Sponsored Project Handbook

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VICE PRESIDENT FOR RESEARCH AND INNOVATION

Sponsored Project Handbook University of North Texas

* Research procedures, guidance and policies are subject to continuous revisions. Please note: although the Sponsored Project Handbook is available for printing, it is subject to constant change and rendering previous printed versions obsolete.

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Preface

Purpose of the Handbook

The Sponsored Project Handbook is designed to provide principal investigators (PIs) and other research and administrative personnel and staff at the University of North Texas (UNT) guidance on:

- services provided by the <u>Division of Research and Innovation</u> and departments within (GCA, RIC, R&D, RCA)
- sponsored project procedures and practices (e.g., pre- and post-award, research compliance, contracts, and commercialization)
- policies and procedures regarding the research enterprise, based on federal and state laws and guidance
- responsibilities of PIs, research staff, and administrative staff
- definitions and resources available to research investigators
- practices to identify research funding opportunities

Leadership and Guiding Concepts

The Faculty PIs drive the research enterprise at UNT by garnering resources and funding to support their research endeavors and the training of students involved in research. Oversight of the research enterprise at UNT is provided by the Vice President of Research and Innovation. The staff within the Division of Research and Innovation (DRI) provide research services support to faculty and researchers so that they are successful in garnering and utilizing resources and funding for research purposes.

Research is comprised of the creative, systematic and demonstrative work undertaken by PIs to increase the stock of knowledge—including knowledge of humankind, culture, and society—and to devise new applications of available knowledge. This can include

experimental work but also creative work designed to stimulate thought and discussion that creates new knowledge. There are three types of research activity: basic research, applied research, and experimental development. To aid our continuity of being a Hispanic Serving Institute, Carnegie Tier 1 Research Institute, and progress towards national research university status, as defined by the State of Texas, the Division of Research and Innovation is adopting a high standard of best business practices aligned with peer and aspiring institutions.

Research General Information

General Information for Research

Information provided in this section covers common definitions, the role and responsibilities of the Principal Investigator (PI), research personnel, and gifts versus grants.

Definitions

Funding grant terminology is extensive and can be reviewed at <u>Grants.Gov</u>. Additionally, many funding agencies have information for researchers (e.g. <u>NIH</u>, <u>NSF</u>) and even provide lists of acronym with definitions (e.g. <u>NIH Acronym List</u>). PIs should utilize these resources to learn more about the funding agencies they are applying to. PIs are expected to familiarize themselves with common definitions that are relevant to both the research process and the PI Handbook.

Principal Investigator (PI) / Program Director (PD)

A PI/PD is the individual(s) designated by UNT to have the appropriate level of authority and responsibility to direct a research project or program supported by funding. This lead researcher for a defined research and scholarly project takes direct and primary responsibility for the completion of the project, direction of the research, and reporting to the sponsored agency. A Collaborating Principal Investigator (Co-PI) or Co-Investigator (Co-I) is a researcher that takes a secondary role in the project direction, completion, and reporting to the sponsored agency.

Sponsor Agency

Sponsor agencies are institutions that are either part of the federal, state, or local government, or a non-profit, corporation, or other institutes that provides funding for a research project.

Research and Development

All research activities, basic, applied, and demonstrative, and all development activities that are performed by non-Federal entities. Research also includes activities involving the training of individuals in research techniques where such activities utilize the same facilities as other research and development activities and where such activities are not included in the instruction function. **Research** is defined as a systematic study directed toward fuller scientific knowledge or understanding of the subject studied. **Development** is defined as the systematic use of knowledge and understanding gained from research directed toward the production of useful materials, devices, systems, or methods, including design and development of prototypes, processes, and creative works.

Facilities and Administrative (F&A) Costs

F&A costs (also known as indirect costs) are defined as necessary costs incurred by a recipient for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of F&A (indirect) costs. F&A (indirect) cost pools must be distributed to benefited cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.

Indirect Cost Recovery Distribution Guidance

Background

Indirect Costs (i.e.: F&A, Overhead) are funds the University receives for the reimbursement of services rendered in support of grants and contracts. F&A funds are paid to the University by the granting agencies as reimbursement for indirect support provided to the grants and contracts (such as maintenance, utilities, library, administration, and support, etc.) Since colleges and units incur costs in supporting sponsored research, a portion of these charges are distributed back to them in order to support their continued involvement in sponsored activities.

Indirect Cost Recovery

The University of North Texas (UNT) will recover indirect costs (i.e.: F&A, Overhead) for all sponsored projects unless specifically prohibited or limited by the funding agency. If a funding agency has published guidance that limits or prohibits the recovery of Indirect Costs, UNT will recover the allowable amount.

Standard Distribution of Recovered Indirect Costs

The Standard Distribution is as follows:

Standard IDC Distribution		1		
	PI/Dept/College/Institute	VPRI	VP Finance	Total Distribution

22.50/	2= =0/	2001	1000/
37.5%	37.5%	30%	100%
32.370	27.270	2070	10070

The distribution of the funds within each college will be based on the College's policy for distribution. Below are the College's current Distributions. In the case of proposal/awards with more than one PI/Co-PI, the indirect cost distribution will be based on the PI Recognition Credit listed in the electronic Funding Proposal.

Standard Colleg	ge/Dept/PI Distributions	s (32.5%)	
College	College Distribution	Department Distribution	PI Distribution
CENG	12.5%	10%	10%
CLASS	10%	12.5%	10%
CMHT	10%	12.5%	10%
COB	10%	12.5%	10%
COE	10%	12.5%	10%
COI	10%	12.5%	10%
COS	10%	12.5%	10%
CVAD	10%	12.5%	10%
CHPS	11.25%	11.25%	10%
Music	10%	12.5%	10%
UNT Libraries	22.5%	0%	10%

^{*}In the case of joint appointments, the IDC distribution will be split proportionally between the two appointments as appropriate.

Distribution of Recovered Indirect Costs

- 1. When ProjID Accounts are established the Indirect Cost Distribution is setup for that project and is based on the PI Recognition Credit that was established in the internal GRAMS Funding Proposal record.
- 2. Indirect cost return funds will be allocated to separate accounts based on indirect cost revenue recovered in the previous month from sponsored program accounts.
- 3. These funds may be used at the discretion of the principal investigator, chair or dean for research or scholarly activities. Expenditures will be governed by current University policies and procedures. Indirect cost return funds may not be used for faculty salaries or for recurring obligations exceeding the funds available at the time the commitment is made.
- 4. The balance remaining in indirect cost return accounts can be carried forward from one year to the next.
- 5. In the event the principal investigator leaves the University, his or her indirect cost return funds will be transferred to the department indirect cost return account.

Funding Opportunity Announcement (FOA)

A funding opportunity announcement is a publicly available document by which a Sponsored Agency makes known its intentions to award discretionary grants or cooperative agreements, usually as a result of competition for funds. Funding opportunity announcements may be known as program announcements, requests for applications, notices of funding availability, solicitations, or other names depending on the Agency and type of program. Federal funding opportunity announcements can be found at Grants.gov/FIND..

Request for Proposal (RFP)

A Request for Proposal is an announcement from funding agencies on the intent to make awards to meet a specific need of the funding agencies. RFPs typically have specific content that guides the applicant on the requirements within the proposal, and while the majority have due dates, many have open or continuous deadlines.

Statement of Work (SOW)

In a contract proposal, a statement of work is the detailed description of the work that will be performed under the contract.

Subaward

A subaward is an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of an award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

PI Eligibility, Role, and Responsibilities

PI Information

From this section, PIs will see information regarding:

- What confers automatic PI eligibility?
- If the employment role does not automatically confer PI status, how can one be requested?
- What are the roles and responsibilities of a PI?

PI Eligibility

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. The PI must have an active appointment with UNT and is responsible for executing and financially managing the grant or project. Since a proposal and subsequent award are a commitment for UNT in many ways, it is important to establish the qualifications and ability of PIs and Co-PIs to carry out the work on externally funded grants and sponsored projects. Several employment titles automatically confer PI/Co-PI status due to the roles and responsibilities that come with that title. This includes faculty holding the titles of Professor, Associate Professor, and Assistant Professor and library faculty holding the titles of Librarian, Associate Librarian, and Assistant Librarian. Other job titles whose workload includes research responsibility also qualify for automatic PI status. These titles include Research Professor, Research Associate Professor, Research Assistant Professor, Clinical Professor, Clinical Associate Professor, Clinical Assistant Professor, and Research Scientists levels II-IV. Other administrative titles are also eligible for automatic PI status provided the individual is a fulltime employee: Vice President, Associate Vice President, Assistant Vice President, Dean, Associate Dean, and Assistant Dean. However, Emeritus faculty do not automatically have PI status and must request PI status.

