



Ohio Administrative Code

Rule 3342-10-03.1 Administrative policy and procedures regarding sponsored programs administration.

Effective: October 15, 2016

(A) Purpose. The sponsored programs office ("sponsored programs") resides in the division of research and sponsored programs and, together with grants accounting in the controller's office, is responsible for stewardship of external funds received for sponsored projects. Sponsored programs oversees submission of proposals to external sponsors, negotiation/acceptance of grant and contract awards, and other Sponsored programs-related matters. Sponsored programs shall assist faculty and staff with:

- (1) Retrieval of funding source information;
- (2) Preparation of proposal applications to include budgeting;
- (3) Authorization and submission of proposals to federal/state/local/private sponsors;
- (4) Negotiation/acceptance of grant/contract award agreements to include review of terms/conditions;
- (5) Plans for spending awarded funds;
- (6) Award modifications to include changes in scope of work or key personnel, re-budgeting, and/or no-cost extension requests; and
- (7) Grant/contract personnel appointments.
- (8) Additionally, in cases of proposed or awarded projects, sponsored programs shall guide faculty and staff in interpretation of university/federal/state/other sponsor policies relative to cost principles; external sponsor-required university cost sharing; effort certification; university use/maintenance/sharing of equipment; intellectual property rights; use of human participants; animal care and use; use of high hazard chemicals, radioactive materials, recombinant DNA, bio-



hazardous materials, select agents/toxins; matters related to export controlled data; and classified research/sensitive but unclassified research.

(B) Scope. A "sponsored project" is defined as any externally funded research or scholarly activity that has a defined scope of work or set of objectives, which provides a basis for sponsor expectations. This more specifically involves research, demonstration, professional development, instruction, training, curriculum development, community and public services, or other scholarly activity involving funds, materials, or other forms of compensation, or exchanges of in-kind efforts under awards or agreements.

(1) A project is considered a "sponsored project" if any one of the following conditions apply:

- (a) The project is awarded based on a proposal request;
- (b) The university commits to a statement of work for a specified project;
- (c) The project involves a set of objectives which provides the basis for sponsor expectations;
- (d) The proposal includes a detailed budget;
- (e) There is a written agreement for a commitment of resources between a sponsor and the university, there is a specified period of performance, requires deliverables (such as reports, financial accounting, or intellectual property ownership);
- (f) The award provides for the disposition of tangible or intangible property that may result from the project (such as equipment, records, formal activity reports, rights in data, software, copyrights, invention or research-related materials);
- (g) The sponsor is involved in making decision regarding project performance; or
- (h) The project involves the use of human subjects, laboratory animals, radioactive or hazardous materials, recombinant DNA, carcinogens, pathogens or proprietary materials.



(C) General principles.

(1) To generate proposals for external funding to the university, Sponsored programs will disseminate information on funding opportunities across all campuses.

(2) Compliance. Proposals must be consistent with the mission of the university and must be suitable to the unit in which the project is to be conducted. A proposal is a formal offer by the university to conduct a program under the direction of the principal investigator/project director who does so utilizing personnel and facilities of the university. Therefore, projects must comply both with university policies and external sponsor regulations. Authority for proposal submission resides in sponsored programs where the authorized organizational representative (AOR) or his/her designee is the legal signatory on submissions.

(3) Acceptance and contracting authority. A grant or contract award is an award to Kent state university and, as such, must be accepted by the university. Authority for acceptance resides in sponsored programs where the AOR or his/her designee serves as the legal signatory on grant or contract agreement documents.

(4) Principal investigators/project director role eligibility. Faculty members and professional staff who are full-time university employees may serve as principal investigators/project directors. It is the responsibility of the principal investigators/project directors to maintain academic and research integrity in the conduct of his/her sponsored project. A project may be carried out under the direction of one or more principal investigators/project directors within a single department, school, institute, center, regional campus or college or under the direction of such individuals from various cooperating units. In extenuating circumstances, an individual who is not a full-time employee may serve as principal investigator/project director; such cases must be sanctioned by the chair of the department/institute or center director, or regional campus dean from which the proposal is submitted. A full-time employee must assume both reporting and fiscal responsibility for the resulting award if granted.

