
LAMAR UNIVERSITY
MANUAL OF ADMINISTRATIVE POLICIES AND PROCEDURES

SECTION: Academic Affairs
AREA: ORSPA

MAPP 02.07.01

Comprehensive Sponsored Programs

I. POLICY

- A. At Lamar University, our commitment to fostering a culture of excellence in research, innovation, and academic pursuits is paramount. To ensure the integrity, quality, and effectiveness of our research endeavors, it is essential to define terms, establish responsible parties, and provide guidance.

II. PURPOSE AND SCOPE

- A. The purpose of this policy is to define a framework to manage external and internal grants and sponsored program activities in adherence with institutional, state, and federal regulations.
- B. Continuous growth of research enterprises is a critical priority as Lamar University continues its mission to seek new knowledge and contribute to the larger academic and professional community. Promoting public good by fostering the transfer of knowledge gained through research to the private sector is a vital element of this mission. The endeavor to create and expand research is one of cooperation, and as such requires the synchronization of multiple functional areas of the University as well as external entities. Lamar University operates as one unit to achieve strategic goals and the institution stands united behind its research operations.
- C. Lamar University is an institution of public trust. The organization must respect that status and conduct its affairs in ways that will not compromise the integrity of the University or impede its mission of research. It is the policy of this institution that its administration, researchers, and staff conduct the affairs of the University in accordance with the highest legal, ethical, and moral standards. These policies and procedures apply to all faculty, students, staff, and administrators who participate in the activities of research and sponsored programs.

III. REGULATORY BASIS

- A. The policies and procedures outlined in this document are to ensure compliance as mandated by **2 CFR Part 200, Uniform Administrative Requirements** of the Office of Management and Budget (OMB), **2 CFR Part 200 Subpart E, Cost Principles**, and **2 CFR Part 200 Subpart F, Audit Requirements** for Federal Awards.

- B. Further guidance for Department of Education grant programs can be found in **34 CFR, parts 75-77, 79, 81-82, 84, 86, and 97-99**.
- C. The policies and procedures provide guidance on the application, acceptance, execution, and project closeout of both internal and external grant programs at Lamar University.

IV. DEFINITIONS

- A. **Chief Research Officer.** An individual ultimately responsible for the oversight of funded research and sponsored programs at Lamar University. At Lamar University, the Chief Research Officer is the Associate Provost for Research. The Chief Research Officer may designate an appropriate official to act on their behalf.
- B. **Co-Principal Investigator (Co-PI).** A researcher, serving under the direction of the Principal Investigator, explicitly involved in a research grant, cooperative agreement, training or public service project, contract, or other sponsored projects.
- C. **Compensation.** Amount of salary that an employee earns for services rendered and paid by Lamar University during a specified employment period (e.g., fall/spring/summer semester or any given months). The total annual compensation of any individual who participates in grant activities cannot exceed the individual's IBS.
- D. **Contracts and Grants Development (Pre-Award).** Individuals employed in the Office of Research and Sponsored Programs Administration focused on the writing, review, and submission of contracts and grants on behalf of the University and its researchers. These duties include, but are not limited to, creating and reviewing grant budgets, proposals, all documentation involved in submission, accepting research awards, and communication with funding agencies and prime sponsors.
- E. **Contracts and Grants Management (Post-Award).** Individuals assigned to carry out the ongoing execution and close-out of funded awards. These duties include, but are not limited to, overseeing expenditures and their allowability, certifying researcher time & effort and activities, invoicing sponsors, monitoring financial transactions, completing financial and nonfinancial reports concerning the performance of grants and sponsored programs, and performing close-out procedures on completed projects.
- F. **Effort.** Time spent on any activities by an individual, expressed as a percentage of the individual's total effort. The total effort must not exceed 100% for employees who receive compensation from any grants. The effort level in percentage is utilized for calculating the employee's compensation based on the IBS.
- G. **Facility & Administrative (F&A) Costs.** Costs that are incurred for common or joint objectives and, therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity. Also referred to as Indirect Costs (IDC).

