

**Roger Williams University  
Grant Resource Center  
Policies & Procedures**

**Revised June 2016**

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## I. Preface

Grant agreements, regardless of grant dollar amount, may be signed for on behalf of the

Form has been signed by all parties), a copy of the full proposal and budget must be submitted to the OSP at least 10 business days prior to the due date. All proposals are submitted through or in co-ordination with the OSP.

### **III. Responsibilities of Each Department in the Development, Submission and Administration of External Funds**

#### **The Role of the Office of Sponsored Programs:**

Develop and administer all grant and contract submissions to funding agencies on behalf of Roger Williams University.

Provide institutional level of consistency in grant and contract administration and clarification of federal and state regulations.

Develop grant proposals that benefit high-priority objectives of the University as identified by the President, Provost and through the University Vision Statement.

Provide announcements of funding opportunities and/or Requests for Proposals (RFPs) to faculty, deans or depts. as appropriate.

Provide assistance and expertise during the preparation of a proposal.

Advise in the formulation of proposal budgets.

Provide final review of all completed grant proposals and work with the PI to resolve any issues encountered during review.

Obtain authorized University approvals and signatures requisite to any grant submission.

Provide written acknowledgment to grantors on behalf of the University. Note: University acceptance of a grant award for any purpose must be approved by the OSP.

Provide campus-wide training on relevant grant and contract issues.

Review the award document to ensure the terms and conditions are in the university and PI's best interest.

Serve as university administrator of the National Science Foundation FastLane grants (proposal and report submission) system.

Maintain all pre award

subcontracts, etc) and submit proposal packet to the OSP in sufficient time for appropriate review.

PI must obtain approval from appropriate Dean for approval of faculty and staff time that will be devoted to the project. NOTE: PIs must weigh time commitments against teaching load and other research commitments – No PI should be committed to over 100% of time. Matched time on a grant can only be used once and all matched time must also be accounted for in Time & Effort Reports.

Read and sign the Conflicts of Interest in Research policy.

Review protocols, safety reviews, etc as required for the project, prior to beginning work on the project.

Review the award document thoroughly for agency requirements that must be fulfilled by the PI or project director. Notify of OSP and Office of Finance of due dates for reports and send a copy of said reports to OSP.

Ensure that cost sharing requirements are properly documented, approved and met.

Contact the OSP regarding intellectual property issues.

Manage the project in accordance with the approved scope of work. Any changes to the scope of work generally need prior written approval from the funding agency. Request for changes in scope of work, or change in PI, must also be sent to the OSP and the Finance Office.

Send all checks received on behalf of the funding agency to the OSP. Faculty and staff who receive grant payments should not make any direct deposits into their project accounts.

Upon receipt of a grant, work with the Office of Finance to set up proper accounts and accounting standards.

Review and verify expenditures reports generated by the Office of Finance.

Review and maintain careful Time & Effort Reports for all individuals employed under the grant or contract.

PI must initiate, monitor and approve expenditures for any subawards or subcontracts according to the scope of the grant.

Ensure that all human and/or animals involved in the project are treated in accordance with all applicable policies.

Notify purchasing office of intent to purchase equipment, or hire independent contractors so that bids may be put out in accordance with the requirements of the award.

Provide Facilities Office with an inventory of all large (\$3,000 and above) equipment purchased under the grant.

Notify the Grants Assistant (or designated person) and Facilities Office of checkout, receipt, or return of loaned equipment or property purchased under the award.

The following acknowledgement of awarding agency support must appear in the publications of any materials which is based upon or developed under this agreement (whether or not copyrighted):

This material is based upon work supported by (insert agency name), under Agreement No. \_\_\_\_\_. Any opinions, findings, conclusions, or recommendations t No. \_\_\_\_\_ erp

## **Role of Grants Assistant**

Oversee Time & Effort reports and assure they are delivered to Office of Finance in a timely manor

Review proposals and help coordinate budget development for proposals

Oversee grant funded project budgets and assure compliance with funded categories – rectify with Office of Finance at least monthly.

