



Office of the Sponsored Programs  
Policy Manual –  
Updated December, 2023

# Table of Contents

<a href="#"><u>General Overview</u></a> .....	1
<a href="#"><u>Research Integrity</u></a> .....	2
<a href="#"><u>Conflict of Interest in Sponsored Programs</u></a> .....	2
<a href="#"><u>Required Review and Approval</u></a> .....	3
<a href="#"><u>Required Compliance Authorizations</u></a> .....	3
<a href="#"><u>Budget Preparation and Policies</u></a> .....	3
<a href="#"><u>Award Receipt</u></a> .....	8
<a href="#"><u>Award Management</u></a> .....	9
<a href="#"><u>Awards from Private Donors (non-applications)</u></a> .....	9
<a href="#"><u>Use of Remaining Funds</u></a> .....	10
<a href="#"><u>Grant Worker Hiring</u></a> .....	10
<a href="#"><u>Budget Changes Requiring Agency Approval</u></a> .....	10
<a href="#"><u>Transfer to Another Institution</u></a> .....	10
<a href="#"><u>Recovery of Grant Funds</u></a> .....	11
<a href="#"><u>Records Retention</u></a> .....	11

## 1 GENERAL OVERVIEW

The University of Tampa encourages faculty members to seek external funding for programs and scholarships that supports the University’s mission and vision. The ultimate responsibility for managing these projects belongs to the Principal Investigator (PI) or Project Director (PD), assisted by the appropriate dean. All applications, proposals, and contracts for research funding, training, and other research-related activities, are made in the name of The University of Tampa.

The University of Tampa is required to comply with the U.S. Office of Management and Budget Uniform Guidance 2CFR Part 200 and other applicable regulations, guidelines and instructions in the notice of grant awards or award letters when receiving federal or state funds. In the use of non-federal funds, the University and the PI/PD must comply with the award agreement and University policy.

The individual serving as principal investigator or project director for a proposed project is responsible for preparation of the proposal following The University of Tampa’s policies and procedures as well as guidelines provided by the anticipated funding agency. By submitting a proposal, the project director is agreeing to abide by all applicable federal, state, and awarding agency policies and procedures, should an award be granted.

## **2 RESEARCH INTEGRITY**

The University of Tampa personnel are expected to adhere to the highest ethical standards for all research and scholarly work. It is the responsibility of every principal investigator to maintain the integrity of research projects by keeping accurate, permanent, and auditable records of all experimental protocols, data, and findings, and to charge other contributors with the same standards. Misconduct in research and other unscholarly activities are incompatible with the standards of The University of Tampa, and all allegations of such behavior will be handled promptly. Additional information including the University Policy on Misconduct in Research can be found in the Faculty Handbook.

## **3 CONFLICT OF INTEREST IN SPONSORED PROGRAMS**

The University of Tampa employees should conduct their sponsored programs so as to avoid or minimize real or apparent conflicts of interest, including financial conflicts of interest and conflicts of commitment. In addition to UT regulations, federal agencies, including the Public Health Service and National Science Foundation, have additional conflict-of-interest regulations that are applicable to sponsored research. These regulations require universities applying for grants to ensure that there is no reasonable expectation the design, conduct, and reporting of research will be biased by any significant financial interest of an investigator responsible for the design, conduct, or reporting of that research.

The University of Tampa Conflict of Interest Policy for Sponsored Programs is as follows:

UT employees may not receive sponsored program funding from any source that will directly or indirectly benefit them in excess of \$10,000 cash per year or own more than 5% of the voting stock or controlling interest in the above sponsor. UT employees, their households, and any persons receiving funds must not be affiliated with the sponsors in any way that will hinder the ability to fulfill obligations to The University of Tampa, its students, faculty, and staff.

Any real or apparent conflict of interest on a sponsored program should be reported to the Office of Sponsored Programs so that a proper disclosure and review can be performed before any sponsored program is initiated. In most cases, a conflict of interest may be managed or avoided through proper guidance in structuring an appropriate relationship and through thorough review, disclosure, and monitoring processes.

