

| 2024-2025 |

# ORGSP

## HANDBOOK



[www.lmunet.edu/orgsp](http://www.lmunet.edu/orgsp)

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# LINCOLN MEMORIAL UNIVERSITY

## OFFICE OF RESEARCH, GRANTS AND SPONSORED PROGRAMS

### OFFICE MISSION STATEMENT

The Office of Research, Grants and Sponsored Programs (ORGSP) is dedicated to providing the supportive infrastructure needed to increase the overall number and types of externally funded grants and ensure the proper management and oversight of new and established awards that fully represent the mission statement and historical integrity of Lincoln Memorial University.

### LINCOLN MEMORIAL UNIVERSITY MISSION STATEMENT

Lincoln Memorial University is a comprehensive values-based learning community dedicated to providing quality educational experiences at the undergraduate, graduate, and professional levels. The University strives to give students a foundation for a more productive life by upholding the principles of Abraham Lincoln's life: a dedication to individual liberty, responsibility, and improvement; a respect for citizenship; recognition of the intrinsic value of high moral and ethical standards; and a belief in a personal God.

While primarily committed to teaching, the University supports research and service. The University's curriculum and commitment to quality instruction at every level are based on the beliefs that graduates must be able to communicate clearly and effectively in an era of rapidly and continuously expanding communication technology, must have an appreciable depth of learning in a field of knowledge, must appreciate and understand the various ways by which we come to know ourselves and the world around us, and must be able to exercise informed judgments.

The University believes that one of the major cornerstones of meaningful existence is service to humanity. By making educational, service, and research opportunities available to students, Lincoln Memorial University seeks to improve life for the students it serves. While serving students from throughout the state, nation, and many other countries, the University retains a commitment to enrich the lives of people and communities in the Appalachian region.

*Revised December 8, 2017; approved by Board of Trustees, November 10, 2017.*

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### **ABOUT THIS HANDBOOK**

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This handbook has been prepared to assist faculty and staff members interested in proposal development. Tips on writing the proposal, completing the application package, and preparing the budgets are included. It provides the tools to use in thinking through the proposal development process and offers practical guidelines for structuring and submitting a proposal, *from start to finish*. This handbook presents a structured approach to minimize potential problems associated with grant proposal submission and award management. Also included in this handbook are a listing of the various budgetary rates, UEI number and other pertinent numbers, and basic steps in preparing the proposal.

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## **GENERAL ADMINISTRATION**

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### **POLICY STATEMENT**

The Office of Research, Grants and Sponsored Programs, under the auspices of the Executive Vice President for Academic Affairs, is formally charged with providing services to faculty and staff for securing and managing external support from federal, state, and other sources.

### **OVERVIEW of PROCEDURES AND RESPONSIBILITIES**

The ORGSP will assist faculty and staff in identifying, preparing, and managing research, educational, and service grants and other funding opportunities. All proposals which use the name and resources of Lincoln Memorial University, and which may result in an award to the University or an award to an individual functioning in a university capacity involving restricted funds must adhere to University policies and procedures for submitting a proposal, accepting an award and administering the project. The President is the authorizing official to commit the University in all related matters involving grants and sponsored programs.

### **GENERAL INFORMATION AND STAFF DIRECTORY**

#### **Physical Location**

Grant Lee 107

#### **Mailing Address**

Lincoln Memorial University  
Office of Research, Grants and Sponsored Programs  
6965 Cumberland Gap Parkway  
Harrogate, TN 37752

#### **Office Hours**

8:00 a.m. to 4:30 p.m. (Monday - Friday)

#### **Staff Contact Information**

Natalie Sweet, Executive Director  
(423) 869-6607  
[natalie.sweet@lmunet.edu](mailto:natalie.sweet@lmunet.edu)

#### **Post-Award Grants Manager**

Emily Gambrel, Post-Award Grants Manager  
(423) 869-6285  
[emily.gambrel@lmunet.edu](mailto:emily.gambrel@lmunet.edu)

#### **Fax Number**

(423) 869-6258

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## COMMONLY NEEDED APPLICATION INFORMATION

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The following information can be used in the preparation of proposal cover sheets, budgets, certifications, and other forms. If you have any questions, contact the ORGSP.