Oversee and assist PIs in submitting timely project reports for grant funded projects.

Work with Dean or Dean's Appointee (of respective school) to assure compliance with federal grants.

## **Role of the Dean or Designated Appointee**

Review proposals with PI for department priorities, space allocations, faculty and/or staff work load, equipment usage, student labor needs, and sign Grant Approval Form.

Evaluate processes in administering sponsored projects to ensure that proper controls are in place in compliance with the grant requirements.

## **Role of the Assistant Dean/ Associate Dean**

Oversee adherence to federal agency compliance regulations in regards to federal funding.

Oversee Human Subject Review of proposals/research projects on behalf of the University.

Work with faculty and OSP to increase proposal submissions.

May act on behalf of Dean in overseeing research projects and help assure adherence to University and/or federal grant policies.

## **Role of the Office of Finance**

Assign general ledger (GL) numbers to segregate revenues and expenses unique to each project and budget category.

Review and process financial transactions to ensure compliance with agency, federal and University regulations.

Assist grant recipients (post award) with modifications to grant budget as may be necessary.

Produce monthly reports for careful accounting of budget vs expenditures against the grant.

Produce and submit financial reports in accordance with grant requirements.

Produce and submit financial close out report at end of grant cycle and notify OSP and PI.

Distribute and collect expense distribution reports to facilitate certification as required by 2CFR200 (Uniform Guidance).

Comply with the terms of the award to recover university funds expended on behalf of sponsored projects. Periodic billings will be prepared as required by the award.

## **Role of the Office of Purchasing**

Comply with the terms of the award in regards to soliciting contractors or purchases in carrying out the terms of the grant.

Maintain inventory of grant funded equipment and ensure that such equipment is not sold or donated without consent of the OSP in accordance with federal regulations.

## **Role of the Office of General Counsel**

Represents the Corporate Entity as its sole client. In furtherance of this role: Responsible for all the legal work arising from the activities of RWU's Faculty and departments.

Prepares and negotiates contracts between the University and other entities; provides legal review for all contracts.

Drafts and reviews policies and procedures for the University.

Advises University officials on regulatory compliance and other legal aspects of their duties.

Represents the University before federal and state courts and administrative agencies.

Supervises the activities of outside counsel who may be retained to assist with particular matters requiring specialized expertise.

## **IV. Grant, Contract, or Gift?**

**Types of Agreements/Awards:** There are differences between grants and contracts in terms of applicable University policies, procedures and administration.

### **Grants**

Grants are the most common vehicle for funding work at the University. Grants are awarded competitively, and especially with government grants, usually follow a Request for Proposal (RFP). Grants may be considered as support given to the University in order to attain certain articulated specified project objectives proposed to be realized by the University (or PI) and agreed to by the University and the grantor.

The terms of such grant agreements are typically articulated in a grant proposal submitted by the University and/or a letter of grant agreement (or similar document) provided by the grantor. Grants from private foundations and corporations are usually paid in full or in part prior to project completion, in advance of project expenditures. Federal grants, conversely, are usually cost-reimbursable. All grants, especially larger federal grants, are subject to an external agency audit.

### **Gifts**

A gift to the University, whether cash or an in-kind donation, from an individual, corporation or sponsor, has no expected outcome beyond knowing that the gift was used as designated. All gifts must be processed through the OSP or the Office of Institutional Advancement.



**Contracts**

Contracts are agreements between the University and an external funding agency, whereby the contract contains a detailed statement of specified services, products or milestones as final deliverables, usually within a fixed period of time. Contracts can be fixed-price or cost-reimbursable. Contracts often focus on deliverables required by the grantor and frequently establish ownership rights for the grantor.

Fixed-price contracts award a specific amount of funding to RWU based upon

## Government





**A. Indirect Cost Rate on Federal Grants**

RWU entities should contact the OSP for the University's current negotiated federal rate to be applied to the salaries and wages costs of a project or program to cover the indirect costs. When allowable, indirect costs may be included in subawards issued to the University, however RWU does not charge indirect costs to a subaward issued by the University. A subawardee on a RWU grant may include indirect costs in their proposed subaward budget by applying their own indirect cost rate or a de minimis rate, if applicable. Applicants for federal grants are urged to read closely the specific indirect cost rate guidelines provided by the particular federal agency to which a proposal is to be submitted.

