

ROGERS STATE UNIVERSITY
External Grant Management Policy

Policy Statement

Rogers State University values the pursuit of external grant opportunities and as such would like to provide a comprehensive policy framework that guides the development, submission, and implementation of external grant projects.

Contents

- Who should know this Policy?
 - Responsibilities
 - Procedure
 - Contacts
 - Forms
 - Policy History
-

Who Should Know This Policy (check target audience (s))

X	President		Faculty
X	Vice Presidents	X	Other Accounting/Finance Personnel
X	Deans		Students
	Directors		Other Groups
X	Department Chairs		All Employees

Responsibilities

Responsible for Policy	
University Officer Responsible:	
Daniel Marangoni	Director, Research and Sponsored Programs

Procedure

STATEMENT OF PURPOSE: In support of the above policy statement, the following procedures guide the pursuit of external grant opportunities.

1.0 General Proposal Management

1.1 Proposal Planning, Review, and Submission

1.1.1 Proposal Planning: The major area of responsibility is assisting Principal Investigators (PI) in the preparation and submission of grants. All grant proposals are authorized through the Office of Research and Sponsored Programs in cooperation with the Vice President for Academic Affairs.

1.1.2 Proposal Review: The PI shall contact the Office of Research and Sponsored Programs once he/she has identified a potential sponsor and is interested in submitting a proposal. Based on the submission of the Grant Approval Form to the Office of Research and Sponsored Programs, the Director of Research and Sponsored Programs will conduct a preliminary proposal review. The Grant Approval Form, which is signed by the relevant Department Chair, Dean, Director of Research and Sponsored Programs, and Vice President for Academic Affairs, is due at least 21 business days prior to the submission deadline of the grant. Final review of the proposal by the Office of Research and Sponsored Programs shall be conducted at least 10 business days prior to submission.

1.1.3 Proposal Submission: The Office of Research and Sponsored Programs is responsible for submission of the proposal to the funding agency, electronically or via hard copies, whichever is required. The President serves as the authorized representatives to sign grant applications, which is done by submission by the Office of Research and Sponsored Programs.. Any grant proposals that are submitted without the approval of the Vice President for Academic Affairs or Director of Research and Sponsored Programs may be

considered noncompliant with university policy and/or may contain incomplete information and/or sponsor requirements. Consequently, these applications may be administratively withdrawn.

2.0 Proposal Processing

2.1 Contact

- 2.1.1 Applicants should contact the Office of Research and Sponsored Programs early for assistance in preparing the proposal budget, obtaining up-to-date information about Rogers State University, setting up of access for electronic submittals, and other assistance as requested. University policies about effort, benefits, cost sharing, subcontracts, travel, etc. will provide necessary information for development of the proposal.

2.2 Routing Initiation

- 2.2.1 Proposals are routed and approved within the University using the Grant Approval Form. The Principal Investigator will need to sign this form to begin the routing process. Assuming the submission deadline allows, this needs to be completed no later than 21 business days prior to the deadline of the grant and returned to the Office of Research and Sponsored Programs in Meyer Hall.

2.3 Routing Completion

- 2.3.1 The Office of Research and Sponsored Programs will complete the routing process. The Grant Approval Form will be reviewed and signed by: the Principal Investigator/Program Director, Chair of the Department, Dean, Vice President for Academic Affairs, and Comptroller and/or Executive VP for Administration and Finance, and the President.