### **Application Organization**

Lincoln Memorial University  
6965 Cumberland Gap Parkway  
Harrogate, TN 37752

### **Type of Organization**

Private  
Educational Institution  
Non-profit Institution

### **Official authorized signatory for applicant organization:**

Dr. Jason McConnell, President  
Lincoln Memorial University

### **Name of person to be notified if award is made:**

Natalie Sweet, Executive Director  
Office of Research, Grants and Sponsored Programs

### **Tax ID (TIN)**

The taxpayer identification number is the number companies use for income tax purposes. It is also known as Employer Identification Number (EIN) and Federal Identification Number (FIN).  
**62-0479542**

### **UEI Number**

LD16WBLNEA71

### **Congressional District**

TN-002

### **Facilities and Administrative Costs (F&A or Indirect Costs)**

Facilities and Administrative Cost are incurred while providing facilities and support services to many or all of the University's sponsored programs. LMU's Indirect Cost Rate Agreement was negotiated with the Department of Health and Human Services and is 32.2% on campus and 11.2% off campus. The rate is effective from 06/30/2023 to 07/01/2027.

### **Institutional Review Board (IRB), Dr. Syed Quadri, Chair**

- **Federal-Wide Assurance Number**  
FWA00012543
- **Institutional Organization Research Group (IORG)**  
IORG0005225
- **Office of Human Research Protections (OHRP) and Biomedical Social Science IRB**  
IRB0000628

**Institutional Animal Care and Use Committee (IACUC), Dr. Charles Faulkner, Chair**

- Assurance Number  
63-R-0019-2006

**Institutional Biological and Chemical Safety Committee (IBSCS), Dr. Matthew Kolp, Chair**

# Policies

# RG:01

## Pre-Award Policy

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### I. PURPOSE

The Office of Research, Grants and Sponsored Programs, under the auspices of the Executive Vice President for Academic Affairs, is formally charged with providing services to faculty and staff for securing and managing external support from federal, state, and other sources. It acts as a check for Project Directors and Primary Investigators to ensure compliance throughout the grant process. This policy ensures that proper procedures are followed at the beginning of an award.

### II. POLICY STATEMENT

All proposals which use the name and resources of Lincoln Memorial University and which may result in an award to the University or an award to an individual functioning in a University capacity involving restricted funds must adhere to University policies and procedures for submitting a proposal, accepting an award and administering the project (see RG and FIN Policies). Award proposals must be reviewed and processed through the Office of Research, Grants and Sponsored Programs to assure compliance and the ability of the University to manage the award.

The Primary Investigator/Project Director assumes responsibility for directing the project or program being supported by the grant. The PI/PD must be a full-time employee of the University, and in the case where students apply for external funding, a faculty or staff mentor must be attached to the project as a co-PI/PD. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity. The PI/PD works with the ORGSP to submit all necessary documentation and reports to the awarding sponsor.

The Executive Vice President for Academic Affairs is formally charged with the responsibility to commit the University on proposal submissions. This includes related certifications required by funding agencies during the proposal and award process. The Executive Director of the ORGSP is the designated staff person to manage all federal electronic grants systems and is the Authorizing Official who submits applications on the University's behalf. The President is the Authorizing Official to commit the University in all related matters involving grants and sponsored programs.

Regardless of funding source, all activities performed by LMU faculty or students that involve human subjects, animal subjects, the use of recombinant DNA, or the use of biohazards must be reviewed by the appropriate University review board and/or committee. It is the responsibility of the PI/PD to ensure this step in the application process. If a grant application involves one or more of these requirements, the ORGSP will request proof of application status before the grant can be submitted. Some federal agencies will allow a grant to be submitted when an approval from the appropriate review board/committee is pending. In these cases, the grant may be allowed to proceed.

Should an award be funded, official acceptance of an award for the University will be made by the PI/PD and the ORGSP under the authority of the Exec. VPAA. However, in certain instances, such as in awards involving international programs and/or agreements,



the President will make an official acceptance. The PI/PD is prohibited from signing agreements for research and development support (including grants and contracts), cooperative agreements, teaming agreements, federal and state disclosures and regulatory compliance, patents or copyright licenses, protection from research risk assurances, product sharing, equipment loans or gifts. These and similar agreements bind the University to certain obligations and, as such, can only be signed by the President or an approved authorized University official.