**B. Determination of Non-Federal Indirect Cost Rates**

Non-federal government agencies, private foundations, and corporations may or may not have published their allowable indirect cost rates. In cases where a prospective funding agency's indirect cost rate is unknown, the faculty or staff member should contact the OSP for assistance. Unless prohibited by would-be grantors, in most cases RWU will apply the federally approved cognizant rate.

**C. Distribution of Indirect Costs**

Contact the OSP for the University's policy on Indirect Cost Rates.

**D. Indirect Cost Rate Reduction/Waiver**

Faculty or staff members who wish to reduce or waive the indirect cost rate (or use it as a match) should alert the OSP early in the proposal development process and should also state such on the Grant Application Form. For further information on direct vs. indirect costs please refer to

set up separate accounts in the general ledger and to assure that the proper accounts are being used throughout the distribution of the grant.

## **IX. Guide to Budgeting Travel Costs**

Travel reimbursement is based on a cost for reasonable and allowable expenditures. For federal grants, reimbursements are made only for coach travel on American carriers (if available). Indicate the names of travelers, their assignment under the grant, destination, and duration of their stay and which class they will be flying. If a personal automobile is to be used, indicate the number of miles that will be traveled and anticipate cost using the Uni

## **Supplies**

Supplies purchased with Federal funds will be in compliance with the Federal Uniform Guidance (2 CFR §200.453). Most notably, any unused supplies exceeding \$5,000 in total value at the end of a project, and not needed for any other federally-sponsored project or program, must be compensated for.

## **Competitive Bid**

All procurement transactions with federal funds shall be conducted in compliance with Uniform Guidance (see Equipment)

## **XIII. Project Reports**

Reporting to grantors is very important. All grants project progress and final reports must, before submission, be reviewed by the faculty/staff member's respective dean or administrative supervisor. Copies of final reports must be filed with the OSP.

**A.** Although recognizing more recent constraints due to online submission, all progress and final reports to grantors must be reviewed by the PI's respective academic dean or designated appointee prior to submission.

**B.** Project directors/principal investigators are responsible for the prompt submission of any progress and final reports required by granting agencies.

**C.** Copies of final reports must also be filed with the OSP.

**D.** The Finance Department submits monthly invoices to the grantor agency for reimbursement of expenditures. If project reports have not been submitted on a timely basis, reimbursement is blocked until the reports have been received and accepted.

## **XIV. Conflict of Interest**

RWU has established policies regarding conflict of interest. Some funding agencies, such as the National Science Foundation, have their own special requirements.

**A.**

University policies and procedures. A copy of the RWU document governing conflicts of interest in NSF grants is available from the OSP.

## **XV. Project Director/Principal Investigator Departure from the University**

As each case is different, any faculty or staff member who is a principal investigator, director or co-director of a grant-supported project, and who believes he or she will depart the University before the project is completed, should contact the OSP as soon as that realization is made.

**A.** Grants are considered agreements between the University and external granting agencies. The departure, due to transfer, termination, illness or death, or other causes, of a project director/principal investigator will presume that a modification of the grant agreement is required. Project continuance at the University will depend upon the terms of the modified grant agreement being established between the University and the granting agency.

**B.** In certain instances of project director/principal investigator transfer to another academic (or possibly non-academic) institution, a granting agency may wish to transfer the grant funds to the project director/principal inv h



C.



research in economics, education, linguistics, medicine, psychology, social sciences, statistics, and research involving human subjects or animals.

Fabrication is making up data or results and recording or reporting them.

specific funding. An MBU will have exclusive rights to any work produced during his/her sabbatical leave.

