the University.

Prior to preliminary proposal discussions, submit a request for a Grants and Contracts Specialist at <http://forms.unt.edu/request-grant-officer-assignment>. The Grants and Contracts Specialist will discuss a timeline for submitting documents to the Office of Grants and Contracts Administration (OGCA) for the administrative review process. It is best to refrain from delving into budget details any more than necessary to define the general or tentative cost of the project during preliminary proposal discussions. In estimating the total cost, be sure to include both direct costs and F&A costs at the current federally negotiated research rate.

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

420.00 General Requirements

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

425.00 Content of Proposal

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

Generally, every proposal should include the following:

1. **Title Page** – Unless a specific format is supplied by a sponsor, the following format may be used:
 - a. Name of the entity to which the proposal is being submitted
 - b. Legal name of the university, University of North Texas
 - c. Title of the proposed project
 - d. Name of the principal investigator and any co-investigators, with the departmental and school/college affiliations of each
 - e. Signature of the principal investigator, and signature of the authorized University official
 - f. Date of submission, and proposed project period

- g. Standard information about the University, e.g. taxpayer identification number (FEIN), DUNs number, etc. which may be obtained from OGCA

2. **Technical Abstract** – Depending on the scope and complexity of a project, an abstract may be of assistance to a prospective sponsor. The technical abstract should be a condensed version of the project. State concisely the significance of the project, what is expected to be accomplish and how, and the period of performance of the project. The abstract is extremely important in creating a favorable first impression of the proposal.
3. **Table of Contents** (optional)
4. **List of Tables** (optional)
5. **List of Figures** (optional)
6. **Introduction** – The introduction, or statement of need, emphasizes the importance of the project. The proposal should be set within a background framework of previous related research and have a theoretical orientation. The relationship of the project to the interests of the funding agency may be stressed tactfully. The introduction sets forth the focus of the proposal.
7. **Objectives** – The problem should be stated as specifically as possible and should be related to the background information provided. The importance and rationale of the proposed research should be well specified. It is important that the objectives, both general and specific, are well conceived. If they are poorly defined, it may be found that the timeframe is unrealistic or that the budget is inadequate.
8. **Methods and Procedures** – This section details how the research will be carried out. The procedures may be written in several different ways: by activities tied to specific procedures, by functional categories such as planning, development, and implementation, or by major time blocks. If the procedural section takes up an undue number of pages, the narrative can be reduced considerably through the judicious use of appendices, tables, and illustrations. If the agency limits the number of narrative pages, these devices can be particularly useful. Be mindful, however, that some sponsors have limitations on use of appendices and what they may contain. Although requests for equipment are usually described in a separate section, additional justification for unusually expensive or specialized equipment can be stated in this section to reinforce the budget request.
9. **Dissemination of Findings** - While projects generally result in published papers in professional journals, many agencies require additional means of disseminating the results of the research. A statement of how this is to be done should be included. Some projects may require inclusion of a plan for evaluation of the success or progress of the project.
10. **Equipment and Facilities** – Most proposals should include a section on equipment and facilities available to the research project. It is extremely important that major items of equipment which are being requested are clearly identified and their need described.
11. **Budget and Budget Narrative** (include subcontract and consultant narrative as applicable) – The principal investigator must estimate with reasonable accuracy the costs of performing the research and provide adequate justification and documentation of those costs. The Grants and Contracts Specialist may be available to assist in preparing the budget. For more details regarding proposal budget preparation see the section on Budget Development.
12. **Bio Sketch** – These data should be submitted with every proposal to indicate the background, areas of interest, research capabilities, and publications of the principal investigator and other professional investigators.
13. **Current and Pending** – This section of the proposal calls for required information on all current and pending support for ongoing projects and proposals, including subsequent funding in the case of continuing grants.
14. **References** – Proposals should include a list of references to pertinent literature in the field. The list should be as current as possible at the time the proposal is prepared, and should cite the most recent advances in the field.

15. **Supplemental Documents or Appendices** – Appendices may be used to indicate data of peripheral benefit to the research, e.g., reprints of articles, letters of support (as required by the RFP), tabular data, and graphs. The use of appendices is recommended, particularly when a sponsor limits the length of the proposal to a specified number of pages.
16. **Certifications** – Federal agencies require a number of representations and certifications from the University which typically must accompany each proposal. Some agencies such as NSF and NIH have incorporated these in their forms, while others such as DOD, NASA, DOE and EPA have separate certification forms which generally must be completed, in part by both the PI and OGCA.

