

**Roger Williams University  
Grant Resource Center  
Policies & Procedures**

**Revised June 2016**

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**IMPORTANT:** For federal awards/subawards issued start date prior to December 26, 2014, 2 CFR Parts 215 and 220 (OMB Circulars A-21 and A-10) apply. For all new funds (new awards and new monies received with a start date on or after December 26, 2014, these new funds are subject to 2 CFR Part 200 (commonly referred to as Uniform Guidance but hereinafter referred to as "2 CFR Part 200").

## **I. Preface**

To support and advance the mission of Roger Williams University through grant-supported projects and programs, the University's Office of Sponsored Programs (OSP) is appointed to review and submit proposals, obtain authorization from the University, facilitate negotiations, oversee important policies and procedures, and accept awards on behalf of the University. Other private grants and gifts are overseen by the Office of Institutional Advancement.

Please familiarize yourself with this guide. It is intended to assist faculty, deans and staff in the process of developing and submitting proposals for grant funding and in the administration of grant awards. This guide is available in hard copy format from the OSP and also on line. Please contact the OSP with your questions.

Because the building and thoughtful stewardship of relationships with donors and funding agencies is so critical to the entire RWU community, we carefully coordinate all approaches to previous and potential funders. Our relationships with faculty and staff are integral to this process, and we encourage you to actively communicate your needs and interests as early as possible so that we can budget time and meet deadlines.

All grant solicitations must receive University approval prior to submission. All grant proposals to foundations, corporations, federal or state agencies on behalf of the University must be submitted in co-ordination with either the OSP or the Office of Institutional Advancement and require that the Principal Investigator or Project Administrator complete a Grant Approval Form. Proposals will not be submitted until all signatures on the form are completed.

Grant proposals that require or make promise of matching funds to be provided by the University, either from existing funds or from other exterior funding sources, must follow additional procedures outlined in Section VI, Guidelines for Cost Sharing and Matching funds on Grant-Supported Projects in the present document.

Any gift to the University or School/College within the University, including cash, gifts in kind or donation of professional services, must be reported to the University Advancement Office so that it can be counted as philanthropy in our Annual Report, and so that we may generate a receipt from the University to the donor for tax purposes.

Grant agreements, regardless of grant dollar amount, may be signed for on behalf of the University only by selected University officials (currently the President or the Executive Vice President for Finance and Administration). Faculty and staff members should contact the OSP for assistance in securing the necessary authorized signature(s).

Grant agreements and contract agreements are typically made between funding agencies (grantors) and the University, not between such agencies and individuals. Accordingly, individual faculty or staff members are not authorized to sign grants or contracts on behalf of the University.

The University' Office of Sponsored Programs has established certain procedures covering contracts and other non-grant financial agreements. Some grants require that the University put certain contracts out to bid; therefore, all contracts must go through the Office of Finance.

Fund-raising: While the University encourages employee fund-raising on its behalf, proper coordination and approval is necessary to avoid conflicts and confusion. Therefore, all fund-raising activities conducted on behalf of or in the name of the University by any employee shall be subject to the approval of the Vice President for Institutional Advancement or his/her appointee.

## **II. Quick Reference for Proposal Development and Submission**

1. Develop your project, program or research idea.
2. Review funding agencies that might be interested in your idea. Compare the types of proposals and the amount of funding awarded with the goals of your project. For help in finding potential sponsors of your project, see the **Grant Resource Center**.
3. Talk to your dean about your project or program, develop the scope of your project and establish a budget. Make sure you also consider space, equipment and staffing needs.
4. If your dean is in support of your idea, complete the **Grant Approval Form**, sign it, have your dean sign it. The OSP will assist in distributing the form for the remaining signatures.
5. Additional forms (regarding matching gifts or cost sharing) may also need to be completed.
6. The proposal will be submitted once all signatures have been obtained on the Form.
7. All notifications and/or funds received in regards to grant or gift activities must be forwarded to the OSP.

Note: Most grant proposals are developed collaboratively between the PI and the OSP. If a PI writes and develops a proposal and budget on their own (after the Grant Approval

Form has been signed by all parties), a copy of the full proposal and budget must be submitted to the OSP at least 10 business days prior to the due date. All proposals are submitted through or in co-ordination with the OSP.

### **III. Responsibilities of Each Department in the Development, Submission and Administration of External Funds**

#### **The Role of the Office of Sponsored Programs:**

- Develop and administer all grant and contract submissions to funding agencies on behalf of Roger Williams University.
- Provide institutional level of consistency in grant and contract administration and clarification of federal and state regulations.
- Develop grant proposals that benefit high-priority objectives of the University as identified by the President, Provost and through the University Vision Statement.
- Provide announcements of funding opportunities and/or Requests for Proposals (RFPs) to faculty, deans or depts. as appropriate.
- Provide assistance and expertise during the preparation of a proposal.
- Advise in the formulation of proposal budgets.
- Provide final review of all completed grant proposals and work with the PI to resolve any issues encountered during review.
- Obtain authorized University approvals and signatures requisite to any grant submission.
- Provide written acknowledgment to grantors on behalf of the University. Note: University acceptance of a grant award for any purpose must be approved by the OSP.
- Provide campus-wide training on relevant grant and contract issues.
- Review the award document to ensure the terms and conditions are in the university and PI's best interest.
- Serve as university administrator of the National Science Foundation FastLane grants (proposal and report submission) system.
- Maintain all pre award records on all grant proposals submitted by the university and provide periodic reports on such grants activity as may be necessary under the grant.
- Maintain agency relationships on behalf of the University. Act as negotiator and liaison for the PI with funding agency when necessary.
- Work with a Grants Policy Committee to ensure University compliance with federal agency requirements in regards to grants and contracts.