### III. DEFINITIONS

**Principal Investigator/Program Director (PI/PD):** Per [§ 75.2](#), “the individual (s) designated by the recipient to direct the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity.”

### IV. AUDIENCE

Faculty, staff, and students of Lincoln Memorial University who apply for external awards.

### V. COMPLIANCE

Any proposal not submitted as stipulated in this policy will be subject to forfeiture. The PI/PD should ensure that every effort is made to follow the stated guidelines. Proposals submitted without the proper University authorization will not be signed after the fact, even if funding is awarded later.

### VI. ROLES AND RESPONSIBILITIES

**PI/PD:** Primary Investigator/Project Director assumes responsibility for directing the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity. The PI/PD works with the ORGSP to submit all necessary documentation and reports to the awarding sponsor.

**Dean/Chair:** The Dean/Chair assumes responsibility for reviewing the application of the PI/PD and assuring that the grant falls within the scope and mission of the school and that it has adequate resources for the application. The Dean/Chair authorizes the grant to move forward for the Chief Financial Officer’s signature (if applicable) and that of the Exec. VPAA.

**IACUC, IRB, IBCSC:** Reviews all activities performed by LMU faculty or students that involve human subjects, animal subjects, the use of recombinant DNA, or the use of biohazards

**Office of Research, Grants, and Sponsored Projects:** The ORGSP will assist faculty and staff in identifying and preparing research, educational, and service grants and other funding opportunities.

**General Counsel:** Provides input, guidance, and advisement on any award contracts.

**Chief Financial Officer:** Approves the use of matching funds.

**Executive Vice President for Academic Affairs:** Formally charged with the responsibility to commit the University on proposal submissions.

**President:** Commits the University in all related matters involving grants and sponsored programs

## VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

[OMB Uniform Guidance 2 CFR §200](#)  
[FIN:20.1](#) and [FIN:20.2](#)  
[Research and Grants Policies](#)

The IRB's primary responsibility is to assure LMU researchers operate within the provisions of the Federalwide Assurance of Compliance filed with the U.S. Department of Health and Human Services (DHHS) Office for Human Research Protections (OHRP) at [45 CFR 46](#). All animal care and use is under the oversight of the IACUC. The IACUC conforms to the general public health service guidelines ([PHS policy at IV.A.3.B](#)) concerning membership.

## IX. PROCEDURE

- 1.) The first step in the grant submission process involves the completion of an intent to apply form by the PI/PD. This form is available on the "Forms" page of the ORGSP Website. The Dean must also sign, certifying that the application is within the scope and mission of the school and that the school has adequate resources for the project. This form notifies the ORGSP that an application is forthcoming so that time and resource management can be allotted to moving through the application process.
- 2.) Regardless of funding source, all activities performed by LMU faculty or students that involve human subjects, animal subjects, the use of recombinant DNA, or the use of biohazards must be reviewed by the appropriate University review board and/or committee. It is the responsibility of the PI/PD to ensure this step in the application process. If a grant application involves one or more of these requirements, the ORGSP will request proof of application status before the grant can be submitted. Some federal agencies will allow a grant to be submitted when an approval from the appropriate review board/committee is pending. In these cases, the grant may be allowed to proceed.
- 3.) Once the PI/PD completes the application (complete with narrative and budget), it along with the Internal Routing Form must be completed. The Dean must also sign, certifying that the application is within the scope and mission of the school and that the school has adequate resources for the project. This document is submitted to the ORGSP.
- 4.) All proposals seeking sponsored funding should be submitted to the ORGSP five (5) business days before the application deadline to allow for additional signatures if needed and proper budget review.
- 5.) Executive Director of the ORGSP reviews applications for completion, to confirm the University's ability to meet compliance, and to review the budget. Additional input is sought from the Post-Award Manager to assure the ability of the University to manage the award in the post-award phase.

- 6.) After the ORGSP review, the internal routing form is submitted with the completed grant with signatures from the PI/PD, the Dean, the Chief Financial Officer (in the case of matching funds/cost sharing) and the Exec. Vice President for Academic Affairs for approval.
- 7.) After the Exec. VPAA's signature is acquired, the ORGSP will notify the PI/PD that they can submit their application. In the case of federal awards, the Executive Director will submit the application through the appropriate portals as Authorizing Official.

