



SAINT LOUIS  
UNIVERSITY

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## Policy for Externally Sponsored Programs: Grants, Contracts, and Agreements

**Policy Number: RA-001**

**Version Number: 4.2**

**Classification: Research Administration Policy**

**Effective Date: 12/11/2013**

**Responsible University Office:**

**Vice President for Research**

### 1.0 INTRODUCTION

Saint Louis University will seek and accept sponsored awards to support its mission in research, instruction, and public service.

The Division of Research Administration at Saint Louis University assists University personnel in securing and managing external funding to support research, scholarly, programmatic, and other activities.

Saint Louis University must affirmatively accept sponsored awards. Once an award has been accepted, the University will fulfill its moral, legal and ethical obligations.

The Office of Research Development and Services (ORDS), a unit within the Office of Research, is responsible for reviewing all sponsored proposals, contracts, memoranda of understanding, consortium agreements, and subawards intended for external sponsors prior to their submission. This comprises determination of agreement mechanisms, negotiation of all business terms and conditions, including the budgeting of facilities and administrative costs. This is necessary to ensure that requests for support are compliant with institutional policies and all relevant regulations.

The Office of Sponsored Programs Administration (OSPA), a unit within the Division of Research Administration, is responsible for the post-award administration of all sponsored awards and contracts, memoranda of understanding, consortium agreements, and subawards. This is necessary to ensure that the administration of sponsored awards is compliant with award documents, University policies and procedures, and all relevant regulations.

Principal Investigators (PI's) are ultimately responsible for defining the scope of work of a project, and its day-to-day operation, both programmatically and administratively, for grants in which the sponsor has named them PI.

## 2.0 PURPOSE

This policy applies to:

- 1) all Saint Louis University faculty, staff, and administrators who seek external support for research, scholarly, programmatic, and other activities.
- 2) all agreements that involve a defined exchange of services by Saint Louis University for funds or other remuneration by an organizational entity external to the institution. These agreements can be titled grant applications, research agreements, sponsored research agreements, subcontracts/subawards or consulting agreements. All agreements are entered into between Saint Louis University as the applicant, and the external entity as the sponsor. The Principal Investigator serves as the Technical Representative. Agreements that name the Principal Investigator as a Party to the agreement, or those which the Principal Investigators negotiate terms and conditions or sign an agreement on behalf of the institution can be held null and void.

In order to ensure the proper adjudication for all grant applications and contracts, this policy sets forth the procedures and timelines necessary to ensure that grant applications and contracts are crafted in the best interests of the institution and the Principal Investigator.

Key to proper adjudication is sufficient time for ORDS review and negotiation. Grant applications require a minimum of five (5) business days prior to deadline; 10 business days if subcontracts are included. Contracts and subcontracts require on average a month to negotiate between both parties. ORDS and the Division of Research Administration reserve the right to not accept for review grant applications and contracts that are submitted with inadequate timeframes.

## 3.0 DEFINITIONS

- 3.1 Authorized University Representative:** An employee who is recognized by Saint Louis University as an official signatory to approve all grant, contract, and other agreement activity with external sponsors.
- 3.2 Business Day:** The standard University administrative workday (8:30 a.m. – 5:00 p.m.) that is not a national or University holiday or a weekend.
- 3.3 Consulting Agreement:** A formal agreement to be used when an individual external to SLU and to any other entity that receives sponsored awards. A consulting agreement:
  - Is procurement in nature
  - Is based on expertise in subject matter not available at the institution
  - Advisory
  - Contains no scope of work
  - Contains no research triggers such as;
    - Evaluation, assessment, review, consideration, analysis, etc...ORDS makes the determination if a consulting agreement is the adequate contractual mechanism to use.