(5) Approval process. Prior to the submission of the proposal to an external sponsor, a proposal must be approved electronically through the Coeus grant proposal and management system, or any subsequent system in place at the university as designated by sponsored programs. Though



completion of the routing and approval process, the principal investigator/co-investigator/project director/co-director must accept responsibility for the proposal's content while also certifying compliance with the sponsoring agency and institutional requirements. Also prior to submission to an external sponsor, the proposal must be approved by the appropriate chair(s), director(s), regional campus dean(s), dean(s), or other university officer(s), as relevant, indicating to sponsored programs that the proposed project, its budget, and the level of effort committed by university personnel have the necessary university endorsements.

In reviewing the proposed project, the chair/director, dean or regional campus dean must ascertain that the proposed project is consistent with the goals of the department, college, school, or regional campus, that the faculty level of effort dedicated to the project is compatible with the unit's needs, and that any cost-sharing commitment is both possible and suitable. The college dean or regional campus dean shall review the proposed project to ascertain to what degree the project commits the college to long-term support of project personnel or program support beyond the award period.

(6) Budget. Sponsored programs staff shall determine the cost of a sponsored project in accord with principal investigator/project director needs and external sponsor program guidelines. The proposed project's budget shall include allowable direct costs, facilities and administrative costs, and, as needed, the appropriate, sponsor required university cost share whose source and amount has been approved by responsible chair, director, regional campus dean, or vice president.

(7) Cost sharing shall become part of a proposed project's budget when required by the external sponsor and only when authorized by the appropriate university official representing the unit providing the cost share. Cost sharing on one project precludes its use on another project. Sponsored programs shall ascertain that costs requested from an external sponsor as well as university cost sharing meet the cost principles (OMB A-21) of allowability, allocability, reasonableness, and consistency (with university financial practices). The university assumes the position that voluntary (not required by the external sponsor) cost sharing shall not ordinarily be offered, and that the university's negotiated facilities and administrative rate, an essential sponsored project cost, shall not be waived. When Kent state university project costs include subrecipient costs, in order to incorporate such costs into the Kent state university proposed budget, sponsored programs must receive adequate documentation from the subrecipient prior to proposal submission.



(8) Research projects involving use of human subjects must be reviewed by the university's institutional review board (IRB) prior to proposal submission or within thirty days after proposal submission if allowed by external sponsor guidelines (see rule 3342-3-03.2 of this Administrative Code). A project's human subjects must be protected in accord with federal regulations. A project that does not comply may not be conducted.

(9) Live vertebrate animals. Research projects involving use of live vertebrate animals must be reviewed by the university's institutional animal care and use committee (IACUC, as provided for in rule 3342-3-03.3 of the Administrative Code). No project involving animals may begin without approval by and adherence to recommendations by IACUC.

(10) Hazardous materials. Research projects involving use of high hazard chemicals, recombinant DNA, bio-hazardous materials, radioactive materials, or select agents/toxins must receive approval from the manager, research safety and compliance in research and sponsored programs. No project may begin without such approval.

(11) Export controls. The conduct of research projects involving export-controlled data must be approved by sponsored programs in concert with university legal counsel, with the aim of maintaining university exemption from export control restrictions based upon the university's position that it is (under "National Security Decision Directive 189") a fundamental research institution with publication rights which the university shall not waive. In such cases where export controlled information is a consideration, the university shall, as necessary, implement its master technology control plan accompanied by the annex appropriate to the specific project in question. Each project involving export-controlled information will comply with its specific annex.

(12) The university shall maintain its publication rights in all sponsored projects. The university shall not accept awards or enter into agreements for the support of research that permits another party the power to prohibit publication of or dissemination in any form of results of the sponsored research activities. The university shall permit short delays (thirty to sixty days) of publication or dissemination of results in order for sponsor review, not sponsor approval, in order for sponsors to remove inadvertently included, sponsor-provided proprietary information or for sponsors to seek patent applications; in such cases, these delay conditions will be specified in the initial grant/contract award.



(13) Classified research. At times, a government agency or an industry has need to contract with the university for a research project under conditions that do not permit free inquiry and disclosure of results. Such research is "classified research." Contracts for classified research may be considered on a case-by-case basis. The general purpose and method of such research shall be disclosed to pertinent faculty and administrators so that they can judge the appropriateness of the research and its contribution to human knowledge and well being. The funding agency shall not influence the selection or promotion of faculty members or the formulation of university academic policy. The study's results and conclusion shall be available for open discussion and/or publication after a reasonable period of time. To ensure adherence to these policies, faculty members shall submit any proposal responding to an external sponsor request involving classified research to the vice president of research and sponsored programs for review and consideration. The vice president of research and sponsored programs may consult with the university research council. The principal investigator or the granting agency may appeal the decision of the vice president to the provost. In order to facilitate the conduct of federal classified grants or contracts, the university shall continue to hold a "facility clearance." This involves providing the physical means to protect security data, perhaps requiring personal security clearance of certain university officers and other employees.