In the case of literary or artistic works, computer software, inventions, designs, technical developments or other intellectual property made or created by the MBU(s) with more than the de minimis use of the University's funds, technical facilities, support or technical personnel, the MBU(s) shall hold 50% and the University 50% of any right, title, or interest arising therefrom, unless other arrangements have been previously negotiated and reduced to a written Agreement between RWU and the MBU(s).

Rents, royalties, and other net profits shall be shared equally between the MBU and RWU, unless otherwise agreed to by the parties, taking into consideration the relative contribution of each.

### **B. Course Materials**

Faculty members shall own all rights to syllabi or lecture notes, handouts, presentation slides, case studies, scientific and laboratory experiments, role playing exercises, examinations, quizzes, problem sets, simulations or similar instructional or teaching materials (whether traditional or innovative) prepared on their own initiative for educational or professional purposes and utilized in conjunction with a course that the faculty member has been or is assigned to teach, and shall be entitled to the benefit of any royalties derived therefrom.

### **C. Patents and Other Technical Copyrights**

The University waives, disclaims and abandons any interest in or claim to any invention, improvement, design or development made by a faculty member without the use of the University's funds, facilities and/or support or technical personnel. Such inventions, copyrights and patents arising therefrom shall be the sole property of the faculty member who is the inventor/creator.

The faculty member and RWU shall each hold fifty percent (50%) of any right, title and interest to any invention, improvement, design or development made by a faculty member with the more than de minimis use of the University's funds, facilities and/or support or technical personnel, unless other arrangements have been previously negotiated by the parties and have been reduced to a written Agreement between RWU and the faculty member.

## **XXII. Export Control Guidelines**

Export Control Guidelines apply to certain types of research that faculty may undertake. These guidelines are administered and overseen by the Department of Commerce and the State Department. In a University setting, Export Control Guidelines should be reviewed for every research project.

However these guidelines most often have the potential for violation when the sponsor places certain restrictions on a research contract, the individuals hired to work on

research projects are foreign nationals, and the dissemination of the research product, (i.e. information or physical product) is “exported.”

It is imperative that researchers completely understand the export control guidelines when undertaking research that may involve a violation of either Export Administration Regulations (EAR) or the International Traffic in Arms Regulations (ITAR).

There are many ways that a university researcher might violate either EAR or ITAR regulations. If a violation is charged, the researcher as well as the university is liable for severe financial penalties up to and including long-term imprisonment. Ignorance is not a defense for violation of these guidelines.

### **What is an export?**

Typically we think of an export as a product manufactured in one country and sold in another. However, when considering export control guidelines, there are a number of products that are considered “controlled” or restricted for export out of the U.S. or

## XXIII. Questions and Answers

1. *I have an idea for a project but I want to pursue it only if grant funds are likely to be available. How can I determine whether doing a project proposal and seeking funds is likely to result in a grant?*

The World Wide Web is an excellent resource for discovering which granting agencies have supported which types of projects or programs. Your faculty colleagues can also be good sources of information. In addition, RWU subscribes to The Grant Advisor, both of which faculty may access from their computer on campus. See the Grant Resource Center for other funding source information.

2. *I'm not ready to do a project proposal yet. Who should I contact to get help in focusing my project idea?*

Again, your colleagues are often good sources of information. You may also wish to consult the previously mentioned Grant Resource Center.

3. *I have a project proposal written, and I know the particular funding agency to which for funding. Do I still need to get internal approvals for my proposal from my department head, dean, etc?*

Yes. The University's internal review process makes sure that there is University approval for your project. Also, the OSP acts as the fielding agent to insure that there are not multiple requests from RWU to the same agency.

4. *Will the University help me find funding, or is that mainly my job?*

If a project has been approved through the grants approval process, the OSP will help in seeking funding for your project. Funding research is related to the extent to which your project is considered a priority within your academic or administrative unit and by the University at large. You may also do research on your own using the World Wide Web, or the RWU Grant Resource Center.

5. *Do I need University approval to contact a prospective funder, even though I*

Yes. Before contacting (whether in person or via phone, E-

revising your project proposal, developing your budget, scheduling a timeline for when funds might arrive and the commencement and end of your project. You have a better chance of securing a grant if you have a good long-