



Standard Administrative Procedure (SAP)

15.01.99.L0.01 Research Administration Guidelines

First Approved: February 20, 2017

Next Scheduled Review: February 20, 2022

Procedure Statement and Reason for Procedure

The purpose of this document is to provide guidelines for administering excepted research projects and research-related activities.

Procedures and Responsibilities

Background

In Fiscal Year 2015, Texas A&M International University (TAMIU) was awarded \$955,158 in research grants from the following agencies: Welch Foundation; National Science Foundation; U.S. Department of Education; High-Value Detainee Interrogation Group/FBI; Defense Threat Reduction Agency; Department of Homeland Security; NASA; Corporation for National Services; Laredo Homeless Coalition; and the Internal Revenue Service. All grant applications and funded projects are routed for internal approval and administered through Maestro.

TAMIU faculty, who are for the most part new to grant writing, utilize the services of the Office of Research and Sponsored Projects (ORSP) to receive targeted funding opportunity announcements; attend grant-writing workshops by expert speakers; and develop: 1) institutional boilerplate components, 2) research partnerships, 3) relationships with program officers, 4) budgets, 5) budget justifications, and, 6) all other aspects of grant applications.

During the pre-award process, the Office of Grants and Contracts (OGAC) reviews the proposed budget and budget narrative for all applications to ensure the allowability of expenses. Upon award, OGAC monitors and reports monthly to each PI/PD the detailed activity and summary of expenditures; provides the Principal Investigator/Project Director (PI/PD) a comparison between the amount of the current budget year that has expired versus the current year's actual expenditures/available balance; reviews and approves sponsored project expenditures; prepares and monitors indirect costs as required; monitors and reports cost sharing; prepares financial reports as required by sponsor agency; monitors time and effort

process; and maintains documentation for the required years during and after the project ends for all fiscal activity of each sponsored project.

Proposal Preparation

The ORSP personnel meet with each new faculty member to learn of his or her research interests. From there, a research administrator (RA) utilizes InfoEd software to help faculty find well-suited funding opportunities. In addition, this familiarity with faculty research interests enables RAs to serve as “matchmakers,” to help put together collaborative and/or interdisciplinary project teams as new RFPs are identified. Many of our local partners are encouraged to collaborate with our faculty by the growing relationships they have with TAMIU staff; whereas, if our local partners had to work with personnel outside this region, they would most likely hesitate to respond. Other services provided to faculty members include assistance in understanding complicated guidelines and learning sponsors’ programs, including the ins and outs of dealing with agency personnel, such as program officers.

When a faculty member notifies ORSP personnel of his/her interest in applying for a funding opportunity, one of the RAs becomes the primary person responsible for the proposal and prepares templates for the application narrative and other components, and works with the faculty member to develop the proposal budget. After that, the involvement of the RA in the development of the proposal varies widely, depending on the PI’s preferences and their level of grant writing experience. Very few of our faculty members provide a completed proposal to the ORSP personnel. In most cases, ORSP personnel assist faculty members with drafting and gathering proposal components (letters of support, biographical sketches, current and pending information, etc.), providing editorial feedback on the narrative and other application components (including making charts and tables), formatting documents, and of course, submitting the application.

For some applications, meetings with faculty members take place months ahead of the release of the program solicitation and continue until the proposal is funded, which at times takes multiple years to submit, revise, and resubmit. This team building over periods of several years has led to awards such as the GREAT – Graduate Retention Enhancement at TAMIU program funded by the U.S. Department of Education Title V PPOHA program and the National Science Foundation Robert Noyce Mathematics Teacher Scholarship Program. Even the new faculty we hire with strong research capabilities are struggling to adjust to the institution and to their new positions.

ORSP (pre-award) and OGAC (post-award) are in the process of training our faculty to use Maestro for the administration of their awards and see the benefit of the system for post-award functions. However, we have found it an inefficient use of faculty time to input the application information into the Maestro system for internal routing. For this reason, ORSP personnel key application details into Maestro, Grants.gov, and other online application systems, allowing the PIs more time to work on the research aspects of their proposals.

Contract Negotiations

Upon notification of an awarded contract for a sponsored research project, including outgoing sub-award agreements, OGAC and the PI review the contract terms and conditions for specific deliverables, reports, milestones, facility and administration rates, and intellectual property rights, ensuring that all are in compliance with federal cost principles (OMB Uniform Guidance 2 CFR 200 – Grants and Agreements or the Federal Acquisition Regulation) and University rules and System policies for sponsored activities and agreements. Based on this review, if there is a need to negotiate changes, OGAC alerts the PI and begins negotiations with the sponsor or sub-awardee business contact.