2.4 Submission and Authorization

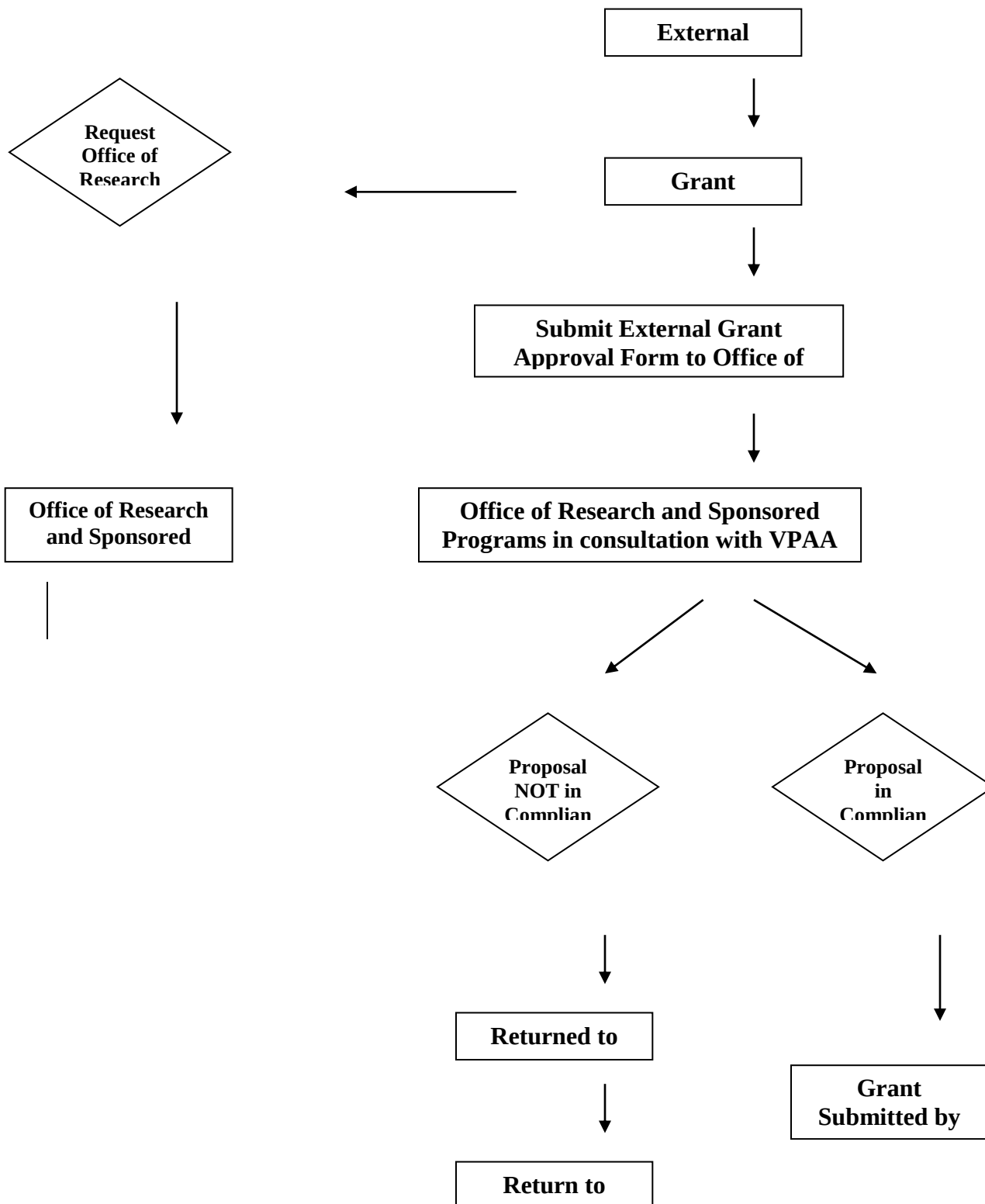
- 2.4.1 The Office of Research and Sponsored Programs will coordinate with the Vice President for Academic Affairs, and the Principal Investigator regarding the mailing or electronic submission of the final grant proposal to the funding agency.

As designated by the President of Rogers State University, only the Director of Research and Sponsored Programs is authorized to submit proposals. Agreements must be signed by those with signatory authority. Others should not sign any submittal certifications on behalf of the institution.

2.5 Human Subject Research

2.5.1 It is the Principal Investigator's responsibility to comply with required human protections by following Rogers State University's relevant policies.

Proposal Processing Overview



3.0 Grant Award Notification

3.1 Award Letter

3.1.1 The Principal Investigator (PI)/ Program Director (PD), the Office of Research and Sponsored Programs, the Vice President for Administration and Finance or the President's office will receive an official award letter once the grant proposal or contract is selected for funding. This legal document notifies the grantee institution and the PD/PI that the grant has been awarded and funds are available for the PD/PI to perform the necessary duties required to achieve the goals described in the proposal. By accepting the award or agreement, the PD/PI accepts the terms and conditions, including legal obligation, set forth by the sponsor agreement. The PD/PI is held responsible for the day-to-day operations and management of the sponsored programs and research.

3.2 Other Official Documents

3.2.1 The PD/PI shall forward all official award documents to the Office of Research and Sponsored Programs. The Office of Research and Sponsored Programs will file and forward documents to the Business Office. The Business Office will set up relevant account(s) and ensure compliance with state and federal regulation. The PD/PI is responsible for the implementation of the project in accordance with the proposal and any other conditions of the award and for ensuring the programmatic and fiscal compliance of the project.

4.0 Closeout

4.1 Final Report

4.1.1 Federal and many other sponsored programs require final reports be submitted and all obligations incurred under the award liquidated, no later than 90 days after the end of the period of performance. All unobligated funds paid in advance, if applicable, must be refunded to the awarding agency (Uniform Guidance: 200.343). Rogers State University requires closeout of sponsored programs in

accordance with federal regulations, specific sponsor policies and the terms of the award within the timeframe required by the sponsor. The exact nature of the reports required and the deadlines for their submission are typically outlined in the award terms and conditions or published sponsor policies.

