Eastern Michigan University

Office of Research Development and Administration (ORDA)

Externally Sponsored Projects Procedures

Scope and Purpose

The purpose of this policy is to ensure that all Eastern Michigan University (EMU) proposals submitted to external funders for sponsored activity meet university requirements and are reviewed, approved, and authorized prior to submission. This procedure addresses the requirements for submitting proposals to external funders, including: internal Office of Research Development and Administration (ORDA) deadlines, ORDA review and approval process, Principal Investigator/Project Director eligibility, involuntarily replacing a Principal Investigator/Project Director (PI/PD) on an award, establishing hardship funds for spending, and general information about transferring awards from or to other institutions.

Externally Sponsored Projects Procedures

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A. Definitions

Applicant: Because awards are made to organizations, and not individuals, **EMU is the applicant for grants, contracts, or cooperative agreements for sponsored projects**.

Authorized Organizational Representative: The Authorized Organizational Representative (AOR) is delegated the authority to submit proposals on behalf of Eastern Michigan University**. At EMU, the Director of ORDA is the AOR and must authorize the submission of proposals.**

Principal Investigator/Project Director (PI/PD): The PI/PD has primary responsibility for achieving the technical success of the project while complying with the financial and administrative policies and regulations associated with an award. Fundamental responsibilities of the PI/PD once an award is made include:

- Executing the project as outlined in the funded proposal, using sound management techniques
- Carrying out the project's financial plan as presented in the funded proposal, or making changes to the plan following prescribed policies or procedures;

- Maintaining accurate and complete records, both scientific/programmatic and financial, associated with the project;
- Complying with all University policies and procedures
- Reporting project progress to the sponsor as outlined in the terms of the award; and
- Ensuring that at the end of the project period, Sponsor's rules pertaining to unexpended grant funds are followed.

The terms Principal Investigator and Project Director are used interchangeably at EMU.

Co-Investigator: Co-Investigators are individuals who are involved with the PI/PD in the scientific or programmatic development or execution of the project and generally dedicating a specific level of effort to the project. Co-Investigators may be from EMU, or personnel affiliated with another organization participating through a Sub-recipient Agreement.

Sponsored Project: Sponsored Projects may include a grant, contract, or cooperative agreement funding that commits the University to a specific line of service, academic support, or scholarly or scientific inquiry. Most typically documented through a proposal submitted to an external sponsor, sponsored projects include a statement/ scope of work and budget allocating EMU resources toward a specific set of goals. The PI/PD is expected to achieve the goals by following a planned organized approach, timeframe, and budget as outlined in the approved proposal. **A project meeting *any* one of the following criteria**, is considered to be a Sponsored Project:

a. A specific commitment is made regarding the level of personnel effort, including student support, university facilities/equipment, deliverables, or milestones
b. The sponsor identifies a period of performance as a term or condition of the award
c. Project activities are budgeted, and the award includes conditions for financial reports, and/or invoicing
d. The project requires that unexpended funds be returned to the sponsor at the end of the project period
e. The award provides for the disposition of either tangible property (e.g., equipment, records, technical reports, theses or dissertations) or intangible property (e.g., inventions, copyrights or rights in data), which may result from the project

A Sponsor may be federal, state, or local government, private nonprofit organization, including a foundation, or for-profit company or corporation. **Submission for externally Sponsored Projects are required to follow procedures outlined here, regardless of sponsor type.** The administration of awards for sponsored activity must comply with federal, state and University policies and procedures.

Fellowships: Fellowship awards are most often paid directly to an individual for the purpose of study or research. In some cases, however, the applicant can request that funds be sent to their home institution, and in other cases, the Sponsor determines that funds must be sent to the home institution. ORDA can provide information about the resources and options that are available to faculty applying for fellowships. In cases where fellowship awards are made to the University, fellowship proposals follow the same review and approval process as other Sponsored Activity.

Gifts: Gifts to the University are not Sponsored Projects and therefore must not include any of the above conditions. Gifts are processed by the EMU Foundation using the normal gift process. Gift solicitation and acceptance should be coordinated with the appropriate development officer in each college, and with the Division of Advancement. Foundations, and other charitable organizations do make grants that are considered Sponsored Projects. ORDA works closely with the PI, and the EMU Foundation to ensure full university reviews and approvals as appropriate.