- 3.4 Cost Share (also referred to as matching funds or in-kind contributions):** Cost share is that portion of a project or program cost that is not reimbursed by the sponsor. Cost sharing represents a commitment by the University. Once an award is made, all cost sharing that has been specifically committed to a project, whether voluntary or mandatory, represents a binding obligation on Saint Louis University and is considered an auditable expense.
- 3.5 Electronic Submission:** Delivery of a proposal to a sponsor using the Web or Internet.
- 3.6 Fee-for-Service Agreement:** A formal contractual agreement governing the provision of routine tasks for a fixed fee, during times of excess capacity, with no contribution to programmatic direction or publication. All data and results are owned by the sponsor. Compensation for work completed is listed as a single sum, with no detailed budget breakdown provided as an exhibit.
- 3.7 Gifts:** External funding provided by Donors who have a clear philanthropic intent and no expectation of performance from the University other than expending the funds as directed. Generally, gifts do not require a deliverable product.
- 3.8 Institution:** Any domestic or foreign, public, or private entity or organization excluding a federal agency. For the purposes of this policy, the term *Institution* will refer to Saint Louis University.
- 3.9 Principal Investigator (PI)/Project Director (PD):** Often used interchangeably, these two terms refer to an individual who assumes full technical and fiscal responsibility for a sponsored program, including the supervision of other key personnel, research assistants, students, and staff. A Principal Investigator must have sufficient experience to responsibly manage the project. PI's at Saint Louis University must be an employee or may have an adjunct position if they transfer to another University and wish to continue the work of their award at Saint Louis University. Throughout this policy, the term *Principal Investigator (PI)* will also refer to the term *Project Director (PD)*.
- 3.10 Prizes:** A prize is an award specifically given to an individual, typically for work already done. Prizes may be awarded as a consequence of a submission by the individual or by another person's nomination. A prize is a form of recognition in nature. The recipient of a prize is typically called a "winner", rather than a Principal Investigator. The award documentation will typically refer to the award as a "prize" rather than a grant, contract, or cooperative agreement. The winner of a prize typically does not have to report the use of the funds. Prize notifications or "Notice of Award" will not include reporting requirements, Period of Performance, deliverables, or right of return. There may be personal tax consequences for the winners of prizes.

Prizes are not considered sponsored activity and would not be uploaded in to the University ERS system, submitted by the Office of Research Development & Services, or administered through the Office of Sponsored Programs Administration.

- 3.11 Paper Submission:** Delivery of a proposal to a sponsor through the U.S. Postal Service, a commercial carrier, or by facsimile.
- 3.12 Scope of Work:** A written statement specifying the tasks (including deliverables) to be completed for a specific project, cost, and period of performance.
- 3.13 Sponsor:** Any governmental agency, private foundation, corporation, or association that provides financial project support.
- 3.14 Sponsored Program:** A research project, program, scholarly activity, or community service project for which an external agency has provided financial support and for which a formal written agreement exists.

The characteristics of a sponsored project are:

- activities relating to a proposal funded by an entity outside the University,
- funded for a specific purpose,
- an exchange transaction where the sponsor receives value in return for the funding provided to the University,
- executed by an award, contract, cooperative agreement, memorandum of understanding, or other formal mechanism,
- for the purpose of supporting any research, scholarly, instructional or public service activity,
- Names a specific person to conduct the work (PI),
- the sponsor may retain some claim (option or otherwise) to intellectual property that may be developed as a result of a sponsored project,
- the sponsor may have a direct interest in the development and ownership of the intellectual property resulting from the activity, and
- the project may have restrictions requiring regulatory compliance.
- Required financial reporting on an annual or final basis.

**3.15 Sponsored Research Agreement:** A formal contractual agreement between SLU and an outside entity where SLU is engaged in full programmatic effort for a specified scope of work, budget and project performance period, and for which publication and intellectual property rights must be guaranteed.

**3.16 Standard Services Agreement:** the formal contractual agreement to be used when

ORDS determines that the work of an entity external to SLU to fulfill the scope of work of a grant or contract is considered a normal procurement activity, and does not impact the programmatic direction of the project.

