SUMMARY:

Coastal Carolina University will solicit and accept sponsored funds and enter into agreements with external agencies for the support of programs and projects in such areas as research, educational programming, training, seminars, workshops, graduate programs, facilities and equipment, centers, public service and campus safety. These programs and projects should assist and be consistent with the mission, goals and strategic plans, providing direct benefit to faculty, staff, students and the greater community of which the University is a part.

POLICY:

I. A "sponsored program or project" is defined as any externally funded activity that has a defined scope of work, itemized budget and technical and/or financial reporting requirements. 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.

II. To be considered a "sponsored project", one (or more) of the following conditions must apply:
   A. The project is awarded based on a proposal request;
   B. The project involves a set of objectives which provides the basis for sponsor expectations;
   C. The proposal includes a detailed budget;
   D. There is a written agreement for a commitment of resources between a sponsor and the University with a specified period of performance and required deliverables (such as technical and financial reports);
   E. The award provides for the disposition of tangible or intangible property that may result from the project (such as equipment, records, activity reports, rights in data, copyrights, or research-related materials);
   F. The sponsor is involved in making decisions regarding project efforts; or
   G. The project involves the use of human subjects, laboratory animals, radioactive or hazardous materials, recombinant DNA, carcinogens, pathogens or proprietary materials.
III. PRINCIPAL INVESTIGATOR ELIGIBILITY

Faculty and staff who are full-time university employees and enrolled students working with a faculty advisor may serve as Principal Investigators (PI). It is the responsibility of the PI to maintain academic and research integrity in the conduct of their sponsored project. In extenuating circumstances, an individual who is not a full-time employee may serve as PI and such cases must be sanctioned by the department Chair(s)/Director(s) and the college Dean(s) from which the proposal is being submitted.

IV. PROPOSAL SUBMISSION RESPONSIBILITY AND AUTHORITY

A. The PI is responsible for the preparation of compliant technical, programmatic and budgetary requirements of the proposal/application.

B. The Director of the Office of Sponsored Programs and Research Services (OSPRS), as the President’s designee, serves as the Authorized Organization Representative (AOR) for the University and is responsible for the submission of all proposals to external sponsors.

C. The OSPRS shall assist faculty, staff and student PIs to with:
   a. Searches for, and retrieval of, funding source information;
   b. Interpretation and synthesizing solicitation requirements;
   c. Preparation of proposal applications, including budgets;
   d. Creation of subaward documentation and agreements;
   e. Matters pertaining to conflicts of interest;
   f. Understanding of intellectual property rights;
   g. Obtaining approvals for use of human subject participants;
   h. Obtaining approvals for use of vertebrate animals; and
   i. Activities related to export controlled data.

D. To meet sponsor submission deadlines, sufficient time must be allowed for the OSPRS to review, edit and internally process the funding proposal/application and all other sponsor-required documentation. In order for the OSPRS to ensure on time submission, the PI must:
   a. Notify the OSPRS as soon as practical when considering a proposal submission.
   b. Provide to the OSPRS all sponsor-required proposal documents, as determined by the solicitation instructions, no later than five (5) business days prior to the sponsor deadline.
   c. Provide to the OSPRS any supplemental or optional documents, such as letters of support or collaboration and equipment quotes, no later than two (2) business days prior to the sponsor deadline.

D. Prior to submission to an external sponsor, a proposal must be approved electronically through the University’s Cayuse grants management system, or any other system in place at the University, as designated by the OSPRS.
In reviewing the proposed project, the Chair(s)/Director(s) and Dean(s) must determine that the work is consistent with the goals of the department, college and University; that the faculty/staff level of effort dedicated to the project is compatible with the department’s needs; and that any cost sharing commitment is both possible and suitable. Approval of submission will be required of the PI(s), department Chair(s)/Director(s) and college Dean(s) associated with all faculty/staff listed on the proposal as well as those with facilities or equipment being offered for use by the project, whether as cost share or not.

E. Prior to issuance of an award, a PI, Chair, Dean or other University authority, with the concurrence of the AOR, may decide that a proposal should be withdrawn from the intended sponsor’s review. In such cases, the OSPRS must notify the sponsor through the same approval or review offices required for submission of the proposal.

V. SPONSORED AWARD ACCEPTANCE, INITIATION AND ADMINISTRATION

A. The University must formally accept all sponsored projects awards. Award notices are typically directed to the AOR, with a copy to the PI. Should a PI solely receive an award notice, they shall immediately forward it to the AOR for acknowledgment and/or acceptance.

B. All grants, contracts and other agreements must be made in the name of Coastal Carolina University and not to the individual(s) responsible for the conduct of the proposed research, tasks or programming. The University President or their designee is the only position authorized to execute contracts and accept grants for the University.