#### **Role of the Principal Investigator**

- Discuss your ideas for your project with your Dean well in advance of developing a proposal, and remember to consider the logistics of your project, including space requirements and equipment needs.
- Upon completion of all signatures on the Grant Approval Form, PI will prepare proposals and all required supporting documentation (budgets, cost sharing,

subcontracts, etc) and submit proposal packet to the OSP in sufficient time for appropriate review.

- PI must obtain approval from appropriate Dean for approval of faculty and staff time that will be devoted to the project. NOTE: PIs must weigh time commitments against teaching load and other research commitments – No PI should be committed to over 100% of time. Matched time on a grant can only be used once and all matched time must also be accounted for in Time & Effort Reports.
- Read and sign the Conflicts of Interest in Research policy.
- Review protocols, safety reviews, etc as required for the project, prior to beginning work on the project.
- Review the award document thoroughly for agency requirements that must be fulfilled by the PI or project director. Notify of OSP and Office of Finance of due dates for reports and send a copy of said reports to OSP.
- Ensure that cost sharing requirements are properly documented, approved and met.
- Contact the OSP regarding intellectual property issues.
- Manage the project in accordance with the approved scope of work. Any changes to the scope of work generally need prior written approval from the funding agency. Request for changes in scope of work, or change in PI, must also be sent to the OSP and the Finance Office.
- Send all checks received on behalf of the funding agency to the OSP. Faculty and staff who receive grant payments should not make any direct deposits into their project accounts.
- Upon receipt of a grant, work with the Office of Finance to set up proper accounts and accounting standards.
- Review and verify expenditures reports generated by the Office of Finance.
- Review and maintain careful Time & Effort Reports for all individuals employed under the grant or contract.
- PI must initiate, monitor and approve expenditures for any subawards or subcontracts according to the scope of the grant.
- Ensure that all human and/or animals involved in the project are treated in accordance with all applicable policies.
- Notify purchasing office of intent to purchase equipment, or hire independent contractors so that bids may be put out in accordance with the requirements of the award.
- Provide Facilities Office with an inventory of all large (\$3,000 and above) equipment purchased under the grant.
- Notify the Grants Assistant (or designated person) and Facilities Office of checkout, receipt, or return of loaned equipment or property purchased under the award.
- The following acknowledgement of awarding agency support must appear in the publications of any materials which is based upon or developed under this agreement (whether or not copyrighted):

This material is based upon work supported by (insert agency name), under Agreement No. \_\_\_\_\_. Any opinions, findings, conclusions, or recommendations expressed in this publication are those of the author and do not necessarily reflect the view of the (insert agency name).

### **Role of Grants Assistant**

- Oversee Time & Effort reports and assure they are delivered to Office of Finance in a timely manor
- Review proposals and help coordinate budget development for proposals
- Oversee grant funded project budgets and assure compliance with funded categories – rectify with Office of Finance at least monthly.
- Oversee and assist PIs in submitting timely project reports for grant funded projects.
- Work with Dean or Dean's Appointee (of respective school) to assure compliance with federal grants.

### **Role of the Dean or Designated Appointee**

- Review proposals with PI for department priorities, space allocations, faculty and/or staff work load, equipment usage, student labor needs, and sign Grant Approval Form.
- Evaluate processes in administering sponsored projects to ensure that proper controls are in place in compliance with the grant requirements.

### **Role of the Assistant Dean/ Associate Dean**

- Oversee adherence to federal agency compliance regulations in regards to federal funding.
- Oversee Human Subject Review of proposals/research projects on behalf of the University.
- Work with faculty and OSP to increase proposal submissions.
- May act on behalf of Dean in overseeing research projects and help assure adherence to University and/or federal grant policies.

### **Role of the Office of Finance**

- Assign general ledger (GL) numbers to segregate revenues and expenses unique to each project and budget category.
- Review and process financial transactions to ensure compliance with agency, federal and University regulations.
- Assist grant recipients (post award) with modifications to grant budget as may be necessary.
- Produce monthly reports for careful accounting of budget vs expenditures against the grant.
- Produce and submit financial reports in accordance with grant requirements.
- Produce and submit financial close out report at end of grant cycle and notify OSP and PI.
- Distribute and collect expense distribution reports to facilitate certification as required by 2CFR200 (Uniform Guidance).
- Comply with the terms of the award to recover university funds expended on behalf of sponsored projects. Periodic billings will be prepared as required by the award.