430.00 Proposal Preparation

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

The Principal Investigator (PI) is responsible for:

- Identifying funding sources
- Reading the Request for Proposal (RFP) or other applicable application guidelines
- Requesting a Grants and Contracts Specialist at <http://forms.unt.edu/request-grant-officer-assignment>
- Engaging their department, college and OGCA as early in the process as possible and preparing the proposal in sufficient detail and sufficiently in advance to allow for adequate reviews
- Developing and preparing proposals in accordance with sponsor guidelines and University policies
- Ensuring the proposal is complete, accurate, and meets all programmatic, administrative and compliance requirements
- Knowing the elements of proposals that could necessitate review and approval by other UNT offices and obtaining those approvals before the OGCA deadline
- Receiving approval for cost share and matching, teaching buyouts or releases, new space or renovations, and any variance from standard F&A (IDC) distribution
- Completing, certifying and routing an electronic Cayuse SP record for each proposal
- **Providing a complete proposal to OGCA, including a reasonable draft narrative, a minimum of 4 (four) full-business days prior to the sponsor's submission deadline**
- Finalizing edits by 5:00pm the day before the sponsor's submission deadline

OGCA does not guarantee the submission of proposals that do not allow for sufficient time to complete the necessary review and navigate an appropriate sponsor submission. If an award is made based on a late submission of a proposal, the PI and the department or other university unit will be responsible for covering costs incurred by UNT as a result of any proposal errors. Such costs might include cost sharing commitments, inaccurate rate calculations for indirect costs (F&A), or unallowable commitments of UNT resources.

435.00 Role of a Grants and Contracts Specialist

OGCA will focus on professional, efficient and effective service to all faculty interested in submitting proposals for funding from external sponsors. Assistance will be provided to PIs prior to the four-day deadline on a “first come / first served” basis as workload allows, with items such as translation of budget items into sponsor forms and completion of other forms required by sponsors. In addition, during the four-day review period before the sponsor submission deadline, OGCA will check the proposal package for all

required elements and for compliance with UNT and sponsor requirements, provided that a complete proposal package was received by the four-day deadline.

- **Proposal review**
 - Review the proposal documents for accuracy and compliance with applicable guidelines and regulations (institutional, local, state, federal, etc.) pertinent to the specific submission
- **Budget review**
 - Require any variance from the standard indirect cost recovery (F&A) be approved in writing
 - Review Cost Share Approval Form for cost share at required level and required approval/s
- **Proposal submission**
 - Facilitate the final submission of the proposal to the sponsor according to the agency requirements
 - If proposal submission is through sponsor portal (e.g. NSF Fastlane, Grants.gov, etc.) ensure UNT is registered with the sponsor to submit proposals online

Late proposals will not receive priority over proposals complying with the required lead times. Proposals and documents received after the four-day deadline will receive a modified level of review.

OGCA does not guarantee the submission of proposals that do not allow for sufficient time to complete the necessary review and navigate an appropriate sponsor submission. UNT reserves the right to review and request changes prior to acceptance of an award or to decline an award, if the budget or other commitments contained in the proposal do not conform to UNT specifications or requirements.

440.00 Role of College/Department Research Administrators

Departments and colleges that have staff available for assisting in the development of the proposal and/or the preparation of budgets and other forms should continue to provide this help before the four-day deadline for transmittal of complete proposal packages to OGCA. Requests for such assistance are to be made at the discretion of the PI, are voluntary assistance on the part of the departments and colleges, and should be carried out prior to the four-day deadline.

Departments and colleges will be required to approve proposals when PIs are requesting from the department or college (i) any cost share or match, (ii) buy-out or release from teaching, (iii) new or renovated space, or (iv) modification of indirect cost (IDC or F&A) distribution. Departments and colleges will be required to approve proposals only when any of these items are noted on the routing form, or, by implication, stated or implied in the proposal documents. Without PI disclosure on the routing form of the four triggers for department and/or college approval listed above (or explicit or implicit inclusion in the proposal documents), proposals may be directly routed to OGCA by the PI.

445.00 Boiler Plate Information

When applications request:	OGCA provides the following response:
Submitting Organization	University of North Texas

Address for all Official Correspondence	University of North Texas Office of Grants & Contracts Administration 1155 Union Circle, #305250 Denton, TX 76203-5017
Type of Organization	State Related Institution of Higher Education
Congressional District	26th (TX-026 on grants.gov forms)
Texas Senatorial District	12th and 30th
Texas House of Representatives District	64th
Authorized Organizational Representative (AOR)	Britt Krhovjak or Carla McGuire Office of Grants and Contracts Administration, UNT proposals@unt.edu phone: 940-565-3940 fax: 940-565-4277
Authorized University Official for Compliance	Jamie Peno, Director, Research Integrity & Compliance, UNT Jamie.Peno@unt.edu phone: 940-565-3941 fax: 940-369-7486
Officials Authorized to Sign Contracts	Dr. Thomas McCoy, Vice President Research and Innovation Dr. David Schultz, Assoc. VP Research and Innovation Britt Krhovjak, Senior Director Office of Grants and Contracts Admin. Carla McGuire, Assoc. Director Office of Grants and Contracts Admin.
Financial Contact	Britt Krhovjak, Senior Director Office of Grants and Contracts Admin. University of North Texas 1155 Union Circle #305250 Denton, Texas 76203-5017 Phone: (940) 565-3246 Fax: (940) 565-4277 Britt.Krhovjak@unt.edu