4.2 Sanctions

4.2.1 In accepting sponsor funding, the University has an obligation to comply with the sponsor's reporting and fiscal closeout requirements. Failure to submit these final reports and manage the fiscal closeout appropriately can lead to closer monitoring by the sponsor, future award delays, the sponsor withholding future funding to the Principal Investigator, the Principal Investigator's Department and the University, or the use of an alternative source of funds to cover sponsored program activity for costs not properly accounted for prior to the closeout of the award. This policy, in conjunction with the associated process and guidance, establishes the University's roles and responsibilities with respect to meeting these final closeout report and submission requirements and final fiscal management of sponsored programs.

4.3 PI Responsibilities

4.3.1 It is the Principal Investigator's responsibility to prepare final performance documentation, for submission to the sponsor, per sponsor requirements. The Business Office will not review and submit new proposals on behalf of a Principal Investigator if the Principal Investigator is currently more than thirty (30) days delinquent (i.e. 30 days past the sponsor closure date) in submitting any final performance report that is due to a sponsor. If the Principal Investigator has not supplied necessary information to the Business Office in order to complete other required final closeout documentation in a timely fashion, the Business Office reserves the right to place a hold on future funding or other administrative actions until such time the Principal Investigator is no longer delinquent. Specifically, the Principal Investigator is responsible for:

- Reviewing award terms and conditions for all closeout requirements.

- Drafting final technical/progress report and submitting to sponsor per sponsor requirements.
- Submitting a copy of the final technical report to the Business Office and Budget accountant for Federally sponsored programs.
- Determining whether final intention statement is negative or positive and submit intention statement to the Business Office.
- Notifying all sub-recipients of requirement to submit final invoice, intention statement and technical report to Rogers State University within 60 days after end of award date.

5.0 Budget Development

5.1 Direct Costs

5.1.1 Direct costs are clearly identifiable costs related to a specific project. General categories of direct costs include but are not limited to salaries and wages, fringe benefits, supplies, contractual services, travel and communication, equipment, and computer use. If Rogers State University's negotiated indirect cost rate is not allowed by a funding agency, they will often allow a percentage of direct costs to be used or suggest a maximum rate.

5.2 Indirect Costs (F&A)

5.2.1 Indirect costs are costs related to expenses incurred in conducting or supporting research or other externally-funded activities but not directly attributable to a specific project. General categories of indirect costs include general administration (accounting, payroll, purchasing, etc.), sponsored project administration, plant operation and maintenance, library expenses, departmental administration expenses, depreciation or use allowance for buildings and equipment, and student administration and services.

Whenever possible, proposals should request full reimbursement of indirect costs. When a proposal provides for less than full indirect cost reimbursement (i.e. below Rogers State University's indirect cost rate), the circumstances should be discussed in advance with the Office of Research and Sponsored Programs.

The Office of Research and Sponsored Programs is available to help determine what the funding agency will allow and to help compute the appropriate rate. In general, programs are computed using Rogers State University's Federal Negotiated Rate.

- On Campus: 30% of salaries and benefits
- Off Campus: 15.8% of salaries and benefits
- From July 1, 2013 to June 30, 2017
- Approving Agency: Department of Health and Human Services

Recipient/Sub-recipient: If the recipient/sub-recipient has a current federally negotiated F&A rate agreement, the negotiated rate must be used. If the entity has never received a negotiated indirect cost rate, a de minimis rate of 10% of modified total direct costs (MTDC) may be used. It is not permissible to force or entice a proposed sub-recipient without a negotiated F&A rate to accept less than the 10% de minimis rate. Principal Investigator or Program Director may not negotiate or agree to lower rates with their sub-recipients **(Uniform Guidance: 200.331)**.

5.3 Fringe Benefits

5.3.1 As you develop the grant proposal budget, always confirm fringe benefits rates with the Office of Research and Sponsored Programs. However, the following average rates, applicable to a regular semester, can be used for planning.

- Annual: 37% plus \$6,160 (Check with Office of Research and Sponsored Programs to obtain precise rate, as it varies by faculty or staff member)
- Part-time and graduate students: 8.65%
- Undergraduate students: 1%

5.4 Off-Semester Salary from External Grants

5.4.1 Following university-wide policy, full-time employees may receive prorated monthly compensation for any time period when faculty offices are not open for work on an external

sponsored project (i.e. summer and intersession). The following guidelines apply:

- Off-semester salary is allowable subject to the regulations of the funding agency and the University's policies.
- Faculty who receive off-semester salary must expend the effort associated with the compensation during that off-semester period.
- The maximum amount of off-semester salary permissible is limited to the two months off contract.

5.5 Add Pay

5.5.1 Add pay is permitted for the principal investigator, project director, or appropriate staff member if allowed by the funding agency. Salary additions will be allowed on a scale of up to 25% per academic year of the faculty ten month contract base salary. The grant or contract must also cover the related fringe benefits and indirect costs. All add pays must be pre-approved by the Dean of the faculty member's school and the Vice President for Academic Affairs.