This is a federally negotiated percentage of Total Modified Direct Cost (TMDC). Currently, Lamar University F&A Costs are calculated as 35% of the TMDC for most projects.

- H. **Full Time Equivalent (FTE).** The equivalent of one position continuously filled full-time for a specified period (e.g., 9-month academic year appointment for regular faculty, 12-month fiscal year appointment for research staff, 3-month summer appointment for faculty, etc.). FTE may be comprised of any combination of part-time and full-time positions. It provides a fractional (0.01 – 1.00) estimate of the full-time employment (1.00) by converting the part-time effort to a full-time derived statistic.
- I. **Institutional Base Salary (IBS).** The annual (12-month) compensation that a grant-receiving organization pays for an individual's appointment, whether that individual's time is spent on research, teaching, service, or other activities. An employee's IBS cannot be increased solely because of the award of one or more research grants. This base salary excludes any income that the individual earns outside of the duties to the organization. IBS represents the salary cap of any employee paid fully or partially by sponsored grants.
- J. **Internal Funding Entity.** A department, division, center of research, or other operational unit belonging to the University that has ownership over, and ability to distribute, internal funding opportunities.
- K. **Principal Investigator (PI).** An individual responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service project, contract, or other sponsored projects.
- L. **Researcher.** All Individuals who are engaged in research, whether funded or unfunded, or in sponsored programs activities. For the purposes of this policy, the term researcher refers to any Lamar University faculty or staff member having direct responsibility for the design, conduct or reporting of funded or unfunded research or other sponsored programs activities funded or proposed for funding by the federal government or other external funder.
- M. **Research Compliance Officer.** An individual responsible for interpreting and enforcing compliance across all research and sponsored programs enterprises across the University. This officer shall be appointed by the Chief Research Officer and work within the Office of Research and Sponsored Programs Administration.
- N. **Sponsored Programs.** All externally funded activities including, but not limited to, research, training, instruction and/or public service projects involving funds, materials, or other compensation from sources (sponsors) outside of Lamar University, under a grant, contract or other agreement that meets any of the following conditions:
 - 1. Lamar University is bound to a line of scholarly or scientific inquiry specified to a substantial level of detail. Such specificity may be indicated by a plan, by the stipulation of requirements for orderly testing or validation of particular approaches, or by the designation of performance targets.

2. The sponsor requires, or the proposal submitted for consideration contains, a line-item budget or modular budget. A line-item budget details expenses by activity, function, or project period. The designation of overhead (or indirect costs) qualifies a budget as the sponsor requires financial and/or programmatic reports.
 3. The sponsor requires that the services performed, the funds awarded, or the materials supplied under the agreement are subject to internal and/or external audit.
 4. The agreement provides for the disposition of either tangible (e.g., equipment, records, technical reports, theses, or dissertations) or intangible (e.g., rights in data or inventions) properties that may result from activities covered by the agreement.
- O. **Total Modified Direct Cost (TMDC).** All direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000.

V. ELIGIBILITY OF PRINCIPAL INVESTIGATORS

- A. The eligibility to serve as a PI or a Co-PI shall meet the requirements as stated in the announcement of funding opportunities and one of the following employment criteria at Lamar University:
1. A tenured or tenure-track assistant, associate, or full professor or librarian.
 2. A research assistant, associate, or full professor, clinical professor, or senior research fellow.
 3. An adjunct, visiting, or emeritus professor, or a lecturer, instructor, or other faculty who has the approval of their department chair and the college dean. The PI in this category shall either:
 - include a Co-PI from appointment types described in A and B above, *or*
 - provide a signed memo in which the appropriate chair and dean accept full fiscal and administrative liability and responsibility for the actions of the PI included in this category
 4. A post-doctoral fellow who has the approval of their department chair and the college dean. The post-doctoral fellow's mentor at Lamar University shall be included as a Co-PI.
 5. A professional or research staff who is not also a student at Lamar University and has obtained the approval of their department chair and the college dean, or of the Associate Provost for Research.