Federal Entity ID Number TIN (Tax ID Number – alphanumeric) DUNS Number Contractor Establishment Code Cage Code FICE Texas State Vendor Number Office of Post- Secondary Education ID Sam.gov registration NAICS (code for Universities) USDA NLGCA (non-land grant college of ag cert.)	756002149 NT756002149 614168995 78-764-557B 6B783 003594 37527527529035 00359400 Expires 08/18/2016 611310 (see pdf copy of certification document)
<u>Human Subjects:</u> DHHS Assurance Number IRB ID DoD-Navy FWA Addendum	FWA00007479 756002149 DoD N-A3305
NIH/OLAQ Animal Welfare Assurance Number	A3841-01
USDA/APHIS	74-R-0033 NIFA ASAP Identifier: 4815783
<u>F&A Rate Agreement</u>	June 19, 2015; extended through 08/31/2020
Cognizant Agency	Department of Health and Human Services Agreement Date: June 19, 2015 Uyen Tran Central States Field Office 1301 Young Street, Room 732 Dallas, TX 75202 (214) 767-3261 (Phone) (214) 767-3264 (Fax)
Cognizant Agency for ONR Proposals	Ms. Kellie Case, Contract/Grant Administrator, Office of Naval Research 140 Sylvester Road, Bldg. 140, Room 218 San Diego, CA 92106-3521 direct tel: (619) 221-5486 main tel: (619) 221-5490 e-mail: kellie.case@navy.mil

450.00 Preparing Proposal Budgets

Preparation of the budget is an important part of the proposal preparation process. Sponsors and peer reviewers are responsible for comparing the level of funding requested to the work proposed. Therefore, the budget section of the proposal should reflect, as accurately as possible, the funding needed to carry out the project. Use the latest version of the budget template to accurately calculate fringe benefits and indirect costs:

<http://research.unt.edu/faculty-resources/research-services>

455.10 Salaries and Wages

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

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

Sponsored activities may not result in any employee receiving compensation in excess of his/her authorized salary. Faculty members are paid by state funds to perform research, instruction and public service activities. Subsequently, state funds are provided to pay administrative support for these activities in the offices of the department chair and dean. The department chair or dean may choose to use indirect cost recovery funds to support additional administrative support.

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

455.11 Postdoctoral Compensation on Research Grants

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

455.12 Employee Benefit Costs

Employee benefit rates are calculated as a percentage of employee salaries and wages, and are established by the State of Texas. The budget template automatically calculates the estimated fringe benefit amount based on the information provided for each individual.

455.13 Graduate Research Assistants

Salaries for Graduate Research Assistants/Fellows (i.e., graduate students performing research) should be budgeted to include employee benefit costs according to the HR Fringe Benefit Component form. Graduate Research Assistants are encouraged. The budget should include:

- Graduate Research Assistantship support in an amount directly proportional to the amount of necessary work the student performs on the project
- Tuition - for graduate students supported on sponsored research grants and contracts, the proposal budget should include the cost of tuition in an amount proportionate to the amount of compensation (GRA support described above)

Tuition remission is the payment of tuition expense as part of the compensation to students performing necessary work on a sponsored project. If the student is working on more than one project, salary/support and tuition must be paid by each project in an amount commensurate with the work being performed on that project.

Tuition should be listed under “Other – Graduate Student Tuition” in the budget template so the amount is excluded from the assessment of indirect costs (F&A).

455.14 Consultants

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

Some sponsors do not permit payments to consultants and some restrict or limit such payments. If in doubt as to the allowability of or rates paid to consultants, check the sponsor’s guidelines or contact OGCA.

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

- Consultant name
- Description of services to be provided
- Number of days, or hours, of anticipated consultation
- Rate of compensation, and/or travel, per diem, etc.
- Resume or curriculum vita

Sponsors may require a letter from the consultant confirming their role in the project, and the daily/hourly rate.

PIs must ensure the following conditions are met when considering a consultant:

- Services the consultant will provide are essential to the project and cannot be provided by persons receiving salary support under the grant or contract or who are otherwise compensated
- Selection process has been followed to select a qualified consultant available to perform the required services
- Fee is commensurate with the qualifications of the consultant and the nature of required services
- Consultant meets the requirement of an independent contractor as defined by the Internal Revenue Service

455.15 Travel

Reimbursement for travel expenses is subject to University policies and sponsor regulations. Include as much information as available for each proposed trip, including destination, transportation costs, number of days, and purpose. “Domestic” and “Foreign” travel should be separately identified and budgeted. “Domestic” travel includes trips within the U.S. and US territories. On federally funded projects all foreign travel, including that which is cost shared, should utilize US flag air-carriers whenever possible and regardless of cost or convenience. These costs need to be fully justified in the budget and any exceptions to the “Fly America Act” requirements may only occur under exceptional circumstances and as/if approved.