C. Any award negotiation that takes place between the University and an external sponsor must be conducted by the OSPRS. If an external sponsor contacts a PI directly, they shall advise the OSPRS. Prior to finalizing negotiations, the OSPRS shall work with the PI to ensure that their needs are met and that the University is protected.

D. Grants and contract awarded to the University are issued as a document that must be reviewed by the OSPRS, often in consultation with University Counsel, prior to acceptance; unacceptable clauses are modified or struck from the agreement. The President or AOR’s signature on the award document evidences acceptance. The University shall make funds available to the PI and research team when all compliance requirements (conflicts of interest, IRB, IACUC, etc.) have been met.

E. When an award to the University includes a subaward to be made to a project collaborator, the OSPRS 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 Coastal Carolina University and the subrecipient, with ongoing monitoring of technical performance by the PI and of administrative requirements by the OSPRS and Grants Accounting.

F. Sponsored projects are subject to indirect costs (IDC) at the University's current federally approved rate unless the non-federal sponsor has a published policy, uniformly applied, prohibiting or restricting the payment of IDC. Financial Services proposes and negotiates the University IDC rate to be used on all grants, contracts or other sponsored agreement.

G. The OSPRS is part of the College of Graduate Studies and Research, and together with the PI and Grants Accounting in Financial Services, is responsible for stewardship of external funds received for sponsored projects. Grants Accounting is responsible for ensuring that auditable records are maintained in support of direct and indirect charges to grants, contracts or sponsored agreements, as well as for preparing and filing all fiscal reports and statements required by sponsors of grants, contracts and other agreements. In the administration of grant or contract awards, the OSPRS and Grants Accounting shall abide by:
   a. The award instrument issued by the particular funding agency;
   b. OMB circulars A-21, A-133, A-1 10;
   c. Other federal regulations; and
   d. University policies.

H. The OSPRS shall assist faculty, staff and students with:
   a. Negotiation/acceptance of grant/contract award agreements to include review of terms/conditions;
   b. Subaward initiation and monitoring;
   c. Managing budget-to-actuals of awarded funds;
   d. Award modifications to include changes in scope of work or key personnel, re-budgeting, and/or no-cost extension requests;
   e. Faculty/staff compensation and student hiring;
   f. Preparing technical, financial and outcomes reports;
   g. Sponsor-required cost sharing;
   h. Use/maintenance/sharing of equipment or resources;
   i. **Conflicts of interest**;
   j. **Intellectual property** rights;
   k. Use of **human subject** participants;
   l. Animal care and use; and
   m. Matters related to **export controlled** data.

I. The PI 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. PIs must exercise appropriate responsibility in reporting performance on the funded project to the sponsor. Technical, annual, final and all other reports required by the sponsor shall be
submitted by to the external sponsor as required and in timely fashion with a copy of any submitted report (to include electronic reports) to the OSPRS. At the project period's end, the project work ceases; after the termination date, no additional expenditures may be charged to the grant account. 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. Grants Accounting shall certify the accuracy of the final fiscal report to the external sponsor.

J. Throughout the sponsored project period, the PI shall inform their Chair/Director and Dean as well as the OSPRS 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. The OSPRS should be informed about any such proposed deviations prior to discussions that might occur between the PI and the external sponsor.

External sponsors and Coastal Carolina University expect PIs to manage the funded project within both the sponsor-approved budget and project period. Unanticipated developments can necessitate modification of the budget, scope of work, personnel effort, project period, or, in some cases, all of these. PIs who need a modification must submit the request to the OSPRS 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 timeframe modifications, expeditiously without contacting the funding agency. When required, the University seeks external sponsor prior approval for modifications and maintains records of the approvals granted. The PI shall not communicate directly with sponsors about such deviations without prior approval from the OSPRS.

K. A separate restricted account with its own number shall be established for each externally sponsored project. All project-related expenditures shall be charged directly to this account. All expenditures must occur during the period of the grant/contract award. PIs shall be responsible for reviewing the project expenditures (as documented in reports) on a monthly basis, correcting any errors, and staying within the sponsor-approved budget.

L. Grants Accounting is responsible for ensuring that timely billings are prepared on grants, contracts and other sponsored agreements.

M. The 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/document and could terminate an active award. Cost sharing obligations 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. Both the PI and Grants Accounting then monitor the subrecipient’s compliance with the required cost sharing commitment for appropriate reporting to the sponsor.

N. 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. A cost transfer request must be made to Grants Accounting and be supported by documentation that fully explains the reason for the request and approval for the charge from the PI and the OSPRS.

O. 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 seven (7) years.

VI. LIMITATIONS

A. In accepting a grant, contract or other sponsored agreement, the University agrees to perform the specified project under the terms and conditions outlined, and to expend the funds following the specifications of the granting agency. The University cannot accept any grant, contract, or enter into any agreement contrary to State of South Carolina law or University policies.