



Eastern Kentucky University

Policy and Regulation Library

Academic Regulation: 4.4.7ACR

Responsible Office(s): Office of the Provost

Effective: October 22, 2015

Next Review Date:

Academic Regulation: 4.4.7ACR

Externally-Sponsored Proposal Submission and Award Acceptance

Statement

This policy sets forth conditions for the submission of grant proposals and other sponsored agreements on behalf of Eastern Kentucky University. The policy outlines the proper signatory authorizations, eligibility criteria, and internal approval process required for all sponsored agreements.

The purpose of this policy is to provide the criteria for submitting proposals to external sponsors and for accepting grant and contract awards on behalf of the University.

Entities Affected

- Departments
- Colleges
- Units involved with externally-sponsored projects

Background

Faculty and staff are encouraged to seek funding for teaching, research, and service activities from external sponsoring agencies. Since the University is legally responsible for performing the scope of work and administering funds if an award is made in response to a proposal, the units of the University that are affected by the proposed project must be aware of commitments involving them. For this reason, proposals must be routed in advance for approval by the appropriate individuals on campus and submitted by the Division of Sponsored Programs upon approval of the Associate Vice President for Research.

Criteria

Authority

The Associate Vice President for Research, as designated by the President, holds the sole authority for approving proposals for submission and accepting awards for externally sponsored programs on behalf of the University. Other University faculty and staff do not have the authority to submit proposals or enter into agreements with sponsors.

Institutional Approval Process

Proposals must be accompanied by an Internal Review and Approval Form (IRAF) that has been approved by applicable University offices. The following routing process is in place for the approval of externally sponsored projects:

1. Principal Investigator/Project Director
2. Department Chair/Administrator
3. College Dean/Administrative Head
4. Director of Sponsored Programs
5. Financial Affairs
6. Associate Vice President for Research

The IRAF normally shall be received by Sponsored Programs, with department and college level approvals, at least five business days prior to the sponsor's deadline. The University cannot guarantee the review and submission of proposals that do not meet this deadline. The University is not obligated to accept awards for proposals that do not follow the prescribed routing process prior to an award being issued.

This approval process applies to proposals submitted in hard copy as well as electronically submitted proposals. Electronic submissions are typically completed by Sponsored Programs. In exceptional cases, however, project directors may be permitted to submit electronic proposals following the approval of the Associate Vice President for Research.

Project Director Eligibility

Only full-time permanent faculty and staff may serve as project directors. Exceptions may be made for emeritus faculty subject to approval by the appropriate chair and dean, and the Associate Vice President for Research. Students, part-time faculty and staff, or temporary employees are not eligible to serve as project directors but may otherwise participate in sponsored programs if an acceptable project director is available to assume responsibility for the direction and management of the project.

Award Negotiation and Acceptance

Award notifications are normally sent directly to Sponsored Programs from the sponsoring agencies. Some sponsors, however, send notifications to the project director. If a project director receives an award notification, he or she shall immediately notify Sponsored Programs and forward the award document for negotiation and acceptance by the University.

Procedures

Proposal Routing

1. The project director shall prepare the proposal and budget in accordance with University and sponsor guidelines.
2. Sponsored Programs shall provide support and guidance during the proposal and budget development process.
3. The project director shall sign and route the current version of the IRAF, with the proposal and detailed budget, through the appropriate channels to be received by Sponsored Programs at least five days prior to the submission deadline.
4. If no formal proposal is to be submitted to the sponsoring agency, the project director shall circulate a completed IRAF and detailed project budget for approval upon first contact with the sponsoring agency and prior to an award being made.
5. The project director shall be available to answer questions and resolve any questions that may arise during the proposal review process.

Proposal Review and Approval

1. The department chair/administrator and college dean shall review the proposal, budget, and IRAF for compliance with University and sponsor regulations.
2. The department chair/administrator's and dean's signatures certify that the proposal has been reviewed for academic/scientific merit and is in line with the mission of the unit.
3. The department chair/administrator's and dean's signatures constitute a commitment to the details outlined in the proposal and budget, including time commitments of project personnel, use of departmental resources, and cost share, when applicable.
4. Sponsored Programs shall review the proposal, budget, and IRAF for compliance with University and sponsor regulations.
5. Sponsored Programs shall work with the project director and other appropriate offices to resolve any concerns or questions that may arise during the review process.
6. Financial Affairs and the Associate Vice President for Research shall review the proposal, budget, and IRAF for compliance with University and sponsor regulations in a timely manner.
7. Financial Affairs and the Associate Vice President for Research shall work with Sponsored Programs and other appropriate offices to resolve any concerns or questions that may arise during the review process.
8. Financial Affairs and the Associate Vice President for Research shall sign the IRAF and return to Sponsored Programs for further routing.
9. As the Authorized Organizational Representative, the Associate Vice President for Research shall sign the proposal in the appropriate places and return to Sponsored Programs for submission.