Those investigators involved in a proposal and subsequent award with a Public Health Service (PHS) agency, National Science Foundation, and other applicable private foundations/agencies that maintain their own financial conflict of interest policies that differ from the university policy must file a disclosure statement with the Office of Sponsored Programs at the time of proposal. Disclosures must be filed whenever an Investigator has a material change in the significant financial interests or obligations previously disclosed, and annually during the project period of the sponsored program. In addition, investigators included in a PHS proposal must complete university provided conflict of interest training every four years.

## **4 REQUIRED REVIEW AND APPROVAL**

The Director of the OSP serves as the University's authorized liaison for institutional, governmental, foundation, corporate or community grants. All proposals and applications must be reviewed and approved by OSP prior to submission.

The Sponsored Program Checklist provides critical information and certifications for sponsored activity to the appropriate university administrator regarding the proposal. The approval form is part of the proposal submission process and serves as a checklist for processing proposals and compliance certifications required for proposal submission. Detailed instructions can be found on the OSP website.

## **5 REQUIRED COMPLIANCE AUTHORIZATIONS**

Research activities are governed by a number of regulatory and compliance committees imposed by federal and state laws as well as awarding agency and university policies. Non-compliance can result in severe penalties to the institution and, in some instances, to the individual. It is the responsibility of any principal investigator to be familiar with all areas of research compliance and any review and reporting processes that are required. In all cases, reviews to ensure research compliance are required of all protocols using human subjects, vertebrate animals, or hazardous materials regardless of whether or not funding (internal or external) is being sought for the project.

If human subjects are to be included as part of a research study, the protocol must be reviewed and approved by the University's Institutional Review Board (IRB), regardless of whether research funding is being sought. After review, the project director will receive written notification of the IRB action. Studies may not begin until a sponsored research agreement is fully executed, and the protocol is approved by the IRB. Additional information can be found on the IRB Website.

## **6 BUDGET PREPARATION AND POLICIES**

The Office of Sponsored Programs can assist principal investigators in formulating a comprehensive project budget. Budgets must adhere to sponsor and institutional costing policies regarding sponsored programs and contracts.

a. Cooperating with Institutions and Organizations

Formal consortium/partnership agreements are executed when any substantial portion of a project is to be performed by another institution. Early in negotiations with any cooperating institution or sub awardee, the Office of Sponsored Programs should be contacted for assistance in acquiring the necessary documentation for the comprehensive proposal budget.

b. Partnering with Industry

University- Industry partnerships, for the purpose of seeking funding for cooperative research initiatives, may require formal agreements between the parties. In these cases, OSP should be involved so that such partnerships can be fully developed.

c. Grant Compensation Policy

In order to ensure UT's compliance with 2 CFR Title 2 Part 200.430 – Personal Services, and with internal policies, grant funded salary rates are defined according to the individual faculty member's institutional base salary. Institutional Base Salary (IBS) is defined as the base salary (9 or 12-month) paid to a faculty member, but does not include summer (for 9-month faculty) or overload salary (sections II and III). During the academic year, work performed on the grant must be charged to the grant at a rate that is directly proportional to both the level of effort expended and the individual's institutional base rate. For periods outside of the academic year, specifically during the summer months, the compensation rate cannot exceed the faculty member's institutional base salary rate as it is defined during the academic year and all charges must be proportionate to the effort expended on the project.

I. Academic Year Salary Subvention—(9- or 12-month faculty)

Academic salaries may be fully or partially funded by external sponsors depending on the policies of the sponsor, with prior approval by the dean and provost required.

This section applies when a grant will pay a portion of the institutional base salary of a faculty member working on a particular research project during the academic year (fiscal year for 12- month faculty). For faculty members charging academic/fiscal year salary support to a grant during a given period, the amount charged will be the result of multiplying the faculty member's IBS by the percent of effort for the period.

II. Summer Grant Salary

- For faculty members on 9-month academic contracts (including those who are paid over 12- months), grant funds may be used to pay up to 3 months of summer salary. The maximum amount of summer salary from a grant (or combination of grants) is **3/9ths of the IBS**, if the sponsor allows, not exceeding 1/9<sup>th</sup> in any one summer month.