Procedures for approval of grant contracts is provided in *TAMIU Procedure 25.07.99.L1.01, President's Delegation of Authority for Contract Administration*.

OGAC notifies the PI/PD of the need to make changes to the grant agreement, project budget, and/or scope of work prior to award acceptance. If such modifications are necessary, the PI/PD collaborates with OGAC to modify the project budget and/or scope of work, and OGAC submits modified documents to the sponsor. The PI/PD communicates with other project team members concerning any changes in the scope of work or budget that substantially impacts their participation in the project. The PI/PD notifies the appropriate regulatory office (i.e., Institutional Review Board, Institutional Animal Care and Use Committee, Biosafety, etc.) if changes to the project scope affect approved protocols.

Project Modifications

If modifications are required to the scope of work (whether by the funder or PI) and/or if funding changes during a project, OGAC works with the PI to review the award particulars and to determine what is required per funding agency instructions. Depending on the situation, modifications may require prior approval of the funding agency, in which case OGAC and the PI contact the program officer to discuss the modification request and then submit any required paperwork. The modifications that have occurred at TAMIU include: 1) changes of PI/Co-PI, which are approved by the chair, dean, and provost; 2) changes in budget or amount of awarded funds, which requires the PI and OGAC to revise the budget and submit it for final approval by the funding agency. If applicable, depending on the modifications, they may also require approval from one or more of the research compliance committees (IRB, IACUC, or Biosafety).

Research Compliance

Compliance in research is a large part of the grant training provided on campus. The ORSP staff worked with various compliance committees and officers to develop the TAMIU IRB, IACUC, Export Controls, Financial Conflict of Interest, and Biosafety procedures and regulations. The ORSP provides personnel to aid the chairs of the IRB, IACUC, and Biosafety committees, as well as the Empowered Official (Export Control) and Conflict of Interest Official in managing the paperwork for each compliance area. ORSP personnel also provide assistance to faculty for training students in the responsible conduct of research, and the ORSP houses the official records for the IRB, IACUC, and Export Controls. For externally-funded research, all compliance is tracked in Maestro.

The research compliance list in MAESTRO is used to identify proposals being submitted which have compliance items. Upon a project being identified with a compliance issue, a notification is automatically sent to the chair of the respective compliance committee notifying him/her about the proposal with a compliance issue. If a proposal receives favorable reviews and has the potential to be funded and/or when it is awarded, the designated RA reviews the proposal to confirm if there are any compliance issues in the proposal that must be addressed prior to the release of funds. The RA checks with the applicable compliance committee and obtains confirmation that the compliance issue has been addressed. If the project does not have the necessary compliance approval, the PI of the grant and chair of the applicable committee are contacted and the PI is advised to get the issue addressed as soon as possible. The OGAC is also notified that no funds can be released until the compliance issue is resolved.

Project Set-Up

Upon notification and receipt of the fully-executed sponsored project award agreement by TAMIU, OGAC requests a Post-Award meeting with the respective PI/PD to discuss fiscal issues related to the project including: agreement/award documents, new account application, approved budget, financial and programmatic reporting requirements, billing processes, access to accounting system (FAMIS/Canopy),

requisition and pro-card processes, independent contracts, indirect costs, time and effort reporting, Maestro, cost-sharing, and general sponsored project administration guidelines. Following the meeting, OGAC submits the "Application to Establish a New FAMIS Account" form, along with a template reflecting funds by budget category, to the Comptroller's Office for account and budget set-up.

OGAC then enters the sponsored project information into the Maestro system. Once the sponsored project information is complete, OGAC initiates the data transfer process to upload the project information into the Sponsored Research module (SPR). Thereafter, other components of the sponsored project including billing, cost-share, and indirect costs are set up through SPR as required.