(14) Gifts. A solicitation for a gift (a donation that has no requirements attached and is not work for hire) is submitted through the office of institutional advancement and foundation. The office of institutional advancement and foundation is also responsible for submission of other proposed projects in such cases where the agencies/foundations require submission by that office. In these latter cases, sponsored programs shall assist the office of institutional advancement and foundation with accurate proposal budget development.

(15) Approving department. A proposal to an external sponsor is subject to approval of the department in which the sponsored project will reside. The proposal may be submitted only if the proposed project does not unduly disrupt the established research and teaching programs of the university and department, that is, if teaching obligations can be met or rearranged as needed; if appropriate space, equipment, and facilities can be made available to the project; and, if the university can provide for continuation of support for a project's new positions if required.

(D) Implementation: proposal preparation and submission.



- (1) Individual faculty/staff members prepare proposals in accord with external sponsor guidelines.
- (2) Sponsored programs staff shall review the proposal and provide project proposal support including but not limited to the following services:
 - (a) Sponsored programs staff shall review the proposal for adherence to university policy and sponsor regulations.
 - (b) Sponsored programs staff shall assist with development of the budget, ensuring its adequacy for the proposed work, allowability (meets cost principles as delineated in OMB A-21 and external sponsor cost requirements), and consistency with university financial procedures; and shall ascertain that the university is not cost sharing unnecessarily or unduly.
 - (c) Sponsored programs staff shall review the level of effort committed and the indicated current and pending support.
 - (d) Sponsored programs staff shall ensure that the principal investigator/project director follows university-required procedures (involving as necessary the institutional review board, the institutional animal care and use committee, the manager, research safety and compliance, university legal counsel) when human subjects, animals, export controlled data, high hazard chemicals, recombinant DNA, bio hazardous materials, radioactive materials, select agents/toxins, or new use of space (obtaining approval from the relevant university official) are involved in the project's conduct.
- (3) Sub-recipient institution. When a sub-recipient institution serves as a partner in the university's proposed project, sponsored programs staff shall coordinate the proposal submission with the subrecipient. Sponsored programs staff shall obtain, prior to submission of the proposal, the necessary subrecipient documents. This documentation shall be in the form of a letter of commitment to the project, an officially authorized budget for subrecipient costs and cost sharing if applicable, the sub-recipient's statement of work substantiating what that institution will do for its proposed costs, and verification of the sub-recipient's facilities and administrative rate.
- (4) AOR authorization. Every proposal must be authorized by the AOR for submission and



submitted by sponsored programs staff to the external sponsor.

(5) Endorsement. Prior to its submission to an external sponsor, the proposal must be approved electronically through Coeus by the appropriate chair/director and dean or regional campus dean. In reviewing the proposed project, the chair/director, dean or regional campus dean and executive dean for regional campuses must ascertain that the proposed project is consistent with the goals of the department, college, school, or regional campus, that the faculty level of effort dedicated to the project is compatible with the unit's needs, and that any cost sharing commitment is both possible and suitable. The college dean or regional campus dean shall review the proposed project to ascertain to what degree the project commits the college to long-term support of project personnel or program support beyond the award period.

(6) Conflict of interest. Prior to its submission to an external sponsor, all potential conflicts of interest must be disclosed (see rules 3342-3-07 and 3342-3-07.1 of the Administrative Code) by the project's key personnel (those who have a role in the design, conduct, or reporting of the project). Each investigator must complete the "investigator certification" in Coeus, which incorporates the financial conflict of interest screening form questions, while key personnel must complete the financial conflict of interest screening form.

(7) Time for submission. Sufficient time shall be allowed for sponsored programs to process the proposed project. University principal investigators/project directors submitting proposals must follow the established timelines to ensure efficiency, expediency, and quality of the proposal process.

(a) Sponsored programs should be notified of intention to submit a proposal at least ten working days before the submission deadline.

(b) A complete proposal with the final budget must be entered into Coeus and routed for internal approval no later than five working days prior to the due date.