Requesting PI Eligibility - Submit an Online Application

For individuals not in an employment position outlined above, or whose role and responsibility does not include serving as PI/Co-PI, PI eligibility will need to be requested. Individuals must complete the <u>online application</u> and upload the required documentation to be considered. The online application will then be routed to the backup faculty member and appropriate approvers before routing to the Associate Vice President of Research and Innovation for review and approval.

Step 1) Complete the Requestor and Sponsor Information, upload a curriculum vitae, and provide a brief summary of the requestor's justification for the request and a summary of their qualifications.

Step 2) Include a Backup PI or Co-PI. This is 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 original requestor leave UNT or otherwise be unable to remain as PI or Co-PI on the project.

Step 3) Include the requestor's unit head for approval (for example, within an academic department, the Department Chair). The unit head must confirm via their approval 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).

Step 4) Once the online form is complete, provide the Requestor Certification online and then proceed to submit for internal routing and approval by the individuals listed above.

Such a request must be made for each proposal submission and will be approved or denied by the Associate Vice President for Research and Innovation. Approval must be obtained before submitting the proposal package to Grants and Contracts Administration (GCA). The rationale for this request is to 1) inform the individual's supervisor and/or departmental chair of the research grant application; 2) communicate the individual's qualifications to conduct research; and 3) ensure that the employee's workload will be adjusted accordingly in the event of an award.

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 UNT. Persons qualified to certify this request 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.

This process is electronic, and the individual requesting PI eligibility should work directly with a grants and contracts staff specialist to process the request.

PI Role and Responsibilities

UNT's principal investigators (PIs) bear the primary responsibility for success of their sponsored research and student 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 crucial for successful function. For the purpose of applying for extramural grants and sponsored projects, a 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. It is the responsibility of the PI/CoPI to be aware of the necessary materials required by the funding agency to provide updates on the project, adhere to proposed budget or modify the budget as allowable by the funding agency, and understand the material within this PI handbook.

Personnel

Research Personnel

PIs should be familiar with all that personnel with could be involved with the research.

Key/Senior Personnel

Individuals that contribute to the development and execution of a project in a substantive, measurable way. Typically, these individuals have doctoral or other professional degrees. These individuals must devote a measurable effort to the project.

Research Staff Positions

The research enterprise at UNT greatly depends on the research staff within research units, core facilities, and departmental units. These research staff are not automatically eligible for PI eligibility but can request PI/CoPI eligibility through the process outlined above. Many sponsored projects can support research positions to conduct the research outlined in the project proposal. Refer to the agencies' guidelines to understand research personnel allowances.

A postdoctoral scholar is an individual who has received a doctoral degree (or equivalent) and is engaged in a temporary and defined period of mentored advanced training to enhance the professional skills and research independence needed to pursue his or her chosen career path. (See the NIH-NSF Definition of a Postdoctoral Scholar. Funding opportunities exist specifically for early career researchers (e.g. postdoctoral fellows). The AVPRI serves as advisor to the UNT Postdoctoral Association to facilitate research opportunities and development for these early career researchers.

Research Positions

Job Title	UNT Job Code	
Postdoctoral Research Associate	1339	
Research Scientist I	1311	
Research Scientist II	1312	
Research Scientist III	1313	
Research Scientist IV	1314	

Visiting Scholar/Researcher

Defined as an individual who is affiliated with an organization/institute outside of UNT who is invited/sponsored by a faculty member to collaborate on a research or scholarly project. The activity should benefit the researchers and further UNT's research mission. Anyone working on campus with a researcher to collaborate for 2 weeks or longer is considered a visiting researcher.

UNT procedures for hosting a visiting scholar/researcher are managed through the Office of the Provost and Vice President for Academic Affairs. Research personnel must submit a <u>form</u> to request a visiting scholar.

Student Researchers

Traditionally, graduate students have played a significant role in the conduct of sponsored research. Undergraduate students are also 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.

Department, School, College, and/or Institute Administration

Administrative staff at the department, school, college, institute or other unit level are a critical component of successful sponsored project administration and therefore are strongly encouraged to provide administrative support to their faculty and staff for all research and sponsored project activity within that unit. Included in this staff category are department administrators, research analysts, administrative coordinators, and budget officers, et al. It is essential that administrative staff maintain current knowledge of sponsor regulations and UNT policies and procedures related to sponsored projects management and research compliance. Administrative staff may assist PIs by:

- i) Preparing and reviewing documents including budget, budget justifications, effort report data, non-competitive renewals, interim and final financial reports, other closing reports, and the appointment of individuals to the project;
- **ii)** Preparing in a timely manner, original and continuing documents for review by the PI for submission to appropriate research compliance committees.
- iii) Developing and maintaining department processes for reviewing payroll allocations on a regular basis, preferably monthly, preparing timely ePARs to document changes, ensuring only people working on the project get paid on the project, and ensuring the % of time paid on the project accurately reflects the % of time actually worked on the project.
- iv) Documenting cost sharing, proposal preparation, and compliance committee reviews;
- v) Processing financial transaction requests;
- vi) Assisting with allocating costs across multiple projects.
- vii) Analyzing financial reports and resolving overdrafts in a timely manner;
- viii) Reconciling project accounts in a timely manner;
- ix) Monitoring and resolving outstanding encumbrances in a timely manner; Initiating requests for cost transfers including payroll re-allocations in a timely manner;
- x) Notifying the PI of any problems regarding grants or contracts management;
- **xi)** Developing and maintaining internal systems for ensuring regulatory compliance and that prevent compliance approval lapses;
- xii) Notifying DRI of changes in key personnel; and
- **xiii)** Performing duties delegated by the PI, including but not limited to data collection and analysis, interaction with auditors, and preparation and maintenance of documentation.

Sponsored Project Description and Definition

Sponsored Projects

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

- 1. The project commits UNT to a specific line of scholarly or scientific inquiry, typically documented by a statement or scope of work.
- 2. A specific commitment is made regarding the level of personnel effort, deliverables, or milestones.
- 3. Project activities are budgeted, and the award includes conditions for specific formal fiscal reports and/or invoicing.
- 4. The project requires that unexpended funds be returned to the sponsor at the end of the project period.
- 5. 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.
- 6. The sponsor identifies a period of performance and/or the ability to audit as a term and condition.

All research and teaching activities, whether or not considered sponsored projects, that 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.

Gifts

Gifts Related to Research

Gifts to UNT of a restricted or unrestricted nature that do not include any conditions that would classify it as a grant are not viewed as sponsored projects and are not processed through GCA, but through the gift transmittal procedures with <u>Corporate and Foundation Relations</u> within UNT Advancement and with the VPRI's Research Commercial Agreements (RCA) if the gift requires a research contract. Gift solicitation and acceptance should be coordinated with the appropriate development officer in each college, and with Corporate and Foundation Relations in the Division of Advancement.

Once a PI identifies a funding opportunity, the researcher needs to <u>submit this GCA web</u> <u>form</u> to request for a Grants and Contracts Specialist. The Grants and Contracts Specialist will discuss the RFP or opportunity, provide access to resources and portals, and develop a timeline for submitting the proposal documents to the Grants and Contracts Administration (GCA) for the administrative review process.

Private, For-Profit Sponsors of Research

Private Research Sponsors

Many private companies are interested in finding ways to interact with University faculty researchers. In order to facilitate such arrangements, the following guidance is offered:

- Interaction between faculty researchers and their counterparts in industry is encouraged.
- Support of specific research projects by industry is subject to the same policies and procedures as those funded by government agencies.
- 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 UNT.
- In fulfillment of above, UNT cannot accept research awards from industrial sponsors until a formal research proposal that includes a budget has been reviewed and approved, as applicable, by the appropriate department Chair, Dean, GCA and RCA. Compliance with applicable policies for conflict of interest, export control, protection of human subjects, animal welfare, radiation safety, etc. is required.
- 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 aware of F&A costs and should recognize UNT's need to recover such costs.
- Research Commercial Agreements (RCA) has developed a model agreement for sponsored research from industry which is available upon request by emailing researchcontracts@unt.edu, and as applicable, may be provided to industry counterparts. Non-Disclosure Agreements should be signed with the potential sponsor before having substantial conversations. All contracts, including Non-Disclosure Agreements, must be signed by a university employee granted signature authority; in most cases, the faculty and administrative staff at the colleges are not authorized to do so but the staff within the DRI are enabled to execute contracts for the University.
 - Terms and conditions of an industry sponsored research agreement (SRA) is negotiated by RCA. These agreements may involve also licensing of existing intellectual property.