## **Role of the Office of Purchasing**

- Comply with the terms of the award in regards to soliciting contractors or purchases in carrying out the terms of the grant.
- Maintain inventory of grant funded equipment and ensure that such equipment is not sold or donated without consent of the OSP in accordance with federal regulations.

## **Role of the Office of General Counsel**

- Represents the Corporate Entity as its sole client. In furtherance of this role:
- Responsible for all the legal work arising from the activities of RWU's Faculty and departments.
- Prepares and negotiates contracts between the University and other entities; provides legal review for all contracts.
- Drafts and reviews policies and procedures for the University.
- Advises University officials on regulatory compliance and other legal aspects of their duties.
- Represents the University before federal and state courts and administrative agencies.
- Supervises the activities of outside counsel who may be retained to assist with particular matters requiring specialized expertise.

## **IV. Grant, Contract, or Gift?**

**Types of Agreements/Awards:** There are differences between grants and contracts in terms of applicable University policies, procedures and administration.

### **Grants**

Grants are the most common vehicle for funding work at the University. Grants are awarded competitively, and especially with government grants, usually follow a Request for Proposal (RFP). Grants may be considered as support given to the University in order to attain certain articulated specified project objectives proposed to be realized by the University (or PI) and agreed to by the University and the grantor.

The terms of such grant agreements are typically articulated in a grant proposal submitted by the University and/or a letter of grant agreement (or similar document) provided by the grantor. Grants from private foundations and corporations are usually paid in full or in part prior to project completion, in advance of project expenditures. Federal grants, conversely, are usually cost-reimbursable. All grants, especially larger federal grants, are subject to an external agency audit.

### **Gifts**

A gift to the University, whether cash or an in-kind donation, from an individual, corporation or sponsor, has no expected outcome beyond knowing that the gift was used as designated. All gifts must be processed through the OSP or the Office of Institutional Advancement.

## **Contracts**

Contracts are agreements between the University and an external funding agency, whereby the contract contains a detailed statement of specified services, products or milestones as final deliverables, usually within a fixed period of time. Contracts can be fixed-price or cost-reimbursable. Contracts often focus on deliverables required by the grantor and frequently establish ownership rights for the grantor.

Fixed-price contracts award a specific amount of funding to RWU based upon satisfactory completion of the terms of the contract. The proposed costs are reviewed and pre-audited by the sponsor prior to the award.

Cost-reimbursable contracts, particularly for research projects, recognize the fact that the costs in the proposal are only an estimate. RWU is responsible for doing the work in the contract only as long as funds are available. Cost-reimbursable contracts are typically audited after the award has ended.

## **Subcontract of Subaward**

A subaward is really a “sub-grant” and represents a portion of contracted work under a larger grant funded project that is to be provided by one or more other institutions or organizations (third parties). The third party must provide an accountable PI for the work site who will be responsible for required oversight of the project and generating the necessary reports. Subcontracts must also be reviewed and approved using the Grant Approval Form.

## **Types of Funding Agencies or Organizations:**

### **Private Foundations**

Non-profit entities established by individuals or families in order to benefit non-profit organizations in a manner in keeping with the interests of the individual or family.

### **Corporate Foundations**

Non-profit entities established by corporations to benefit non-profit organizations in a manner in keeping with the interests and purposes of the corporation.

### **Corporations**

May make direct grants or gifts, without a separate corporate foundation, often through their community affairs office.

### **Community Foundations**

Non-profit entities established to benefit particular communities or regions.

### **Operating Foundations**

Non-profit entities established to advance particular projects in which the foundation takes an active operational role. They do not often accept grant requests from other organizations.

## **Government**

State or federal grant agencies, e.g. National Science Foundation, Minnesota Humanities Commission, National Endowment for the Humanities, etc.

## **Individuals**

Alumni and friends of the University may, on occasion, be approached to provide grant support.

## **V. Contract Protocol**

Contact the University Office of General Counsel for information regarding negotiating and developing a contract.

## **VI. Guidelines for Cost Sharing and Matching Funds on Grant-Supported Projects**

RWU values and encourages the efforts of faculty and staff members to secure external funding for their research or special programs. The use of cost sharing or cost matching, wherein University financial and/or other resources are applied to grant-supported projects or programs, must, however, be kept to a reasonable level. The following guidelines offer faculty and staff member's essential information on how to properly seek and account for cost-sharing and matching funds for their grant-supported projects.

### **Roger Williams University Matching Fund Policies and Procedures**

For grant proposals involving RWU matching funds, the PI must:

- Complete the cost sharing or matching funds section on the Grant Approval Form and obtain the signature of the dean or director controlling that budget.