- 3.17 Subcontract/Subaward:** A formal contractual agreement with a participating organization for research collaboration and/or services under sponsored-program projects. Tasks to be performed contribute to the programmatic direction of the overall project, and there is measurable effort. The term does not apply to the normal procurement of supplies and research equipment.
- 3.18 Transmittal Form:** An electronic document housed on eRS@SLU that is completed by the PI with all necessary, relevant information and documentation for the submission of the proposal to an external agency, including the electronic signatures of the PI/PD, Department Chair(s), School/College Dean(s), relevant compliance officials, and the Office of Research Development and Services Authorized University Representative. By their signatures, all of these parties indicate they have reviewed and assented to the terms and conditions of the proposal submission.
- 3.19 Student Loan Activity:** Funding resulting from student loans guaranteed by the federal government with federal audit requirements such as OMB A-133.
- 3.20 Timely:** Occurring no later than two (2) months after the end of the month of the original transaction.

## 4.0 POLICY

- 4.1 All Awards are sought in the name of and awarded to Saint Louis University**
- 4.2 It is the policy of Saint Louis University that all requests for support and award acceptance from external sponsors be submitted through and approved by the Office of Research Development and Services (ORDS).** Deans, Department Chairs, and individual faculty or staff members are not authorized to submit applications for grants or contracts, nor are they authorized to accept awards, contracts, subcontracts, or agreements on behalf of the University. The authorized university representatives for submission of proposals and acceptance of grants and contracts is the Director of Research Services or their designee.
- 4.3 All proposals to external funding sources that do not have a clear philanthropic intent (including no expectation of performance), must be submitted to ORDS for review.** Proposals that are consistent with the definition of a “gift” as defined in FASB 116 and FASB 117 will be forwarded to the Office of Development to be processed as gifts. Please see the “Policy on the Distinction between Gifts and Sponsored Programs” for further guidance.

**4.4 ORDS makes official determination of what type of agreement mechanism should be used, depending upon a review of the scope of work proposed by an entity external to SLU.** This is an assessment based on significant programmatic effort, weighted by:

1. Nature of the transaction,
2. presence of a deliverable,
3. time/effort,
4. external entity's institutional choice

**4.5 If a sponsor requests direct submission from the PI** (e.g., for a fellowship or scholarship), the proposal must still be processed through normal procedures per 4.2 above and will be submitted by the PI on behalf of Saint Louis University

**4.6 It is the policy of Saint Louis University that all awarded projects are administered through the Office of Sponsored Programs (OSP).** The Director of Sponsored Programs is the official Fiscal/Business Officer for sponsored awards accepted by the University. Deans, Department Chairs, and individual faculty or staff members are not authorized to submit financial budgets, reports, estimates, or invoices to award sponsors. This policy does not include clinical billing invoices, including clinical trials, which will be submitted to sponsors by the Clinical Trials Office.

**4.7 Proposals including Supplemental Pay**

Submitted proposals requesting supplemental pay must clearly state the request in the proposal, and the request must clearly use the term "Supplemental Pay". Please see Policy "Supplemental Pay" for further guidance.

**4.8 Technical/programmatic negotiations (Scope of Work) with the sponsor and sub-awardees are the responsibility of the Project Director/Principal Investigator.**

**4.9 Fiscal/business/legal (business terms and conditions) negotiations with the sponsor and sub awardees are the responsibility of ORS. This is to include the incorporation of full facilities and administrative costs into project budgets.**

**4.9.1 Executing Awards**

**4.9.2** Deans and Department chairs are required to provide appropriate resources to execute awards that have been accepted in their schools and departments. This includes personnel and other items included as indirect costs that may not be charged directly to awards.

**4.9.3** Direct cost-sharing commitments as well as implied cost sharing should be recognized as both a percent of the direct cost and actual dollars to ensure the resources exist or will exist to fulfill the commitment on all department sponsored awards.

**4.9.4** PI's should execute the awards consistent with the signed agreement. Costs should not be incurred before the signed agreement is in place unless a Pending Award has been established. (See Policy "Pending Award")

**4.9.5** Costs should not exceed the awarded budget. Over-spent accounts must be cleared by the next monthly review unless the sponsor has provided documentation that clearly states their intent to provide additional funding in a timely manner.

#### **4.10 Expenditures of Funds**

All expenditures of funds received from an award must be made in accordance with standard university policies, cost accounting standards, and OMB Circulars.

All Sponsored awards will be administered consistent with Federal rules.

