Policy Title: Sponsored Programs Submission Policy

Policy Type: Administrative

Policy Number: Administrative Policy #38-07 (2014)

Approved: 08/26/2014

Responsible Office: Sponsored Programs

Responsible Executive: Provost and Vice President for Academic Affairs

Applies to: Full-time instructional, administrative/professional faculty and staff

POLICY STATEMENT

To legally, programmatically and fiscally protect the University and those individuals receiving external funding, it is required that proposals for sponsored programs be centrally vetted and approved prior to submission. The timely submission of proposals ensures sufficient time for review of proposals, budgets and compliance with University and sponsor policies. Norfolk State University encourages faculty members and researchers across the University to engage in scholarly activities as Project Directors, Principal Investigators and collaborators through sponsored programs to energize discovery and to participate in the intellectual communities of their disciplines. The University is committed to facilitating and enabling this engagement while providing responsible stewardship of University commitments and resources. Proposals for sponsored programs must be reviewed by Sponsored Programs. Sponsored Programs is responsible for ensuring that: prior to submission, proposals meet all sponsor, University and possibly Commonwealth of Virginia requirements; that the use of any University resources for the program is approved; any regulatory issue such as human subjects is addressed; and all University administrative approvals are obtained.

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DEFINITIONS

Internal Approval Form (IAF): Form is required to obtain Authorized Official’s signature on proposals and awards. (IAF)

Principal Investigator and Project Director: are titles that identify persons authorized to conduct research or other sponsored projects under institutional auspices. Principal Investigator refers to persons initiating research. Project Director refers to persons with organizational and leadership responsibility for other types of programs.

On projects where several key persons are identified, each may be referred to as a “co-investigator” or a “co-director.”

Requests for Proposals (RFPs, BAAs, NOFAs, etc.): are announcements in which potential sponsors predetermine activities to be funded along with methodology and related technical matters.

Sponsored Project: an activity that is funded from outside the University, from government or non-government sources that is subject to an agreement, binding on the University, and includes any of the following conditions:

• It commits the University to a specific plan of research or scholarly inquiry.
• It makes a specific commitment regarding the level of personnel effort, items of output or deliverables or the achievement of specific targets.
• It requires adherence to both a line item budget and either a detailed fiscal report or an external audit of the project.
• It requires periodic technical reporting.
• It often requires that any unexpended funds be returned to the sponsor at the end of the project period.
• It provides for the disposition of tangible or intangible property that may result from the activity.
• It involves the use of human subjects, radiological or biological hazards, recombinant DNA, or the use of questionnaires.
• It occurs when construction, alteration or renovation of facilities or the acquisition of equipment or facilities involves using external program funding.

CONTACTS

Sponsored Programs officially interprets this policy. Sponsored Programs is responsible for obtaining approval for any revisions as required by BOV Policy # 01 (2014) Creating and Maintaining Policies [https://www.nsu.edu/Assets/websites/policy-library/policies/01/BOV-Policy-01-Creating-and-Maintaining-Policies.pdf](https://www.nsu.edu/Assets/websites/policy-library/policies/01/BOV-Policy-01-Creating-and-Maintaining-Policies.pdf) through the appropriate governance structures. Questions regarding this policy should be directed to Sponsored Programs.
STAKEHOLDERS

Faculty/Staff Administrators

SPONSORED PROGRAMS SUBMISSION POLICY: POLICY CONTENTS

Sponsored Programs (OSP) must review, guide necessary revisions, and approve all sponsored program proposals prior to their submission to any external funding organization. SP is the only university unit authorized to provide official approval for all sponsored program proposals, even when not required by the sponsor.

However, review and approval are necessary at various stages and from multiple areas to ensure compliance and that the proposed resources to be dedicated to the project have full university support. Prior review and approval from the chair and/or center director and the dean are required for this purpose. These prior internal approvals must be documented on an SP Internal Approval Form (IAF), which must accompany all proposals when they are submitted for SP review. Depending on the project, other approvals may be necessary. This includes proposals submitted electronically to a sponsor and even when not required by the sponsor.

Faculty and staff are not authorized to commit the University through proposal submission or award acceptance. Failure to obtain the required university approvals before submission may result in a refusal to accept and support an award or proposal.

As the authorized signing official for the University, the Dean of the SGSR, or his designee, will approve and submit a Proposal only after SP determines and confirms that the Proposal meets the requirements of NSU, the Commonwealth of Virginia, the Sponsor, and any other applicable rules and regulations.

