

CAMERON UNIVERSITY

External Grant Management Procedure

Procedure Statement

Cameron University values the pursuit of research and creative/scholarly activities by faculty members and the achievement of institutional objectives by all employees. The acquisition of external funding through grants and gifts is one means to that end. This procedure provides a comprehensive framework that guides the development, submission, and implementation of external grant projects.

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Who Should Know This Procedure

President	Faculty
Vice Presidents	Other Accounting/Finance Personnel
Deans	
Department Chairs	
Directors	

Responsibilities

Responsible for Policy	
University Officer Responsible	Vice President for Academic Affairs

Procedure

STATEMENT OF PURPOSE: This Procedure will establish general guidelines for Cameron University employees engaged with external grants and contracts.

1.0 Definitions and Abbreviations

- 1.1 **External Grant:** For the purposes of this procedure, an external grant is one in which the grant funds come from an entity external to Cameron University. Such examples include grants by federal and state governments, corporations and private foundations; and sub-awards or collaborative grants with other institutions. External grants received by the Cameron University Foundation are not covered in this procedure.
- 1.2 **Principal Investigator (PI):** The Principal Investigator is the university employee named in the grant as the project director. He or she is responsible for all grant activities, reporting requirements, and issues of compliance.
- 1.3 **Approval to Submit External Grant Form:** The Approval to Submit External Grant Form is an internal form that ensures all appropriate parties have reviewed the final version of the grant and approve of its submission. The PI and the Office of Academic Affairs will work together to acquire all required signatures on this form before coordinating the submission of the grant. The form also includes a “Statement of Submission” which records the details of the grant’s submission.
- 1.4 **Time, Effort, and Compensation Form:** This is an internal form to be submitted along with the Approval to Submit External Grant Form if any Cameron University employee requests additional compensation from the grant. This form details time and effort expended on the grant and how the employee plans to balance grant obligations with regular work duties. Also, the form helps to ensure that compensation received from the grant will not exceed restrictions set forth by the University of Oklahoma Board of Regents governing Cameron University.
- 1.5 **Authorized Representative:** An Authorized Representative is a person on campus who is designated to submit the grant on behalf of Cameron University. For information on who the Authorized Representative is for a particular grant, please contact the Office of Academic Affairs.
- 1.6 **Award Letter:** An award letter is an official document from the funding agency listing the award amount and any terms and obligations of a funded grant. This form must be forwarded to all interested parties including the Office of Academic Affairs. Only an Institutional Authorized Official may sign an award letter.
- 1.7 **Subrecipient:** According to the U.S. Office of Management and Budget (OMB), a **Subrecipient** is a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program. Cameron University may serve as a subrecipient and receive a subaward, or Cameron University may pass through funds to a subrecipient in the form of a subaward, depending upon the grant.

2.0 Institutional Information

Congressional District	04
DUNS (Dun and Bradstreet No.)	0207232270000
UEI number	S26CBUS4H4A9
Employer/Taxpayer ID No. (EIN/TIN)	73-1490825
Institutional Authorized Official	Jari Askins , President Margery Kingsley , Vice President for Academic Affairs Mick Coponiti , Vice President for Business and Finance
Institutional Mailing Address	2800 West Gore Boulevard Lawton, OK 73505-6320

3.0 Pre-Submission Guidelines

3.1 Routing Forms

Once a potential grant opportunity has been identified, the PI shall obtain approval from their supervisor to pursue the grant opportunity. The PI should submit an Approval to Submit External Grant Form to the Office of Academic Affairs at least two weeks prior to the external deadline, unless otherwise approved by the appropriate Executive Council member. Please allow extra time for review by the appropriate Chair and Dean/Director.

The PI will work together with their Chair and Dean/Director to review and finalize the grant. Grants should not be submitted without all signatures. If a grant is submitted without a completed Approval to Submit External Grant Form, the university may choose to decline the grant award, even if funded.

The person who submits the grant will complete the “Statement of Submission” at the bottom of the form after the grant has been submitted, keep a copy for their own records, and return a copy to the Office of Academic Affairs.

The Time, Effort, and Compensation Form must be submitted along with the Approval to Submit External Grant Form if any Cameron University employee requests compensation from the grant.

3.2 Proposal Review

During the grant development phase, the Office of Academic Affairs will read the grant proposal as requested by the PI. Proposal reviews can be requested at any time by contacting the Office of Academic Affairs. During the review, the Office of Academic Affairs will make suggestions for revision and check for the inclusion and accuracy of all necessary documents and forms. Thereafter, the PI can request further proposal reviews from the Office of Academic Affairs. The Office of Academic Affairs must review all grant proposals along with the Approval to Submit External Grant Form prior to final submission.