Cayuse: Cayuse is a web-based electronic grants and research management software. EMU uses Cayuse for two primary functions pertaining to externally sponsored grant and contracts: 1) Cayuse 424 provides a system-to-system submission tool for the electronic submission of federal proposals; 2) Cayuse SP is used by EMU for the review and approval of sponsored project proposals. It also serves as the University's electronic repository of files, and provides a management tool for all sponsored projects activity for PIs, Departments, Colleges, and the University.

B. Proposal Review and Approvals

As awards for sponsored projects are made to EMU and require a commitment of its resources, all proposals must be reviewed and approved before they can be authorized for submission. Proposal approval is provided through Cayuse SP, which allows for the electronic review and approval of proposals.

To ensure appropriate time for review and approval, **all proposals in near-final, and complete form must be submitted for routing and certified in Cayuse SP at least five business days in advance of the proposal deadline**. While ORDA pre-award officers can assist with this step, it is the PI/PDs responsibility to do this. The required elements of the Cayuse SP Proposal necessary for routing and approval include:

1) A completed Cayuse SP electronic proposal file
2) Near-final draft of the Technical Proposal
3) Final budget
4) All ancillary proposal documents, (i.e., abstract, biosketch, current and pending support forms, letters of support, etc.)
5) If applicable, all sub-recipient materials that have been reviewed and approved by the sponsored research office of the collaborating entity and documented through a letter of participation from its sponsored research office

In order to successfully develop and submit a proposal, ORDA suggests the attached Proposal Development and Application Preparation Timeline as a guide.

Exceptions to this "five-day rule" may be approved by the Associate Provost for Graduate Studies and Research. Requests for exceptions are submitted in writing to the Director of the Office of Research Development and Administration.

Prior to submitting to an external funder, all proposals must be reviewed and approved by the department head/school director (DH/SD) or unit director, the college dean (or other senior

administrator), and the director of ORDA. A dean (or his or her delegate) is authorized to sign on behalf of a DH/SD in their absence, and in the absence of the dean, the provost is authorized to sign on behalf of the college, or other senior administrator.

Proposal approval is documented using Cayuse SP, as described above.

The PI/PD is responsible for routing for approval and certifying the final proposal in Cayuse at least five business days prior to the submission deadline. The budget, and any commitments of University resources (i.e., release time, cost share, etc.) must be finalized before this time and included as part of the package. The ORDA Pre-award Officer can assist PI/PDs with the preparation and routing of the Cayuse proposal. ORDA suggests that a PI/PD inform department head/school director of the intent to submit early in the process. This will allow time to identify necessary resources and secure commitments as the proposal is being developed.

Department Head, School Director, or Unit Director: The DH/SD review and approval certifies the following:

- The applicant is academically eligible and qualified to conduct the project;
- The applicant can effectively manage the project;
- Financial commitments, such as faculty time, space, and other resources provided by the unit are appropriate, available, and approved;
- The budget is adequate relative to the project scope and appropriate justification is provided;
- The faculty and staff time commitments are compatible with departmental workloads;
- Any dedicated laboratory, office, or classroom space not already designated to the PI/PD will be available and adequate for the proposed activity;
- Any specialized equipment required for the project will be available and adequate for the proposed activity;
- The project is consistent with the mission, goals, and strategic plans of the unit and the University; and
- Any equipment purchased for the project can be installed, used, and maintained within the current facilities.

Review and approval of proposal submission by the **Co-I's DH/SD** certifies the following:

- The applicant is academically eligible and qualified to conduct the project
- Financial commitments provided by the unit are appropriate, available, and approved
- The faculty and staff time commitments are compatible with departmental workloads
- Any dedicated laboratory, office, or classroom space not already designated to the Co-I will be available and adequate for the proposed activity
- Any specialized equipment required of the Co-I Department will be available and adequate for the proposed activity

Dean: Review and approval of proposal submission by the Dean certifies the following:

- Financial resources provided by the Dean's Office are appropriate, available, and approved;
- Availability of financial resources provided by the PI/PD's department will be available in the event an award is made;
- Commitments for dedicated laboratory, office, or classroom space are compatible with long-term plans for the College;
- Long-term commitments of personnel or program emphasis are consistent with long-term plans of the College; and
- Agreement with department heads'/school directors' assessment of space, equipment availability, and maintenance commitments related to the grant project.