Financial commitments or expenditures are not to be made before an award is officially accepted. Pre-award expenditure arrangements can be made under certain circumstances if the expenditures are backed by a commitment of funds from the manager of a currently existing source, and such pre-award expenditures are allowable under the terms of the anticipated award. Expenditures may not be made after an award has terminated.

Expenditures should be recorded correctly and only once. Costs should be recorded based on the type of item and the nature of the transaction. The SPO should be consulted if any uncertainties exist as to the allowability and proper recording of any expense.

Transfers onto grant funds should be made for errors only. Further, it is expected that transfers will be infrequent and minimal. Unallowable costs must be removed from the grant funds in a timely manner. See policy “Transfers of Income and Expense Items” for further guidance.

#### **4.11 Property and Equipment Purchased on Sponsored Awards**

All property or equipment obtained from or purchased with funds from external sponsors shall receive the same care and safeguards as all other University property. Property purchased or constructed with external funding or provided by an external sponsor must be inventoried, tracked and disposed of in accordance with the terms and conditions of the external sponsor’s requirements and OMB Circulars.

The OSP must be consulted prior to the disposition of any non-expendable sponsor-owned property and/or equipment.

PI’s leaving Saint Louis University that wish to take equipment purchased on their federal award must transfer the equipment per University and OMB Circular rules. See Policy “Federal Equipment” for further guidance.

PI’s entering Saint Louis University with equipment purchased with Federal Funds from a previous institution must transfer equipment per University and OMB Circular rules. See Policy “Federal Equipment” for further guidance.

#### **4.12 Required Reports and Billings**

As stated in 4.5 above, the OSP will submit all financial reports and invoices to award sponsors.

PI's are responsible to submit all required technical and progress reports that are programmatic in nature. Reports must be completed and submitted on time as agreed upon in the award document and consistent with OMB Circulars. Copies should be uploaded to the University's eRS System for reference and documentation purposes.

#### **4.13 Required Certifications**

PI's must ensure that required certifications are completed for grants under their supervision. This includes effort reports for salaries charged to their grants, project end certifications consistent with OMB Circular A-21 Section K, and quarterly certification of expenses.

#### **4.14 Required Review of Expenses**

OMB Circular A-110 requires that PI's review transactions related to their grants on a monthly basis. The review is indicated by the PI signature and date completed. Monthly review may be delegated to a knowledgeable assistant but the PI must still sign and date the completed work to ensure completion.

#### **4.15 Usurpation of University Opportunities.**

Situations may arise in which a faculty or staff member has the option to engage in professional extramural activities either (1) as an independent consultant or through a business organization in which the faculty or staff member has an ownership interest, or, alternatively (2) through the University. In such situations, the faculty or staff member has an obligation to give the University an opportunity to decide whether it wishes to have the activity carried on under University auspices, and only if the University rejects the opportunity, is the faculty or staff member free to undertake the activity by other means. For faculty members and other staff members; a written waiver of University interest shall be obtained from ORDSRS prior to accepting professional extramural activities personally.

#### **4.16 Special Rule for Outside Consulting**

The University has adopted a special rule for agreements that are De Minimis and has the following Characteristics:

- does not reflect significant programmatic effort, and
- whose annual effort expended less than or equal to 5 percent in one budget period.

- Total dollar award is small.

The Standard Services Agreement can be used as the contractual instrument for these types of relationships. Compensation may be listed using a per hour or per day fee.

In addition, the University will require that the Consultant provide an “Outside Employment Certification Form” in order to qualify for this exception.

## **5.0 RESPONSIBILITIES**

### **5.1 Institutional Responsibilities**

The Office of Research Development and Services will:

- Review all proposals for external support and for any necessary changes to ensure compliance with University policies and sponsor regulations,
- Authorize and sign proposal submissions as long as they are submitted in accordance with the timelines set forth in Section 4.0 of this document,
- Negotiate award conditions with external sponsor representatives, and
- Accept awards on behalf of Saint Louis University.