VI. ROLES AND RESPONSIBILITIES

- A. The roles and responsibilities of individuals who participate in research and sponsored programs are defined in this section to comply with the Uniform Guidance and the policies of Lamar University and Texas State University System. The responsibilities of program administration are shared by the Senior University Administrators, the Office of Research and Sponsored Programs Administration, Academic Deans and Chairs, Principal Investigators, and research staff employed by the grant resources.
1. **Senior University Administrators.** The President, Provost, Associate Provost for Research and Sponsored Programs, and the Chief Financial Officer share the ultimate responsibility for all sponsored grants and contracts by providing continuous support and oversight of these activities.
 2. **Office of Research and Sponsored Programs** consisting of the following organizational units:
 - a. **Contracts and Grants Development** (Also known as Pre-Award)
 - i. Assisting investigators in identifying funding sources.
 - ii. Conducting review and certification of research agreements and project budgets.
 - iii. Approving proposals and administering sponsored projects.
 - iv. Submitting proposals to funding agencies.
 - v. Accepting the research awards for funded projects.
 - vi. Facilitating project close-out activities with Contracts and Grants Management staff.
 - vii. The Associate Provost for Research and Sponsored Programs or their designee is responsible for approving proposals for submission to sponsors on behalf of Lamar University after the proposals are reviewed and approved by the co-PIs, Academic Chairs and Deans. For a proposal to be approved, a full proposal record must be documented in the electronic research administration (eRA) system (Lamar Cayuse, <https://lamar.cayuse424.com>). After a proposal has been approved at all levels, the Contracts and Grants Development staff may submit the proposal to the external funding agencies.
 - b. **Contracts and Grants Management** (Also known as Post-Award)
 - i. Implementing grant policies concerning the expenditures of the sponsored projects.
 - ii. Recording and certifying the time & effort contribution of all personnel participating in research and sponsored grants.

- iii. Ensuring and approving the accuracy, allocability and allowability of project expenditures.
- iv. Invoicing applicable sponsors.
- v. Performing financial transactions of sponsored programs including allocations of F&A costs.
- vi. Coordinating with researchers, Contracts and Grants Development staff, and sponsors for project closeout in a timely manner.
- vii. A separate policy and procedure detailing expenditure and recording is available for guidance.

c. Research Integrity and Compliance

- i. Ensuring research compliance with sponsors' requirements, including:
 - a. Financial Conflicts of Interest Disclosure.
 - b. Conflicts of Commitment.
 - c. Institutional Review Board (IRB) applicability and regulations.
 - d. Institutional Biosafety Committee (IBC) applicability and regulations.
 - e. Institutional Animal Care and Use Committee (IACUC) applicability and regulations.
 - f. Institutional Patent Committee (IPC) applicability and regulations.
- ii. Providing and maintaining relevant training to researchers.
- iii. Investigating non-compliance or misconduct concerning investigators' actions.
- iv. A separate policy and procedure outlining human subjects, animal subjects, research integrity, and other, more detailed compliance conventions is available for guidance.

3. **Academic Deans** are responsible for the research and other sponsored activities that are conducted in their colleges. The Dean or the designee is responsible for approving the proposal in the eRA system before it is routed to the ORSPA. The approval/signature of the Dean serves to:

- Attest to the appropriateness of proposed project activities within the College.