Review and approval of proposal submission by the **ORDA director** certifies the following:

- The proposal meets all statutory and regulatory requirements
- The budget request is a factual, accurate, reasonable estimate of costs required to conduct the project
- The University has the capacity to complete the project as proposed
- The proposal is endorsed at all appropriate levels within the University
- All University contributions and commitments are approved and will be honored in the event that the proposal is accepted
- The proposal complies with all terms and conditions contained within the proposal guidelines
- The University will provide appropriate fiscal, technical, and regulatory oversight over the project in the event that an award is granted

When all of the above are completed, the ORDA Director authorizes the submission of the proposal.

C. Principal Investigator Eligibility

All tenured and tenure track faculty, and Administrative/Professionals (APs) are eligible to serve as PI/PDs and/or Co-Investigators at EMU. Exceptions may be made on a case-by-case basis upon written request of department head/school director with support of the college dean, or other division-level administrator. Exceptions will be granted by the Associate Provost and Associate Vice President for Graduate Studies and Research in consultation with the Director of ORDA. PI/PDs must have appropriate university authority to carry out responsibilities necessary for the project.

In cases of institutional-wide program proposals that require a full-time project director, PIs/PDs will be budgeted and filled using a twelve-month appointment.

D. Grant Transfers

As awards are made to institutions and not individual PIs/PDs, the institution receiving the award must agree to relinquish the grant when its PI moves to another institution. Sponsors' rules, regulations, and allowability pertaining to grant transfers vary widely and are often complex. ORDA is the office designated to facilitate the

transfer of grants from a relinquishing institution, when faculty are moving to EMU. In cases where EMU is the relinquishing institution, ORDA will assist the department/school and college in making a disposition decision, and in cases where relinquishing the award is approved, facilitate the transfer to another receiving institution. Any decision regarding the disposition of an active grant considers the wishes of the sponsor and the University's ability to provide a qualified replacement.

E. Replacing a Principal Investigator/Project Director

Because grants and contracts are normally awarded based on the qualifications and expertise of the PI/PD and the intellectual content of the proposal a decision to involuntarily remove the PI/PD on a grant will not be taken lightly. It will only be done with the approval of a sponsor or at the request of a sponsor for serious cases of malfeasance, academic misconduct, or non-performance. The final decision to remove a PI will be made by the provost or appropriate divisional vice president. Grants awarded to the University are the property of the University. In the event of involuntary replacement, or where a PI leaves the employment of the University, the University has the option to retain the grant as indicated above.

F. Issuing Hardship Funds

A so-called hardship fund is authorized when PI/PDs have legitimate reasons to begin work and spend in advance of a grant award notice, or a signed project agreement. These costs put the University at risk in the event that sponsored agreements are not finalized, or the sponsor declines to pay the costs. EMU has two processes for establishing a hardship fund. One, a Pre-award Fund, can be authorized by the ORDA Director. The second is a Bridge Fund and must include an approved source to which expenses are charged in the event that the award is not finalized.

Pre-award Funds: ORDA will authorize a pre-award fund when: 1) the PI/PD demonstrates that it is essential that the project starts immediately; 2) a grant or contract is imminent, and 3) the sponsor provides written communication documenting the following:

- An award has been recommended for funding
- The pre-award period falls within the spending period
- That pre-award costs will be reimbursed upon finalization of an award

Pre-Award Time and Spending Limits: Pre-award funds shall be established for no more than sixty (60) calendar days, with budgets not exceeding a pro-rated share of the annual budget.

Pre-Award Authorization: Pre-award funds are requested by the PI. If the above conditions are met, the ORDA Director will authorize the pre-award and request that a fund be established. In cases where the above conditions are not met, Bridge Funds are an option for the project.

Bridge Funds: A Bridge Fund is established when the issuance of an award is not definite, but it is essential to start the project, or as in most cases, carry a program through a short period between the end of a non-competing period and a new competing funding cycle. The PI/PD, his

