

Bellarmino University

Office of Sponsored Projects (OSP)

Policies and Procedures

Bellarmino University through the Office of Sponsored Projects (OSP) is committed to assisting faculty, staff, and students with support to engage in creative activities, pursue research interests, and advance career objectives. The OSP serves to assist, guide and support a culture of research and exploration for Bellarmine employees.

All Bellarmine employees (faculty [and supervised students]; staff) who are interested in seeking outside funding through grants or contracts, **must** contact the OSP for assistance with the coordination, budget development, review, and submission of all externally contracted funds. Although early contact with OSP is always best, all proposals for external funding should be received by the OSP via email or electronically **at least 10 business days** in advance of submission. Faculty and staff are strongly encouraged to work closely with their department chairs, supervisors, and deans throughout the submission process to facilitate successful applications for external support. Externally sponsored recipients must also work closely with the OSP during the funded period to meet all reporting requirements, including extensions, renewals, and annual and final reports.

General University Policy Overview

External funding is a vital part of today's academic environment. Bellarmine University encourages faculty members to seek external support for research and scholarship activity that addresses societal issues, contributes to the generation, synthesis, and application of new knowledge, or provides for the critical assessment of pedagogy. The immediate and ultimate responsibility for managing these projects lies with the principal investigator (PI) and only assisted by the OSP, the Business Affairs Office, other support offices, school or college dean and the departmental chairperson and staff.

All applications, proposals, letters of intent and contracts for sponsored research projects are made in the name of Bellarmine University. The Board of Trustees in Chapter 4: Contractual Agreements has empowered a select number of university officials to request and accept grants, contracts, and other related agreements on behalf of the University, including the Assistant Vice President for Academic Affairs, the Vice President for Administration and Finance, and the President. Therefore, only those officials designated by the Board of Trustees of Bellarmine University may bind the University.

Bellarmino University is required to comply with applicable U.S. Office of Management and Budget (OMB) "Uniform Guidance" circular as amended and other regulations, guidelines, and instructions of notice of grant award or award letter when receiving federal funds. In the use of non-federal funds, the University must comply with the award agreement and University policy.

Eligibility for External Funding

Any individual who is a full-time member of the Bellarmine University (faculty [and supervised students]; staff) may seek a grant funded by external funds and is in fact encouraged to do so.

Part-time faculty must receive prior approval from the Vice President of Academic Affairs/Provost before applying for external funding.

Contractual Requirements for Sponsored Projects

If an application/proposal/contract/report is not processed through the proper channels of Bellarmine University, and is subsequently funded, there is the risk of the award not being accepted or a delay in accessing funds. Additionally, if a project is solicited by a third-party, and work is performed on this project in absence of a recognized and fully executed sponsored project agreement, the PI alone maintains ultimate liability for all requirements of the project. Further, the PI must reimburse the University for any costs associated with the use of university resources commonly associated with the pursuit of said project.

Research Costs

Bellarmino University expects the external sponsor to pay the actual costs for conducting the research. These costs include both the direct costs and facilities and administrative costs (F&A or indirect costs) incurred by the PI during the conduct of a project.

Direct costs can be clearly identified and directly benefit a specific research project including salary(ies), fringe benefits, consultants, equipment, laboratory supplies, travel, other expenses and consortium or contractual costs.

The facilities and administrative (F&A) costs are those institutional infrastructure costs that cannot be easily attributed to an individual project or monitored on an individual basis and include building and equipment use, operations, maintenance, utilities, general departmental administration, telecommunications, library resources and capital improvements. Each grant is expected to pay its proportional share of these infrastructure costs. The federally negotiated F&A rate can be found on the OSP website.

All project budgets should include facilities and administrative costs (as applicable to the sponsor). Exceptions to this policy may be considered on a case-by-case basis but will require Vice President for Administration and Finance, or his/her designee approval.

The Bellarmine University Board of Trustees has authorized revenue sharing of F&A recovery. This policy can be found in section 9.6.11.2 in the Faculty and Staff Policies and Procedures Manual. Revenue sharing is based on actual expenditures (i.e., research performance funded by a sponsor excluding match) and awarded in the fiscal year following the expenditures. The agreed upon distribution is: 25% deans, 25% investigator, and 50% to the University to resource the delivery of critical functions such as accounting and compliance, as well as to offset actual facilities expenses. All distributions are subject to modification in situations where a grant may be over budget.

Conflict of Interest

Bellarmino University employees should conduct their affairs to avoid or minimize real or apparent conflicts of interest, including financial conflicts of interest and conflicts of commitment. It is the responsibility of all faculty to acquaint themselves with Bellarmine's Conflict of Interest (COI) Policy found in the Faculty Handbook (Chapter 7 – see section 7.6) at

<https://one.bellarmino.edu/facstaffresources/hr/Documents/Faculty%20Handbook.pdf>.

This policy is intended to be used as a primer for faculty in terms of structuring their relationships with business entities considering assigned academic responsibilities with Bellarmine University. Further, the policy is not intended to eliminate all instances or situations of conflict of interest; rather it is used to enable faculty or staff to identify and avoid real or perceived conflicts of interest.