Foundations and Other Not-for-Profit Sponsors

Foundations/Not-For-Profit Sponsors

UNT 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, and review with Research Commercial Agreements if needed, prior to submitting applications to these sponsors.

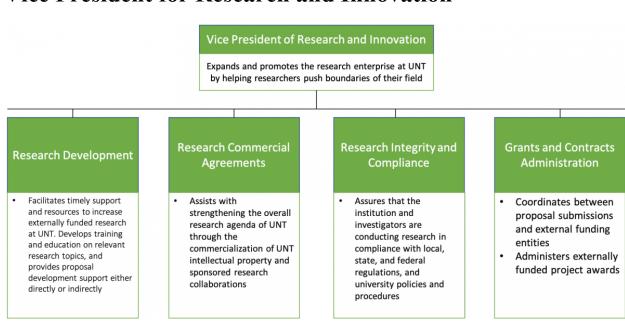
UNT Research Enterprise: Organizational Structure, Oversight & Roles

UNT Research Enterprise

This section provides information about the research division and departments therein at UNT.

VPRI and **Responsibility**

Vice President for Research and Innovation



The VPRI is the University official responsible for the development and implementation of policies and procedures relating to sponsored projects (extramural and intramural). These policies and procedures are aligned with federal and state laws and guidelines for conducting research. That is, DRI provides the necessary structure and support so that PIs can conduct research aligned with federal guidelines.

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). UNT 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 UNT's faculty, staff, and students. Information about the IRB is located at the IRB Protocol Submission page.

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.

Technology & Sustainable Processes

The DRI embraces the use of technology, implements sustainable processes, and is aware of use of resources. Thus, PIs and other research personnel can reach all of our staff via Microsoft Teams (message chat or calls). Furthermore, the DRI has implemented paperless processes.

UNT Research Administrative Structure and Collaborative Units

UNT Research Administrations and Units

UNT is comprised of several different research departments and units that contribute to UNT's research enterprise.

DRI Departments

The Vice President Research and Innovation (VPRI) is responsible for the administrative oversight of UNT's research projects. This administration is made possible by the departments within the DRI: Grants and Contracts Administration (GCA), Research Integrity and Compliance (RIC), Research Commercial Agreements (RCA), Research Development (RD), and Research Communications and Project Management (RCPM) departments.

Collaborating Units

Cross unit collaborations are key to providing top research services. The VPRI and AVPRI work closely with the Vice President for Academic Affairs, Advancement, Corporate and Foundations Relations, Risk Management, Deans, Chairs, and Faculty in establishing research policies and procedures. The VPRI is advised by the Faculty Research Council, Faculty Senate, and the Vice President for Finance and Business Administration to provide supporting services to the PIs.

Research Institutes, Centers, and Core Facilities

Additionally, the VPRI oversees the University Research Institutes and Centers and the University Research Core Facilities. Through strong administrative support and collaboration, these resources provide UNT researcher PIs with opportunities and support to grow their research enterprise.

Deans, Department Chairs, Institute Directors, 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 GCA, 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 UNT 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. PIs are required to work with Deans and Department Chairs to when cost sharing (matching) commitments are required by a funding agency.

Associate Deans of Research (ADR) are often collaborators with the DRI and called upon to provide input, guidance, and recommendations to the Division of Research and Innovation. Faculty are advised to work closely with their respective ADR or other academic Associate Deans to develop research programs aligned with college and departmental mission and goals.

Governing Authorities for Research and Sponsored Projects

Governing Authorities

The Division of Research and Innovation works with UNT units to develop and implement UNT policies. Research policies are within Chapter 13 of the UNT Policy manual.

- For general policy information, consult UNT's policy homepage.
- For more specific information, consult UNT's policy manual.

Externally funded 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 the White House's Office of Management and Budget page.

Research Development Services

Research Development Services

The DRI provides many capacity-building opportunities for researchers so that they increase the success of garnering external funding. The VPRI, AVPRI, Assistant Director of Research Development, and staff members of the DRI all contribute to developing research capacity at UNT. Refer to the <u>DRI Events Calendar</u> to identify scheduled events (e.g., workshops, informational seminars, interdisciplinary meetings).

Capacity Building and Research Training

The AVPRI and Associate Director of Research Development work closely with one another and respective academic units to provide services and resources to PIs. Their objective is to facilitate the building of interdisciplinary teams, increase external funding applications and awards, provide technical editing support on proposals, identify and disseminate information on external funding opportunities, manage the limited submissions process, inform about the opportunities UNT has a Hispanic Serving Institute, and manage internal seed funding.

PIVOT

The Vice President of Research and Innovation provides all UNT researchers with a paid subscription service to Pivot, which is a proprietary funding opportunity database built by the education company Proquest. Researchers can log into the site through Pivot's homepage. The Pivot database provides users with a personalized portal to search, track, and save funding opportunities keywords entered in the database. Research Development staff within the VPRI provide training and tips on the database upon request. Grants.gov is a free resource to the public that captures real-time information on Requests for Proposals (RFPs) and Broad Agency Announcements (BAAs). Researchers at UNT may also request to be added to a listery to receive a monthly curated funding newsletter, vetted for UNT eligibility and provided by the Research Development staff. UNT researchers may contact untresearchdevelopment@unt.edu to be added to the listery.

Limited Submissions

Defined as opportunities in which the sponsoring agency limits the number of proposals a single institute (e.g., one application from UNT) or units within an institute can submit (i.e., one application per college or department). The limited submission opportunities are listed on the DRI Limited Submission webpage, provided in a monthly email newsletter sent to Associate Deans and list serve. The VPRI office will work with college Deans to and other stakeholders in cases in which the sponsoring agency requires cost share (e.g. NSR MRI grant applications). Institutional grants, those requiring programmatic support from upper

administration, will be distributed similarly. PIs interested in Institutional Grants should begin conversations with the appropriate administrators and DRI personnel early.

Hispanic Serving Institute (HSI)

UNT is designated by the Department of Education as a Hispanic Serving Institution (HSI), which is under the umbrella of a Minority Serving Institute. This designation now allows for UNT to apply for Title III and Title V funds. UNT is positioned to apply for both Minority Serving (MS) and Hispanic Serving (HSI) opportunities. A curated list of MS and HSI funding opportunities is provided on the VPRI website that researchers are encouraged to learn about and apply for. Note that some of these opportunities are Limited Submissions.

Grants and Contracts Administration

GCA

This section contains the organizational structure of GCA, points of contact for specific services, and the various types of sponsored projects and agencies.

Grants and Contracts Administration (GCA) serves as the coordinating unit for externally sponsored projects. The goal of GCA is to assist faculty and professional staff in their efforts to secure external funding and administer awards received by UNT. Research Commercial Agreements (RCA) negotiates and executes those sub awards and subcontracts related to sponsored projects or contracts. Both GCA and RCA report to the VPRI.

The functions of GCA include the following:

- Formulating grant and contract administration policies and procedures.
- Overseeing the submission, award acceptance, and administration of sponsored project grants and contracts throughout UNT from inception through closeout.
- Assuring timely receipt of and proper fiscal stewardship for sponsor funds.
- Maintaining liaison with sponsoring agencies concerning University organization, policies, and procedures; representing UNT 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.
- Negotiating University-wide F&A costs.

GCA Staff Role and Responsibilities

GCA Staff Roles and Responsibilities

The GCA has several teams to assist research personnel throughout the proposal process.

Pre-Award

The <u>pre-award team</u> coordinates the proposal submission and award acceptance from external funding agencies. This team helps with the grant application process, reviews materials that the PI provides the office, and submits the final proposal to the funding agency.

Early in the pre-award process, PIs should fill out the online form to request a grants and contracts specialist/analyst.

