

# **SUL ROSS STATE UNIVERSITY**

*A Member of the Texas State University System*

**SRSU Policy: Externally Sponsored Programs: Post-Award Policy**

**SRSU Policy ID: APM 2.21.2**

**Policy Reviewed by: Director of Sponsored Programs**

**Approval Authority: Executive Vice President and Provost**

**Approval Date: July 11, 2017**

**Next Review Date: July 2020**

## **POLICY SCOPE**

Sul Ross State University (“University”) encourages faculty and staff to pursue sponsored program activities in their areas of expertise. Please see Administrative Policy Manual, “Externally Sponsored Programs: Pre-Award Policies and Procedures” for specific rules covering submitting proposals to sponsors.

This policy covers the post-award phase of externally sponsored programs already subject to the “pre-award” policies in the Administrative Policy Manual. In addition, other projects may be subject to these policies as deemed necessary by University administration. Its purpose is to ensure that the University properly manages funds, departmental workloads, complies with legal and fiduciary responsibilities, and maintains the highest standards of academic performance, research, scholarship and administration.

The Office of Sponsored Programs (OSP) assists with identifying potential funding sources, developing proposals and coordinating the internal review and approval process, as well as assisting with communication of progress or final reports or other requested information. Grants accounting is a function of the Office of Accounting Services which provides support during the post-award phase.

## **PROGRAM MANAGEMENT**

Primary responsibility for compliance with the terms of the contract and implementation of the program resides with the Principal Investigator/Project Director (PI/PD). The PI/PD is expected to maintain the highest levels of integrity and objectivity regarding the program.

The PI/PD remains an employee of the University and must continue to follow all University policies, regardless of the funding source(s) for the program.

Externally sponsored programs must comply with all applicable federal, state, private, Texas State University System, and Sul Ross State University regulations. Externally sponsored programs must follow the federal regulations applicable to educational institutions, unless the State of Texas or University policies are more restrictive. The PI/PD may request a waiver from federal/state polices on programs funded by private sponsors in certain situations. The waiver must be obtained from Accounting Services, which may impose other conditions in order to receive the waiver.

# SUL ROSS STATE UNIVERSITY

*A Member of the Texas State University System*

It is the PI/PD's responsibility to deliver to the sponsor the appropriate number of all sponsor-required reports by the deadline and to furnish copies of all sponsor-required interim and final reports to the appropriate Vice President and OSP for recordkeeping. It is the PI/PD's responsibility to notify OSP and Accounting Services as soon as it is known that a deadline has been missed or if the program cannot be completed by the termination date listed in the award notice.

All personnel in the PI/PD's supervisory chain (including Chairs/Directors and Deans, etc.) are required to perform oversight duties to ensure that work is being performed and complies with all applicable regulations/policies. Accounting Services is available to assist with compliance issues as well as being required to perform its own financial oversight duties.

If the PI/PD's employment is terminated, then the applicable personnel in the PI/PD's supervisory chain (including the parties approving the *University Approval Form for Externally Sponsored Programs and Projects*) become responsible for completing the program.

Should a conflict arise between the PI/PD, OSP and/or Accounting Services regarding the proper application/interpretation of a policy/regulation, each party should document their position and submit it to the appropriate Chair/Director or Dean responsible for the program. If a resolution cannot be reached, all parties should submit their positions to the Executive Vice President and Provost and to the Vice President for Finance and Operations who will discuss and recommend further action as necessary.

PI/PD's are encouraged to contact Accounting Services for assistance with completing the financial portion for any post-award reporting requirements. If the PI/PD chooses to complete the financial information without Accounting Services' assistance, he/she is required to maintain copies of the financial system information used to prepare the report and a schedule of any reconciling items, if any.

The PI/PD is expected to maintain the highest level of scholarly and research integrity, including following the minimum standards for the handling of misconduct as defined in the "Federal Policy on Research Misconduct" published by the United States Office of Science and Technology Policy (OSTP) and, when applicable, as codified by the Federal Agency sponsoring the program.

Violations of any policies relating to externally sponsored programs by the PI/PD may result in the PI/PD being prohibited from applying for or participating in future externally sponsored programs in addition to the customary disciplinary actions available.

## **PROGRAM MODIFICATIONS**

Often, modifications to the Scope of Work and/or the Budget of a program after it has been awarded require the approval of the sponsor. The PI/PD must consult the regulations applicable

# **SUL ROSS STATE UNIVERSITY**

*A Member of the Texas State University System*

to the program and consult with Accounting Services to decide if sponsor approval is needed before making a change.

OSP and Accounting Services will assist the PI/PD as needed with drafting a request for program modification. If a sponsor requires an official amendment for the modification, only the President and the Vice President for Finance and Operations are allowed to sign on behalf of the University.

As they become available, the PI/PD will file with the OSP, all contracts, forms, budgets and correspondence which may alter the basic agreements and responsibilities of the institution.

## **FULL UNIVERSITY SUPPORT**

By accepting an award from a sponsor, the University is committing its full resources to the successful completion of the program. The University is ultimately legally and financially responsible to the sponsor for the performance of the program funded. All University departments must make a good faith effort to work with the PI/PD when called upon to assist with the program. Departments cannot refuse to support the program when such refusal could jeopardize the successful completion of the goals/objectives committed to by the University. Disputes arising due to the inability of the department to 'bill' the program, the PI/PD failing to give advance notice to the department, etc. should be referred to the appropriate Chair/Director, Dean and/or Vice President for Finance and Operations.