

Texas A&M University-San Antonio

15.01.01.01.01 Administration of Sponsored Agreements - Research and Other

Approved: April, 2013

Revised: August, 2015

Next Scheduled Review: August 2020

Procedure Statement

This Procedure describes the process for the administration of sponsored agreements for internally and externally funded research and non-research projects.

Reason for Procedure

The procedures for administration of sponsored agreements ensures that agreements between the University and project sponsors are managed in a consistent manner and in compliance with Texas A&M University System (System) policy and the terms of the agreements.

Official Procedure

1. GENERAL

- 1.1 Texas A&M University-San Antonio (A&M-San Antonio) will adhere to System Regulation [15.01.01 Administration of Sponsored Agreements – Research and Other](#).

2. PREPARATION, APPROVAL, AND SUBMISSION OF PROPOSALS

- 2.1 Grant Champion or Principal Investigator (GC/PI) will identify the project, funding source, and discuss proposal with department chair, college dean, or division head.
- 2.2 GC/PI will notify the Office of Graduate Studies and Research (OGSR), and other stakeholders of the intent to pursue a grant opportunity by providing a summary that includes the funding source, statement of work, preliminary budget (Financial Reporting Analyst will assist with budget), deadline, partner institutions, organizations/agencies, a program summary, and identify the PI and any co-PIs.
- 2.3 OGSR staff and other University stakeholders will review the summary and provide timely feedback. A meeting or discussion may occur to clarify concept, explore project feasibility, available resources, and fundability.

- 2.4 GC/PI and/or co-PI and OGSR staff will identify deadlines and establish a timeline for preparation, approval, and submission of grant application with the intent to have the completed application package ready for review and uploading to the Maestro system at least 4 work days prior to the sponsor's deadline.
- 2.5 PI and/or co-PI will work with the OGSR staff and Financial Reporting Analyst in the Division of Business Affairs to ensure that all sponsor requirements are satisfied.
- 2.6 Financial Reporting Analyst will review grant application and assist in budget preparation with special attention to accuracy and reasonable fringe benefit costs if salaries are included. Financial Reporting Analyst references System Memorandum on fiscal year fringe benefit rates for sponsored agreements.
- 2.7 OGSR staff will review project grant application to ensure all required information, documentation, and assurances (Institutional Review Board, Institutional Animal Care and Use Committee, Institutional Biosafety Committee, financial conflict of interest, export controls) are satisfied.
- 2.8 Assisted by the Financial Reporting Analyst, PI and/or co-PI will ensure that cost sharing provisions represent the minimum cost sharing required by the project sponsor and that these are approved by the Director of Graduate Studies and Research in concurrence with Division of Business Affairs staff.
- 2.9 PI and/or co-PI, with OGSR staff assistance, will scan grant application, save it on Maestro, and route it for review and required signatures.
- 2.10 When the grant application is complete including necessary signatures, the Director of Graduate Studies and Research, as the Authorized Organizational Representative, will review and sign as the University's approving official.
- 2.11 After final approval, the grant application will be submitted to the sponsor as specified in the request for proposals (RFP) or other document containing submission instructions.

3. ALLOWABLE COSTS

- 3.1 GC/PI and/or co-PI will comply with grant sponsor requirements on allowable costs. Any inquiries regarding determination of allowable costs will be discussed with the academic department head, the Financial Reporting Analyst, and the Director of Graduate Studies and Research.
- 3.2 Federally sponsored agreements with an effective date of December 26, 2014, or later, are governed by OMB Uniform Guidance. These cost principles are also used in determining the cost of work performed by educational institutions under subrecipient agreements and other awards under federally sponsored agreements. In a subaward, the

co-PI will be accountable to the prime awardee (PI) for use of federal funds provided by the subaward.