455.16 Capital Expenditures/Non Expendable Equipment

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

Budget all equipment needed to perform the proposed tasks (including estimated freight and installation). Most sponsors will not support the purchase of general purpose equipment, such as office furniture, etc.

List each specific item in the budget, justify its need, and provide information on how the amount requested was derived, (i.e. catalog price, quote or bid).

455.17 Supplies

A research project will usually consume expendable supplies and laboratory items, teaching materials, etc.

Note: Office supplies are typically not allowable.

455.18 Publication Costs

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

455.19 Sub-recipients

When a portion of the programmatic scope of work is proposed to be completed by a collaborating institution or organization, generally the entity involved is considered a sub-recipient. When investigators from another institution or organization participate in the research, their home institution or host organization will be the sub-recipient, and their proposal related documents are required by UNT prior to submission of the proposal.

The sub-recipient's proposal must contain, at a minimum, the following:

- Statement or scope of work
- Budget (including applicable indirect costs – F&A)
- Period of performance (start/end dates)
- Letter of collaboration/commitment signed by authorized person (not PI or Co-PI)
- Copy of negotiated F&A Rate Agreement

The sub-recipient should provide the Federal Employer Identification Number (FEIN), confirmation of current SAM registration, and any required certifications.

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

OGCA review of the proposal will include review of sub-recipient documents.

455.20 Other Direct Costs

Other direct costs may include contractual or vendor services, and/or other costs allowed by the sponsor.

460.00 Representations and Certifications

For some proposals, special representations, certifications and acknowledgments may be required. OGCA will work with the PI to complete these forms.

465.0 Facilities and Administrative Costs

Facilities and Administrative (F&A) costs, also called overhead or indirect costs, reimburse the University for laboratory and office space, utilities, administrative services (e.g., Department and Dean Administrators,

Purchasing, Accounting, Human Resources, Security, etc.), custodial services, buildings, and other general use UNT facilities. In other words, they include costs essential to support sponsored activities which cannot be specifically identified and directly charged to a specific research grant or contract. F&A cost percentages are determined periodically from actual cost records through a detailed cost accounting procedure and are audited and approved by the federal government.

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

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

- Capital expenditures and Equipment (non-expendable equipment estimated to cost \$5,000 or more and with a useful life of 1 year or more)
- Patient care charges (not typically included on UNT Denton projects)
- Rental costs
- Tuition remission (see 455.13 Graduate Research Assistants, for explanation on tuition relating to sponsored research grants and contracts)
- Participant Support costs
- Sub-award costs in excess of \$25,000 (any portion above the initial \$25,000 per sub-award, over the lifetime of the project)
- Scholarships and Fellowships

An off-campus F&A rate may apply for projects where more than 50% of all proposed activities and project related effort will be performed in, or on, non-university owned or leased space during the project period.

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

470.00 Cost Sharing

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

University contributions in terms of personnel effort and the associated employee benefit costs, other direct expenses and the F&A costs calculated on these expenses at the approved F&A rate may be shown as cost sharing, unless the sponsor's published guidelines specifically state otherwise. Any difference between F&A costs at a sponsor's limited rate and the University's negotiated rate may be used to meet a cost share requirement if permitted by the sponsor. The University discourages cost sharing unless mandated by the sponsor. All proposed cost-sharing must be approved by the responsible Chair/s and Dean/s, and as applicable, by the Office of Research and Innovation.

475.00 Deadlines for Proposals

The University review process takes time. **A complete proposal should be submitted to OGCA, including a reasonable draft of the narrative, a minimum of 4 (four) full-business days prior to the sponsor's submission deadline.** The final narrative should be finalized and received by OGCA by 5:00pm the day before the sponsor's submission deadline.

OGCA will review proposals for which the technical portion is still in draft provided that all other proposal elements are complete and final (including the budget, sub-recipient documents, and any required cost share), and all required reviews and approvals by the appropriate Chair/s, Dean/s, and ORI have been received.

Proposals will normally be processed in order of receipt. It is the responsibility of the PI to ensure that a proposal is received by OGCA in time to meet any established sponsor deadline.

Late proposals will not receive priority over proposals complying with the required lead times. Proposals and documents received after the four-day deadline will receive a modified level of review.

OGCA does not guarantee the submission of proposals that do not allow for sufficient time to complete the necessary review and navigate an appropriate sponsor submission. UNT reserves the right to review and request changes prior to acceptance of an award or to decline an award, if the budget or other commitments contained in the proposal do not conform to UNT specifications or requirements.