5.6 Consultants

5.6.1 Consultants include any person who is not a Rogers State University employee that will work on the project. Typically, a person will be considered a consultant (versus an employee) if he/she meets the following criteria: (1) is engaged to complete a specific item or project, (2) considers this type of work as their regular business profession, (3) works for multiple people on a routine basis, (4) is not a current Rogers State University employee, and (5) provides the University with an invoice detailing the item(s) or service(s) rendered. Fringe benefits should not be calculated for consultants and they should not be included in the indirect costs calculations if Rogers State University's negotiated indirect cost is used. If the negotiated rate is not used, consultant fees should be included in any other indirect cost rate calculation based on a percentage of direct costs.

5.7 Exclusions

5.7.1 The following items are often considered personnel costs, however, when using the negotiated rate of 30% (on campus) and 15.8% (off campus), do not compute fringe and indirect costs on:

- Consultant fees
- Honoraria
- Stipends
- Student scholarships

5.8 Honoraria

5.8.1 An honorarium is paid to an individual for professional services of a consulting, artistic, or entertainment nature. Generally, the individual should be an authority or recognized expert in the field of endeavor for which retained, and the service should be of a non-recurring nature. To qualify, the individual must not have been on the University payroll or of any other Oklahoma State Agency at the time the services are provided. Fringe benefits should not be calculated for honorariums and they should not be included in the indirect cost calculations if Rogers State University's negotiated indirect cost rate is used. If the negotiated rate is not used, honorariums should be included in any other indirect cost rate calculation based on a percentage of direct costs.

5.9 Equipment and Mileage Reimbursement Rates

5.9.1 Equipment refers to an item worth \$5,000 or more. Regarding reimbursement rates for mileage, check current rate with the Business office.

6.0 Budget Revision and Change of Scope, Program Director, and Status

6.1 Budget Revision

6.1.1 Some sponsors give the University certain flexibility in re-budgeting, while others require prior approval if the cost(s) was not initially requested. The PD/PI shall submit in writing a request for any budgetary revision to the Business Office. The requested amount must be allowable, reasonable, and

necessary for the performance of the sponsored programs or research.

The request should include the budget item(s), the revised amount, the entire account number and the justification for the revision. The PD/PI is strongly encouraged to review the budget and expenditure needs prior to the request to minimize the number of revision requests. The Business Office will contact the PD/PI for further information if needed.

6.2 Change in Scope of Work

6.2.1 The PD/PI must notify the Business Office and the sponsor of any changes in the specific aims or the methodology that may significantly affect the objectives of the approved project. The sponsor's prior approval may be required before integrating any modifications into the project's activities. Refer to the sponsor guidelines for further instructions.

6.3 Changes in Program Director/Principal Investigator Status

6.3.1 The PD/PI shall inform the Business Office in writing of a change in status as soon as he/she is aware of it to prevent any delay in the progression of the funded project. The newly named PD/PI must have the capabilities and expertise to accomplish the goals set forth on the project proposed in an efficient and productive manner. Hence, he/she shall assume responsibilities for the operation and management of the project. Reduction or increase in the PD/PI's committed effort to the project will require prior approval from the Business Office and may require prior approval from the sponsor. Refer to the sponsor guidelines for instructions and requirements on these matters. The Business Office will assist the PD/PI with the request. The request will be forwarded to the sponsoring agency for approval.

7.0 Effort Reporting

7.1 General

7.1.1 The purpose of this policy is to comply with the Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance") as well as other federal requirements for certifying effort expended on sponsored awards. As such, Rogers State University faculty and staff are expected to charge their time to sponsored

awards commensurate with the committed effort expended on all activities they perform. Payroll charges to sponsored awards, and cost sharing recorded for faculty and staff, serve as the initial data points for the University's effort reporting system (Uniform Guidance 200.430).

7.2 Responsibilities of Principle Investigator

7.2.1 Responsibilities are as follows:

- Understand their own as well as their staff members' (non-faculty personnel) levels of effort committed, charged and reported on all applicable awards.
- Communicate significant effort changes to the Business Office.
- Review salary charges on awards on a monthly basis with grant manager and identify any effort-related changes and communicate with administrators to post corrections if needed.
- Monitor effort commitments, salary charges, and cost sharing on all applicable awards.
- Communicate to the Business Office any changes that require sponsor notification and/or approval.
- Review salary charges with PI/faculty member and post any salary distribution updates and/or corrections in a timely manner.

7.3 Responsibilities of the Business Office

7.3.1 Responsibilities are as follows:

- Communicate significant changes in effort to sponsors.
- Update effort commitments in the grant file to reflect new effort commitment when changes in effort are approved by sponsors.