- Acknowledge that the research or sponsored activities conform with the research and/or the educational mission of the College.
 - Attest that the Dean is aware of and in agreement with the faculty on space requirements, materials, staffing, matching funds, or hazards associated with the conduct of the activities.
 - Acknowledge and approve the proposed time & effort contribution of the investigators toward the proposed project activities in the College.
 - Attest that the Dean is committed to providing the resources as specified in the proposed projects at college level, including matching funds as required by the grant program, if any.
 - The Dean may decide to discuss any additional requirements with Senior University Administrators before approving the proposal in the eRA system.
4. **Department Chairs** are responsible for knowing the general technical contents of the research or sponsored activities that are conducted in their departments. Each project activity must be approved by the Department Chair prior to routing the proposal to the Dean and then the ORSPA through the eRA system. The approval of Department Chair serves to:
- Acknowledge that the research or sponsored activity conforms to either the long or short-range plans of the Department.
 - Agree to address the project needs in terms of space requirements, materials, staffing, or hazards associated with the proposed activities.
 - Acknowledge and approve the proposed time & effort contribution of the PIs toward the proposed project activities in the Department.
 - Attest that the Chair is committed to providing the resources as specified in the proposed projects at department level.
 - The Department Chair may decide to discuss any additional requirements with the Dean before approving/signing approving the proposal in the eRA system.
5. **Principal Investigators** are responsible for:
- Leading the development of the research proposal.
 - Drafting the project budgets for review by co-PIs, Chair, Dean and the ORSPA.
 - Accomplishing the research objectives specified in the funded proposal.
 - The intellectual contents of the research or scholarly activities specified in the sponsored project.

- Ensuring the accuracy, allocability and allowability of project expenditures.
 - Reporting the time & effort contribution of all research personnel in the sponsored projects.
 - Coordinating with ORSPA and Post-Award Management staff for project closeouts.
 - Communicating the program deliverables to the sponsors.
 - Ensuring that all necessary approvals (e.g., nondisclosure agreement, COI disclosure of co-PIs and other research staff) are received prior to the submission of the proposal through the eRA system.
 - Early in the development of the proposal, faculty should consult with their department chair and/or dean to inform them of plans for preparing a proposal and to discuss any special requirements that may be necessary.
 - In accordance with Lamar University policies, responsibility for scientific and budgetary decision-making in project agreements rests with the individual designated as the lead PI, who is responsible for understanding costing principles (e.g., direct vs. indirect costs) and appropriately communicating to administrators at all levels the applicability of expenditures in the sponsored project. Administrators may assist in judging accuracy after the fact, but only the PI or the PI's technical staff can truly judge the appropriateness of a charge to the project for reporting and certifying the time & effort required by Post-Award Finance. These decisions must be recorded in a manner that assures their subsequent accurate implementation and that permits ready review by internal or external auditors. In the event of a dispute concerning the allowed ability of an item of cost, the ORSPA and Office of Post-Award Administration will jointly provide the final determination in accordance with grant regulations and Lamar University policies.
6. **Project staff** can be other faculty, post-doctoral research associates, graduate students, or technical support staff. They report to the lead PI for planning, conducting, and documenting of activities related to the sponsored activity, including their time & effort contribution to the sponsored projects.
7. **Internal Funding Entities** are responsible for distributing external funding they receive that is earmarked for internal funding opportunities. These operational units must define parameters for how this funding will be distributed, establish rubrics, committees, and standards for evaluation of proposals, and maintain detailed records of this funding and all transactions to ensure compliance with all applicable regulations.

VII. EXTERNAL PROPOSAL DEVELOPMENT AND SUBMISSION**A. Grant Preparation**

1. All grant submissions to federal, state, and private sponsors shall be processed through the Cayuse platform.
2. PIs are responsible for informing and coordinating activities with Pre-Award for proposal submissions.
3. PIs must upload all pertinent documents listed in the funding announcement into Cayuse platform for review by Pre-Award (abstract, project narrative, budget, vita, subaward agreements, etc.).
4. PIs must ensure all sections in Cayuse are fully completed and have a current Conflict of Interest (COI) form on file for all participants, disclose if the project will have any human, biological, or animal subjects, disclose if project has potential intellectual property, and identify any items subject to export control.
5. Demonstrate current, unexpired training certificates for Conflicts of Interest, Human Subjects Research, Animal Research, or any other applicable area relevant to the project being carried out.