Any real or apparent conflict of interest must be reported to the Office of Academic Affairs. In most cases, a conflict of interest can be managed or avoided through the proper guidance, working relationship structure and disclosure.

All PIs, co-PIs, collaborators, and others who are associated with a sponsored project must complete a COI form. This form will need to be routed for signatures and filed internally with the grant application. This form is located at the OSP website (www.bellarmino.edu/osp).

Cost Sharing

Bellarmino University discourages voluntary cost sharing, and such costs must be approved in advance by the Provost or Associate Provost for Academic Affairs and the VP for Administration and Finance before applying for funding.

Bellarmino will only provide cost sharing in cases where the sponsor's written guidelines state that cost sharing is required of all applicants. In this case, in-kind faculty salary time and unrecovered F&A costs are examples of costs that can be applied toward this cost sharing requirement as allowed.

Funding agencies now label budgeted cost sharing amounts as being required (guaranteed) terms of the award. Therefore, all award documents must be carefully reviewed and written to avoid non-essential cost sharing and any financial repercussion to your department and the university. Be careful to include cost sharing in a proposal as the University's contribution toward a project only when required to do so by the sponsor.

University Review Process

Occasionally there are funding requests for proposals (RFP) that must be considered in an expedited format. Typically, however, there is adequate time for the PI to prepare and submit a funding proposal that allows for an informed and conscientious review by the department chairperson/school dean, the Business Affairs Office, and the OSP. All external funding request, annual report, no cost extension request, request for budget revisions, final report, etc. should be received by the OSP via email or electronically **at least 10 business days** in advance of submission to the sponsor.

This review is necessary to ensure PI compliance with funding agency requirements, full disclosure of Bellarmine's responsibilities to a grant, and to provide a minimal degree of content edit. For funding requests, the OSP Proposal Routing Form should accompany the proposal for the appropriate review signatories.

In rare instances, an expedited review of a grant/contract or report submission is necessary. In these situations, it is still imperative the PI work closely with the chairperson/dean, the OSP and the Business Affairs Office toward the successful completion and submission of the grant. Early communication with the OSP can facilitate the process and help to anticipate and avoid problems during submission.

Certain times of the year are especially busy in the Business Affairs Office and additional planning may be necessary on the part of the grant requester. June and July are traditionally hectic, and requests may be slow moving through the process during these high traffic periods.

Locating Funding Opportunities

Bellarmine University offers support and guidance for locating external funding opportunities; please contact the OSP for assistance with this type of activity.

Limited Grant Submissions

A limited submission program is a circumstance in which the sponsor sets an institutional limit for the number of applications or proposals the university can submit for a funding opportunity. The OSP will handle this event as a 'first come, first serve' situation. Meaning, those who contact the OSP first, will have first consideration for submission.

Preparing Your Proposal

The individual serving as the PI for a proposed project is responsible for preparation of the proposal following Bellarmine University's policies and procedures as well as the guidelines provided by the sponsor or funding agency. By submitting a proposal to the federal government, the PI is agreeing to abide by all applicable federal policies and procedures should the award be granted.

All sponsored project proposals require the combined efforts of the OSP and the Business Affairs Office. Coordination of these offices helps to ensure a complete and accurate proposal.

All proposals for private foundations require the combined efforts of the OSP, University Development Office and Business Affairs Office. Coordination of these offices helps to ensure a complete and accurate proposal.

- Alert the OSP, the Business Affairs Office and the appropriate chair and/or dean as soon as you decide to submit a proposal.
- Send them a link to the sponsor's program guidelines and deadline.
- Let the OSP know if the sponsor requires an online submission. Not all online proposal submission systems are immediately accessible, so early notification is key so the OSP can ensure the required set up is completed in the sponsor's system.
- Contact the OSP and the Business Affairs Office for assistance with developing a budget and budget justification and proposal review.

Bellarmine University Proposal Routing Form

The Bellarmine University Proposal Routing (PRO) Form is an internal form for documentation of the University's official approval of the plans and commitments contained in proposals to external sponsors. It should be completed and routed along with the complete proposal narrative, proposal guidelines, budget, and budget narrative to all appropriate officials: Chair, Dean, Provost, Vice President for Administration and Finance, and, as necessary, the President before submitting a proposal to an external sponsor.

The Proposal Routing Form requires the PI to indicate their awareness of, and agreement to abide by, the Bellarmine policies on Conflict of Interest and Drug-Free Workplace.

PIs are reminded that each office which signs the PRO Form requires time to review the proposal and other documents.

University Review, Approval and Signature

Route via email or electronically the final version of the proposal application and the completed internal forms (PRO and COI) to the OSP at **least 10 business days** prior to the proposal submission date.

If a grant is funded, contact the OSP as soon as possible. Only the OSP can officially accept an award on behalf of the University. We must work with the sponsor to determine the terms and conditions of the award and accept it.

Grant vs. Gift

Grants and gifts are handled by two separate Bellarmine units, and each carry their own distinct sets of policies and procedures.