**X. CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

**XI. DOCUMENT HISTORY**

Effective Date: 04.24.2024

- [Intent to Apply](#)
- [Internal Routing Form](#)
- [Checklist: Submit Proposal](#)
- [ORGSP Handbook](#)

## RG:02

### Post-Award Policy

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#### III. PURPOSE

The Office of Research, Grants and Sponsored Programs, under the auspices of the Executive Vice President for Academic Affairs, is formally charged with providing services to faculty and staff for securing and managing external support from federal, state, and other sources. It acts as a check for Primary Investigators and Project Directors to ensure compliance throughout the grant process. This policy ensures that proper procedures are followed from receipt to closeout of an award.

#### IV. POLICY STATEMENT

The Primary Investigator/Project Director is responsible for the management of an award from the time that the application is submitted. Responsible completion of the project, submitting purchase requests, managing project/research personnel, and submitting reports related to project goals and updates on time is the responsibility of the PI/PD. In doing this, the PI/PD must update the Post Award Manager, who is responsible for the fiscal monitoring of grant awards. The ORGSP will serve as a check to ensure that expenditures are made in accordance with the approved budget as well as contract/federal terms and conditions, financial reports and invoices are submitted in a timely manner, and all fiscal matters have been satisfied during the life of the project, including the closeout phase. To ensure that the PI/PD is aware of the responsibilities of managing the award, the PI/PD must schedule a meeting with the Post-Award Manager prior to receipt of the grant line and sign an acknowledgement of their awareness of award requirements, University policies, and any other pertinent information.

The PI/PD is responsible for ensuring that all reports are submitted to the sponsor (with the exception of financial reports, which will be prepared and submitted in conjunction with the ORGSP office). All required reports will be submitted in accordance with the terms and conditions of the award. Some reports will be required to be submitted in hardcopy to specific persons at the sponsoring agency and others are submitted via the internet. When electronic submission of reports is required, all PIs must ensure that they are trained in the system for which their report will need to be uploaded. The Post-Award Manager will discuss this requirement during the initial meeting.

When closeout is reached, the PI/PD will work with the Post-Award Manager to ensure that all final deliverables/final reports (financial, progress, property, subcontract, patent, etc.) are made. Upon submission of all required documents to the sponsor, the project file is placed in the closed files and retained in accordance with the appropriate retention schedule (normally, records must be retained for seven years after submission of the Final Financial Report, or in the case of litigation, records must be retained until final resolution).

#### III. DEFINITIONS

**Closeout:** the period of performance or the time allotted for work and completion is due and it is time to cease expenditures and bring all activities to an end.

**Principal Investigator/Program Director (PI/PD):** Per [§ 75.2](#), “the individual (s) designated by the recipient to direct the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity.”

**IV. AUDIENCE**

Faculty, staff, and students of Lincoln Memorial University who receive external awards.

**V. COMPLIANCE**

The PI/PD should ensure that every effort is made to follow the stated guidelines, policies, and procedures of an award. Mismanaged projects present significant risk to the University, and as such, the mismanagement of a project may result in the PI/PD being placed on probation from applying for future awards, and/or be required to have a co-PI/PD for support. In cases where the Executive Vice President for Academic Affairs deems that willful mismanagement has occurred, further action may be taken, including but not limited to removal as PI/PD, denial of future applications, and/or termination.

**VI. ROLES AND RESPONSIBILITIES**

**PI/PD:** The Primary Investigator/Project Director assumes responsibility for directing the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity. The PI/PD works with the ORGSP to submit all necessary documentation and reports to the awarding sponsor.

**Dean/Chair:** Supports the PI/PD and assures that the school provides adequate resources for the running of the award.

**Office of Research, Grants, and Sponsored Projects:** Serves as a check to ensure that expenditures are made in accordance with the approved budget as well as contract/federal terms and conditions, financial reports and invoices are submitted in a timely manner, and all fiscal matters have been satisfied during the life of the project, including the closeout phase.

**VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES**

[OMB Uniform Guidance 2 CFR §200](#)

**IX. PROCEDURE**

- 8.) The ORGSP receives notification that a proposed project has been selected for funding by the granting agency. Once this notification is received the Post-Award Manager starts the process of project initiation from the start (acceptance of award) to the end (close out of the project).
- 9.) The Post-Award Manager will submit to the finance office a request for a project account number. This account number will be assigned to establish and maintain the project budget.

- 10.) The Post-Award Manager will establish a project file that will consist of the proposal, guidelines, initial award document, and any amendments to the initial award document, prior approval requests, correspondence, compliance approval, fiscal transaction forms and documentation of actions taken from the initiation to final closeout of the project. The project folder is representation of the complete history of the project.
- 11.) The Post-Award Manager will notify the PI of their account number along with a copy of the budget and budget lines and any applicable documents necessary to conduct the project. A meeting between the PI and the Post-Award Manager is scheduled to discuss the fiscal aspects of the project such as procedures for purchases, signatures required and timelines for purchases.
- 12.) Some sponsors require interim reports (monthly, quarterly or annually) in order to track the status of the project and ensure that the project is being conducted in accordance with the approved scope.
- 13.) Some sponsors require interim reports, such as monthly or quarterly, for purposes of tracking the financial status of the project and for handling reimbursements due the University. The Office of Research, Grants and Sponsored Programs handles these interim billings or reports in conjunction with the PI or department. The progress report should contain a comparison of actual accomplishments with approved goals and objectives, PIs' research findings, and other data. Recipients generally will be expected to provide reasons why established goals were not met and to identify corrective actions. For most agencies that anticipate funding a project over a period of years, but make incremental awards one year at a time, an annual progress report is required prior to the sponsor's release of the next year's funding. A copy of the final progress report must be submitted to the sponsor in accordance with the terms of the award. A copy must also be submitted to the ORGSP.
- 14.) On multiple-year projects with federal agencies, the University may be required to request formal carryover of remaining funds from one budget period to the next. Excess balances run the risk of new funding being reduced unless there is a justifiable reason why such balances remain un-obligated.
- 15.) The University is required to submit a final report of expenditures generally 60 to 90 days subsequent to the termination of an award. All authorized expenditures and outstanding obligations must be determined and considered in the preparation of this report. Accurate, timely, and complete input from the PI/PD and department is essential to prepare this report.

## X. CONTACT INFORMATION

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

## XI. DOCUMENT HISTORY

Effective: 4.24.24

- [The ORGSP Handbook](#)
- [Post-Award Checklist](#)

## RG:03

### Intellectual Property Policy

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#### I. PURPOSE

The intent of this policy is to preserve and protect the University's rights in intellectual property where appropriate and to define and respect the rights of others in works developed without the use of appreciable University support, particularly those works used solely to assist or enhance a faculty member's educational assignments. The University expects all members of the community to be mindful of how intellectual property laws, regulations, and policies apply to their work and to respect the intellectual property rights of others.

#### II. POLICY STATEMENT

1. Intellectual property may be broadly divided into two categories: (a) the result of University-sponsored or supported efforts, or (b) the result of an individual's independent efforts. University students, faculty, and staff are encouraged to develop intellectual property relating to educational endeavors that include but are not limited to inventions, educational materials, works of art, literary works, teaching aids, textual materials, computer software, databases, audiovisual materials, drawings, lectures, musical/dramatic compositions, pictures, graphics, other copyrightable materials, and any other products or things that are designed to enhance or supplement the educational process at Lincoln Memorial University. The University also encourages the use of intellectual property and/or products resulting from the application of intellectual property for the good of the community and the general public.
2. The University may, in its own name, secure foreign and domestic letters of patent, copyrights, and trademarks on intellectual property produced or developed on behalf of the institution or produced as a result of University-sponsored or supported efforts, in a manner consistent with this policy and any other applicable University policies.
3. Funds and facilities provided by government, commercial, industrial, or other public or private organizations and administered and controlled by the University shall be considered to be funds and facilities provided by the University.
4. Rights Secured
  - a. Generally, Lincoln Memorial University retains all ownership rights, foreign and domestic, in any intellectual property created through University-sponsored or supported efforts of its faculty, staff, and/or students. The proceeds of any use, sale, licensing, or other monetization of such intellectual property shall inure solely to the University. The individual creator(s) of such intellectual property may only share in the proceeds arising from the property's use, sale, licensing, or other monetization if they have entered an appropriate agreement with the University.
  - b. Specifically, it is University policy that intellectual property developed by faculty, staff, and/or students shall be and become the sole and exclusive property of Lincoln Memorial University if the intellectual property is (a) developed within the person's scope of employment with the University, (b) developed in the course of a project sponsored by the University, (c) developed with the significant use of the University's funds, facilities, services, or equipment, or (d) developed in the course of a project arranged, administered or controlled by the University and sponsored in