7.4 Other Responsibilities

7.4.1 Other Responsibilities are as follows:

University Principal Investigators and other academic appointees who have effort charged or committed to federal awards must certify their academic-year and/or supplemental/summer salary on an annual basis. The annual effort report(s) covers the fiscal year (July 1st to June 30th) and is released for review and signature after the fiscal year end close process is complete.

Principal Investigators are required to review their certifications and determine whether the percentages reasonably reflect the committed effort expended and the work performed on each sponsored award and the aggregate effort associated with “all other activities” displayed on the certification. Variances of up to 5% of total salary, for each award listed, are allowable and do not require an adjustment or recertification. Variances over 5% for each award should be corrected prior to final approval of the certification. Principal Investigators should complete their certification within 30 calendar days of the date they receive notification from the Business Office.

8.0 Compliance and Assurances

8.1 Federal Compliance

8.1.1 All federal proposals will conform to the Office of Management and Budget’s Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CRF 200.

8.2 Human Subjects Research

8.2.1 Oversight

8.2.1.1 The University of Oklahoma (OU) is currently providing oversight for all research compliance and human subject protection training at Rogers State. All research involving human subjects that is conducted at or by researchers affiliated with Rogers State University must comply with applicable policies for the protection of human subjects.

All research involving human subjects must be reviewed and approved by the OU Norman-Campus Institutional Review Board (IRB) prior to subject recruitment and data collection. The Director of Research and Sponsored Programs serves as the point of contact on campus and liaison between the University of Oklahoma Office of Human Research Participant Protection and Rogers State University.

8.2.2 iRIS Access

8.2.2.1 To obtain iRIS access, contact the Director of Research and Sponsored Programs with the following information:

- Name, status (i.e. faculty, instructor, staff, undergraduate student, graduate student), email, phone number, and date of birth.
This information will be used to create an individual OUNet account, which will provide the basis for iRIS access. Keep the following general guidelines in mind when applying for an OUNet account:
- Faculty: Must apply for an OUNet account and complete CITI training
- Graduate Students: Must have a faculty sponsor, apply for an OUNet account, and complete CITI training
- Undergraduate Students: Must have a faculty as Principal Investigator (and indicate in the application their role), apply for an OUNet account, and complete CITI training

8.2.3 CITI Certification

8.2.3.1 All individuals conducting research involving human participants at Rogers State University must complete a free Human Subject certification online with Collaborative Institutional Training Initiative (CITI). As you register with CITI, register under the University of Oklahoma designation. Proposal submissions for internal or external grants that require Human Subject certification must include a copy of the certificate indicating the successful completion of the course. To register with CITI and take the course, contact the Director of Research and Sponsored Programs.

Include the Human Subject certificate with the OU IRB application material. Also, in an effort to track faculty, students, and staff who have successfully completed the CITI course, please forward a copy of your certificate to the Office of Research and Sponsored Programs.

8.3 Responsible Conduct of Research Plan

8.3.1 General

8.3.1.1 Effective January 1, 2010, all undergraduate and graduate research assistants, postdoctoral researchers, and Principal Investigators receiving external research funding from NSF must engage in Responsible

Conduct of Research (RCR). RCR training is provided by the Oklahoma State Regents for Higher Education (OSRHE). For the purpose of this plan, responsible conduct of research is defined as the practice of scientific investigation with integrity. It involves the awareness and application of established professional norms and ethical principles in the performance of all activities related to scientific research.

8.3.2 Background

8.3.2.1 Training in the responsible conduct of research is an essential component of higher education and an important element in the implementation of Rogers State University's Strategic Plan to enhance student learning.

The National Science Foundation (NSF) has implemented Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act (42 U.S.C. 1862o-1). This section of the Act requires that "each institution that applies for financial assistance from the Foundation for Science and Engineering Research or education describe in its grant proposal a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project."

NSF requires that, at the time of proposal submission to NSF, a proposing institution's Authorized Organizational Representative certify that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research.

While training plans are not required to be included in proposals submitted to NSF, institutions are advised that they are subject to review upon request.

8.3.3 Requirements

8.3.3.1 The responsible conduct of research requirement mandates that:

- The institution will determine the content, frequency, and delivery method of the training.
- Any student who is being paid by or receiving support (salary and/or stipends) to conduct research through an award and/or sub-award from NSF is required to complete the training program.
- The institution will track, verify, and keep records that students have completed the training program.

8.3.4 Implementation and Procedures

8.3.4.1 Rogers State University is dedicated not only to learning and the advancement of knowledge but also to the development of ethically sensitive, socially responsible persons. The University charges faculty and students with shared responsibility for maintaining the academic integrity of the University in all respects.