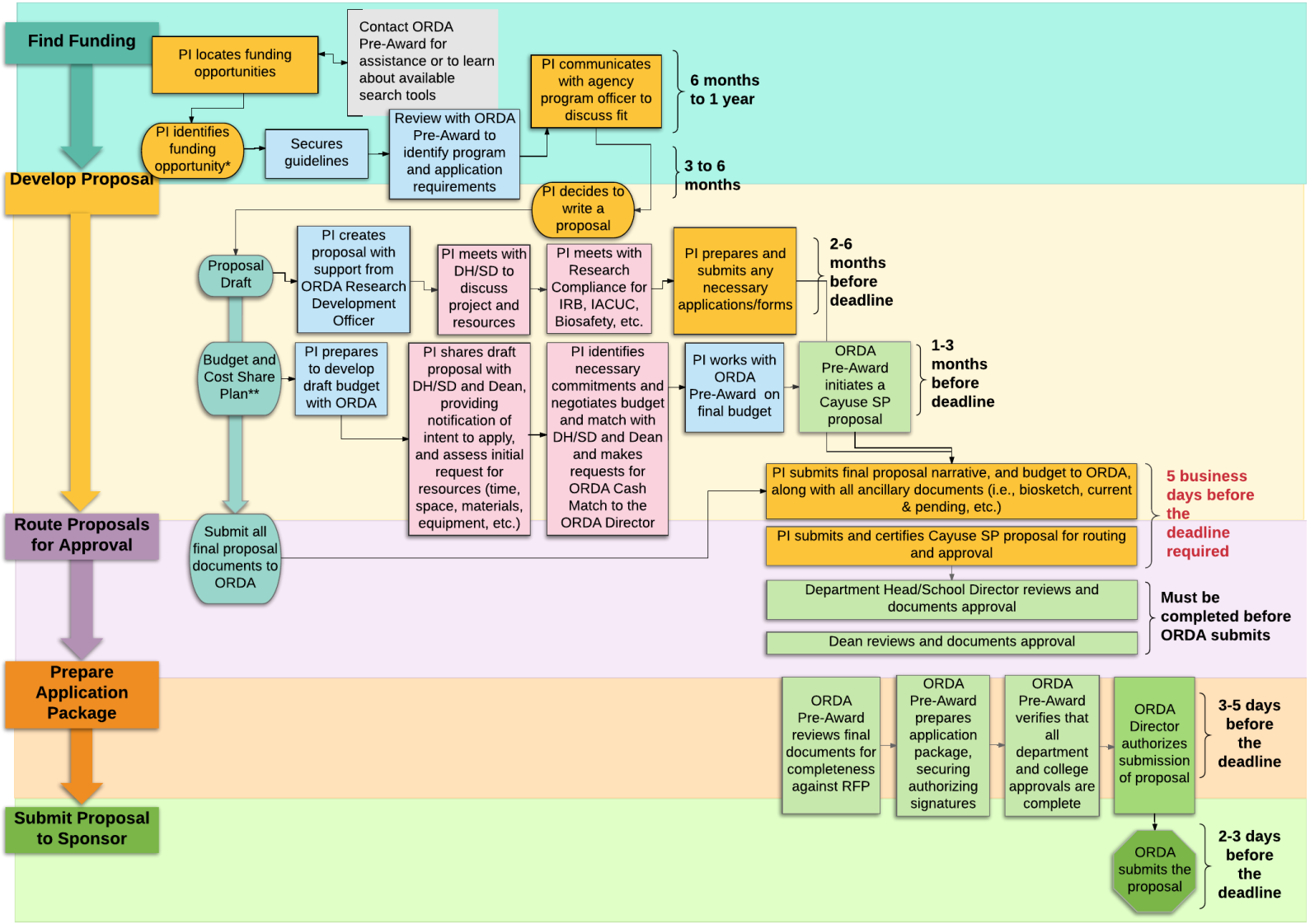
department head, school director, or other supervising administrator must identify a source of funding that can be used in the event that an award is not made.

The PI/PD works with ORDA to complete a Bridge Fund Request form that identifies the source of funding and a spending plan for essential expenses during the bridge period. The request form is signed by the PI/PD, his or her department head/school director, college dean, and any other fund approver for funds that are provided as a guarantee. Once it is signed by all appropriate people, ORDA will request the opening of a fund.

In the event that grant is not ultimately received and the pre- award costs are determined to be unbillable, the costs incurred are transferred to the funds identified in the Bridge Fund Request Form.

ORDA Proposal Development Application Preparation Timeline

This process map will help you identify the steps and actions necessary to submit proposals for external funding, and plan for the time needed to prepare a competitive proposa.



*If program to which PI wants to submit is a "limited submission" program, ORDA can advise the PI on how to compete within EMU for one of the limited spots. Limited submission are those proposals where Sponsor limits the number of applications EMU can submit.

**If cost-share (matching) is required or planned the PI must discuss with the DH/SD as far in advance as possible to obtain approval.