Role of a Grants and Contracts Administration (GCA) Specialist

The GCA Specialist will provide 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 six-day deadline on a "first come, first served" basis as workload allows. In addition, during the six-day review period before the sponsor submission deadline, GCA 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 GCA Internal deadline.

The pre-award team will provide:

- 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: Review the budget for alignment with funding agency requirements. Translate the budget items into sponsor budget forms. Require that any variance from the standard indirect cost recovery (F&A) be approved in writing. Review the Cost Share Approval Form for cost share at required level and required approval/s.
 - Note that for cost share approval the PI must work with their department chair, Dean, VPRI office and other necessary administrative units well in advance to discuss cost share approvals from the academic and research units.
- Proposal submission: Facilitate the final submission of the proposal to the sponsor according to the agency requirements. If the proposal submission is through a sponsor portal (e.g. NSF Fastlane, Research.gov, etc.) the pre-award team will 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 GCA Internal deadline will receive a modified level of review.

GCA 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.

Post-Award

The <u>post-award team</u> coordinates the administration of externally funded sponsored project awards. This includes working with the PI to submit annual updates to the funding agency and to close-out grant awards. The awards are set up in PeopleSoft, and the PI and administrative support team within the academic units can monitor the expenditures, invoices, financial reporting, and award close-out.

Contact Information

To contact the GCA team, visit the GCA homepage or browse the DRI directory.

Research Commercialization Agreements (RCA)

RCA

Research Commercial Agreements (RCA) is responsible for the negotiation and execution of contract agreements and subawards, intellectual property licensing, and cooperative agreements with companies and other institutions.

RCA is also responsible for the identification, protection, and commercialization of the intellectual property generated by the faculty and staff of UNT.

Associate Vice President for RCA Role

Acts as UNT's Intellectual Property Officer and is responsible for accepting all disclosures of new inventions and other discoveries.

Research Commercial Agreements Staff Role

Evaluate disclosures and work with inventors to develop a strategy to protect the intellectual property and to license the discovery for commercial development. Research Commercial

Agreements is responsible for complying with sponsor terms and conditions related to the management of intellectual property. Faculty cannot sign contracts with sponsors.

Role of College/Department Research Administrators

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 six-day deadline for transmittal of complete proposal packages to GCA. 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 six-day deadline.

The Lead/Contact PI's Department Chairs and, College Deans, will be included in the electronic review and approval steps to allow for more robust Departmental and College oversight and to ensure the most effective use of Departmental and College resources. It is the college Dean's and the department Chair's responsibility to confirm that financial commitments made in a proposal, as well as the personnel and facilities referenced in a proposal, are reasonable and available to carry out the proposed project. UNT's Grants and Research Administration Management Suite (GRAMS) software system allows PIs to enter proposal-related information into a web-based form and submit it to the appropriate reviewers and approvers for electronic authorizations.

The Dean and Chair are expected to electronically review and approve the proposals from their College or Department in a timely manner. This will ensure sufficient time for the thoughtful consideration and review of the proposal by GCA for sponsor and institutional requirements prior to the proposal submission to federal agencies and other sponsors.

Types of Agreements and Instruments

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, GCA reviews the formal document for compliance with University policy. GCA is authorized to accept and sign notices of award on behalf of the University of North Texas.

Grants

Grants

Grants constitute the majority of awards received by UNT and constitute a less-restrictive award type. Sponsors may not require UNT 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, or made publicly available, by the sponsoring agency. Research personnel should always check program announcements and similar documents for referenced terms and conditions.

Contracts

Contracts

Contracts are generally more restrictive awards than grants. 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

Ocost Reimbursable contracts specifically state the maximum (not-to-exceed) level of funding that a sponsor will provide. If actual project costs to complete the statement of work are less, UNT will only be reimbursed for actual incurred costs. UNT reports only on costs incurred up to the maximum amount. Additional funding requires contract modification.

Fixed Price

Fixed Price contracts are 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 a portion of the 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). Learn more about Fixed Price in Contracts.

Fixed price research contract with residuals

In some cases, faculty can arrange for Research Contracts based on fixed price performance. Under fix price conditions, the sponsor agrees to pay a set price for the research activities being accomplished in the project. If the expenses of the project total less than the fixed price, residuals are accrued and remain with the institution. Equally, if expenses accumulate beyond the agreed to fix price, then those expenses are carried by the institution. The appropriate risk on both parties is agreed to in executing the contract.

The Cost Accounting Standards are a set of cost principles put forth by the federal government to assure consistency in the costing of proposals that are submitted to federal government. The Cost Accounting Standards Board's cost accounting standards located at 48 CFR § 9905.501, 9905.502, 9905.505, and 9905.506.are incorporated into the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200). It is the expectation of UNT that all research contracts agreed to by this institution are budgeted in accordance with these four standards. 9905.501 is the Cost accounting standard that requires consistency in estimating, accumulating and reporting costs by educational institutions. Given this expectation, this institution expects fix price contracts to be executed with a budget that accurately estimates costs and results in actual expenses that do not greatly deviate from that proposed budget.

Executing a contract with efficiency and effectiveness can yield significant savings and that, in those cases, savings should be realized by the principal investigator and his or her department chair/dean. The reasoning behind the sharing of these resources across the principal investigator, department chair, and dean is that likely institutional capacity was used to create a significant amount of the savings yielded in a fixed price contract. UNT expects that split of residuals to be either based on college/departmental policy or negotiated on a contract-by-contract basis.

Given that UNT research/contracting expects to function in the cost accounting principles of truth in budgeting, we will allow up to a maximum of 25% of budget to be captured in expense residuals. Any balances beyond the 25% will be deemed as outside of expected norms and will be utilized by the VPRI to promote university wide research programs. The intent is to ensure that the university promotes the highest level of accuracy in proposal budgeting practices.

When material levels of residuals are captured in the contract process through efficiency and savings, those residuals are to remain in the sponsored project and spent out of the sponsor project in order to further our capture of those expenses as research expenditures. Immaterial levels of residuals are reasonable to remove from the project and placed in a designated account. Intent to transfer to a designated account will be done with the approval of the AVP of Grants & Contracts Administration.

Cooperative Agreements

Cooperative Agreements

Cooperative Agreements are used when federal sponsors want to retain more active involve ment 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, or other similar circumstances.

Issues Requiring Special Consideration

Issues Requiring Special Consideration

Research personnel and PIs should be aware of both export controls and HIPAA protocols. These issues require special handling and could impact proposals and research plans.

Export Controls

Export Controls

Export Administration Regulations (EAR, enforced by the Department of Commerce) and I nternational 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 international students or faculty in the research;
- working with international companies; and
- sharing research results with persons who are not U.S. citizens or permanent residents.

These restrictions apply to work physically 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 implicate d by export control laws, should be identified as early as possible.

HIPAA

HIPAA Protocols

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 UNT, 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 that 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 GCA that do contain PHI so that these may be given special attention and handled in accordance with HIPAA regulations.

Administrative Research Policy

Administrative Research Policies

The research process entails several different policies and administrative duties. It is the PI's responsibility to understand how the following issues impact their research.

Corporate Responsibility

Corporate Responsibility

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

Formal Documentation

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.

Authorized Signatures

Authorized Signatures for Research Projects

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

Classified Research

Classified Research

UNT 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.

Endorsement of Research Results

Endorsement of Research Results

Because UNT 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 UNT. Consequently, UNT 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 UNT. In addition, UNT will neither guarantee nor warrant the results of sponsored projects.

Ownership of Intellectual Property

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 UNT's policies on these issues.

Students in Research

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.

Administrative Requirements for Sponsored Programs

Administrative Requirements for Sponsored Programs

The following conditions must govern any research agreement entered into by the Universit y 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 UNT or to the integrity of the research and is essential for the award to be given.
- The resources or data sources on which research is wholly dependent must be free of control by the sponsor. UNT 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 UNT'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 UNT shall not be excluded by a sponsor from participation
 in a project for any reason other than when necessary because of
 insufficient competence, when required to protect privileged information, or cases
 where certain individuals may be excluded by federal law (e.g. citizenship
 requirements).
- No financial obligations by UNT in the present or any time in the future can be implied
 other than those stated in the contract. When uncertainty exists in their judgment, the
 VPRI or a designated member of the VPRI's staff shall consult with appropriate
 officers of UNT to assure that this condition is met prior to the final approval of
 the agreement.
- UNT 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.