Accordingly, all students involved in NSF funded research are required to complete the RCR training offered by the OSRHE in the fall or spring semesters. Based on 7.5 contact hours, RCR training at the OSRHE is organized around the following subjects: (1) Research Misconduct; (2) Human Subjects Research; (3) Data Management; (4) Conflict of Interest; (5) Collaboration; (6) Mentoring; (7) Authorship; (8) Peer Review; and (9) Undergraduate Research. In addition to the RCR training, regular follow-up discussion sessions regarding the responsible conduct of research will be led by the participating students' research mentor on the campus of Rogers State University.

The Office of Research and Sponsored Programs will track and record names, start dates, and RCR training completion dates of all affected students participating in the OSRHE RCR training and copies of the participation list provided by the OSRHE that indicate the successful completion of the RCR training will be

retained in the appropriate Academic Research Support Center (ARSC) project file.

8.3.5 Sanctions and Oversight Contact

8.3.5.1 Consequences for failing to complete RCR training in a timely manner may include:

- Discontinuance from participation on the funded research project.
- Transfer of salary and related expenditures from the grant account to a departmental or other institutional account.
- If a failure is noted during a future audit, the appropriate salary and related expenditures will be moved from the grant account to an institutional account. In addition, the finding may cause an expanded audit and require the University to pay penalties.

Oversight of the Responsible Conduct of Research training is a responsibility shared by the Director of Research and Sponsored Programs in coordination with the Vice President for Academic Affairs.

8.4 Sub-recipient and Sub-award Agreement Management

8.4.1 The purpose of these procedures is to provide general administrative structure and guidance in fulfilling Rogers State University's obligations related to the management of sub-recipient agreements. These procedures apply to sub-awards and sub-recipients. Sub-awards are used when sub-recipient

- facilities, employees, and/or resources will be used to perform a scope-of-work;
- will bring unique knowledge and expertise to the project;
- is contributing substantively to the scholarly/scientific conduct of a project as described in a scope-of-work and has responsibility for programmatic decision making related to the sub-award; or
- will conduct the work independent of Rogers State University's direct supervision or control with only general technical direction and coordination exerted by

Rogers State University's principal investigator/project director (PI/PD).

Rogers State University will issue sub-awards after consideration of a) the nature of the work to be performed by the sub-recipient, b) an evaluation of the budgetary needs of the sub-recipient, and c) the administrative capacity and integrity of the sub-recipient. Based on these considerations, Rogers State University will determine the type of sub-award that best satisfies its stewardship obligations to its prime sponsor. Cost-reimbursement or fixed-amount sub-awards will be issued.

Rogers State University will determine compliance and process sub-recipients based on the following criteria:

- Confirm that potential or current sub-recipient organizations, and those directing work for them under a proposed sub-award, are not denied parties, specially designated nationals, or debarred or prohibited from doing business with the State of Oklahoma or the U.S. Government;
- Review sub-recipient Federal audit reports to determine if any findings are relevant to sub-recipient compliance or project performance;
- Evaluate corrective actions taken by the sub-recipient in response to audit findings and assess the appropriateness of a sub-award;
- Obtain and verify F&A and fringe benefit rates for potential sub-recipients;
- Verify that sub-recipient proposal and award budget information is correct and comprised of allowable costs;
- Confirm that the sub-recipient's proposal has the approval of the Principal Investigator / Program Director, appropriate department, school, Director of Research and Sponsored Programs, Vice President for Administration and Finance, and Vice President for Academic Affairs;
- Ensure that sub-recipient agreements proposed under Federal assistance awards include the Federal agency and the Catalog of Federal Domestic Assistance (CFDA) number as required by OMB Uniform Guidance

and the Federal Funding Accountability and Transparency Act of 2006 (FFATA);

- Ensure that sub-recipient agreements on Federal awards include the Data Universal Numbering System (DUNS) identifier for all sub-recipients as required by the FFATA;
- Ensure that all Federal sub-awards include a clause requiring that sub-recipient's invoices state that costs are in compliance with OMB Uniform Guidance and/or the sponsor's requirements. Similar compliance statements will be required for non-Federal sub-awards;
- Ensure that sub-recipient agreements include appropriate conflict of interest language and, for sub-awards governed by Federal rules, state whether financial conflict of interest requirements of the sub-recipient or sponsor apply; and
- Ensure the inclusion of appropriate terms and conditions concerning closeout of the sub-award.

8.5 Sub-recipient and Sub-award Monitoring

8.5.1 The purpose of this policy is to monitor financial activities of Rogers State University's sub-recipients in order to ensure proper stewardship of sponsor funds. This policy addresses institutional responsibilities and assists Principal Investigators and staff to ensure that sub-recipients comply with Federal laws and regulations and with the provisions of any agreements that govern the sub-award. These procedures apply to sub-awards and sub-recipients (**Uniform Guidance 200.220**).