### **5.2 Principal Investigator Responsibilities**

#### **5.2.1 Pre-Award Responsibilities**

- Notify the appropriate personnel in the Office of Research Development and Services as early as possible (but not less than 2 full business days prior to deadline for grants, or one month for contracts) prior to submission of proposals to or entering contract discussions with external organizational entities;
- Consult with the Office of Research Development and Services when questions about the type of agreement/gift arise, prior to proposal submission or contract negotiations begin.
- Discuss scope of work with potential sponsor, but not terms and conditions, to include type of agreement or Facilities and Administrative rate.
- Complete proposal/application in compliance with sponsor’s guidelines and requirement;
- Develop project design;
- Attend to all compliance issues including, but not limited to, export controls and embargoes; protection of human research subjects; animal care and use; biosafety, radiation safety, and other safety concerns; and disclosure of potential or real conflicts of interest in research;
- Obtain all necessary institutional approvals for submission of a proposal (e.g., Chairperson, Dean, ORS, Finance, and any other required approvals);
- Submit annual conflict of interest in research disclosure materials and update any apparent or actual conflict of interest in research issues that may arise between annual disclosures;
- Develop accurate proposal budgets containing only allowable, allocable, and

- essential expense items;
- Determine effort for key personnel;
- Notify Chair and Dean of any released time or absences that will result if the proposal is funded, and obtain appropriate approvals for this time;
- Coordinate required cost sharing or matching funds (including tuition waivers) with ORDS, and obtain appropriate approvals;
- Obtain scope of work, budget, and institutional approval from any external subcontractors five ( 5) business days prior to deadline; 10 business days if subcontracts are included.
- Submit the proposal, along with the sponsor guidelines, subcontract documentation, and the completed Transmittal Form with signatures of co-investigators and all appropriate Chairs and Deans to ORS for review and approval in accordance with the timelines specified in Section 6.0 of this document; and
- If paper submissions are required by the sponsor, assume responsibility for submitting the correct number of copies to the agency and mailing/delivering the application by the agency deadline.

## **5.2.2 Post-Award Responsibilities**

- Supervise and maintain progress of the technical aspects of the project to ensure the responsible and ethical conduct of activities according to award document and in compliance with University, sponsor, and local, state, and federal government requirements;
- Devote effort to the project at the level agreed to with the sponsor;
- Ensure that all compliance issues are met for all key personnel including, but not limited to, conflict of interest in research reporting; effort reporting, and training in the protection of human subjects, animal care and use, and environmental safety;
- Maintain quality, accurate records of research for a period not less than sponsor's requirements;
- Ensure that support staff attend training sessions and monthly meetings conducted by ORS and OSP to keep up on grant administration issues;
- Maintain research integrity, including the management of activities of project personnel;
- Ensure responsible management of expenditures in accordance with awarded budget that are allowable, allocable, and essential, and ensure that any budget changes or alterations are done in accordance with sponsor and University guidelines (excessive expenditures are the responsibility of the PI/PD and will be charged to a departmental account);
- Inform staff of all University and sponsor guidelines and regulations, and
- Select, train, and evaluate project staff and provide necessary input and guidance to all students, post-docs, staff, and research assistants to ensure the integrity of the project and compliance with sponsor and federal guidelines;
- Manage acquisition of equipment, supplies, and personnel according to sponsor guidelines, University policies and procedures, and OMB Circulars;

- Disclose and subsequently manage intellectual property with the Office of Innovation and Intellectual Property;
- Work with the Office of Sponsored Programs on required financial close-out of project at end of grant period; and
- Know and adhere to all reporting requirements, both University and sponsor, per sponsor Agreements, including:
  - Certifying time and effort on a semi-annual basis,
  - Certifying expenditures quarterly,
  - Submitting annual conflict of interest disclosures,
  - Monitoring conflicts of interest in research and immediately disclose changes in actual or apparent conflicts,
  - Fulfilling sponsor reporting requirements, including technical progress and final reports, and
- Analyze and publish findings.