### **Cost Sharing**

Cost sharing may be indicated:

- When required by an external funding agency;
- When a University project or program exceeds that supported by a grant;

In addition, faculty and staff members must be aware of provisions of 2CFR-200 Guidelines on Cost Sharing: For grant proposals being submitted to federal programs and agencies, the faculty/staff member must document to federal granting agency that the proposed project or program is in compliance with 2CFR-200 General Guidelines on cost sharing, which states the following:

- 1. All matching contributions**, both cash and in-kind, shall be accepted as part of the recipient's cost sharing and matching when such contributions meet all of the following criteria:

- Are verifiable from the recipient's records;
- Are not included as contributions for any other federally-assisted program;
- Are types of charges that would be allowable under the applicable cost principles
- Are not paid by the Federal Government under another assistance agreement
- Are provided for in the approved budget when required by the Federal agency

## **2. Use of Space**

The value of donated space shall not exceed the fair rental value of comparable space established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.

## **3. Volunteer Services**

Must be documented and, to the extent feasible, supported by the same methods used by the recipient for its employees.

## **4. Services of an Employee**

When an employer other than the recipient furnishes the services of an employee, these services shall be valued at the employee's regular rate of pay (plus an amount of fringe benefits that are reasonable, allowable, and allocable, but exclusive of overhead costs, provided these services are in the same skill for which the employee is normally paid).

## **5. Donated supplies**

May include such items as expendable equipment, office supplies, laboratory supplies or workshop and classroom supplies. Value assessed to donated supplies included in the cost sharing or matching share shall be reasonable and shall not exceed the fair market value of the property at the time of the donation.

## **6. Provision of Matching Funds**

Through Indirect Cost Waiver: Reduction or waiver of the indirect cost may then be considered, if granting agency policies permit, as a portion of the RWU matching contribution only if indicated and approved through the Grant Application Form. Of necessity, University general policy is to secure all indirect costs due the University in order to recover real costs incurred by the University in its support of grant-funded projects and programs. Accordingly, granting of such reductions or waivers will be kept at a minimum. Faculty/staff considering this method of meeting matching funds expectations or requirements of external funding agencies should contact the OSP very early in the proposal development process. (See Section IX, Guidelines on Indirect Cost Recovery.)

### **A. Matching Funds**

Matching funds may be required or encouraged by some external funding agencies. While cost sharing may often be met by contributed effort of faculty and staff (often referred to as "in-kind contribution," the term "matching" is typically used to indicate that a contribution of actual dollars is needed to match (at various ratios) a funding agency's contribution. Matching funds may be provided, when funds are available for such purposes, by a faculty or staff member's academic or administrative

department, by a college or school, or by central University resources when such funds are available or may readily be raised.

### **B. Eligibility**

To be eligible for RWU cost sharing or matching funds, the applicant must be a faculty or staff member in the Feinsein College of Arts and Sciences, the Gabelli School of Business, Roger Williams School of Law, School of Engineering, Computing and Construction Management, School of Education, School of Architecture, Art and Historic Preservation, School of Justice Studies, School of Continuing Studies or any of the Master of Arts graduate programs.

### **C. Preliminary Approval for Matching Funds**

OSP approval of a cost-sharing or matching-grant proposal for submission to an external agency indicates the faculty or staff member's eligibility to receive cost sharing or matching funds for a grant-supported project or program. While this approval signifies the University's pledge to seek to provide such funds, it is not a guarantee that such cost sharing or matching funds will be provided by the University. Final allocation of funds will always depend on the availability of such funds.

- Faculty or staff members should immediately contact the OSP when they receive notification of any grant, but such notification takes on added importance when the grant award involves matching funds.

The OSP will make a formal request to the faculty/staff member's RWU academic or administrative unit that the matching funds pledged by that unit be allocated to the grant supported project.

- Gifts for Matching Funds: The University will ordinarily not undertake special fundraising in order to secure gifts to be used for matching fund purposes.

## **VII. Guidelines on Indirect Costs Recovery on Grant-Supported Projects**

Indirect cost payments reimburse the University for expenses incurred during the course of a grant funded project. Such expenses include use of the libraries, student services, personnel, payroll, grants administration, utilities, grounds maintenance, janitorial services, sanitation services, and similar expenditures that cannot be readily identified with a single grant-supported project or program.

The University expects to recover such costs to the extent allowable by law and/or according to granting agency allowances or regulations. It is important to understand that indirect costs payments are to cover costs that the University actually incurs; reduction of such cost recovery means that the University must find commensurate funds from other sources. Accordingly, reduction of indirect cost assessments in grant proposal budgets is to be avoided whenever possible.

### **A. Indirect Cost Rate on Federal Grants**

RWU entities should contact the OSP for the University's current negotiated federal rate to be applied to the salaries and wages costs of a project or program to cover the indirect costs. When allowable, indirect costs may be included in subawards issued to the University, however RWU does not charge indirect costs to a subaward issued by the University. A subawardee on a RWU grant may include indirect costs in their proposed subaward budget by applying their own indirect cost rate or a de minimis rate, if applicable. Applicants for federal grants are urged to read closely the specific indirect cost rate guidelines provided by the particular federal agency to which a proposal is to be submitted.

### **B. Determination of Non-Federal Indirect Cost Rates**

Non-federal government agencies, private foundations, and corporations may or may not have published their allowable indirect cost rates. In cases where a prospective funding agency's indirect cost rate is unknown, the faculty or staff member should contact the OSP for assistance. Unless prohibited by would-be grantors, in most cases RWU will apply the federally approved cognizant rate.