480.00 Electronic Submission of Proposals

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

The electronic proposal preparation process may be time consuming for the PI, particularly the first time a sponsor's electronic portal or system is used. Prior to the first submission of a proposal using any form of electronic proposal portal or system, the PI must contact OGCA. In addition, the PI may need Adobe Acrobat and/or PDF capability on his/her computer.

OGCA must approve the proposal before it may be submitted. Proposals for electronic submission (or online submission) must meet the OGCA four (4) full business day deadline, the same as proposal submissions by any other method.

OGCA may review a very large volume of proposals for any given sponsor deadline, so it is important to submit proposals to OGCA well before the deadline to allow for appropriate review. Failure to do so may jeopardize a successful or timely submission of the proposal.

485.00 Required Copies of Proposals

The number of copies of proposals required by a sponsor may vary. The PI should review proposal instructions and contact OGCA with any questions. In addition to the copies required for submission to the sponsor, one additional copy is required for the proposal file kept in OGCA.

The PI is responsible to provide OGCA with any and all copies of proposals required for submission (photocopies and/or digital copies such as DVDs). OGCA does not make copies of proposal documents.

490.00 Multiple Solicitations

The submission of the same proposal to two or more sponsors is typically allowable provided this is clearly disclosed in each proposal application, however, some agencies may specify otherwise and may not accept proposals submitted to other potential sponsors.

495.0 Review and Approval

The PI must route his/her proposal for review and approval, as/if required, before it may be submitted to the sponsor by OGCA. A review may include the following:

- Commitment of faculty, staff, and student time, as well as any other UNT resources
- Personnel salary/fringe (i.e. reimbursement of academic year and/or provision for summer support)
- Space and facilities requirements
- Budgeted costs, including F&A assessment, are in accordance with federal/state regulations, UNT policies and sponsor guidelines
- Specific project activities which require compliance review and approval prior to award, such as the use of human subjects, animals, biohazards, radioactive materials, lasers, export control, and intellectual property, etc.
- Disclosure of any potential financial conflicts of interest by the PI or any other person responsible for the design, conduct or reporting of the proposed project.

Proposal review and approval may be required by any of the following:

1. Department Chair

Approval by the Chair constitutes endorsement attesting to the academic purposes of the proposed research or other sponsored activity, departmental compatibility, appropriateness in the context of budget, faculty time available to carry out the project, and availability of space and research equipment. As/if approved by the Chair, the proposal is then typically submitted to the Dean of the college for review and approval.

2. Dean

Approval by the Dean relates to the substance and merit of the proposal as well as to the budget, including salaries and employment of present and proposed personnel, as well as any other aspect of the proposal which may affect the teaching, research, and use of both school and University space and facilities. The Dean's approval of a F&A recovery rate less than the federally negotiated F&A rate indicates acceptance of reduced F&A cost recovery to the school. As/if approved, and endorsed, by the Dean, the proposal is then typically submitted to OGCA.

3. Office of Grants and Contracts Administration (OGCA)

Review by OGCA is for accuracy and compliance with applicable guidelines and regulations (institutional, local, state, federal, etc.) pertinent to the specific submission, as well as to confirm the proposal is complete and required internal approvals have been received by OGCA. Proposals and documents received after the OGCA four (4) full business day deadline will receive a modified level of review.

OGCA cannot guarantee a successful submission of proposals that do not allow for sufficient time to complete the necessary review and navigate an appropriate sponsor submission. UNT reserves the right to review and request changes prior to acceptance of an award or to decline an award, if the budget or other commitments contained in the proposal do not conform to UNT specifications or requirements.

4. Vice President for Research and Innovation

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

500.00 Types of Agreements and Instruments

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

510.00 Grants

Grants constitute the majority of awards received by the University and constitute a less restrictive award type. Sponsors may not require the University to countersign grants if the terms and conditions are agreed to upon submission of an appropriately authorized or signed proposal. Federal grants are governed by the administrative terms and conditions published by, or made publically available, by the sponsoring agency. Always check program announcements and similar documents for referenced terms and conditions.

520.0 Contracts

Contracts are usually more restrictive awards. Usually, contracts require signatures by both the sponsor and the University to be binding and require defined deliverables on a specific schedule.

The two basic types of contracts are:

- **Cost Reimbursable**
Cost Reimbursable contracts specifically state the maximum (not-to-exceed) level of funding a sponsor will provide. If actual project costs to complete the statement of work are less, the University will only be reimbursed for actual incurred costs. The University reports only on costs incurred up to the maximum amount. Additional funding requires contract modification.
- **Fixed Price**
Contracts for a specific dollar amount, regardless of the actual cost to complete the full scope of work. The University is paid the full amount specified in the contract. If the PI completes the work for a lesser cost, the University may retain the full amount of funding. If costs are greater than the contracted amount, the University is still required to complete the full scope of work, and the PI becomes responsible for paying the difference (any un-funded costs).