B. Budget Preparation

1. PIs must develop internal budgets containing financial information for senior personnel, other personnel, travel, equipment, supplies, publications, consultant services, and subaward services. Internal budget sheet can be obtained from ORSPA website or directly contacting a staff member of Contract and Grant Development (the form contains macros; PI must enable content).
2. The ORSPA budget sheet incorporates federal GSA travel rates. If an investigator's destination is not listed, they will be required to submit flight and mileage supporting documentation.
3. PIs shall be responsible for coordinating with their departmental and college administration to ensure budget is accurate, accounts for cost-of-living increases, tenure, and promotion.

C. Routing and Submission

1. All PIs shall coordinate with Pre-Award staff to ensure accuracy of proposal submission prior to routing.
2. All PIs must order "Approving Units" before routing proposal.
3. All PIs, Co-PIs, Department Chairs/Directors, and College Deans must review and certify information provided in proposal is true and accurate. The Research Office shall not bypass any department or college approval, unless ORSPA has expressly been given approval in writing to act on behalf of a department or college.

4. ORSPA is the designated office responsible for submitting all proposals for Lamar University. PIs, Co-PIs, Department Chairs/Directors, and College Deans are expressly prohibited from submitting proposals.

VIII. INTERNAL PROPOSAL DEVELOPMENT AND SUBMISSION

A. Grant Preparation

1. All grant submissions to Internal Funding Entities shall be processed through the Competition Space platform.
2. PIs must upload all pertinent documents listed in the funding announcement into Competition Space for review by the Internal Funding Entity as defined by the funding announcement.
3. PIs must ensure all sections in Competition Space are fully completed and have a current Conflict of Interest (COI) form on file for all participants, disclose if the project will have any human, biological, or animal subjects, disclose if project has potential intellectual property, and identify any items subject to export control.
4. Demonstrate current, unexpired training certificates for Conflicts of Interest, Human Subjects Research, Animal Research, or any other applicable area relevant to the project being carried out.

B. Budget Preparation

1. PIs must develop an internal budget containing financial information for senior personnel, other personnel, travel, equipment, supplies, publications, consultant services, and subaward services. An internal budget sheet can be obtained from the ORSPA website to be used as a template or may be defined by the Internal Funding Entity.
2. The ORSPA budget sheet incorporates federal GSA travel rates. If an investigator's destination is not listed, the PI will be required to submit flight and mileage supporting documentation.
3. PIs shall be responsible for coordinating with their departmental and college administration to ensure budget is accurate, accounts for cost-of-living increases, tenure, and promotion.

C. Routing and Submission

1. All PIs shall coordinate with the Internal Funding Entity to ensure accuracy of proposal submission prior to submission.
2. Internal Funding Entities must evaluate proposal submissions based on standards and rubrics developed by the operational unit responsible for the funding. Internal Funding Entities should maintain detailed records of these evaluations and all financial transactions and adhere to any applicable regulations to which the funds may be subject.

IX. STUDENT EMPLOYMENTS AND TUITION REMISSION

- A. Full-time students employed by Lamar University to participate in the activities of research and sponsored programs shall not exceed 0.5 FTE.
- B. Tuition remission is the payment of tuition expense as part of compensation to students performing sponsored work on federal research awards. Tuition awards from a grant cannot include institutional, differential, or other fees that are incorporated into the student's tuition bill. Although not a required budget component, tuition remission may be charged to research awards as a direct cost and is excluded from the application of F&A costs. In total, student "compensation" is an aggregate total of salary/stipend, fringe benefits, and tuition. Students may be asked to reimburse any pre-paid tuition on a pro-rata basis.
- C. PIs are encouraged, but not required, to include a request for tuition costs for student research assistants when allowed by the sponsor and if funding policies permit. After the sponsor approves the tuition of the awarded grant, the student is assigned to the funded project as a research assistant. The amount of tuition, expressed as a percentage of FTE, charged against the grant shall correlate to the percentage of available work effort the student is assigned to provide on the grant. When student tuition is paid from a sponsored grant, the PI and their department will be responsible for accurately managing the compensation, encumbering the project, monitoring the expenditures, and reporting and certifying the related work effort. If a student changes status or their work effort during a budget period, the PI shall notify ORSPA and other appropriate University services for updating the changes.