### **C. Distribution of Indirect Costs**

Contact the OSP for the University's policy on Indirect Cost Rates.

### **D. Indirect Cost Rate Reduction/Waiver**

Faculty or staff members who wish to reduce or waive the indirect cost rate (or use it as a match) should alert the OSP early in the proposal development process and should also state such on the Grant Application Form. For further information on direct vs. indirect costs please refer to 2CFR-200 (Uniform Guidance).

## **VIII. Grant Processing**

All acceptance of grant awards, of checks or other forms of payment, and the establishment of new accounts for grant-supported projects must be coordinated through the OSP.

### **A. Notification and Acceptance of an Award**

All notifications of grant awards must be forwarded immediately to the OSP.

### **B. Acceptance of Grant Payments**

The Finance Office will not accept grant payment checks forwarded directly by project directors. All grant checks must be forwarded to the Director of Sponsored Programs or the Office of Institutional Advancement. The OSP will coordinate acknowledgment of grant payments and will deposit grant payments into the faculty's or staff member's project account. Faculty and staff who receive grant payments should not make any direct deposits into their project accounts.

### **C. Establishment of Accounts**

The OSP will provide the Finance Office with general information (a project summary and the project budget) needed to establish expense accounts for the project; however, the PI and/or the Grants Assistant should meet with the Office of Finance to

set up separate accounts in the general ledger and to assure that the proper accounts are being used throughout the distribution of the grant.

## **IX. Guide to Budgeting Travel Costs**

Travel reimbursement is based on a cost for reasonable and allowable expenditures. For federal grants, reimbursements are made only for coach travel on American carriers (if available). Indicate the names of travelers, their assignment under the grant, destination, and duration of their stay and which class they will be flying. If a personal automobile is to be used, indicate the number of miles that will be traveled and anticipate cost using the University's current mileage reimbursement rate (available from the OSP).

## **X. Guide to Budgeting Salary Costs**

List key University personnel, their titles and project roles. In order to calculate salaries for a grant budget, multiply the percentage of effort that will be devoted to this project (out of your total work load at the University) by the actual annual salary. Please note whether the work will be done in the academic year or during the summer. Note: Be mindful of other research or grant related commitments and teaching loads and do not exceed 100% of effort in your calculations. University employees cannot be compensated at an amount greater than their authorized University salary level.

### **Summer Salary**

Faculty wishing to pursue research projects in summer may include a request for summer salary in their proposals. Full summer salary is compensated at 2/9 annual salary. Requests for additional summer salary will be considered on an individual basis and must have the authorization of the Dean and the Chief Academic Officer.

## **XI. Cost Transfers**

Any cost transfers must be pre-approved by the Office of Finance and the funding agency. Please notify the Office of Finance as soon as possible if a budget appears that it may need to be altered. A detailed explanation must be provided which justifies the need to transfer an expense previously approved by funding agency.

## **XII. Purchasing Policy**

### **Equipment**

Any equipment purchases over \$3,000 must go through the Office of Purchasing to ensure that the University receives the best competitive price.

An inventory of all equipment purchased through external funding must be updated bi-annually and is maintained by the Facilities Office.

Equipment purchased with Federal funds must be in compliance with 2 CFR §200.439, §200.33, §200.452

## **Supplies**

Supplies purchased with Federal funds will be in compliance with the Federal Uniform Guidance (2 CFR §200.453). Most notably, any unused supplies exceeding \$5,000 in total value at the end of a project, and not needed for any other federally-sponsored project or program, must be compensated for.

## **Competitive Bid**

All procurement transactions with federal funds shall be conducted in compliance with Uniform Guidance (see Equipment)

## **XIII. Project Reports**

Reporting to grantors is very important. All grants project progress and final reports must, before submission, be reviewed by the faculty/staff member's respective dean or administrative supervisor. Copies of final reports must be filed with the OSP.

- A.** Although recognizing more recent constraints due to online submission, all progress and final reports to grantors must be reviewed by the PI's respective academic dean or designated appointee prior to submission.
- B.** Project directors/principal investigators are responsible for the prompt submission of any progress and final reports required by granting agencies.
- C.** Copies of final reports must also be filed with the OSP.
- D.** The Finance Department submits monthly invoices to the grantor agency for reimbursement of expenditures. If project reports have not been submitted on a timely basis, reimbursement is blocked until the reports have been received and accepted.

## **XIV. Conflict of Interest**

RWU has established policies regarding conflict of interest. Some funding agencies, such as the National Science Foundation, have their own special requirements.

- A.** All faculty and staff members engaged in research or projects that may present a possible conflict of interest must read the University's Conflict of Interest Policy and sign the University's Conflict of Interest Disclosure Statement annually.
- B.** Faculty and staff members are advised to consult their dean as there may exist additional policies and procedures in respective schools/colleges governing conflicts of interest that may arise in the pursuit of official University business. Staff members who serve as grant-supported project directors/principal investigators are advised that they are subject to the same policies and procedures regarding **conflicts of interest that apply to faculty.**
- C.** To meet National Science Foundation grant requirements, RWU has established particular policies and procedures regarding conflicts of interest that apply to NSF grants. These policies and procedures are considered as applying in addition to other

University policies and procedures. A copy of the RWU document governing conflicts of interest in NSF grants is available from the OSP.