Proposal Submission

1. Sponsored Programs shall ensure that the proposal is submitted to the sponsoring agency in advance of the deadline by facilitating timely reviews by other offices on campus.

2. For paper submissions, Sponsored Programs shall copy and mail the proposal to the sponsoring agency according to the directions provided by the project director on the IRAF.
3. For electronic submissions, Sponsored Programs shall work with the project director to ensure that all applicable forms and attachments have been included with the application package. In most cases, Sponsored Programs shall submit the application to the sponsoring agency; in exceptional cases, Sponsored Programs shall contact the project director to grant approval for proposal submission.

Award Processing

1. If the project director receives an award notification, he or she shall immediately contact Sponsored Programs and forward the original award documentation.
2. The project director shall be available to answer questions and resolve any questions that may arise during the award review and negotiation process.
3. If the award document does not match the proposal submitted by the University, Sponsored Programs shall work with the project director to make any adjustments necessary. If the project is funded at a difference of more than ten percent from the original proposed amount, a new IRAF shall be required. A revised IRAF shall also be required if the award requires the University to provide cost share or commit resources beyond what was approved with the original proposal.

Award Review

1. Sponsored Programs shall review award documents and forward to the Associate Vice President for Research for review and acceptance on behalf of the University.
2. The Associate Vice President for Research shall review award documents and determine whether they require review by the Office of University Counsel.
3. The Office of University Counsel shall review contracts and other award documents as requested by the Associate Vice President for Research.
The Office of University Counsel shall work with appropriate individuals at the University as well as with external sponsoring agencies to make changes to any unacceptable terms and conditions included in award documents.

Award Acceptance

1. When satisfied that the University can accept the award terms and conditions, the Office of University Counsel shall return the final award documents to the Associate Vice President for Research for signature and acceptance by the University.
2. The Associate Vice President for Research shall sign all award documents and return to Sponsored Programs for further processing in a timely manner.
3. Sponsored Programs shall establish internal budgets for awarded grants and contracts; provide project directors with guidance on any award conditions and the

process for securing an organizational code for the project; and forward award information to Sponsored Programs Accounting.

Account Setup

Upon receiving award documentation from Sponsored Programs and required forms from the project director, Sponsored Programs Accounting shall establish and provide project directors with organizational codes for new projects in a timely manner.

Definitions

- **Authorized Organization Representative:** The individual with the authority to submit proposals and accept awards on behalf of the University. The Associate Vice President for Research, as designated by the President, serves as the Authorized Organizational Representative on all externally funded grants and sponsored agreements.

Responsibilities

- Associate Vice President for Research
 - Review and approve proposals
 - Review and approve awards
 - Sign, as Authorized Organizational Representative, proposals and awards
- College Dean
 - Review proposals from within the college
 - Commit cost share resources, if applicable
 - Review Conflict of Interest Disclosure
- Department Chair / Administrator
 - Review and approve proposals from within the department/unit
 - Commit cost share resources, if applicable
 - Review Conflict of Interest Disclosure
- Financial Affairs
 - Review and approve proposals

- Office of University Counsel
 - Review contracts, as appropriate
- Program Directors
 - Develop proposal and detailed budget
 - Complete IRAF
 - Route for signatures at Chair and Dean levels
 - Submit IRAF, proposal, and detailed budget to Sponsored Programs at least five days in advance of the deadline
 - Be available to make any changes requested during the review process
 - Complete Conflict of Interest Disclosure
- Sponsored Programs
 - Assist with proposal and budget development
 - Route proposal and IRAF for approvals beyond the Chair and Dean levels
 - Submit approved proposals
 - Process award notifications
- Sponsored Program Accounting
 - Setup organizational code for awarded projects

Violations of the Policy

Policy compliance is the joint responsibility of all involved. If non-compliance issues are identified by the Office of Graduate Education and Research, corrective action may be necessary and shall be completed following consultation with the Principal Investigator, respective Dean, Department Chair, and/or Financial Manager. Corrective action may include, but is not limited to, movement of unallowable or inappropriate charges from grant accounts to departmental, college, or other university accounts, suspension of grant accounts, and/or withdrawal of a proposal or award. Any actions deemed necessary in response to policy non-compliance may be appealed to the Provost and/or Executive Vice President for Administration.

Regulation Adoption Review and Approval

Regulation Revised

DATE

October 18, 2024
October 22, 2015

ENTITY

University Counsel
Vice Provost

ACTION

Editorial Revision
Editorial Revision

Regulation Issued

DATE

January 26, 2009
December 19, 2008
October 6, 2008

ENTITY

Board of Regents
President Whitlock
Faculty Senate

ACTION

Adopted
Approved
Approved