530.00 Cooperative Agreements

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

540.00 Issues Requiring Special Consideration

540.10 HIPAA

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

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

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

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

540.20 Export Controls

Export Administration Regulations (EAR, enforced by the Department of Commerce) and International Traffic in Arms Regulations (ITAR, enforced by the Department of State) are Federal regulations which, for reasons of national security or protection of trade, prohibit the “export” (defined very broadly as any oral, written, electronic or visual disclosure, shipment, transfer or transmission of a commodity, technology or software/code) of certain technologies without a license, unless an exception applies. If research at UNT involves such technologies, these regulations may require UNT to obtain prior approval from the State or U.S. Department of Commerce before:

- Involving foreign students or faculty in the research;
- Working with foreign companies; and
- Sharing research results with persons who are not U.S. citizens or permanent resident aliens

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

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

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

800.00 Post Award Administration

The process of managing sponsored research funds is a shared responsibility among the PI, the College or Department Research Administrator and OGCA; each has unique areas of primary responsibility.

810.00 Principal Investigator Responsibilities in Post-Award Administration

The Principal Investigator (PI) has primary responsibility for management of the project within funding limitations, adherence to reporting requirements, ensuring that the sponsor will be notified when significant conditions related to the project status change, following award terms and conditions, hiring, training and managing project personnel, directing technical aspects of the project and coordination with departmental personnel to define administrative support.

UNT also requires all PIs to review their obligations for stewardship of sponsored funds and compliance with applicable regulations, including cost principles as defined by UNT Policy and the federal government in 2 CFR Part 200 of the Uniform Guidance: [link](#).

PI responsibilities include:

- Execute the project as outlined in the funded proposal and the terms and conditions of the award, using sound management techniques.
- Authorize only those expenditures that are reasonable and necessary to accomplish the project goals and that are consistent with the sponsor's terms and conditions. A list of unallowable costs can be found in the Uniform Guidance - 2 CFR Part 200 (General Provisions for Selected Items of Cost) at: [link](#).
- Spend no more than the amount authorized by the sponsor for the project period.
- Carry out the project's financial plan as presented in the funded proposal.
- Notify OGCA of any proposed changes in the scope of work, the PI or other key research personnel, the budget, or the period of performance.
- Follow all applicable University policies and procedures such as travel, purchasing, employment, contracted services, and compensation policies.
- Assure that cost-sharing or matching commitments are fulfilled and reported to OGCA in a timely manner.
- Assure that Time and Effort Reports for the funded project are completed accurately and timely.
- Oversee the care and maintenance of property procured with project funds in accordance with sponsor guidelines.
- Report any intellectual property development which relates to the project to the Technology Transfer Office
- Report project progress, including final reports as required by the terms of the award.
- Review project expenditures reflected in COGNOS regularly and in a timely fashion to assure they are correct and appropriate.
- Expenditures or services rendered must directly relate to the scope of work and budget, be incurred within the award period and approved by the PI.
- Sufficient funds must be available at the time of purchase to ensure overspending doesn't occur.

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

The college/department research administrator (CRO/DRA) plays a key role in the financial management of a project, acting as a liaison between the PI and OGCA. While the university places the

prime responsibility for the conduct of the sponsored projects in all aspects on the Principal Investigator, the CRO/DRA is involved in the day-to-day operations of the project. Therefore, it is imperative that the PI and the CRO/DRA interact closely and frequently to review and discuss financial and administrative matters. Although responsibilities can vary by department, typically their responsibilities include:

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

830.00 Role of OGCA in Post-Award Administration

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

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

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

831.00 Award Notification and Initiation of Account

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

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

832.00 Anticipated Awards

If a project needs to be started prior to the receipt of formal sponsor notification, a Proj ID number may be requested from OGCA by submitting a completed and signed "At Risk Account" (ARA) form, previously called a Departmental Commitment Agreement (DCA), along with a pro-rated budget for a period of 30, 60, or 90 days. If the award is not ultimately received or if sponsor terms and conditions disallow any expenditures incurred during the ARA period, the Principal Investigator and/or the authorized signatories on the ARA form are responsible for covering any unreimbursed expenses.

833.00 Expenditure/Encumbrance Tracking

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

833.10 Equipment Purchases

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

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

The UNT Asset Management Office tracks and reports capital equipment purchases in accordance with state and federal guidelines and assists the PI with disposition of federally purchased and owned equipment in accordance with Uniform Guidance (2 CFR Part 200) [link](#).

833.20 Personnel Expense

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

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

833.30 Summer Salary

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

833.40 Travel

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

Regarding travel charges, our practice is to pay actuals up to per diem, except in the instance of conference travel when the traveler stayed at a conference hotel. In that instance, we pay actuals for the lodging at the conference rate. All other expenses are paid actuals up to per diem or "maximum allowable." In the instance of conference travel at conference hotel we typically state: "Please pay actuals for lodging and maximum allowable for all other expenses." Any instance other than this is where we pay actuals for travel would be based on sponsor requirements or on a case by case basis requiring PI justification.