The OSP assists with grants, which have:

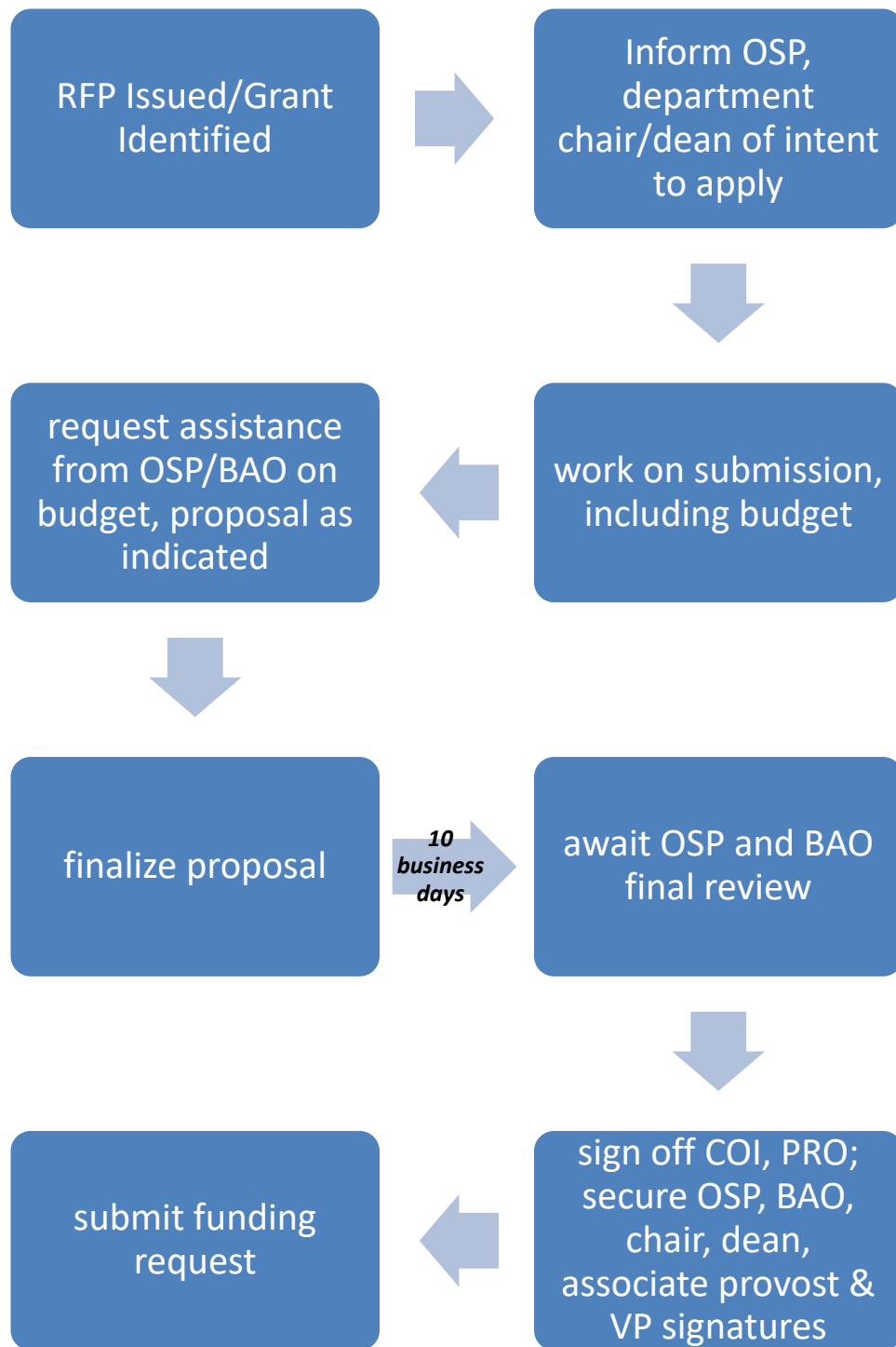
- A line-item budget for the expenditure of funds for the project activity
- A detailed statement of the planned activity or scope of work
- A specified period of performance as a term and condition
- A commitment by Bellarmine to provide “deliverables” (e.g., products, periodic technical or progress reports)
- Fiscal accountability, such as submission of financial reports, audit provisions, sponsor prior approval of or control over expenditures, and/or an obligation to return unexpended funds

The Development Office assists with gifts, where:

- The donor receives no value, or only nominal value, in exchange for the support provided
- No detailed scope of work, budget, or period of performance is specified by the donor or promised by the University (the general area of work to be supported may be specified)
- There is no line-item budget, nor any restriction on the use of funds (as long as the use is consistent with the donor’s original, accepted, stipulations)

When an award or proposal is in question as to whether it is a grant or a gift, OSP should be contacted to ensure proper protocols are followed.

OSP FLOW CHART FOR EXTERNAL FUNDING PROPOSAL



RFP = Request for Proposal
OSP = Office of Sponsored Projects
BAO = Business Affairs Office
COI = Conflict of Interest Form
PRO = Proposal Routing Form