As a non-profit recipient of federal funds that expends \$500,000 or more per fiscal year, Rogers State University must ensure that its sub-recipients comply with the Uniform Guidance administrative requirements, cost principles and audit requirements. Rogers State University's responsibilities include:

- Informing the sub-recipient of all applicable federal laws and regulations and all appropriate flow-down provisions from the prime agreement.
- Reviewing the sub-recipients' audit results via the Federal Audit Clearinghouse (<http://harvester.census.gov/sac/>).
- Reviewing any corrective actions cited by sub-recipients in response to their audit findings, where the audit findings

are related to Rogers State University's awards to the sub-recipients.

- Issuing a management decision on sub-recipient's audit findings within six months after receipt of the audit results and ensuring the sub-recipient takes appropriate and timely corrective action.
- Sub-recipient monitoring responsibilities are shared among the following:
 - Principal Investigators have the primary responsibility for monitoring sub-recipients' progress, and ensuring compliance with Federal regulations and both prime and sub-recipient award terms and conditions.
 - The Business Office will assist Principal Investigator in reviewing their monitoring responsibilities, reviewing sub-recipient invoices, identifying and following up on questionable expenditures, if necessary, and maintaining documentation of monitoring efforts.

The Business Office ensures that the University's sub-recipient monitoring policies and procedures comply with federal and other applicable regulations and are applied consistently. The Principal Investigator and the Business Office should use the following sub-recipient monitoring procedures when appropriate:

- The Principal Investigator should review technical performance reports or other specified deliverables on a timely basis. Any unforeseen issues should be documented, investigated, and resolved.
- The Principal Investigator and the Business Office should perform an expense to budget comparison for cost-reimbursement sub-agreements. The sub-recipient's invoices must show both current period and cumulative expenses-to budget.
- The Principal Investigator and the Business Office should review invoices regularly and document their review in the grant file.
- The Business Office should request the sub-recipient to provide clarification of invoiced charges that appear unusual, excessive, or otherwise questionable. If the sub-award terms permit, local administrators may

request detailed justification to verify the allowability of the cost.

8.6 Financial Conflict of Interest

8.6.1 All grant-funded personnel shall comply with 42 CFR Part 50, Subpart F, and the National Science Foundation (NSF) Financial Conflict of Interest (FCOI) policy. Investigators, faculty and staff shall disclose any potential or existing conflict of interest to Raspberry Promotion, Research, and Information (RASP) as required by federal law and University policy. The University shall investigate, report, and appropriately discipline, if necessary, all cases of alleged or apparent financial conflict of interest. For further information regarding the Financial Conflict of Interest (FCOI) policy, refer to the Code of Federal Regulation 42 Part 50, Subpart F, and NSF FCOI guidelines.

8.7 Ethics in Grant-Supported Activities

8.7.1 Rogers State University strongly encourages scholarly practices that prevent misconduct and fraudulent activities. The PI, staff and students, who are involved in grant-supported activities, shall not use their positions for the purposes of financial gain for themselves or others (family members, business, or other ties). Rogers State University has established rules and regulations to enforce high standards of conduct. The University will investigate, report and take disciplinary action, if necessary, in all cases of alleged or apparent misconduct in grant-related activities.

9.0 Internal Control

9.1 General

9.1.1 The purpose of this policy is to establish and maintain effective internal control over federal awards received by Rogers State University. The internal controls are in compliance with guidance in “Standards for Internal Control in the Federal Government” [i.e., the Green Book] issued by the Comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). (Uniform Guidance 200.303)

9.2 Procedures

9.2.1 To ensure that externally funded awards are expended only for allowable activities and that the costs of goods and services charged to all externally funded awards are allowable and in accordance with the applicable cost principles, the following criteria guide Rogers State University's internal control procedures: 1) Control Environment; 2) Risk Assessment; 3) Control Activities; 4) Information and Communication; and 5) Monitoring.

Within that context, Rogers State University continually reviews its existing documentation associated with internal controls and already has policies and procedures generally in line with Uniform Guidance language in this area.

More specifically, Rogers State University's systems of internal controls are documented in:

- The University of Oklahoma Board of Regents Policy Manual-CU/RSU
- Faculty and Employee Handbooks

Contacts

Policy Questions: Daniel Marangoni, Director of Research and Sponsored Programs, 918-343-7583

Forms

In support of this policy, the following forms are included:

A. Recipient/Sub-recipient

Policy History

Forms

A. Recipient/Sub-recipient Policy

All recipient/sub-recipients will complete this form when submitting a proposal to Rogers State University's Office of Research and Sponsored Programs. It provides a checklist of documents and certifications required by sponsors, as well as an area for the authorized institutional representative to sign.