Project Financial Compliance

In accepting sponsored agreements, TAMIU agrees to administer agreements in compliance with fiscal guidelines provided by sponsors, as well as System policies and regulations and TAMIU rules. OGAC has the responsibility to review and approve all sponsored project expenses submitted through a requisition, pro-card, and independent/service contract to ensure allowability. Tests for allowability of costs include reasonableness, allowability, consistency, conformity, and timeliness. OGAC also approves requests for new positions funded from sponsored project accounts along with requests to hire new employees. All costs charged to sponsored agreements are documented, and the documentation that is maintained for costs such as payroll, travel, supplies, consultants, participant costs, scholarships, and equipment must be appropriate for the specific type of expense involved (e.g., payroll vouchers, airline and hotel receipts, invoices, consultant contracts, scholarship disbursement forms, etc.) This documentation is maintained by the office which handles the processing of the payment for the particular expense.

During the sponsored project award set-up process, OGAC ensures that sponsored projects requiring time and effort certification are flagged accordingly in FAMIS. Thereafter, OGAC monitors the semi-annual certification process to ensure that all documents are certified within 45 days as required by System policy. Certification of non-exempt employees (e.g., students and selected technical staff positions) is performed by the Approving Manager (PI/PD, key personnel, or other designated individual who supervises employees working on a sponsored project) on a bi-weekly basis during the timesheet approval process through the web-based TimeTraQ system.

Cost Sharing

Unless cost sharing is required by the funding agency, TAMIU does not submit proposals containing cost sharing. When a proposal is being submitted with a cost sharing requirement, it is flagged in Maestro and routed for approval by the Director of Budget, Payroll, & Fiscal Analysis before being routed to the Provost, the institutional official for sponsored projects, for final approval. TAMIU requires proposals being submitted with cost sharing to have identified accounts that will be used for payment of the cost sharing. For purposes of cash cost sharing, the TAMIU Office of Institutional Advancement is consulted for finding resources to support the grant.

OGAC has the responsibility to monitor and report cost sharing. Cost-sharing is documented and identifiable in the University's accounting or time and effort system, with the exception of waived F&A (Facilities & Administrative costs). Cost sharing account(s) are established during the sponsored project set-up process to help monitor cost share transactions. In instances where there is committed cost-share of salaries, an EPA is initiated by the department for the appropriate individual(s). This account is also flagged for time and effort certification. Cost-sharing is monitored and tracked by utilizing the cost-share module within SPR or with a custom software program, if necessary.

Project Deliverables

The ORSP personnel monitor project activities and ensure PIs are compliant with programmatic deliverables by randomly selecting three to five externally-funded projects per year. The monitoring involves a review of deliverables and working through a thorough checklist for documentation of each deliverable described in the application with the PI and project staff.

During the Post-Award meeting, OGAC reviews the programmatic and financial reporting requirements with the PI/PD for their respective sponsored project. The PI/PD has the responsibility of preparing and submitting programmatic reports, while OGAC has the responsibility of preparing and submitting financial reports as required by the sponsor.

Project Billing

During the sponsored project award set-up process, OGAC ensures that the billing parameters are listed properly within the Sponsored Project (SPR) module. OGAC requests reimbursement of expenditures for all sponsored projects from the respective agency. Billing for direct federal awards is usually completed through a drawdown whereby the request for reimbursement is submitted through the sponsor's payment website. In other instances, the award documents stipulate that TAMIU submit an invoice on a periodic basis in order to obtain reimbursement for program expenditures. The request for reimbursement includes: an invoice based on the specific requirements of the award, a cover letter, and supporting documentation of all expenditures, if required. Once the invoice is prepared, a secondary review is performed by an authorized individual within the office before receiving a signature from Director of OGAC. The invoice is then submitted to the sponsor, and OGAC maintains an electronic copy of the invoice (cover letter, invoice, and supporting documentation) within the respective project folder in Laserfiche—the University's document management system.

Project Closeout

OGAC submits a notice of award closeout to the PI/PD approximately 60-90 days prior to the sponsored project's end date. The memo references various items that should be considered by the PI/PD in order to bring the project to a successful completion such as: review budget, review cost-share, submit requisitions for outstanding payments, submit pending travel vouchers, contact Human Resources if separation of employment is required for any positions funded by the sponsored project, cancel service or change account for recurring charges, review inventory for technology/equipment, complete final report, and ensure records retention policy is followed. OGAC disallows any new expenses after the project end date; however, requisitions received after project end date that are to liquidate expenses incurred prior to project end date are allowable. OGAC submits a final invoice or requests a final drawdown, completes and submits the final financial report, and freezes the sponsored project account to prevent further expenditures.

Related Statutes, Policies, Regulations, or Rules

[System Policy 15.01, Research Agreements](#)

Contact Office

Office of Research & Sponsored Projects, 956-326-3026