## **XV. Project Director/Principal Investigator Departure from the University**

As each case is different, any faculty or staff member who is a principal investigator, director or co-director of a grant-supported project, and who believes he or she will depart the University before the project is completed, should contact the OSP as soon as that realization is made.

**A.** Grants are considered agreements between the University and external granting agencies. The departure, due to transfer, termination, illness or death, or other causes, of a project director/principal investigator will presume that a modification of the grant agreement is required. Project continuance at the University will depend upon the terms of the modified grant agreement being established between the University and the granting agency.

**B.** In certain instances of project director/principal investigator transfer to another academic (or possibly non-academic) institution, a granting agency may wish to transfer the grant funds to the project director/principal investigator's new institution. In such cases, the University will make every effort to facilitate that process.

**C.** Faculty and staff members who serve as grant-supported project directors/principal investigators, and who know that their departure from the University appears possible or likely before the terms of their grant agreement with an external funding agency are fulfilled, should contact the OSP immediately for guidance and assistance.

## **XVI. Time and Effort Reporting**

Per the Uniform Guidance, Roger Williams University is required to document effort spent on externally-sponsored activity. This time and effort reporting policy is intended to meet this requirement. The system is an "After- the-Fact- Activity" system, under which the distribution of salaries and wages by the University will be supported by activity as described below:

**A.** "Time and Effort Reporting Forms" will reasonably reflect the percentage distribution of efforts expended by RWU faculty and professional staff involved in federally-funded and state-funded grants, contracts, and cooperative agreements.

**B.** "Time and Effort Reporting Form" will be completed and signed by each faculty member and professional staff member working on the project, provided that the approved grant, contract or cooperative agreement commits University personnel time to the project, regardless whether such time is paid by external funds or is an unpaid contribution, i.e., an "in-kind" match.

**C.** “Time and Effort Reporting Forms” do not need to be completed for clerical staff who utilize weekly time sheets, undergraduate assistants or graduate assistants, as long as the time sheets which are completed segregate the time spent on each project.

**D.** “Time and Effort Reporting Forms” will be confirmed by a person having first hand knowledge of the employee’s activities. Confirmation is indicated by a countersignature on the form.

- If a form documents a faculty member’s effort and he/she is the Project Director, the form should be countersigned by the Department Dean (or immediate supervisor in non-academic divisions).
- If a form documents a faculty member's effort and he/she is not the Project Director, the form will be countersigned by the Project Director or PI.
- If a form documents a professional staff member’s effort and he/she is not the Project Director, the form will be countersigned by the Project Director or PI.

**E.** “Time and Effort Reporting Forms” will be completed near the end of each semester and will document the percentage distribution of effort expended during the same semester.

**F.** “Time and Effort Reporting Forms” must be returned to the Finance Office no later than 30 days after the end of each semester (last day of exams). Summer months (June, July, and August) will be treated as one semester.

**G.** Completed “Time and Effort Reporting Forms” will be filed in the Finance Office.

## **XVII. Institutional Animal Care and Use Policy**

Using animals for research, teaching, and testing is accompanied by both ethical and legal responsibilities to use them appropriately, both scientifically and humanely. Individual faculty members who use animals in their research or teaching, including those whose research consists of field work involving animals, are, by law, accountable for conforming to the basic regulations and policies governing animal use on campus.

Policy decisions at RWU have been made to address research with limited groups of vertebrates (fish, amphibians and marine mammals). Policies may be modified when and if additional groups of animals are used at the institution. These regulations and policies involve:

- the acquisition, care, and use of animals
- efforts to minimize animal pain and distress
- the training of personnel who use animals
- consideration of alternatives to animal use
- methods whereby deficiencies in animal care and treatment are reported

Individuals who use animals must know, understand, and comply with applicable laws, regulations, and policies. They are responsible for properly instructing students and employees. The laws governing the use of animals are framed to ensure compliance via both civil and criminal laws.

Failure to comply may carry penalties that range from substantial fines to “cease and desist” orders that can suspend all animal research, and all funding for animal research at the offending institution. As a matter of educational policy, faculty who do not themselves use animals must be aware of these regulations and policies, since their students may use animals at a later time. All faculty, staff and students preparing to submit a protocol to the IACUC committee must first complete the online training course at [www.citiprogram.org](http://www.citiprogram.org)

Any faculty member, staff member, or student who believes that any of the above mentioned principles are being violated may submit a written request to the Roger Williams University IACUC for a review of the procedure or situation. The Committee shall review all pertinent facts regarding the alleged violation, and if a violation has occurred, the Committee will recommend corrective action to the responsible individuals, including the appropriate Department Coordinator, Dean of the College, and Chief Academic Officer (Provost).