X. FACILITIES AND ADMINISTRATIVE REVENUES

- A. The Facilities and Administrative (F&A) revenues generated by externally funded grants shall be distributed according to the following proportions:
 - 1. 50% to Lamar University
 - 2. 25% to the Office of Research and Sponsored Programs Administration
 - 3. 10% to the lead principal investigator (PI)
 - 4. 7.5% to the participating college
 - 5. 7.5% to the participating department/center
- B. The distribution shall be obligated based on the actual research expenditures of the funded grants. For funded collaborative projects involving multiple departments, centers, and colleges, the distribution of the college/department/center portion shall be based on the proportion indicated in the approved Cayuse electronic submission file or internal routing sheet when the proposal was submitted.
- C. Once distributed, the lead PIs, departments, centers, and colleges shall have until the end of the third academic year to spend the approved F&A budget. The unspent F&A fund managed by the PIs, departments, centers, and colleges subsequent to this period shall be transferred to the Lamar University F&A account. Individuals and operating units receiving F&A funds shall document how the funds are spent to benefit scholarly and creative activities at Lamar University.

D. Examples for uses of F&A funds include:

1. Conducting pre-grant feasibility studies for proposal submissions.
2. Preparing competitive proposals for external sponsored programs.
3. Providing continuation funding for research teams between externally funded projects.
4. Supporting research activities pending external awards.
5. Purchasing capital equipment related to expanding research capabilities.
6. Engaging students in research activities and programs.
7. Reimbursing research-related administrative, maintenance and operation costs;
8. Supporting research activities of eligible PIs and students (e.g., publication costs, training, research-related travel, graduate assistants, etc.).
9. Supporting other activities that directly benefit scholarly and creative activities.

XI. EDUCATION AND TRAINING

- A. The University will provide education and training sessions through the CITI system on conflict of commitment regulations and best practices to ensure researchers understand their obligations and responsibilities.

XII. CONCLUSION

- A. The administration of internal and external grants, contracts, and sponsored programs requires the dedicated teamwork of senior administration, faculty, and staff from every faculty administrative unit across Lamar University. The Office of Research and Sponsored Programs Administration holds all participants to the highest standards of moral, ethical, and legal conduct.

XIII. REVIEW AND RESPONSIBILITY

Responsible Parties: Academic Policy Advisory Council; Office of Research and Sponsored Programs Administration.

Review Schedule: Every three years on or before the date the policy was last revised and/or approved.

XIV. APPROVAL

Dr. Brett Welch	11/08/2024
Interim Provost and Vice President for Academic Affairs	Date

Dr. Jaime Taylor	11/08/2024
Lamar University President	Date

POLICY LOG

Version	Date	Description of Changes
1	01/01/2011	Issued.
	08/01/2023	Last updated
		Reviews by constituency groups completed.
		Review by campus community completed.
		Policy approved by President.

APPENDICES

Related Links

Office of Research and Sponsored Programs Administration (<https://www.lamar.edu/research/research-and-sponsored-programs.html>)

Faculty Information (<https://www.lamar.edu/faculty-staff/academic-affairs/faculty-info/index.html>)

Faculty and Staff Policies (<https://www.lamar.edu/faculty-staff/policies.html>)

2 CFR Part 200 – Uniform Guidance (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1>)

2 CFR Part 200, Subpart E – Cost Principles (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E>)

2 CFR Part 200, Subpart F – Audit Requirements (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-F>)

Office of Management & Budget (OMB) Circulars (<https://www.whitehouse.gov/omb/information-for-agencies/circulars/>)

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