RECIPIENT/SUBRECIPIENT'S LEGAL
NAME: _____

RECIPIENT/SUBRECIPIENT'S DUNs #:

PROPOSAL TITLE:

RECIPIENT/SUBRECIPIENT'S TOTAL FUNDS REQUESTED:

RECIPIENT/SUBRECIPIENT PERIOD OF PERFORMANCE BEGIN:
_____ END: _____

The following documents are included in our sub award proposal submission and covered by the certifications below:

___ **PROPOSAL** (*required*)

___ **BUDGET AND BUDGET JUSTIFICATION** (*required*)

1. Institutional Grant Policy

___ Our institution abides by a current official grant policy. The policy is located at
XXX

(If the policy is not publicly available online, a copy of it must be furnished in addition to this form.)

2. Facilities and Administrative Rates included in this proposal have been calculated based on:

___ Our federally-negotiated F&A rates for this type of work that we hereby agree to accept. (If this box is checked, a copy of your F&A rate agreement must be furnished to in addition to this form.)

_____ We do not have a federally-negotiated F&A rate, and we hereby agree to accept the rate designated by the OSRHE.

3. Human Participants

_____ Yes _____ No If “yes” Indicate the status of IRB Review:
Pending or Date IRB determined research to be exempt or approved:
_____ IRB Number: _____ (must be current)
If “Yes” and NIH funding is involved:
_____ Yes _____ No Have all key personnel involved completed Human Subjects Training?

4. Animal Subjects _____ Yes _____ No

5. Conflict of Interest

_____ Sub-recipient hereby certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 50, Subpart F “Responsibility of Applicants for Promoting Objectivity in Research.”

_____ Sub-recipient also certifies that, to the best of Institution’s knowledge that all financial disclosures have been made related to the activities that may be funded by or will have been satisfactorily managed, reduced or eliminated in accordance with sub-recipient’s conflict of interest policy prior to the expenditures of any funds under any resultant agreement.

6. Responsible Conduct of Research (RCR)

_____ Sub-recipient organization/institution hereby certifies that it will ensure that all undergraduates, graduate students, and postdoctoral researchers who will be supported by this proposal will be trained on the oversight in the responsible and ethical conduct of research.

7. Cost Sharing/Matching/In-Kind _____ Yes _____ No

Amount: _____
(Cost sharing, Matching, and/or In-Kind amounts and justification shall be included in the sub-recipient’s budget).

8. Certification Regarding Debarment and Suspension

_____ Yes _____ No Is the Sub-recipient Organization, PI or any other employee or student participating in this project debarred, suspended or otherwise excluded from or ineligible for participation in federal department, agency, assistance programs or activities? (If “Yes” please explain in Comments section below)

9. Export Control

_____ Sub-recipient is individually responsible for maintaining its compliance with federal export laws and procedures. By checking this box, sub-recipient certifies that an export control officer, or other authorized person, has reviewed the sub-recipient's proposal for compliance with federal export control laws. (Explain potential problems in the comments section below)

_____ N/A

10. Fiscal Responsibility

_____ Yes _____ No	The organization certifies that its financial system is in accordance with generally accepted accounting principles.
_____ Yes _____ No	Has the capability to identify, in its accounts, all Federal awards received and expended and the Federal programs under which they were received.
_____ Yes _____ No	Maintains internal controls to assure that it is managing Federal awards in compliance with applicable laws, regulations and the provision of contracts or grants.
_____ Yes _____ No	Complies with applicable laws and regulations.
_____ Yes _____ No	Can prepare appropriate financial statements, including the schedule of expenditures of federal awards.
_____ Yes _____ No	There are no outstanding audit findings which would impact contract costs. If there are findings, submit a copy of the most current report that describes the finding and steps to be taken to correct the finding.

Comments:

B. Off-Semester Salary from External Grants

Full-time faculty may receive prorated monthly compensation for any time period when faculty offices are not open for work on an external sponsored project (i.e. summer and intersession). The following guidelines apply:

- Off-semester salary is allowable subject to the regulations of the funding agency and the University's policies.
- Faculty who receive off-semester salary must expend the effort associated with the compensation during that off-semester period.
- The maximum amount of off-semester salary permissible is two-ninths of the faculty's regular academic year salary. In other words, in any year, a faculty member may receive no more than two months of off-semester salary or one-ninth for each month.
- Off-semester salary should be requested on the form below and should be signed by the Principal Investigator (PI), Director of Research and Sponsored Programs, and the Vice President for Academic Affairs.

Faculty Off-Semester Salary Form

Faculty Information		
PI	Department	Project Title

Details of Compensation							
Months of Service		Base Academic Salary		One-Nine Equivalent		Amount Requested	
1.		\$		1.		\$	
2.				2.			

Principal Investigator

Date

Director of Research and Sponsored Programs

Date

Vice President for Academic Affairs

Date

Note: Please sign and file accordingly