whole or in part by persons, agencies, or organizations external to the University, absent prior written agreement to the contrary.

- c. With respect to students, the use of resources or facilities typically available to students in their educational activities shall not be considered “significant.”
  - d. The University recognizes and reaffirms the traditional academic freedom of its faculty to engage in scholarly activity and to publish freely without restriction. In keeping with this philosophy, the University will not construe the payment of salary from unrestricted funds, nor the provision of office or library facilities, as constituting significant use of University facilities or funds, except for those situations where the funds were paid or the facilities provided specifically to support the development of an invention(s) and/or creation(s).
5. Independent Efforts
- a. Students, faculty, and staff may through independent efforts produce educational endeavors, works or other things that are subject to copyright, trademark or patent protection. In such cases, each creator has the right to determine the disposition of the materials’ property rights and to receive revenue derived from such works.
  - b. The University is not responsible for any opinions expressed in works that are created through the independent efforts of students, faculty and/or staff, which opinions shall be the sole responsibility of each individual creator. The University reserves the right to require an appropriately worded and displayed disclaimer to that effect to accompany any publication of a work that arises from the independent efforts of its students, faculty and/or staff. Further, the name of the University or reference to the University shall not be used in any form of publicity without prior written approval from the University.
  - c. Faculty members’ textbooks, scholarly articles published in independent publications, and similar works intended to disseminate the results of study or research are generally considered independent efforts unless the University commissioned them, the projects that gave rise to them were specifically University-sponsored or supported, or an external sponsor commissioned them pursuant to a separate agreement with the faculty member and/or the University.

### III. DEFINITIONS

**Copyright:** The right of an author, artist, composer or other creator of a work of authorship to control the use of his or her work by others.

**Independent Efforts:** (a) ideas and works that originated from the individual faculty member, staff member, and/or student; and (b) works not made with the use of significant University support.

**Intellectual Property:** Encompasses all works or things which result in any copyrightable material, and all inventions or things created and produced by faculty, staff, and students, regardless of whether they are, in whole or in part, protectable under patent, trademark, copyright or other applicable laws.

**University-Sponsored or Supported Efforts:** those efforts that involve the use of significant University funds, personnel, facilities, equipment, materials or technological information, which may include support by another private or public organization if



LMU administers or arranges for such support. University-sponsored or supported work further means work in which the creator was either engaged or commissioned by the University or made use of the University's support in developing the intellectual property, or that was not made in the course of independent efforts.

#### IV. AUDIENCE

This policy applies to all students, faculty, and staff of the University and is intended to protect the interests of all concerned parties, including the University itself; members of the University community (faculty, staff, and students); external sponsors of research; and the public.

#### V. COMPLIANCE

1. Generally speaking, individuals may not reproduce a copyrighted work (including computer software) without the copyright owner's permission. The term of copyright protection is usually defined as the life of the creator plus 70 years, but there are some complicated exceptions, and it is best to assume that any work published after 1922 is still protected by copyright. In certain instances, the "fair use" doctrine may allow the use of a copyrighted work for purposes such as scholarship or criticism. Generally, though, the unauthorized reproduction of a copyrighted work is copyright infringement and may subject the infringer to civil and criminal penalties.
2. Despite court rulings holding such activity illegal, some individuals continue to engage in so-called peer-to-peer file sharing of commercially copyrighted music, movies, and software. The law allows copyright owners who have detected illegal file sharing over a campus network to subpoena the name of the individual(s) involved. The copyright owner may then sue the individual for up to \$150,000 for each act of infringement. Since 2003, the recording and movie industries have filed more than 6,000 such lawsuits, including hundreds against college students and staff members nationwide.
3. The University and its faculty, students, and employees must comply with the copyright law, including without limitation by refraining from unauthorized file sharing. In addition, such conduct violates the University's technology use policies and can cause the University to subject an employee to disciplinary action up to and including termination. Questions regarding copyright law compliance should be directed to the University Librarian or the Office of General Counsel.
4. This policy as amended from time to time shall be part of the conditions of employment of every faculty, staff and student employee of the University. All employees are subject to any changes to this policy made after employment.