## **XVIII. Human Subjects Research**

If your proposed grant-supported project entails or may entail the use of human subjects in such a manner that Institutional Review Board action (covering the protection of human subjects) is appropriate and/or required, or if your project involves use of laboratory animals or hazardous waste, you must contact the Human Subjects Review Board and also review the guidelines before submitting your request.

## **XIX. Treatment of Hazardous Materials**

Please refer to the University’s policies on the treatment and procedures regarding hazardous materials.

## **XX. Misconduct and Ethics in Research**

Two Federal agencies have taken the lead in defining policy and guidelines for Misconduct in Research. These agencies are: 1) The Office of Research Integrity in the Department of Health and Human Services, and 2) The National Science Foundation. The Office of Research Integrity in the Department of Health and Human Services defines misconduct in science and research as:

### **Research Misconduct Defined**

"Research misconduct is defined as fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results.

Research, as used herein, includes all basic, applied, and demonstration research in all fields of science, engineering, and mathematics. This includes, but is not limited to,

research in economics, education, linguistics, medicine, psychology, social sciences, statistics, and research involving human subjects or animals.

Fabrication is making up data or results and recording or reporting them.

Falsification is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.

Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit. Research misconduct does not include honest error or differences of opinion.”

The complete policy including the areas of: 1) Findings of Research Misconduct, 2) Responsibilities of Federal Agencies and Research Institutions, 3) Guidelines for Fair and Timely Procedures, 4) Agency Administrative Actions, and 5) Roles of Other Organizations is found at: <http://ori.dhhs.gov>

The National Science Foundation defines misconduct in science and engineering as:

Misconduct means:

“Fabrication, falsification, plagiarism, or other serious deviation from accepted practices in proposing, carrying out, or reporting results from activities funded by NSF; or (2) Retaliation of any kind against a person who reported or provided information about suspected or alleged misconduct and who has not acted in bad faith.”

The full discussion of the policy including: 1) General Policies and Responsibilities, 2) Actions, 3) Role of Awardee Institutions, 4) Initial NSF Handling of Misconduct Matters, 5) Investigations, 6) Pending Proposals and Awards, 7) Interim Administrative Actions, 8) Dispositions, and 9) Appeals. The full NSF policy is found at:

<http://www.nsf.gov/oig/pdf/cfr/45-CFR-689.pdf>

RWU's policy is posted under the Office of the Academic Affairs:

<http://rwu.edu/sites/default/files/researchmisconduct.pdf>

All IACUC, IRB (Human Subject Review Board) and RCR (Responsible Conduct of Research, which is mandated by NIH and NSF) trainings are conducted through:

[www.citiprogram.org](http://www.citiprogram.org)

## **XXI. Intellectual Property and Patents**

### **A. Intellectual Property Arrangement in General**

A member of bargaining unit (MBU), who writes, produces, or creates any work, creation, design, invention, software, or other intellectual property, independent of specific funding and/or resources of the University, shall have exclusive rights thereto, including patent, literary or artistic copyright. Sabbatical leaves are not considered

specific funding. An MBU will have exclusive rights to any work produced during his/her sabbatical leave.

In the case of literary or artistic works, computer software, inventions, designs, technical developments or other intellectual property made or created by the MBU(s) with more than the de minimis use of the University's funds, technical facilities, support or technical personnel, the MBU(s) shall hold 50% and the University 50% of any right, title, or interest arising therefrom, unless other arrangements have been previously negotiated and reduced to a written Agreement between RWU and the MBU(s).

Rents, royalties, and other net profits shall be shared equally between the MBU and RWU, unless otherwise agreed to by the parties, taking into consideration the relative contribution of each.

## **B. Course Materials**

Faculty members shall own all rights to syllabi or lecture notes, handouts, presentation slides, case studies, scientific and laboratory experiments, role playing exercises, examinations, quizzes, problem sets, simulations or similar instructional or teaching materials (whether traditional or innovative) prepared on their own initiative for educational or professional purposes and utilized in conjunction with a course that the faculty member has been or is assigned to teach, and shall be entitled to the benefit of any royalties derived therefrom.

## **C. Patents and Other Technical Copyrights**

- The University waives, disclaims and abandons any interest in or claim to any invention, improvement, design or development made by a faculty member without the use of the University's funds, facilities and/or support or technical personnel. Such inventions, copyrights and patents arising therefrom shall be the sole property of the faculty member who is the inventor/creator.
- The faculty member and RWU shall each hold fifty percent (50%) of any right, title and interest to any invention, improvement, design or development made by a faculty member with the more than de minimis use of the University's funds, facilities and/or support or technical personnel, unless other arrangements have been previously negotiated by the parties and have been reduced to a written Agreement between RWU and the faculty member.

## **XXII. Export Control Guidelines**

Export Control Guidelines apply to certain types of research that faculty may undertake. These guidelines are administered and overseen by the Department of Commerce and the State Department. In a University setting, Export Control Guidelines should be reviewed for every research project.