Identifying Research Funding Opportunities

Identifying Research Funding Opportunities

There are multiple avenues in which a PI or team can locate funding opportunities. The most common form of external funding identification is through databases, listervs, and institutional newsletters/emails. The research development unit under the VRPI is tasked

with sharing information as it becomes available and administering access and training to the <u>Pivot database</u>. To access Pivot, all UNT researchers must sign up with their institutional email (unt.edu) and create a password. In addition to paid databases, there are a multitude of free databases that are open to the public and do not need an individual login to utilize, such as <u>Grants.Gov</u>, the Texas government <u>eGrants portal</u>, and many more.

A monthly UNT funding newsletter is also provided by the research development staff that is vetted for UNT eligibility. While staff can provide insight and information on funding opportunities, the Principal Investigators are ultimately responsible for identifying research opportunities that fit their expertise. Funding identification and fit are best determined by discussing research topics with chairs, deans, program officials, and experienced colleagues in their field.

Grant Databases

Grant Databases

PIs have access to several different grant and funding databases in which they can access relevant funding opportunities.

Pivot

While there are many ways to search for external funding opportunity, the most common way is through databases. UNT subscribes to <u>Pivot</u>—a powerful funding search engine that houses not only grant opportunities, but also conference information, researcher profiles, and more research and academic resources. PIs are encouraged to contact <u>untresearchdevelopment@unt.edu</u> for Pivot questions and group training sessions.

Federal Funding

For federal opportunities, researchers can access <u>Grants.Gov</u> and search under the search grants tab for a list of relevant federal opportunities by using the keyword search feature.

Private or Philanthropic Funding

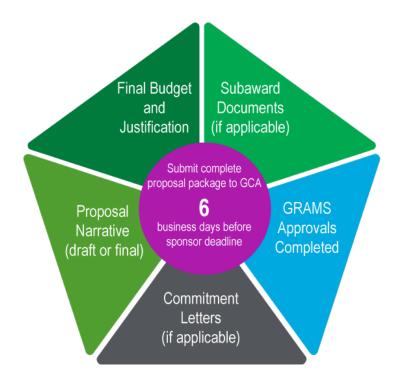
For private funding opportunities to support research, UNT libraries hold a subscription to the <u>funding information network</u>. This is a UNT-subscribed public access database for private, philanthropic, and non-profit sources (must be accessed in the <u>Sycamore Library</u>). PIs are encouraged to contact subject-matter librarian <u>Jen Rowe</u> for questions or a free consultation.

In addition to signing up for listservs and newsletters from your preferred funding agencies, PIs should discuss new appropriate networks and funding sources with their chair or colleagues (e.g., associations, laboratories, private sources).

Research Proposal Preparation

Preparing a Proposal for Submission

The submission of a proposal is the common avenue of approaching potential sponsors for support of research or other projects. The process of writing proposals—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 (PI) 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.



GCA 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. There is a 6-business-day deadline in which the PI must submit all required proposal documents in order to receive a full comprehensive review from GCA. 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.

Common Sponsored Project Information

The University of North Texas has standard Institutional Information that is commonly required for proposal submissions. Frequently used information for proposals can be found on the GCA Website: https://research.unt.edu/research-services/grants-and-contracts/codes-and-numbers

Preliminaries to Proposal Preparation

Preliminaries to Proposal Submission

Roughly develop the proposed project, as well as 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 UNT may be made until a formal proposal has been processed and approved by GCA.

Sponsored Research Agreements with Commercial Entities

Sponsored Research Agreements with Commercial Entities

RCA 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 an SRA should consider the various stakeholder groups involved in the process. The interests and needs of UNT 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 UNT.

Prior to preliminary proposal discussions, <u>submit a request</u> for a Grants and Contracts Specialist. The Grants and Contracts Specialist will discuss a timeline for submitting documents to GCA 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 GCA is made aware of informal proposals (white papers) or correspondence being exchanged with potential sponsors. This may be accomplished by sending informational copies to GCA. This is particularly true when large or complex projects are being discussed or there are unusual aspects to a proposal that may require University consideration prior to approval.

General Requirements

General Requirements

The requirements for content and format of proposals differ markedly among the various sp onsoring 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 that will be evaluated by the proposed sponsor to determine whether or not the project merits support.

Content of Proposal

Content of Proposal

The PI is responsible for the technical content of the proposal and for compatibility of the proposed research along with her or his 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:
 - 1. Name of the entity to which the proposal is being submitted.

- 2. Legal name of the university, University of North Texas.
- 3. Title of the proposed project.
- 4. Name of the principal investigator and any co-investigators, with the departmental and school/college affiliations of each.
- 5. Signature of the principal investigator, and signature of the authorized University official.
- 6. Date of submission, and proposed project period.
- 7. Standard information about the University, e.g., taxpayer identification number (FEIN), DUNs number, etc., which may be obtained from GCA.
- 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, area s 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 UNT which typically must accompany each proposal. Some agencies such as NSF a nd 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 GCA.

Public Access to Research Using Data Management Plans

Public Access to Research and Data Management Plans

Federally funded researchers are required to make their published results available and manage their data.

Background: On February 22, 2013, the Office of Science and Technology Policy (OSTP) released a <u>memorandum</u> entitled "Increasing Access to the Results of Federally Funded Research." It directed Federal agencies with more than \$100 million in research and development (R&D) expenditures to develop plans to make the published results of

federally funded research freely available to the public within one year of publication, and it required researchers to better account for and manage the digital data resulting from federally funded scientific research.

UNT developed a framework and plan for PIs and staff to implement that will increase public access to publications and data per the OSTP directive.

- The concept of using a Data Management Plan (DMP) as the vehicle to implement Public Access became a widely shared result. The DMP becomes the obligation to those who receive these grants, the obligation of what the institution must meet.
- Awards to institutions will include conditions to implement this public access requirement. Principal Investigators must ensure that all researchers who work on projects funded in whole or in part by federal grants or cooperative agreements comply with the public access requirements, including public access to data being maintained by the university and maintained going forward. Even though this is a shared responsibility, it is the primary responsibility of the PI to execute the public access to the data and publications.
- The Grants and Contracts Administration office created a process for Public Access to Research using the DMP, in partnership with the library. The philosophy is that data and publications be placed in the appropriate location for a designated discipline with the location of the data and publications housed at the library.
- This Public Access to Research process will be fully implemented by Jan 1, 2021. Every outgoing federal grant will have a DMP associated with it, and every incoming federal grant will have a direct link to a library record and where the information is located, based on the DMP.

This process is required for Researchers with Awards at all Federal Agencies as well as any other non-federal award listing "data management" or "public access" on an RFP, an award document, or on a sponsor's website.

Data Management Plan Roles & Responsibilities

Below outlines each stakeholder role in fulfilling the federal requirements of creating and maintaining a Data Management Plan (DMP) and giving public access to research data at UNT

Funder/Sponsor

- Provides funding for research projects
- Creates specific requirements to comply with federal DMP rules
- May provide templates to help PI comply with DMP
- Audits for compliance in the post-award phase

Principal Investigator

- Creates the Data Management Plan per funder requirements
- PI commits to using the DMP tool provided by UNT library if funder does not provide one
- Utilizes research field resources to share data
- Submits data to data management inbox for upload as required
- Certify periodically that all data has been reported

Grants Staff

- At proposal stage will notify PI if DMP is required
- Assists PI in understanding sponsor requirements/next steps
- Introduces PI to library and creates Persistent Grant Identifyer (PGI) in UNT digital Library
- Reminds PI to deposit research data in library or repositories per sponsor

Library Staff

- Coordinates between grant staff and PI if DMP is required & data needs to be stored in UNT's digital library
- Uploads all submitted data to the digital library for public access

Data Management Procedure

1. At the proposal stage, the Proposal Team will email the PI letting them know a **Data Management Plan (DMP)** is required, and that the PI is responsible for developing the plan.

Resources to assist PI with DMP:

- Follow sponsor agency guidelines on data management storage (example: upload data to NIH PMC database)
- o Know what the PI's field/societies utilize
- o Follow expectations of PI's field and discipline

If a form/format is not provided by the sponsor, it is expected the PI use the tool provided by the UNT Library.

By this process, UNT declares to all UNT university principal investigators that UNT will only recognize the distribution plan for data as detailed in the DMP. The DMP is the formal obligation. regarding public access to data and no other parts of the proposal document will obligate this institution to alternative requirements.