Once the grant application is ready for submission and the Approval to Submit External Grant Form has been submitted, the appropriate Dean, Director or AVP, the appropriate Executive Council member and the President must review the grant before it is submitted.

4.0 Budget Development

4.1 Direct Costs

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.

4.2 Indirect Costs

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. If Cameron University's negotiated indirect cost rate is not allowed by a funding agency, the funding agency will often allow a percentage of direct costs to be used or suggest a maximum rate.

When possible, proposals should request full reimbursement of indirect costs. When a proposal provides for less than full indirect cost reimbursement (i.e. below Cameron University's indirect cost rate), the circumstances should be discussed in advance with the Office of Academic Affairs. The Office of Academic Affairs is available to help determine what the funding agency will allow and to help compute the appropriate rate.

When working with a subrecipient, the Recipient/Subrecipient cost agreement in the U.S. Office of Management of Budget (OMB) "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (also known as "Uniform Guidance" or "2 CFR 200") must be followed, which can be found on the grants.gov website.

4.3 Fringe Benefits

When developing a grant proposal budget, confirm fringe benefit rates in writing with Human Resources before submitting the budget. Fringe benefits should not be calculated for consultants and they should not be included in the indirect costs calculations if Cameron University's negotiated indirect cost is used.

4.4 Additional Pay for Faculty and Staff

Additional pay is permitted for the PI, project director, or appropriate 10 month faculty employees if allowed by the funding agency and approved by the appropriate Executive Council member. In summer, faculty may receive compensation from all university assignments up to 2/9 of their regular nine-month salary. Faculty who accept summer compensation from grants are under employment with the university. Additional pay is not allowed for 12 month employees, except when work is done outside of the employee's normal work hours and has been approved by the appropriate Executive Council member. According to Oklahoma state law, compensation for faculty and staff must be dispersed at the same time as the work is performed. The grant or contract must also cover the related fringe benefits and indirect costs if allowed. The Time, Effort, and Compensation Form must be completed and submitted with the Approval to Submit External Grant Form for all additional pay from grants to be approved.

4.5 Release Time

In order to receive release time, the salary of the person receiving release time must be written into the grant in order to pay for the person who will assume teaching and other responsibilities during release time. Release time must also be approved by the appropriate supervisors before it can be included in a

grant proposal. When a grant is approved with release time included, the Academic Affairs Coordinator must be notified before the appropriate faculty load deadline.

4.6 Consultants

Consultants include any person who is not a Cameron University employee who 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 Cameron University employee, and (5) provides the University with an invoice detailing the item(s) or service(s) rendered.

4.7 Honorariums

An honorarium is paid to an individual for professional services of an 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 Cameron 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.

4.8 Exclusions

The following items are often considered personnel costs, however, when using the negotiated rate of 41% (on campus) and 11% (off campus), do not compute indirect costs on:

- Consultant fees
- Fringe benefits
- Honorariums
- Stipends
- Student scholarships

4.9 Equipment and Mileage Reimbursement Rates

Check the current rate with the Business and Finance Office before submitting a grant proposal.

5.0 Certification of Debarment and Suspension

In accordance with federal procedure, all potential grant employees' status must be checked using the federal debarment and suspension list. Any person or business on that list is not eligible to be paid with federal funds or be a part of the grant.

6.0 Compliance and Assurances

6.1 Federal Compliance

All federal proposals will conform to the U.S. Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

All federal proposals will also conform to the requirements of the granting agency (e.g. National Science Foundation).

6.2 Human Subjects Research

Oversight

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

All research involving human subjects must be reviewed and approved by the University of Oklahoma Institutional Review Board (IRB) prior to subject recruitment and data collection. Information on who serves as the point of contact can be found on Cameron University's grant writing webpages or by contacting the Office of Academic Affairs.

It is the PI's responsibility to comply with required human protections and obtain approval for research with human subjects from the IRB.

6.3 Responsible Conduct of Research Plan

It is the responsibility of the PI to comply with all required Responsible Conduct of Research trainings as stated by the funding agency.

6.4 Subrecipient and Subaward Agreement Management

Cameron University can issue subawards after consideration of a) the nature of the work to be performed by the subrecipient, b) an evaluation of the budgetary needs of the subrecipient, and c) the administrative capacity and integrity of the subrecipient. Based on these considerations, Cameron University will determine the type of subaward that best satisfies its stewardship obligations to its prime sponsor. Cost-reimbursement or fixed-amount subawards will be issued. In making these determinations and subawards, Cameron University will determine compliance and follow all applicable criteria from the State of Oklahoma, granting agency, Federal Government, and the Office of Management and Budget Uniform Guidance.