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

833.50 Consultants

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

UNT employees should not be paid as a consultant. Special exception may be specifically authorized when the sponsor approves the payment, the employee is from a different departmental or involves a remote operation, and the work is performed in addition to regular duties.

834.00 Expanded Authority

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

835.00 Federal Demonstration Partnership (FDP)

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

836.00 Pre-Award Expenditures

Most federal grants permit the incurrence of pre-award costs, and UNT permits pre-award expenditures which conform to UNT’s cost transfer policy. If the PI needs to commit funds or order equipment within the ninety (90) days preceding the award start date, an “At Risk Account” (ARA) form, previously called a Departmental Commitment Agreement (DCA) for pre-award spending may be submitted to OGCA. Upon verification of the expected award (and if allowed by the sponsor), a Proj ID number may be assigned by OGCA. However, if the award funding is not ultimately received or if sponsor terms and conditions disallow any expenditures incurred during the ARA period, the Principal Investigator and/or the authorized signatories on the ARA form are responsible for covering any and all unreimbursed expenses which posted to the Proj ID.

837.00 One Year, No-Cost Extensions

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

838.00 Budget Revisions

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

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

839.00 Sub-awards

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

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

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

840.00 Cost Transfers

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

Costs directly charged to sponsored awards must comply with the cost principles outlined in the Office of Management and Budget (OMB) Uniform Guidance (2 CFR Part 200) [link](#). The circular explicitly states that expenses “...may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored agreement, or for other reasons of convenience.” Expenditures should be direct charged to the project account. If overspending occurs, a cost transfer should immediately be processed to move the error to a different account.

841.00 Program Income

Program Income is defined in OMB Uniform Guidance (2 CFR Part 200, [link](#)) as “Gross income earned by the University that is directly generated by a sponsored activity or earned as a result of an award.” Examples include:

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

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

842.00 Project Reporting

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

- **Financial Reporting** - OGCA has primary responsibility for preparing and submitting all interim and final financial reports; however, timely reporting usually requires assistance from the PI through their input prior to the reporting deadline. The PI is responsible for ensuring that all expenses charged are accurate and allowable under the terms of the award. For final reports, the PI plays a vital role in assuring that the report (and final invoice) is accurate and submitted by the deadline. Any trailing charges not included in the final invoice will become the responsibility of the PI.
- **Progress Reporting (interim and final)** - Most awards require submission of interim and final progress reports covering the technical aspects of the award. Such reports can vary from a brief summary and list of publications to a complete compilation of project results. The specific reporting

requirements are stipulated in the award agreement. The PI is responsible for preparing and submitting progress reports in the correct form (manual or electronic) and by the prescribed deadline. OGCA requests that a copy of the report be forwarded to our office for placement in the award file.

850.00 PI Termination Checklist

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

Grant Closeout

If you are transferring to another institution and desiring to move grant/contracts(s) to the new institution you should contact your department head to initiate this discussion. Since the award is issued to UNT, whether a transfer will be allowed is determined by the institution and in conjunction with the sponsoring agency. After the transfer has been approved by the department head, contact OGCA to identify the specific transfer requirements for your project's sponsor. Most frequently on federal awards a final financial report should be submitted that reflects the unexpended balance that could be moved to your new institution. Please work with the OGCA accountant assigned to your award to finalize this balance.

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

Equipment

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

Final Reports and Deliverables

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

Facilities and Administrative (or IDC) Balances

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

855.00 Closing a Sponsored Project Research Account Close-out Notification

Preparing for close-out actually begins upon receipt of an award. The award agreement and prescribed terms and conditions must be reviewed to ensure accuracy throughout the life of the award. Expenditures should be reviewed at least monthly to ensure all charges are appropriate and allowable. Final corrections must be

identified and adjusted within 90 days of the award end for most sponsors; however, some sponsors only allow 30 or 60 days.

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

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

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

860.00 Audit

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

861.00 Time and Effort Reporting

Effort reporting is a method of documenting the work time devoted to an externally sponsored grant or contract and is expressed as a percentage of professional activity devoted to a particular account. All individuals who devote effort to grants or contracts, whether or not they are paid, are subject to effort reporting. Effort reporting is required by Federal regulations Uniform Guidance (2 CFR Part 200, [link](#)) for all compensation/salary costs charged to federal grants and contracts. The regulations require UNT to have a system in place for certifying the allocation of salaries and wages associated with sponsored agreements. UNT employs after-the-fact certification to confirm and substantiate that the activity of an employee supports the compensation charged to federal awards. After each significant term (fall, spring and summer) a time and effort report is submitted by all employees who perform work on the award. Each person must provide a reasonable estimate of the time actually spent working on the project. PIs are responsible for reviewing all time and effort reports to ensure accurate accountability of their own effort and the effort of their staff in a prompt and timely manner. Certifiers must have suitable means of verification regarding the effort expended on the activities they are certifying.