If proposal submission is carried out using a Sponsor’s electronic system, SP must have access to review and submit the proposal using the Sponsor’s system. Failure of the PI to grant SP access to the final proposal may result in either no Proposal submission, a failure to submit the proposal before the Sponsor’s deadline, or withdrawal of the proposal if submitted independent of SP’s input.

The Principal Investigator (PI)/Project Director (PD) originates and prepares the proposal, including the Internal Approval Form (IAF).

All proposals requesting support for sponsored programs require University approval. All of the necessary approvals are identified on the IAF. The IAF has been carefully designed to guide you through the approvals process, and to obtain the information necessary to review the proposal.

The IAF is available at the SP website. The IAF can be completed electronically and printed for routing and approval signatures. All sections of the IAF must be completed by the Principal Investigator/Project Director prior to routing the proposal. Questions regarding the IAF should be directed to the Sponsored Programs office.
The submission of Revised, Continuation, Supplemental and Renewal Proposals require the same processing and approvals as New Proposals. The type of proposal being submitted must be identified on the IAF and processed through the SP.

The original and one copy of the following information must be submitted to Sponsored Programs at least five business days prior to the proposal submission deadline.

- Original IAF with required signatures
- Complete Proposal
- Budget and Budget Justification
- Any special approvals/proposal information
- Any sponsor forms which contain program or budgetary information and/or require Authorized Organizational Representative signature

If electronic submission is required, the electronic proposal must be released or emailed simultaneously with a hard copy and signed IAF to SP. SP reviews, corrects and approves all proposals. No electronic proposal can be forwarded to a sponsor without prior SP approval.

If the proposal is submitted in response to a Request for Proposals (RFPs, BAAs, NOFAs, etc.), a copy of the announcement, must be submitted to SP with the IAF or a website must be indicated on the IAF if available electronically.

Occasionally a sponsor may require an institutional cover letter or letter of support from the President. These letter requests should be received by SP at least ten business days before the deadline. In addition to the required internal review, extra time is necessary to obtain a signature due to the President’s schedule.

Investigators/Directors are strongly urged to coordinate their proposal schedule with SP as soon as the proposal deadline is known.

All proposals should be typed in Times New Roman Font, 12 pitch, unless otherwise required by the sponsor and submitted in hard copy with the appropriate signed forms and in an editable form electronically (on removable storage media or via email) to the SP.

Proposal forms and guidelines are available on the Sponsored Programs web site https://www.nsu.edu/sgsr/sponsored-programs/policies-post.

Special Reviews

A number of internal review and approval procedures may be required by the sponsor or by the SP before proposal submissions, or before an award can be accepted by the university. All necessary reviews and approvals should be initiated by the PI/PD at least ten business days before SP’s proposal review process, thereby avoiding last minute delays.
Intellectual Property

Intellectual property is addressed in the terms and conditions negotiated by SP when accepting an award. For most awards NSU will retain ownership of intellectual property developed on sponsored projects in order to avoid conflicting commitments to various sponsors. In the case of patents, policy requires the University to retain ownership unless a special waiver is approved.

As with patents, NSU prefers to retain ownership of copyrights. In some instances, NSU will allow the sponsor to own the copyright on deliverable reports, while retaining the right of use for University purposes. A link to the IP Policy can be found on the SP website.

Animals

Currently, NSU does not allow animal research at any NSU facility.

Human Subjects

The Institutional Review Board (IRB), as required by Federal law, acts as the human protection committee for all research on human subjects at NSU regardless of the source of funds. All uses of humans as subjects (including survey respondents) by faculty, staff or students, whether or not the research is supported by external funds must be reviewed and approved by the IRB prior to initiating any phase of the research.

The Human Subjects Policy is available on the SP website.

Research Misconduct

In compliance with PHS regulation (42 C.F.R. Part 50, Subpart A) the SP has in place procedures for Responding to Allegations of Research Misconduct. Research misconduct means fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the research community for proposing, conducting, or reporting research. It does not include honest error or honest differences in interpretations or judgments of data.

The Research Misconduct Policy is available on the OSP website.

This office will work exhaustively to protect the reputation and position of good faith whistleblowers as outlined in the Office for Research Integrity's Handbook for Institutional Research Integrity Officers.

SP staff will place major importance on fostering a research environment that discourages misconduct in research efforts as outlined in (42 C.F.R. Part 50, Section 105) as well as encourage researchers in cultivating new and innovative research ideas.
PUBLICATION


REVIEW SCHEDULE

- Next Scheduled Review: 07/30/2015
- Approval by, date: President, 08/26/2014
- Revision History: None – New Policy

RELATED DOCUMENTS

1. Intellectual Property Procedure
3. Research Misconduct

FORMS

1. Internal Approval Form