(c) If narrative proposal documents will be revised after submission for internal approval, all files must be finalized in Coeus no later than two working days before the due date of the proposal to the external agency or source.



(E) Procedures: Grant/contract acceptance, initiation, and administration.

(1) The grant or contract award to Kent state university is issued as a document that must be reviewed by sponsored programs staff, often in concert with university legal counsel; prior to acceptance, unacceptable clauses are modified or struck from the agreement. Acceptance is evidenced by the AOR's signature on the award agreement document. The university does not make funds available to the principal investigator/project director until he/she has met all compliance requirements (e.g., financial conflict of interest, IRB, IACUC).

(2) When an award to the university includes subrecipient collaboration, the university shall issue the subaward agreement that includes the external sponsor's award terms and conditions. The subaward agreement will require the subrecipient's certification of compliance with federal regulations and/or other external sponsor requirements. The agreement is then executed between Kent state university and the subrecipient. Ongoing monitoring of subrecipient technical performance is documented by the principal investigator/project director and of administrative requirements by sponsored programs and grants accounting.

(3) In the administration of grant or contract awards, sponsored programs shall abide by: The award instrument issued by the particular funding agency; OMB circulars A-21, A-133, A-110; Other federal regulations; and university policies.

(4) When an external sponsor selects a proposal for an award, the sponsor commonly requests additional budgetary or technical information. Such budgetary information may be provided only by sponsored programs staff.

(5) Any award negotiation that takes place between Kent state university and an external sponsor must be conducted by sponsored programs. If an external sponsor contacts a principal investigator/project director directly, he/she shall advise sponsored programs. Prior to finalizing negotiations, sponsored programs staff shall work with the principal investigator/project director to ensure that his/her needs are met and that the university is protected. Sponsored projects are subject to facilities and administrative costs (F&A) at the university's current federally-approved F&A cost rate agreement applicable to the type of project being conducted. If the sponsor has a published



policy, uniformly applied, prohibiting or restricting the payment of F&A costs, the university may accept the reduced F&A rate in accordance with the sponsor's policy. This does not apply to for-profit sponsors that are expected to provide full F&A recovery.

(6) The principal investigator/project director shall operate within university policy and external sponsor requirements and shall be responsible for day-to-day direction and financial and administrative management of his/her awarded project. Sponsored programs staff shall guide the principal investigator/project director in the interpretation of university policy and external sponsor requirements. University policy and external sponsor terms and conditions shall be followed for all sponsored program activities including but not limited to travel, equipment acquisition, employment and committed effort of personnel, participation of human participants, and/or use of animals. The principal investigator/project director shall fulfill the requirement for review and certification of salaries, assuring that salaries charged to sponsored projects correspond to effort expended on those projects.

(7) Equipment as defined by the university that is purchased with grant/contract funds shall be subject to university equipment inventory control procedures regardless of whether title vests in the university or the funding agency. The principal investigator/project director shall be responsible for such equipment, shall purchase the equipment in due time (well before an award end date), and shall account for all items periodically as well as at the project's end. Retention and disposal of equipment at project termination falls into three categories: (a) equipment purchased by the university with university funds (deemed to be cost share) remains in the department, school, or regional campus of the principal investigator/project director and cannot be removed from the university by a resigning principal investigator/project director; (b) special purpose equipment purchased by the university with grant or contract funds with title vested in the university by a sponsor remains in the principal investigator/project director's department, school, or regional campus and may be transferred with the approval of the appropriate chair/director/regional campus dean to a principal investigator/project director's new institution upon his/her resignation, only if the department/school/regional campus has no use for the equipment (final approval for transfer rests with the provost or his/her designee; and (c) equipment purchased with grant/contract funds that remains vested with the external sponsor shall be tagged appropriately to identify the sponsor and grant/contract number and shall be disposed of in accord with external sponsor instructions and as coordinated between the controller's office and sponsored programs.