- 3.3 The Financial Reporting Analyst will establish a FAMIS account based on the award letter. On federal grants the Financial Reporting Analyst will add to the account attribute screens object codes that are linked to *unallowable* costs to ensure that no unallowable costs are charged to the project. Financial Reporting Analyst will create a reconciliation spreadsheet based on the approved budget and will monitor expenses throughout the grant timeline reconciling expenses to the appropriate budget category.

4. DOCUMENTATION REQUIREMENTS

- 4.1 The GC/PI and/or co-PI, and Financial Reporting Analyst will be responsible for adequately documenting all costs charged to sponsored projects in compliance with the terms of the agreements. Documentation of costs will be accurately maintained and readily retrievable.
- 4.2 Financial Reporting Analyst will post and monitor all charges for grants on the individual FAMIS account in a timely manner. Financial Reporting Analyst also will ensure that related documents (i.e., payroll voucher sheets, travel vouchers, invoice payments, certification of space, etc.) are kept and easily accessible in grants where cost sharing is a factor.

5. RESEARCH COMPLIANCE

- 5.1 Office of Graduate Studies & Research staff will review grant applications to ensure compliance with System and University policies related to:
 - *Research with Human Subjects (IRB)* – Notice of protocol approval from the IRB is required.
 - *Financial Conflict of Interest (FCOI)* – TrainTraq training and completion of financial disclosure forms to ensure no financial conflict of interest exists are required.
 - *Export Controls* – Any restrictions on publications or on who may work on the project indicates export controls constraints apply. Visual Compliance software will be used to do screening required by export controls regulations.
 - *Institutional Animal Care and Use Committee (IACUC)* - Notice of protocol approval from the IACUC is required when the research involves vertebrates.
 - *Institutional Biosafety Committee (IBC) Protocols* – Notice of approval from the IBC and a permit to work with biohazardous materials issued by National Institutes of Health (NIH) are required.

6. FINANCIAL COMPLIANCE

- 6.1 Financial Reporting Analyst will monitor available funds and expenditures and will communicate with PI to ensure compliance with all financial obligations including submission of interim and final reports required by sponsor.
- 6.2 If specified on the award letter, the Financial Reporting Analyst will prepare invoices and reconcile these to the FAMIS account. The PI will review the invoices, certify and return the invoices to the Financial Reporting Analyst for submission to the granting agency. The Financial Reporting Analyst will track the invoices for timely payment and posting to FAMIS.

7. EFFORT REPORTING COMPLIANCE

- 7.1 The PI and/or co-PI will be responsible for ensuring that accurate time and effort reporting is kept for all employees who are assigned to each sponsored agreement project. This will include workload for each specific project by exempt-employee or nonexempt employee based on grant sponsor requirements.
- 7.2 Each PI and/or co-PI, in consultation with the Financial Reporting Analyst, will be responsible for establishing and maintaining an acceptable effort reporting system for all employees on the sponsored agreement. Any electronic database must be in a format that facilitates transferability to Office of Graduate Studies and Research, Business Affairs, and the sponsor.
- 7.3 All faculty and staff who fulfill sponsored agreements will complete and submit accurate time and effort reports according to the format established by the PI and/or co-PI. This includes individuals paid directly from any sponsored project and individuals paid directly from any other non-sponsored funds that provide some effort on sponsored projects (cost sharing effort).
- 7.4 Based on arrangements specified in the sponsored project, individuals will be assigned and expected to contribute to the project as agreed. It is the responsibility of the PI and/or co-PI to maintain accurate time and effort records and to certify their accuracy based on reporting standards of the funding agency for all approved individuals. In addition, the PI or co-PI are responsible for documenting all cost-sharing agreements for individuals who are paid or who are providing cost-shared effort on federally sponsored projects.

8. RECOVERY OF FACILITIES & ADMINISTRATIVE (F&A) COSTS – RATES APPROVED BY COGNIZANT FEDERAL AGENCY (DHHS)

- 8.1 When the University receives its first direct federal grant, the F&A rate will be negotiated by A&M System and approved by the Department of Health and Human

Services. Until that is accomplished, there will be no authorization for F&A cost recovery, except in projects where F&A cost recovery is specifically provided in the request for proposals (RFP) or the award letter.