However these guidelines most often have the potential for violation when the sponsor places certain restrictions on a research contract, the individuals hired to work on

research projects are foreign nationals, and the dissemination of the research product, (i.e. information or physical product) is “exported.”

It is imperative that researchers completely understand the export control guidelines when undertaking research that may involve a violation of either Export Administration Regulations (EAR) or the International Traffic in Arms Regulations (ITAR).

There are many ways that a university researcher might violate either EAR or ITAR regulations. If a violation is charged, the researcher as well as the university is liable for severe financial penalties up to and including long-term imprisonment. Ignorance is not a defense for violation of these guidelines.

### **What is an export?**

Typically we think of an export as a product manufactured in one country and sold in another. However, when considering export control guidelines, there are a number of products that are considered “controlled” or restricted for export out of the U.S. or transfer to a foreign embassy within the U.S.. In a University context, some research byproducts such as publications, knowledge, information, prototypes, training, diagrams, pictures, etc. may be considered a “controlled” or “deemed” export. An export may be transferred either orally, visually, in electronic or published form within or out of the U.S...

The regulations involving export control guidelines are complex and require that a researcher understands the potential implications of the type of research he or she is conducting, how the research is conducted, and the nature of research findings dissemination.

The regulations also require that a researcher stay current on the status of “blocked” countries and individuals, and prohibited export activities. These lists change frequently. On the positive side, Universities have certain exemptions for fundamental research and classroom teaching activities; however these areas are not commonly the areas where violations might occur.

Below are a number of websites that begin to inform researchers on the many facets of Export Control Guidelines. The most appropriate advice is to review your research contract as well as the exact nature of your research with your research administrator prior to beginning work.

### **Additional Resources:**

- University of North Carolina Office of Sponsored Research – Export Control Guidelines  
[http://osr.unc.edu/policies/export\\_control.php](http://osr.unc.edu/policies/export_control.php)
- Yale University – Export Control Guidelines  
[http://www.yale.edu/grants/policies\\_reg/exportcontrols.html](http://www.yale.edu/grants/policies_reg/exportcontrols.html)

## XXIII. Questions and Answers

1. *I have an idea for a project—but I want to pursue it only if grant funds are likely to be available. How can I determine whether doing a project proposal and seeking funds is likely to result in a grant?*

The World Wide Web is an excellent resource for discovering which granting agencies have supported which types of projects or programs. Your faculty colleagues can also be good sources of information. In addition, RWU subscribes to The Grant Advisor, both of which faculty may access from their computer on campus. See the Grant Resource Center for other funding source information.

2. *I'm not ready to do a project proposal yet. Who should I contact to get help in focusing my project idea?*

Again, your colleagues are often good sources of information. You may also wish to consult the previously mentioned Grant Resource Center.

3. *I have a project proposal written, and I know the particular funding agency to which I'm going to apply for funding. Do I still need to get internal approvals for my proposal from my department head, dean, etc?*

Yes. The University's internal review process makes sure that there is University approval for your project. Also, the OSP acts as the fielding agent to insure that there are not multiple requests from RWU to the same agency.

4. *Will the University help me find funding, or is that mainly my job?*

If a project has been approved through the grants approval process, the OSP will help in seeking funding for your project. Funding research is related to the extent to which your project is considered a priority within your academic or administrative unit and by the University at large. You may also do research on your own using the World Wide Web, or the RWU Grant Resource Center.

5. *Do I need University approval to contact a prospective funder, even though I haven't yet developed a written project proposal?*

Yes. Before contacting (whether in person or via phone, E-mail, or other means) any prospective funder, you must contact the OSP, which will be able to advise you on how to proceed. In general, the Office of Institutional Advancement is the point of contact with foundations and corporations, however, there may be instances where it will be helpful or even necessary for you to work with a program officer, especially in the federal grant programs.

6. *What are some of the most important things for me to know in order to get a grant?*

The grants process takes an extensive period of time and is deadline driven. Be sure to consider whether you have the time available to spend on writing and

revising your project proposal, developing your budget, scheduling a timeline for when funds might arrive and the commencement and end of your project. You have a better chance of securing a grant if you have a good long-range plan for supporting your activity after the grant period is over.

**7. *What are the most common errors people make when writing project proposals?***

A very common error is proposing to do too much with limited dollars and time. You ordinarily cannot be expected to solve a major social or educational problem with a grant of say \$5,000 or \$10,000. A related error is lack of specificity. Exactly what limited things do you plan to accomplish? How? When? Why (is it important)? How will you evaluate whether you accomplished what you set out to do? In short, be realistic and specific. Think of your proposal from the funders point of view – how are you going to help meet challenges, respond to opportunities, etc.

**8. *Will the OSP be able to help me raise funds for my sabbatical?***

Staffing limitations preclude providing this service; however, the University has subscribed to The Grant Advisor database that will allow you to search for funding on your own.

**9. *I need a small grant of less than \$1,000 for things related to my teaching and/or research. Will the OSP be able to help me?***

Again, OSP staffing limitations generally preclude providing this service. For such smaller amounts, you should contact your department head, dean or comparable administrative head to determine whether internal funds are available.