III. Overload Salary

In rare cases, UT faculty members (9- or 12-month or part-time) may be paid for work that is outside of and in addition to their regular assignment. For example, an overload assignment might be serving as a one-time conference workshop leader, evaluating a program, etc. Salary for this type of “overload” assignment that is for contributing to a grant-based project is subject to the following restrictions:

- a) Overload pay from Federal grants must have prior sponsor approval
- b) The work must be outside the scope of their normal duties and unrelated to academic assignment
- c) The work must be “incidental,” meaning temporary and not on-going in nature
- d) Work done on the grant does not interfere with normal duties.
- e) Such additional pay is not considered part of the IBS.
- f) Overload salary during any budget period typically is paid in one lump sum, and is not related to percent of effort.

All requests for supplemental compensation charged to extramural funds must be pre-approved by the Principal Investigator Dean of the faculty member’s home college, OSP and the Provost’s office **prior** to any work contracted and/or commenced.

#### IV. Staff Salary

Staff members may be compensated by a sponsored project when the administrative or programmatic management aspects of the scope of work require it and it is approved by the sponsor as part of the proposal and/or within the sponsor’s guidelines. Staff compensation must be approved by the staff members supervisor is treated in a manner similar to the faculty academic year salary subvention method.

Staff compensation may occur in one of three ways:

1. For current full time staff, a portion of their salary will be paid by the award, relieving their department budget while the staff member spends that amount of effort on the sponsored project.
2. For part-time staff, at the consent of the staff member, relevant supervisor(s), and human resources the staff member’s full time equivalent may increase.
  - a. For example, if the staff member is currently employed at .50 FTE and an awarded sponsored project includes .25 FTE for an administrative staff position, the staff member’s FTE may increase to .75 FTE for the duration of the sponsored project (and then will return to .50 FTE). During this time, the staff member will maintain all current departmental duties while taking on an additional .25 FTE in support of the specific sponsored project.
3. For new administrative or project management support included in a sponsored project, the PI may need to hire an employee to fulfill that role for the duration of the sponsored project (limited term or temporary). The PI must work with Human Resources during the proposal stage to ensure the position will be fairly

compensated at the appropriate market range.

d. Facilities and Administrative (F&A) or Indirect Costs

Facilities & Administrative costs (F&A or indirect costs) are allowable costs associated with the conduct of a research study, but which cannot be directly charged since they result from shared services.

Such costs might include libraries, physical plant operation, support, research administration expenses, and depreciation or use allowance for building and equipment. F&A costs on federal grants are computed on the basis of negotiations with the Department of Health and Human Services, currently set at 57% of direct salaries and wages, not including fringe benefits. **UT's policy is to always obtain indirect costs to the maximum extent allowed by the sponsor,** noting however, that some sponsors/grants do not allow for indirect costs.

Indirect cost returns (ICR) will be allocated according to the following percentages:

- 70% to the University General Fund
- 10% to the Dean of the College
- 10% to the Principal Investigator/Project Director
- 10% to the Grant Matching Fund

Funds to the University general fund are unrestricted and can be used in any manner deemed appropriate by the President or other appointed University administrator.

There is no presumption that these funds will be used for research programs specifically. The University is not required to report on or seek approval for how funds are used.

Funds to the Dean should be used to support the academic programs of the school or college. There is no presumption that these funds should be returned to or used for either the grant recipient or the department from which the grant originates. The Dean is not required to report on or seek approval from the department or grant recipient for how funds are used

Funds to the principal investigator/project director will reside in the Dean's office and use of them will require the Dean's approval. Funds may be used for the professional or scholarly development of the project recipient and are not required to relate to the grant's projects. Funds cannot be taken as a stipend or salary supplement.

Funds to the Grant Matching Fund will reside in the Office of the Provost and be used solely to build a pool of funds for future faculty or institutional grant proposals where cost sharing is required by the sponsor in order to submit and cannot be satisfied through non-monetary means. University administrators or faculty wishing to submit an application with a match requirement should contact OSP.