#### VI. ROLES AND RESPONSIBILITIES

**Executive Vice President for Academic Affairs:** Reviews University-sponsored or supported intellectual property and determines whether Lincoln Memorial University will assert an interest in the intellectual property. Also develops a written agreement reflecting the interests of all parties, including how any proceeds from the monetization of the intellectual property will be distributed.

**Office of Research, Grants, and Sponsored Programs:** Under the direction of the Executive Director, sets, administers, and provides guidance on the Intellectual Property Policy.

**Office of General Counsel:** Addresses questions related to copyright law compliance.

**University Librarian:** Addresses questions related to copyright law compliance.

## **IX. PROCEDURE**

1. Once University-sponsored or supported intellectual property is created, and before its publication, the faculty member, staff member, and/or student creator is required to disclose the work or thing in its entirety to the Executive Vice President for Academic Affairs. For all intellectual property created during an employee's approved employment outside the University, the employee may only delay disclosure to the University to protect the outside employer's interest until a decision has been made whether to seek a patent, copyright, or trademark.
2. All disclosures shall include (a) the name(s), address(es) and telephone number(s) of all creators or other participants in the creative process; (b) a descriptive title of the work or thing; and (c) a concise description of the work or thing, including an explanation of its nature, purpose and operation; a summary of results achieved; features believed to be novel; further experimental work planned; and any additional information which the creator believes might be helpful in deciding whether a patent application should be filed. The disclosure must be signed and witnessed.
3. The Executive Vice President for Academic Affairs will have sixty (60) days after actual receipt of the disclosure to determine whether Lincoln Memorial University will assert an interest in the intellectual property and to develop a written agreement reflecting the interests of all parties, including how any proceeds from the monetization of the intellectual property will be distributed. Both the University and the individual will make every effort to protect both the individual's and the institution's interests.
4. Any agreement between an individual creator and the University will consider the relative contribution by such individual and may establish the percentage of ownership of the trademark, copyright or patent rights and compensation terms for development. All such agreements must satisfy any pre-existing commitments to outside sponsoring agencies.
5. All revenue derived from the monetization of such intellectual property by the University shall be used to support its academic purposes and programs.
6. All discoveries or inventions made outside the field in which the employee is hired by the University, and where the University has not provided any support, are and shall be the individual's property and invention. However, the employee and the University may agree that a patent for any such discovery and invention may be pursued by the University, with the proceeds of any monetization thereof to be shared in accordance with the agreement.
7. The development of intellectual property shall not interfere with an employee's effective performance of his/her assigned duties at the University. Unless otherwise determined by an agreement between the University and the employee, the employee's immediate administrative supervisor shall determine whether development of the intellectual property has a detrimental effect upon the employee's performance of his/her regular assignments. Standard University policies may be applied regarding employee performance in cases where it is determined that effective performance of work duties is negatively impacted by development of intellectual property.

8. All University personnel and students are obligated to refrain from any act that would defeat the University's rights in any University-sponsored or supported intellectual property, and to cooperate in the documentation and demonstration of the University's rights therein, including without limitation executing assignments of rights and providing sworn testimony or other support for the University in the event of litigation without necessity of a subpoena.
9. Lincoln Memorial University requires that agreements concerning work products including or contemplating any intellectual property development must address, at a minimum, the following issues: (a) Ownership; (b) Compensation; (c) Copyright issues; (d) How the intellectual work product can be utilized by LMU students, faculty, and staff; (e) How revenues are to be allocated and used by LMU; (f) Disclosure of requirements prior to publicizing a project; (g) Reference to any documents needed to provide for intellectual property protection; and (h) Other terms agreed to by the parties.
10. With respect to theses and dissertations, a University student must, as a condition of a degree award, grant royalty-free permission to the University to reproduce and publicly distribute, including by technologies now known or developed in the future, on a non-commercial basis, copies of the thesis or dissertation.