The Proposal Team will set up an email introduction between <u>datamanagementplans@unt.edu</u> and the PI, and suggest they discuss the Data Management Plan and the availability of the Data Management Plan (DMP) tool. Library staff receiving email to <u>datamanagementplans@unt.edu</u> and the GCA Specialist should be copied on the email introduction.

If the Proposal/award's funding source is Federal Flow Through, then a separate DMP is not required by our office, unless required by the sponsor.

Other situations that do not require a DMP:

- "Export Control" associated Proposals/Awards
- Proposals/Awards that have research formally designated as "Controlled Unclassified" or otherwise deemed by the sponsor as "sensitive."
- Proposals/Awards carrying an IRB protocol with personally identifiable information.
- Proposals/Awards with a PI declared "expected intellectual property" exception Requires approval from Research Commercial Agreements (RCA)

In these situations, a DMP would be submitted listing the appropriate exception.

2. If the grant is awarded, but before GCA sets up the award in their recordkeeping systems, Proposal Team will send the DMP to the GCA Specialist stating an award with a DMP requirement has been received.

Included with the DMP should be:

- o PI name
- Federal Agency (or non-fed sponsor requiring a DMP)
- o Project Title
- o Agency grant number
- 3. GCA Specialist will send email to PI and to <u>untrepository.grant-inventory@unt.edu</u> with DMP and award information attached, congratulating PI on receiving award and telling the PI that we are working to post an online copy of the DMP and establish a Persistent Grant Identifier (PGI) in the UNT Digital Library.
 - The email will include a reminder that the establishment of the DMP and the PGI is required before an award can be set up.
- 4. Library staff receiving email to <u>untrepository.grant-inventory@unt.edu</u> creates a record in the UNT Digital Library that contains the PGI and associated copy of the DMP; once the PGI is established, library staff will email the PI, and copy the GCA Specialist, that the DMP and PGI have been set up.

The email will include the blank inventory template, with the award information inserted, which is to be used when submitting data and/or publications to the UNT Libraries, with a reminder to include the PGI, or agency grant number with all data and/or publications submitted to the UNT Libraries.

- 5. The GCA Specialist will enter the DMP and PGI in institution system, and the Proposal Team will be notified that the award can officially be set up and sent to Post Award.
 - The DMP and PGI will be saved in the institutional record for these awards.
- 6. A Data Management Plan reminder will be sent annually for data and publication updates:
 - GCA Specialist will email PI, copying <u>untrepository.grant-inventory@unt.edu</u>, with the reminder to deposit data and publications and with a recommendation to the PI to submit all available data, publications, and permalinks to content hosted elsewhere (as required by the DMP).
 - If the PI has not yet reported any data or publications to the UNT Digital Library, the attached template can be used. Otherwise, the PI will be asked to add to the last version of the inventory template that was submitted to untrepository.grant-inventory@unt.edu, and to make any applicable submissions at this time rather than waiting until grant closeout. PIs are reminded that they must include the PGI, or agency grant number when submitting data, publications, and permalinks to content elsewhere.
 - o PI submits any data, publications, and permalinks, including the PGI, Project ID#, or agency grant number, to untrepository.grant-inventory@unt.edu.
- 7. A Data Management Plan reminder will be sent when the award ends:
 - GCA Specialist will email PI, copying <u>untrepository.grant-inventory@unt.edu</u>, encouraging PI to submit any data, publication, and permalinks to content hosted elsewhere, that has not already been submitted.

If the PI has not yet reported any data or publications to the UNT Digital Library, the attached template can be used. Otherwise, the PI will be asked to add to the last version of the inventory template that was submitted to untrepository.grant-inventory@unt.edu.

The GCA Specialist will also let PI know there will be 2 additional reminders sent, one 12 months after closeout and the final reminder 36

months after closeout, as final opportunities to submit data, publications, and/or permalinks.

- OPI will be required to submit a statement confirming all data and publications have been disclosed to the library and all conditions of the DMP policy have been fulfilled. This statement can be submitted at any time after closeout and would end future reminders about required data and publications from GCA Specialist.
- o Following the process described under section (6) above, the PI submits data, publications, and permalinks, to untrepository.grant-inventory@unt.edu.
- 8. A Data Management Plan reminder will be sent 12 months after award closeout:
 - o GCA Specialist will email PI and copy <u>untrepository.grant-inventory@unt.edu</u> as in the previous sections. Then, following the process described under section (6) above, the PI submits data, publications, and permalinks to <u>untrepository.grant-inventory@unt.edu</u>.
- 9. Data Management Plan final reminder to be sent 36 months after award closeout:
 - o GCA Specialist will email PI copying <u>untrepository.grant-inventory@unt.edu</u> as in the previous sections. Then, following the process described under section (6) above, the PI submits data, publications, and permalinks to untrepository.grant-inventory@unt.edu.

A confirmation email from the PI is required at this time stating all data, publications and permalinks have been submitted.

10. Should UNT Post Award specialist determine that the PI failed, after 36 months post award closeout, to post the data as stipulated in the formal DMP, the PI will be restricted from access to the UNT pre-award proposal submission process until and unless the VPRI approves a reconciliation.

Note: If there is a change to the primary PI on an award with a federal agency, or other award requiring a DMP, the GCA Specialist will contact the new PI about the institutional obligations of the DMP.

Proposal Preparation

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) and/or other applicable application guidelines.
- Requesting a Grants and Contracts Specialist.
- Engaging their department, college, and GCA 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 GCA 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 GRAMS Funding Proposal for each proposal.
- Routing a complete proposal package in GRAMS and obtain needed Department and College, approvals before the GCA internal deadline. A complete proposal package includes all proposal materials or a PDF of the assembled application from a sponsor's portal, as well as all internal forms, such as the budget justification, sub awardee documents, and other required documents as applicable. If applicable, all proposal materials must be uploaded in the GRAMS 424 application or into other agency electronic proposal systems (i.e.,Research.gov) and access to the assembled proposal should be granted to GCA for review.
- Finalizing edits to the narrative by 8:00 am the day of submission. GCA may modify this request based on the time the proposal is due.
- If the proposal is required to be mailed, the PI is responsible for mailing (including appropriate number of copies) to the sponsor once the proposal has been reviewed and authorizing signatures secured. When a proposal is being mailed in hard copy rather than electronically, and will be mailed, express mailed, or shipped with an overnight delivery service, the PI is encouraged to secure the routing number and evidence of pick-up and delivery.

GCA 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.

Preparing Proposal Budgets

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.

Proposal Budgets are drafted electronically within Grants module of the GRAMS system. The GRAMS budget is the budget of record for the proposal.

A cost-of-living adjustment or allowance can be budgeted in order to cover expected cost increases ranging from raises for salaries and generic inflationary forces for other direct costs. A standard 3% increase can be used for budget categories when appropriate.

Salaries and Wages

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 entered into GRAMS in-terms of an annualized percent 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 their 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 UNT 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.

Postdoctoral Compensation on Research Grants

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.

Employee Benefit Costs

Employee Benefit Costs

Employee benefit rates are calculated as a percentage of employee salaries and wages and are established by the State of Texas.

Fringe Benefit Rates used for proposal budgets are based on average Fringe Benefit rates. Current rate information regarding the average Fringe Benefit rates used for proposal budget can be found on the GCA website.

Graduate Research Assistants

Graduate Research Assistants

Salaries for Graduate Research Assistants/Fellows (i.e., graduate students performing research) should be budgeted for based on the VPAA Graduate Student Pay Schedule published on UNT's VPAA website. 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 perfor med on that project.

Consultants

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 UNT. 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 GCA.

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 Intern al Revenue Service.

Travel

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 those that are 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 or under the "Open Skies Act" may only occur under exceptional circumstances and as/if approved.

Capital Expenditures/Non-Expendable Equipment

Capital Expenditures/Non-Expendable Equipment

Non-expendable equipment is defined by UNT 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).

Expendable Supplies and Equipment

Expendable Supplies and Equipment

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

Note: Office supplies are typically not allowable.

Publication Costs

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.

Sub-recipients

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, when applicable

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.