(8) Kent state university considers that cost sharing included in proposal budgets and accepted by the sponsoring agency is an award condition and university obligation. Cost sharing is subject to audit; the external sponsor will require repayment of a portion of grant funds if the proposed cost sharing is not obtained/documented and could terminate an active award. Cost sharing obligations, including both mandatory and voluntary-committed investigator effort, are appropriately recorded by project in the university's accounting records and substantiated by documentation (e.g., effort certification, vendor letters stating equipment value). Cost sharing is monitored for timeliness and adequacy as well as for allowability, allocability, reasonableness, and consistency with other university charging procedures. Cost sharing expenditures like expenditures subsidized by the grant/contract award must comply with federal cost principles and sponsor award terms and conditions. Where cost sharing is a requirement of a university-issued subaward, the cost sharing commitment that the university requires from the subrecipient is included in the university-issued subaward document. The subrecipient's compliance with the required cost sharing commitment is then monitored by both the principal investigator/project director and grants accounting and appropriately reported to the external sponsor.

(9) Throughout an externally funded project's course, the principal investigator/project director shall inform his/her chair/director, or regional campus dean as well as sponsored programs staff if there is or will be (a) any deviation from the project's sponsor-approved scope of work, budget, and/or level of personnel effort; or (b) any other change necessitating external sponsor approval. Sponsored programs staff should be informed about any such proposed deviations prior to discussions that might occur between the principal investigator/project director and the external sponsor. The principal investigator/project director shall not communicate directly with the external sponsor about such deviations without approval from sponsored programs.

(10) A separate university-restricted index with its own number shall be established for each externally sponsored project. All project-related expenditures shall be charged directly to this index. All expenditures must occur during the period of the grant/contract award. Principal investigators/project directors shall be responsible for reviewing the project expenditures (as documented in the university system-generated reports) on a monthly basis, correcting any errors, and staying within the sponsored programs-approved budget. Costs allocable to a particular sponsored agreement may not be shifted to other sponsored agreements in order to meet deficiencies



caused by overruns or other fund considerations, or to avoid restrictions imposed by law, by terms of the sponsored agreement, or for other reasons of convenience.

(11) Costs allocable to activities sponsored by industry, foreign governments or other sponsors may not be shifted to federally sponsored agreements. If a cost transfer is made due to discovery of an error, the transfer must be supported by documentation that fully explains how the error occurred and a certification of the correctness of the new charge. sponsored programs staff must approve any cost transfer that exceeds ninety days from the original erroneous charge.

(12) External sponsors and Kent state university expect principal investigators/project directors to manage the funded grant/contract project both within the sponsor-approved budget and project period. Unanticipated developments can, however, necessitate modification of the budget, scope of work, personnel effort, project period, or, in some cases, all of these. Principal investigators/project directors who need a modification must submit the request to sponsored programs for approval. The university has established procedures to implement the federal expanded authorities and documents actions taken under such federal expanded authorities. Exercising this authority, the university's AOR is able to approve certain budget and time frame modifications, to include pre-award costs, expeditiously without contacting the funding agency. When required, the university seeks external sponsor prior approval for modifications and maintains records of the approvals granted.

(13) As recipients of external funds, principal investigators/project directors must exercise appropriate responsibility in reporting performance on the funded project to the sponsor. Technical progress (e.g., quarterly, annual) and final reports shall be submitted by the principal investigator/project director to the external sponsor as required and in timely fashion. The principal investigator/project director shall provide a copy of any submitted report (to include electronic reports) to sponsored programs. At the project period's end, the project work ceases; after the termination date, no additional expenditures may be charged to the grant/contract index. A period of thirty to ninety days is usually allowed to pay previously committed financial obligations prior to grant accounting's preparation of the final financial report based on expenditures recorded in the grant index. Grants accounting shall certify the accuracy of the final fiscal report to the external sponsor. Final technical reports, invention disclosure reports, subrecipient reports (property, patent, technical, and fiscal) if applicable, and other reports as required by the external sponsor shall be submitted by sponsored programs to the external sponsor (the principal investigator/project director



may have submitted the final technical report as required). The university shall not pay the subrecipient's final invoice until the reports and deliverables required from the subrecipient have been received and accepted. The principal investigator/project director shall certify that the subrecipient has adequately completed the technical aspects of the work. Upon acceptance of these closeout reports, grants accounting shall close the index.

(14) Considered an integral part of a department/center/institute, school, or regional campus program and resources base, grant/contracts/other sponsored agreements must be monitored not only by the principal investigator/project director but also by the chair, director, and college dean or by the regional campus dean. Project over-expenditures and audit disallowances are, ultimately the responsibility and burden of the home department/center/institute, school, or regional campus.

(15) Records of sponsored project activities (financial and programmatic records, supporting documents, statistical records, lab books, records for real property and equipment) shall be retained for the active years plus five years.