In cases where applications include project directors from different departments, the amount for each receiving unit must be specified clearly prior to submission of the grant and outlined on the Sponsored Program Checklist. Should disputes arise over the allocation of indirect cost recovery, and should the parties be unable to resolve these disputes, allocations will be returned to the Grant Matching Fund in the Office of the Provost. Should the project director leave UT, unused ICR funds will be distributed to the Grant Matching Fund in the Office of the Provost.

ICR will be allocated to the Dean's office from the University once the grant has been approved and the Office of Administration and Finance have received the funds. ICR funds will be maintained in a continuing account for use over multiple years until the funds are spent.

Note: Grants/applications/proposals/contracts that are not processed through the proper channels as outlined herein will not be eligible for ICR funding.

e. Fringe Benefits

Fringe benefits include such items as Social Security, University retirement programs, health insurance, life insurance, and disability insurance. Average rates are used for budgeting the costs of a project. Typically, fringe benefits are a direct charge to the grant or contract, and most forms that UT faculty members fill out will indicate lines for fringe benefits on project staff salaries. The current rate for Fringe benefits is 32% for full time and 8.33% for part time. Contact the Office of Sponsored Programs with any questions.

f. Release Time

Though the primary obligation of university faculty is teaching, the university also encourages faculty to seek external grants in support of scholarship or approved programmatic initiatives. In some cases, the external funding agency will allow requests to pay salary costs to carry out the project. In such cases, the faculty member may request released time from teaching. Approval of such requests shall be subject to the following requirements:



- a faculty member must either request full release from teaching for a minimum of a semester (thus allowing for a full-time visiting faculty replacement), or no more than 1 course per semester;
- for a faculty member requesting a full release from teaching, the grant must pay the full salary and fringe benefits;
- For a faculty member requesting 1 course per semester, the grant must pay 10% of the full salary and fringe benefits of the faculty member per course release.

Proposals that include released time request must be approved by the faculty member's dean in addition to the other approvals required of all proposals.

**g. Cost Sharing**

Occasionally sponsors may require the University to share part of the costs of the proposed project. UT discourages voluntary cost sharing and any such costs must be approved in advance by the OSP and the appropriate dean before applying for funding. UT will only provide cost sharing in cases where the sponsor's written guidelines state that cost sharing is required of all applicants. In such cases, in-kind faculty salary time, unrecovered F&A costs and/or tuition contributions for graduate research assistants working on the project will be applied toward the cost sharing requirement.

To qualify for cost sharing, matching funds, or in-kind contributions, all charges must be:

- Allowable under sponsor policies and the terms of the grant award guidelines;
- Allowable as a cost to the project;
- Reasonable and necessary for performance of the project; and
- Allowable on the source proposed to fund the cost sharing commitment.

## **7 AWARD RECEIPT**

The Office of Sponsored Programs seeks to help with any administrative questions that might pertain to a submitted proposal. Awards are made to The University of Tampa. The original notice of grant award, award letter, or contract for all activities should be provided to the Office of Sponsored Programs immediately after it is received if the office has not already been the primary recipient. Also, please provide OSP with a copy of or link to any of the sponsor's policies, as this will assist both OSP and the Office of Administration & Finance with preparation for the ongoing management of the grant.

Successful awards of grants and contracts made to The University of Tampa must be

reviewed and accepted by the Director of the Office of Sponsored Programs prior to money being received by the University. Terms and conditions associated with an award will be noted on the Summary of Award Form and distributed, along with copies of the award, to the Provost, Office of Administration & Finance, Dean, and the Principal Investigator/Project Director. Should the PI/PD receive the award documents, the original documentation, in its entirety, should be sent promptly to the Office of Sponsored Programs, with the PI retaining a complete copy. OSP will review the award documents and distribute for account set-up.

When applicable, after review by OSP, award letters or contracts are sent to the President for final acceptance signature. All contract negotiation will be handled through the Office of Sponsored Programs at the direction of the Provost or other applicable University Representative. Unexpected or questionable terms and conditions will be discussed with the PI/PD and Dean. Awards that contain conditions unacceptable to the University may be returned.

## **8 AWARD MANAGEMENT**

Funds for sponsored programs are awarded to the University. The funds are used only for the purpose and at the level designated in the final approved proposal. The principal investigator is responsible for the day-to-day administration and direction of the approved project. In order to carry out this responsibility, the principal investigator should be aware of all grant/contract terms and conditions and should give special attention to those terms and conditions regarding budget limitations, patents and copyrights, inventions, confidential information, safety and security, and required reports.