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

Other Direct Costs

Other Direct Costs

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

Representations and Certifications

Representations and Certifications

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

Facilities and Administrative Costs

Facilities and Administrative Costs

Facilities and Administrative (F&A) costs, also called overhead or indirect costs, reimburse UNT 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 of UNT facilities. In other words, these include costs essential to support sponsored activities that 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 section on 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 UNT and the rent is not charged to the grant or contract, the on-campus rate prevails.

Cost Sharing

Cost Sharing

Some sponsors require UNT to contribute to the cost of the project and will require a financial accounting of UNT'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 UNT must document. UNT account(s) to which such cost sharing will be charged must be identified prior to approval of the sponsored project budget as well as 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 UNT's negotiated rate may be used to meet a cost share requirement if permitted by the sponsor. UNT 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 Division of Research and Innovation.

Deadlines for Proposals

Deadlines for Proposals

The University review process takes time. A complete proposal should be submitted to GCA, including a reasonable draft of the narrative, a minimum of 6 (six) full business days prior to the sponsor's submission deadline. The final narrative should be finalized and received by GCA by 8:00 am the day of the sponsor's submission deadline. GCA may modify this request based on the time the proposal is due.

GCA will review proposals for which the technical portion is still in draft provided that all other proposal elements are complete and final and all required reviews and approvals by the appropriate Chair, Dean, and other applicable approvers have been received in GRAMS.

Proposals will normally be processed in order of receipt. It is the responsibility of the PI to ensure that a proposal is received by GCA 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 six-day deadline will receive a modified level of review.

GCA 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.

Electronic Submission of Proposals

Electronic Submission of Proposals

A number of sponsors require electronic submission of proposals.

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 GCA. In addition, the PI may need Adobe Acrobat and/or PDF capability on their computer.

GCA must approve the proposal before it may be submitted. Proposals for electronic submission (or online submission) must meet the GCA internal deadline, the same as proposal submissions by any other method.

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

Required Copies of Proposals

Required Copies of Proposals

The number of copies of proposals required by a sponsor may vary. The PI should review proposal instructions and contact GCA 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 GCA.

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

Multiple Solicitations

Multiple Solicitations

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

Review and Approval Channels

Review and Approval Channels

The PI must route their proposal for department and college review and approval, before it may be submitted to the sponsor by GCA. 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 required by the following:

• Department Chair

o Approval by the Chair constitutes endorsement attesting to the academic pur poses 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.

• Dean

o 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 GCA.

• Grants and Contracts Administration (GCA)

- Review by GCA 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 GCA. Proposals and documents received after the GCA six (6) full business day deadline will receive a modified level of review.
- o GCA 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.

- Vice President for Research and Innovation
 - O Proposals that appear to deviate from University policy are submitted by GCA to the Vice President for Research (VPRI) for review. If the VPRI finds the proposal acceptable, it is approved and returned to GCA 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.

Post-Award Administration

Post-Award Administration

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

Principal Investigator Responsibilities in Post-Award Administration

Principal Investigator Responsibilities in Post-Award Administration

The Principal Investigator (PI) has primary responsibility for management of the project within funding limitations: adhering 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 Code of Federal Regulations (CFR) 2, Part 200 of the Uniform Guidance.

PI Responsibilities:

- 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 <u>Uniform Guidance: 2 CFR Part 200</u>
 (General Provisions for Selected Items of Cost).
- 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 GCA 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 GCA 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 Intellectual Property Officer.
- 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.
- Sponsor approval is required for PI disengagement from a Proj ID for more than 3 months. Applies to all sponsors—federal, state and private. Being away from campus does not necessarily constitute disengagement, as long as the PI continues to activity manage the award on a daily basis.
- 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.
- The PI will ensure public access to research data on Federal awards and those other awards that require a data management plan according to UNT's policy and procedures.

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

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

The college/department research administrator (CRO/DRA) and other college/department staff play a key role in the conduct and financial management of a project, acting as a liaison between the PI and GCA. While the university places the prime responsibility for the conduct of the sponsored projects in all aspects on the Principal Investigator, the CRO/DRA and other staff are involved in the day-to-day operations of the project. Therefore, it is imperative that the PI and the CRO/DRA/Staff 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 GCA 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.
- Ensuring that awards and related budgets are created accurately in UNT'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 reporting obligations and schedule with the PI.
- Ensure sub-awards are managed properly, including working with GCA 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.

Role of GCA in Post-Award Administration

Role of GCA in Post-Award Administration

GCA acts as the primary administrative liaison between PI, sponsors, and other University central administrative offices. The primary responsibilities of GCA 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. GCA prepares the required financial reports that are sent to sponsors.
- Receivables, billings, and collections. GCA manages the collection of grant funds and maintains account records for each sponsor. GCA 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, GCA 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.

Award Notification and Initiation of Account

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 GCA. If the PI receives a notice directly, GCA 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 UNT.

Upon receipt of a fully executed award document or executed contract, GCA 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.

Anticipated Awards

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 GCA 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.

Expenditure/Encumbrance Tracking

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.

Equipment Purchases

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 one year. 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).

Personnel Expense

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.

Summer Salary

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.

Travel

Travel

Per U.S Office of Management and Budget's Uniform Guidance, 2 CFR 200.474(a), travel Costs for our Federal Awards are defined in the as "the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-Federal entity."

Uniform Guidance requires that we apply our policies and procedures consistently to both federally-funded and other activities of the university. As a result, travel requests and reimbursements for sponsored projects are processed in accordance with University travel procedures as defined in <u>Travel Policy 10.049</u> and in the <u>University of North Texas Travel Guidelines</u>.

While federal and most non-federal sponsors require that travel be in accordance with the recipient (UNT) travel policies, it is important that you review the specific terms and conditions of your award and the corresponding sponsor guidelines to ensure that you are in compliance with their requirements. Certain awards may be more restrictive and may require specific sponsor prior approval, even when included in the proposal budget.

When determining whether or not and travel charges are allowable, the University of North Texas considers the following factors:

- The travel is necessary to fulfill the programmatic objective of the project and directly benefits the program being charged, and the cost of the travel is reasonable and allocable to the award.
- There is a clearly defined relationship between the traveler and their involvement in scope of work being performed. That relationship should be documented in the travel documentation.
- Contributed paid or unpaid effort (normally cost sharing) to a project normally provides sufficient documentation of that relationship. However, there may be cases where personnel are contributing unpaid effort toward a project as part of their training.

Foreign Travel

Traveling abroad on federal awards must comply with the Fly America Act and the Open Skies Agreements. To assist in that process, please look at the procedures on the Grants and Contracts Administration website.

Consultants

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 and 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 department or involves a remote operation, and the work is performed in addition to regular duties.

Expanded Authority

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.

Federal Demonstration Partnership (FDP)

Federal Demonstration Partnership (FDP)

Many federal agencies, universities, and hospitals participate in the FDP. As a participant in the FDP, UNT 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.

Pre-Award Expenditures

Pre-Award Expenditures

Most federal grants permit the incurrence of pre-award costs, and UNT permits pre-award expenditures that 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 for pre-award spending may be submitted to GCA. Upon verification of the expected award (and if allowed by the sponsor), a Proj ID number may be assigned by GCA. 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.

No-Cost Extensions

No-Cost Extensions

Uniform Guidance (200.308) allows federal agencies to waive the written prior approval requirement for a One Year, No Cost Extension for Federal awards. Most federal agencies allow the sponsored project office, at UNT it is Grants and Contracts Administration (GCA), the authority to extend a project for up to 12 months, for a first One Year No Cost Extension. These sponsors usually include NSF, NIH, NASA, Department of Energy and EPA. All federal agencies however, expect institutions to verify that the scope of work is unchanged and the extension is not being requested merely for the purpose of using unliquidated balances for these first One Year No Cost Extensions. The approval of a first One Year No Cost Extension therefore requires the submission of a justification to GCA. The justification should identify the completion of the remaining project objectives and include an explanation of how the remaining funds will be spent. These first One Year No

Cost Extension requests should be submitted by GCA, and require a response from the federal agency before the extension of the award can be processed.

Subsequent extension requests and all other non-federal No Cost Extension requests require sponsor approval and should be submitted through GCA. 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. The justification should not indicate a change to the scope of work and the extension should not be requested merely for the purpose of using unliquidated balances for a No Cost Extension. Additional information may be requested for subsequent federal award or other non federal award No Cost Extension requests, based on the specific award. All No Cost Extension requests should be submitted to GCA at least 60 days prior to the expiration date of the award, although some federal agencies may request an earlier submission.