### **5.3 Departmental Chair and School/College Dean Responsibilities**

- The Department Chair(s) and School/College Dean(s), or other appropriate unit head(s), must review and approve the Transmittal Form and the proposal in a timely manner, paying particular attention to any cost sharing that is included in the proposal budget, especially as it relates to the percentage of effort that a faculty member is devoting to the project. By signing the Transmittal Form, unit heads certify that they approve of the project, the involvement of the PI and other investigators and students (including released time), the budget, cost sharing, and any other considerations described in the proposal and the Transmittal Form.
- Provide adequate resources administratively to conduct sponsored awards:
  - Provide appropriate staffing to fulfill administrative requirements such as data for reports and completed cost transfers along with non-grants related activities,
  - Ensure that cost sharing commitments do not exceed available resources during the performance of the award,
  - Require support staff to attend training and monthly meetings provided by ORS and OSP on Grant Administration subjects.

Provide clear accountability and sanctions to PI's, faculty and staff who do not comply with University Policies and Procedures.

## **6.0 PROPOSAL/CONTRACT SUBMISSION GUIDELINES**

**6.1 The policy specifies that all proposals must be submitted in accordance with the following timelines:**

Category	Deadline for Submission to ORS (to guarantee on-time submission)
Matching Fund Requests	<b>Three (3) weeks</b> prior to sponsor deadline.
<p>Electronic and Paper Grant Application Submissions (including non-competing progress reports and other sponsor-required documents on which continued funding depends)</p> <p>NOTE: Applications with Multiple Principal Investigators</p>	<p>At least <b>five (5) business days prior to deadline; 10 business days if subcontracts</b> are included for compliance review – (Medical Center proposals must first receive budget review from the Medical Center Finance Office - Schwitalla Hall 283, 314-977-9880). Applications with multiple principal investigators should submit their applications three (3) full business days prior to the sponsor deadline.</p> <p>Final (ready to submit) versions of proposals must be released to ORDS for submission <b>no later than 8:30 a.m. five (5) business days prior to deadline; 10 business days if subcontracts</b> are included to ensure submission.</p> <p>Once released to ORDS, proposals will be submitted in the order they are received.</p> <p>On-time submission cannot be guaranteed for any application released to ORDS after the five (or 10) -business day deadline. Proposals/documents will only be submitted during Saint Louis University's normal weekday business hours (8:30 a.m. - 5 p.m.) ORDS requires <b>five (5) business days; 10 business days if subcontracts</b> are included to process grants to ensure that we can fully review sponsor guidelines, make sure that the proposal adheres to both the sponsor's guidelines and SLU's internal guidelines, and it allows time for corrections to be made to a proposal if errors are found. Additionally, it allows for sufficient time for both the Chair and Dean to review the proposal and sign off on its submission. The granting process is complex and often multiple revisions of a grant are required before submission. To promote a smooth submission please have the proposal submitted to ORS through the eRS system by noon at least <b>five (5) business days prior to deadline; 10 business days if subcontracts</b> are included.</p>

### 6.1.1 Contact ORDS

PIs should contact the ORS as early as possible prior to submission of proposals to external agencies. ORDS staff assists with the review of proposals and projects to ensure compliance with University policies and sponsor regulations.

- ORDS North Campus – 977-7742, Fusz Memorial Hall, Floor 3

NOTE: When funding is sought from an individual, please contact the Office of the Associate Vice President for Development at 977-2306, DuBourg Hall 307.

PIs should provide as much of the following information as possible at first contact:

- A summary of the proposed project,
- The name of the funding agency and program,
- Copies of program guidelines, RFPs, RFAs, etc.,
- The deadline for submission,
- Special needs such as matching funds, tuition waivers, or use of institutional resources,
- The need for protection of human subjects, animal care and use, biohazards, or other safety approval, and a plan for obtaining that approval, and
- Evidence that the appropriate unit heads support the project.

### **6.1.2 PIs must develop budgets that are accurate, reasonable, and adequate for the proposed project.**

Items included in budget lines must be consistent with the function of the item and nature of the transaction as required by cost accounting standards, OMB Circular A-133, and OMB Circular A-21. It is the policy of Saint Louis University that only allowable costs are included in proposal budgets, including facilities and administrative costs specified in the University's current negotiated rate agreement, or a lesser rate formally approved by the Vice President for Research. PI's who do not have sufficient expertise to complete budgets within these guidelines should work closely with ORDS staff and/or the Medical Center Finance Office in this process.