Principal investigators are responsible for tracking their individual grant budgets and abiding by all federal, state, university and/or other awarding agency policies. All funds will be placed into University restricted accounts and used only for the purposes outlined explicitly in the grant application and/or award document. When funds need to be expended, university and financial management policies should be followed including initial signature of funds requests by the Dean and when appropriate, the Provost, and further review and approval shall be made by the Office of Sponsored Programs prior to dissemination of any funds from such restricted accounts.

## **9 AWARDS FROM PRIVATE DONORS (NON-APPLICATIONS)**

The Office of Development will notify OSP as soon as any discussions develop that would involve faculty as the conduit for a donor's request. The Sponsored Program Director or her delegate would attend meetings and seek appropriate approvals for their request as it relates to faculty involvement. If faculty are to be involved, their department chair, Dean and the Provost will be notified prior to any action. Should a grant or donor allocation decide to hire an adjunct, OSP will check with their Dean to determine their eligibility. Should the grant or donor allocation decide to hire a student, OSP will check with payroll to be sure they are eligible and will not violate their 999 hours for the year.

## 10 USE OF REMAINING FUNDS

Any funds remaining in a restricted grants account after the close of the grant will be sent back to the grantor unless otherwise specified. If funds were received through time billed but not paid out to employees, the remaining funds shall be moved to a new restricted account for use by the Department that earned the billed time. Specific use of funds must be approved by the appropriate Dean and the Provost.

## 11 GRANT WORKER HIRING

Grant Worker hiring follow the policies and procedures of the UT Human Resources Department. PI's should familiarize themselves with these policies and consult with both OSP and HR at the proposal stage to determine the applicable policies and procedures.

## 12 BUDGET CHANGES REQUIRING AGENCY APPROVAL

Most budget changes can be made without prior approval from the funding agency, but PD should contact OSP for approval of all budgetary changes.

Others, however, cannot be made until the sponsor has granted prior approval. The types of transactions that require prior approval vary depending on the agency and the type of agreement. Generally prior approval or notification will be required for the following:

- Change in scope of work
- Extension of the duration of the project
- Purchase of an item of permanent equipment that was not in the original budget
- Purchase of any item of general-purpose equipment (office, computer etc.)
- Funding of foreign travel if not approved in the original budget
- Subcontract not approved in the original budget
- Movement of more than 10% between budget line item

If agency approval is required, it must be requested and approved in writing. The PI/PD should submit a letter of justification to OSP at least 30 prior to when the approval is needed from the sponsor.

## 13 TRANSFER TO ANOTHER INSTITUTION

If a principal investigator anticipates leaving The University of Tampa for another appointment, OSP and the Office of the Provost should be notified immediately. If requesting a transfer of extramural support to another institution, specific written approval must be obtained from the Office of the Provost, the anticipated recipient institution, and the funding agency. If the principal investigator becomes unable to serve as the lead investigator on a grant and wishes to relinquish the grant and nominate another UT faculty member as the lead principal investigator, written permission from both UT and the sponsor must be obtained. In all such cases, the Office of Sponsored Programs can provide assistance.

## **14 RECOVERY OF GRANT FUNDS**

After the close of a grant which allows for charges of time worked, any remaining recovered funds shall be placed in a restricted account assigned to the office or department from which the time was earned. Use of these funds must be approved by the Provost or appropriate Vice President in the case of a staff department.

## **15 RECORDS RETENTION**

Retention of all financial and programmatic records, supporting documents, statistical records, and other records of the University is an integral responsibility of OSP and UT Finance and Administration. Grant related records are required to be kept for specific periods after the completion of grant projects. Record retention requirements can differ by sponsor and by the type of award agreement (grant, cooperative agreement, or contract).

The Office of Sponsored Programs is the official repository for UT grants related records. PI/PDs are responsible for ensuring that copies of technical or program reports are forwarded to OSP for inclusion in the official file. The University is responsible for maintaining the fiscal records for each grant.