Budget Revisions

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.

Sub-awards

Sub-awards

Sub-awards are negotiated by RCA 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.

Cost Transfers

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) <u>Uniform Guidance (2 CFR Part 200)</u>. 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 directly charged to the project account. If overspending occurs, a cost transfer should immediately be processed to move the error to a different account.

Program Income

Program Income

Program Income is defined in <u>OMB Uniform Guidance (2 CFR Part 200)</u> 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, GCA should always be consulted for advice if any income is generated by work under a grant.

Project Reporting

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—GCA 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. GCA requests that a copy of the report be forwarded to our office for placement in the award file.

PI Termination Checklist

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 desire 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 GCA 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 GCA analyst 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 and must be approved by the VPRI. 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 (F&A) Balances

Once the PI terminates from their position at UNT 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.

Closing a Sponsored Project Research Account

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 GCA requesting that that all required activities be completed to ensure an efficient and timely close out of the project. At this time, a full review of all direct cost categories (salaries, P-Card, equipment, supplies, tuition, etc.) should be completed in preparation for close-out. Generally, all materials and supplies must be received and services rendered prior to the expiration date of the project. It is the PI's responsibility to carefully review the related COGNOS report to

verify accuracy of all expenses. All accounts payable and payroll encumbrances must be liquidated prior to the award end date. Vendors should be contacted regarding the status of any unpaid invoices.

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

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

Audit

Audit

When UNT accepts funds from external sponsors, those organizations presume UNT 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. GCA 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, GCA should be notified.

Time and Effort Reporting

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) 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. GCA 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.

Equipment Transfer

Equipment Transfer

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, the UNT Vice President of Research and Innovation 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 <u>UNT Policy 10.048</u>, Section 10, Disposal of Surplus and Salvage Property paragraph for Disposition of Computer Related Equipment (pages 11 and 12).

"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, the UNT Vice President for Research, 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.

Research Commercialization Agreements (RCA)

Research Commercialization Agreements (RCA)

Research Commercial Agreements (RCA, is responsible for the negotiation and execution of contract agreements and subawards, intellectual property licensing, and cooperative agreements with companies and other institutions.

RCA is also responsible for the identification, protection, and commercialization of the intellectual property generated by the faculty and staff of UNT.

More Resources

PIs are encouraged to visit the <u>RCA homepage</u> for a full list of services.

Licensing

Licensing

RCA assists with the licensing of various technologies and inventions that are used or devised in the research process. Researchers should contact RCA to disclose and license an invention as soon as possible.

Commercialization and Conflict of Interest

Commercialization and Conflict of Interest

Faculty and staff are strongly encouraged to commercialize intellectual property developed at UNT. In most cases, commercialization does not take place in a vacuum; the technology continues to play a role in the researcher's academic and research agendas. This creates the need to ensure we manage perceived conflicts of interest on licensed technology. A perceived conflict of interest exists when any external competing interest could influence the performance of a faculty member's research duties. The financial gain does not have to be realized to create the perception of conflict of interest. Rather, the potential for manipulating research results is enough to trigger this requirement to file and publish all perceived conflicts of interest.

Faculty earn license royalty income if a licensed technology succeeds commercially and both research results and academic journal articles may impact the commercial success of a technology. This is part of the nature of commercializing university research; the conflict or perceived conflict is not negative against the faculty, university, or the commercial company. However, that perceived conflict must be managed to ensure that UNT, the faculty, academic journals/publishers, and the commercializing company are not hindered from the lack of reporting up-front. Reporting allows all interested parties to be sure they have all facts related to a commercial activity. This transparency protects UNT, the researcher, and the licensee from conflict problems that might arise years after the research is completed.

What to do once a technology has been licensed:

Faculty have an obligation to ensure that publications, sponsored research, and other work related to licensed technology are accounted for after a technology has been licensed.

Publications: All future publications on the licensed technology, including improvements to the technology or work that was started prior to the licensing, must be noted with COI reporting to UNT as well as reporting to publishers that a potential interest exists. This includes informing a publisher if the article was submitted prior to license execution, but the license execution occurs prior to acceptance or publication.

Sponsored Research: If the licensed work is being utilized in current sponsored research, it is critical to alert both Research Commercial Agreements (RCA) to the current, active sponsored research program and to alert that sponsor of the license. Often, sponsored research will provide rights to the sponsor for use of background intellectual property being used by our faculty in performing the sponsored work and, in some cases, they might have a legal right to license such intellectual property for commercial use. The faculty must contact RCA so that the sponsor can be alerted as required under the terms of such sponsored research agreement.

UNT Financial Conflict of Interest: A license is not a financial COI for the faculty if that licensed technology is no longer used in sponsored research projects or the subject of future research/academic publications. However, if a researcher is sponsored by a licensee to intellectual property ("IP") disclosed by that researcher to UNT and licensed by UNT to that sponsor, the faculty must report a COI. Simply, this transparency to all interested parties, both at the time of disclosure, and many years down the line when such licensed IP might be a massive commercial enterprise, shows that the researcher and UNT took all reasonable steps and followed a documented plan to manage conflicts assuring the research integrity of the work. Again, the COI is not a detriment to the faculty member's reputation or their research's value; the documentation of the COI ensures that all research results published after a license ensures that the faculty member's possible financial interest has been managed. UNT wants to ensure that our faculty do not face a problem resulting from a lack of disclosure, and we believe that disclosing just a potential for perceived COI will allow conflicts to be managed so that there is no detriment to UNT, our faculty, or their research results.

UNT's Research Integrity and Compliance (RIC) office oversees the disclosure process. At the beginning of every fiscal year (September 1), RIC opens the annual disclosure process for researchers to complete their annual COI disclosures. Any modifications or changes to an annual disclosure must be made within 30 days. Conflicts are not inherently negative but must be managed via a Conflict of Interest Management Plan (CMP). Disclosures allow us to address most COI concerns. Additionally, outside of the annual disclosure, if a perceived conflict is created around licensed technology, the faculty is required to provide an immediate update to the COI so that the perceived conflict is managed and publishers, licensees, and sponsors are notified immediately.

Research Integrity and Compliance

Research Integrity and Compliance

Research Integrity and Compliance (RIC), a unit within the Division of Research and Innovation (DRI), provides regulatory compliance oversight and interpretive support for the topics described below. Links to the DRI website are included below for each topic, except for Biosafety, Radiation and Laser Safety, which are supported by the UNT Risk Management Services Department; the links for those topics will lead to the RMS website.

Human Subjects Research

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. Visit the UNT IRB website for guidance.

Animal Care and Use – Research with Live Vertebrate Animals

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 on a monthly basis to review all proposed uses of live vertebrates for research and instructional purposes. The Committee is also responsible for conducting inspections and to inspect (on a semi-annual basis) 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). Visit the UNT IACUC website for more guidance.

Financial Conflict of Interest for Sponsored Projects

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The US Department of Health and Human Services' (HHS) Public Health Service (PHS) policy guidelines requires the University to establish conflict of interest review procedures with the goal of promoting objectivity in funded research. All covered individuals,

regardless of the funding source, must complete a conflict of interest disclosure and complete conflict of interest training. The disclosures are reviewed by the Research Integrity and Compliance staff and UNT's Conflict of Interest Committee. The Conflict of Interest Committee reviews 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. To submit a disclosure or for more guidance, visit UNT's financial conflict of interest website.

Research Misconduct

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. More information can be found at UNT's Research Misconduct website.

Export Controls

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), the U.S. Department of State through its International Traffic in Arms Regulations (ITAR), and the U.S. Department of the Treasury through its Office of Foreign Assets Control (OFAC). Export control affects three main areas at UNT:

- Research
- Travel outside the U.S.
- Shipping

If a research project involves certain types of technologies as specified in the regulations, 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. Shipping items outside the U.S. could require a license from OFAC (the Office of Foreign Assets Control), the Department of State, or BIS (Bureau of Industry and Security). Licensing could take anywhere from 2 weeks to 6 months, and shipping without a permit could lead to a fine for violators and UNT. For guidance, visit UNT's Export Controls website.

Topics Supported by UNT Risk Management Services Department

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Biosafety

The UNT Institutional Biosafety Committee (IBC) is responsible for reviewing proposed uses of biohazardous 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.

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 <u>Risk Management Services Department website</u>.