### **6.1.3 Modular Budgets and Expanded Authority**

Modular budgets must have detailed account budgets that roll up to the submitted aggregate amount. Budgets must be crafted and submitted with account's that are consistent with the nature of the transaction and the actual detailed category, not posting level or accumulated accounts.

### **6.1.5 Obtain Institutional Review and Approvals**

The following procedures apply to PIs and Co-Investigators for both paper and electronic proposal submissions:

1. The PI must complete the electronic Transmittal Form on eRS, which includes:
  - a) obtaining the signatures of all co-investigators, appropriate Department Chair(s) and Dean(s). If institutional matching funds are included as part of the proposal budget, written approval from the Office of the Provost must also be included as an attachment on the Transmittal Form, authorizing these funds.
  - b) completing the "Conflict of Interest in Research" certification that is required by federal regulation.

2. The PI then attaches any relevant sponsor guidelines and the proposal to the Transmittal Form for approval routing.
3. The completed Transmittal Form, sponsor guidelines, and proposal must be submitted to ORDS in accordance with the required timelines specified in Section 7.0 of this document. Any cover sheet or application forms requiring the signature of an authorized University official should also accompany the Transmittal Form in the “Attachment Status” section of eRS when submitted to ORDS. **Deans, Department Chairs, and individual faculty and staff are not authorized to sign the application forms on behalf of the University.**

### 6.1.6 Submit the Proposal to the Agency

#### Paper Submissions

After securing all institutional approvals, the PI is responsible for sending the correct number of copies to the sponsor to be received by the sponsor’s deadline (postmark or receipt).

Awards for proposals that have not undergone proper review may encounter compliance problems with University or sponsor policies. If satisfactory terms and conditions can be negotiated and compliance with these policies assured, the University may choose to accept an award that had not been reviewed before submission. However, the University reserves the right to decline an award that is not compliant with institutional, sponsor, or government regulations.

#### Electronic Submissions

In the case of electronic submissions, the authorized University representative must electronically sign and submit the proposal. Agencies of the federal government have different requirements for electronic submissions. Please consult agency guidelines and contact ORDS for specific information.

### 6.2 Award Acceptance

Usually, notification of an award is sent to the University. However if an award notice is sent directly to the PI, a copy must be sent immediately to ORDSRS for processing. **PIs cannot incur expenses without a University-assigned fund number and budget for a grant or contract. All external funds within the scope of this policy must be set up in a sponsored-program account.**

Grant and contract awards are made to the University on behalf of the researcher. An authorized University representative must sign a contract to accept the award. Deans, Department Chairs, and individual faculty or staff members are not authorized to sign award documents. (An exception to this is a fellowship that is paid directly to a faculty member and not to the University. Faculty members may accept this type of award, although they must still submit the Transmittal Form).

ORDS or Medical Center Finance and business managers will work with the Sponsored Programs Office to establish a new fund number for a newly awarded grant or contract.

The fund will include a line-item budget in accordance with the award budget, funding agency regulations, University guidelines and Cost Accounting Standards.

In order to fulfill audit requirements, all official correspondence or contact with the sponsor normally will be made through the Office of Research Development and Services or the Sponsored Programs Office.

Any significant changes to grants need to be brought to the attention of ORDS and OSP. Significant changes include but are not limited to:

- Changes in PI or PD,
- Changes in effort devoted to the project (see Effort Reporting Policy),
- Budget revisions,
- Extension of grant period, and
- Change in scope of the project.

Any questions regarding this policy or the procedures mentioned herein should be addressed to the ORDS office: 314-977-7742.

## APPROVAL SIGNATURES

This policy was developed by:

The Division of Research Administration

This policy has been approved by:

Raymond C. Tait, Ph.D.

Vice President, Research

December 11, 2013

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Date

Revision History		
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February 24, 2009	1.0	New Document
January 1, 2010	2.0	Revision
July 1, 2011	3.0	Revision
June 1, 2012	4.0	Revision
September 24, 2012	4.1	Revision
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