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

When assessing percentage of activity expended on a sponsored project, total effort is defined as actual effort devoted to all the activities for which UNT compensates an employee for their appointment. For faculty, total effort includes instructional activities, public services and research activities. The federal government

guidelines acknowledge that, in an academic setting, teaching, research and public service are often inextricably intermingled. A precise assessment of factors that contribute to costs is not always feasible, nor is it expected. Reliance is placed on reasonable estimates in which a degree of tolerance is appropriate.

However, the percentage of compensation charged to a federal award during a reporting period can never exceed the percentage of total effort associated with the award. If the percentages shown on the report are inaccurate, the PI must initiate a request to the department administrator to process a prior year salary redistribution.

862.00 Equipment Transfer

(Revision of 01-08-2016)

When a faculty member accepts an appointment at another University, and wants to take equipment with them, the request must be approved in writing by the Chair and the UNT Vice President for Finance, and the other university must be willing to accept responsibility for the equipment and pay for the shipping costs.

Restrictions include:

- 1) Items purchased under a Proj ID belong either to UNT or to the funding entity. If the items belong to the funding entity, then the funding entity must give written permission in order for items to be transferred to the new institution.
- 2) If the grant has ended, and ownership of the equipment vests with UNT, then the items must remain until UNT receives something of value in exchange. The UNT Property Manager can assist with determination of the remaining value of the equipment. In Texas, there is a constitutional prohibition against making a gift of state funds. To give away state funds, or items paid for with state funds, is unlawful absent the receipt of something of equivalent value.
- 3) If a computer is being transferred, pursuant to UNT Policy 10.048, Section 10, Disposal of Surplus and Salvage Property paragraph for Disposition of Computer Related Equipment (pages 11 and 12) https://policy.unt.edu/sites/default/files/10.048_Asset%20Management_2008_0.pdf , "Unless specified by the contract or law, it is the intent of the University to erase all software and data files from all data processing storage devices before their official disposition." Licensed software and confidential information may not be transferred.

Assuming all parties agree to the transfer, UNT receives something of value for the transfer, there are no unusual restrictions in the original award document that might limit our ability to transfer title, and the equipment is not being shipped outside the United States, please use the following procedure.

- The PI should obtain written approval for the transfer from the Chair and the UNT Vice President for Finance.
- Submit the written approval, along with a list of the equipment to be transferred to the UNT Property Manager. The list should include a description, serial number, and UNT inventory tag number (where applicable).

The UNT Property Manager will then review the list of equipment for appropriate value and identify a contact at the receiving University. Property transferred by UNT to an out of state University must occur as a sale for "best value" and the current State sales tax must be assessed (see UNT Policy 10.048).

The UNT Property Manager will collect payment from the receiving university prior to shipment. The receiving University will need to arrange and provide transportation and related costs.

900.00 Research Integrity and Compliance

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

910.00 Human Subjects Research

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

911.00 Animal Care and Use – Research with Live Vertebrate Animals

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

912.00 Financial Conflict of Interest for Sponsored Projects

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

913.00 Research Misconduct

Federal regulations require that UNT assume primary responsibility for the investigation of allegations of research misconduct and that UNT adequately protect the rights of those who report allegations of research misconduct as well as those who are accused of such misconduct. The UNT Research Misconduct Policy describes the roles of the Deciding Official, the Research Integrity Officer, the Inquiry Committee, and the Investigation Committee in the review and investigation of such allegations. The Vice President for

Research and Innovation serves as the Deciding Official and appoints the members of each Inquiry Committee and Investigation Committee. The Associate Vice President for Research serves as the Research Integrity Officer to administer the procedures set forth in the Research Misconduct Policy. Link to Research Misconduct website: <http://research.unt.edu/faculty-resources/research-integrity-and-compliance/research-misconduct>

914.00 Export Controls

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

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

915.00 Topics Supported by UNT Risk Management Services Department

Biosafety

The UNT Institutional Biosafety Committee (IBC) is responsible for reviewing proposed uses of bio hazardous agents, human materials, and recombinant DNA molecules to assess compliance with applicable regulatory guidelines, including the NIH Guidelines for Research Involving Recombinant DNA Molecules.

Uses of these materials must be registered with the Biosafety Officer, and some uses will require IBC review. Link to Biosafety page on the Risk Management Services Department website: <https://wiki.unt.edu/display/RMS/Institutional+Biosafety+Committee>

Radiation and Laser Safety

The UNT Radiation Safety Committee has responsibility for policies and practices regarding the receipt, use, monitoring, and disposal of radioactive material, radiation producing devices, and lasers. Link to Radiation Safety page on the Risk Management Services Department website:

<https://wiki.unt.edu/display/RMS/Radiation+Safety+Committee#RadiationSafetyCommittee-forms>