9. COST SHARING

- 9.1 Cost sharing (also known as matching contributions, third-party contributions, in-kind contributions) will be negotiated at the lowest level that will satisfy sponsor requirements and must be approved by the Director of Graduate Studies and Research. Cost sharing provisions will be documented in the grant proposal budget narrative.
- 9.2 The GC/PI and/or co-PIs will be responsible for identifying all cost-sharing activities and budget items and will identify items that require approval from agencies external to the university.
- 9.3 Based on established rules of accounting for the University, cost sharing will be documented and identified in the University's accounting system. When cost sharing is a factor, the Financial Reporting Analyst will annotate the grant folder and will ensure that supporting documents (i.e., payroll voucher detail sheets, copies of travel vouchers, copies of invoice payments, certifications of space, etc.) are readily accessible.
- 9.4 PIs and/or co-PIs will be responsible for ensuring that all time-and-effort and cost-sharing schedules are signed by the responsible individuals within 90 days following certification. Should the certification forms not be signed in a timely manner, the PI's supervisor will ensure that all forms are signed within five business days.

10. PROJECT MODIFICATIONS

- 10.1 Project modifications agreed upon by PI and sponsor must be reviewed and approved by the Director of Graduate Studies and Research. After approval, the Financial Reporting Analyst will implement modifications related to financials. The Financial Reporting Analyst will monitor the end-date of the project and will enter the new date on FAMIS if the sponsor extends the grant beyond the initial end-date indicated on the initial award letter.

11. CONTRACT NEGOTIATION AND ACCEPTANCE

- 11.1 The terms of the agreement will be reviewed for any non-standard conditions by the GC/PI, Financial Reporting Analyst, and other University stakeholders. The Director of Graduate Studies and Research is responsible for ensuring that any negotiated contract is fiscally responsible and acceptable to University stakeholders. Negotiations will be conducted in consultation with the GC/PI and the Division of Business Affairs.

11.2 System Office of General Counsel and Sponsored Research Services (SRS) will be consulted if deemed necessary.

12. PROJECT DELIVERABLES

12.1 Project deliverables will be primarily the responsibility of the PI. PI will submit interim and final technical reports on deliverables, as required by the sponsor.

12.2 The Financial Reporting Analyst will monitor and complete reports on all financial aspects of the grant and will route these to the PI for review and submission to the sponsor.

13. PROJECT CLOSEOUT

13.1 The Financial Reporting Analyst will close the FAMIS account after all expenses incurred prior to the end-date have been posted. If unspent funds will be returned to the sponsor, Financial Reporting Analyst will process payment request through Accounts Payable. If unspent funds will be retained by the PI, Financial Reporting Analyst will transfer account balance to a designated account with the PI as the responsible person.

13.2 The Financial Reporting Analyst will freeze the FAMIS grant account and will mark it for deletion.

Related Statutes, Policies, or Requirements

System Policy [15.01 Research Agreements](#)

System Regulation [15.01.01 Administration of Sponsored Agreements – Research and Other](#)

A&M-San Antonio Rule [15.01.01.01 Administration of Sponsored Agreements – Research and Other](#)

[OMB Circular A-110](#)

[OMB Uniform Guidance 2 CFR 200, Grants and Agreements](#)

Definitions

Authorized organizational representative (AOR)— An administrative official who is authorized to make certifications and assurances on behalf of the university and can commit the

university to a sponsored agreement. This authority is delegated to the Director of Graduate Studies and Research.

Grants champion (GC) – An individual -- faculty member, administrator, etc. -- who identifies a program or need for the University and who desires to take the lead role in the preparation of the grant proposal. This may or may not be the principal investigator (PI) or co-PI.

Contact Office

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