6.5 Subrecipient and Subaward Monitoring

Monitoring of subrecipients and subawards is the responsibility of the Business and Finance Office. The Business and Finance Office ensures that the University's subrecipient monitoring policies and procedures comply with applicable regulations and policies such as those by Cameron University, the State of Oklahoma, and the Federal government.

7.0 Submission

7.1 Proposal Submission

Timely proposal submission is ultimately the responsibility of the PI, but it must be done with approval from the Office of Academic Affairs and the appropriate supervisors. Any grant proposals that are submitted without the approval of the Office of Academic Affairs and the appropriate Executive Council member(s) may be considered noncompliant with university procedure. Consequently, these applications may be administratively withdrawn.

As designated by the President of Cameron University, only designated personnel are authorized to sign proposals and agreements on behalf of Cameron University. Others should not sign any submittal certifications on behalf of the institution.

8.0 Award Notification

8.1 Once notification has been received, the PI, or whoever received notification, should notify their chain of command and the Office of Academic Affairs as to the funding agency's decision and should send a copy to the Business and Finance Office if funds will be transferred.

8.2 Award Letter

When a grant proposal is approved, the funding agency will send Cameron University an award letter or similar document. This legal document notifies the grantee that the grant has been awarded and lists the specific requirements and terms of the funding arrangement. An employee designated to sign documents on behalf of Cameron University will accept, negotiate, or reject the award or agreement. By accepting the award or agreement, Cameron University accepts the named terms and conditions, including legal obligations. The designated employee shall forward the award letter to the Office of Academic Affairs and the Business and Finance Office.

8.3 Other Official Documents

The PI shall forward all official award documents to the Office of Academic Affairs and the Business and Finance Office. The Business and Finance Office will set up any relevant accounts and ensure compliance with state and federal regulations. The PI is responsible for the implementation of the project in accordance with the award letter; any other conditions of the award; and for ensuring programmatic and fiscal compliance.

9.0 Responsibilities during Grant Management

9.1 Budget Revision

Some granting agencies require prior approval for any budget revisions once the grant has been received; other agencies allow budget revisions without prior approval during the grant period. The PI shall submit a request for any budgetary revision to the Business and Finance Office. The requested amount must be allowable, reasonable, and necessary for the performance of the sponsored programs or research. The PI will coordinate with the granting agency to receive permission for any budget revisions.

9.2 Change in Scope of Work

The PI must notify the Business and Finance 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.

9.3 Changes in the Status of the Principal Investigator

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

10.0 Grant Management and Reporting Responsibilities

10.1 In accepting outside funds, Cameron University has an obligation to comply with the granting agency's reporting and fiscal closeout requirements.

10.2 Effort Reporting

All effort reporting must comply with the Office of Management and Budget's Uniform Guidance.

10.3 Responsibilities of Principal Investigator

- Understands and monitors effort commitments, salary charges, and cost sharing on all applicable awards.
- Review salary charges for any employee funded by the grant and inform the Business and Finance Office of any salary corrections in a timely manner.
- Communicates to funding agency any significant effort changes or any other changes that require sponsor notification and/or approval, unless the funding agency is a private foundation. If the funding agency is a private foundation, coordinates communication with the Vice President for University Advancement and/or the Director of Development.
- Communicates all notifications from funding agency to the Business and Finance Office.

10.4 Responsibilities of the Business and Finance Office

- Maintains records on all spending of grant funds.
- Submits financial reports to the funding agency as needed.
- Sends out monthly financial statements to the principal investigator.

11.0 Grant Closeout

11.1 Final Report

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. 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.

11.2 Sanctions

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 PI, the PI's department, and/or the University. Failure to comply with the appropriate close out requirements can result in sanctions from Cameron University and/or the funding agency. The PI is ultimately responsible for the preparation and submission of the final closeout report in coordination with the Business and Finance Office.

12.0 Conflict of Interest and Internal Control Procedure

12.1 Conflict of Interest

All grant-funded personnel shall comply with the conflict of interest requirements of the funding agency and award letter.

12.2 Ethics in Grant-Supported Activities

Cameron 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). Cameron 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.

12.3 Internal Controls

Cameron University's systems of internal controls are documented in:

- The University of Oklahoma Board of Regents Policy Manual-CU/RSU
- Written policies at www.cameron.edu/policies
- Faculty and Employee Handbooks

Contacts

Procedure Questions: Vice President for Academic Affairs, Admin 250, (580) 581-2250

Forms

Forms can be found at https://www.cameron.edu/academic_affairs/grants.

Procedure History

Procedure

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