**X. CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants and Sponsored Programs (ORGSP).

**XI. DOCUMENT HISTORY**

Effective: 4.24.2024

## RG:04

### Responsible Conduct of Research Policy

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#### V. PURPOSE

Lincoln Memorial University is committed to maintaining high standards of ethical conduct in all aspects of its work including research and education. Appropriate instruction in Responsible Conduct of Research (RCR) is an essential component of the professional development of faculty, staff, and students at all career levels.

#### VI. POLICY STATEMENT

LMU provides training in key RCR topics through the CITI training platform. An academic researcher's exposure to RCR is not limited to a specific classroom experience. The University shares responsibility with its senior researchers, course instructors and other mentors for ensuring that students, trainees, faculty, and staff at all career levels have formal and informal opportunities to observe, model, evaluate and discuss responsible research behaviors during their time at LMU. RCR training is an important component of research education at LMU regardless of discipline, career aspiration, or source of research support. Likewise, the University recognizes specific obligations to certain federal sponsors.

Responsible Conduct of Research (RCR) training is required of all undergraduate, graduate, and postdoctoral students, as well as short-term visitors, who are funded by NSF research awards subject to the America COMPETES Act and individuals receiving support through applicable NIH training, career development awards (individual or institutional), research education grants, or dissertation research grants. These programs must be compliant with the legal, regulatory, and ethical requirements established by funding sources, professional organizations, and regulatory agencies.

RCR instruction, as defined by federal agencies and by various scientific societies, covers the following content areas:

- Collaborative Science
- Research Ethics and the Role of the Scientist
- Conflict of Interest and Conflict of Commitment
- Data Acquisition, Management, Sharing and Ownership
- Mentor/Trainee Responsibilities
- Peer Review
- Publication Practices and Responsible Authorship
- Research Misconduct
- Research Involving Human Subjects
- Research Involving Animals

#### III. DEFINITIONS

**Responsible Conduct of Research:** *the ethical practice of doing research. It entails being aware of and abiding by accepted professional standards and ethical guidelines when carrying out any task connected to research.*

#### IV. AUDIENCE

RCR training is strongly recommended for all graduate students, postdoctoral fellows, other postgraduate trainees, faculty, staff, as well as undergraduate students engaged in research.

Participation is required for the following individuals:

- Graduate students, postdoctoral fellows, other postgraduate trainees, faculty, staff, and undergraduate students supported by NSF grants to the University. Support includes both salary support and funding for research expenses, e.g. dissertation improvement grants.
- Trainees at all career levels supported by NIH grants in programs defined by NOT-OD-10-019.

RCR training received during a previous career stage (e.g. undergraduate, graduate, postdoctoral, faculty, staff), either at LMU or elsewhere, does not exempt a trainee from this requirement.

#### V. COMPLIANCE

Failure to follow this policy can result in loss of grant funding, the ability to apply for future grant opportunities through the University, and/or disciplinary action by the Exec. Vice President for Academic Affairs.

#### VI. ROLES AND RESPONSIBILITIES

**Researcher:** Completes RCR instruction through the Collaborative Institutional Training Initiative (CITI).

**Dean/Chair:** Ensures that graduate students, postdoctoral fellows, other postgraduate trainees, faculty, staff, and undergraduate students within a program/school/college are aware of the RCR policy and know where and how to access CITI training.

**IACUC, IRB, IBCSC:** Reviews research proposals and ensures researchers have met RCR training requirements before a research project is approved.

**Office of Research, Grants, and Sponsored Programs:** Provides access to Responsible Conduct of Research training through the Collaborative Institutional Training Initiative (CITI). Assures that individuals awarded funding from certain federal sponsors have completed required RCR training before funding is accepted.

#### VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

RCR training is designed to meet the following requirements:

- NSF of the America COMPETES Act Implementation of Section 7009
- NIH training grants requirements as described in Notice, Update on the Requirement for Instruction in the Responsible Conduct of Research NOT-OD-10-019

#### IX. PROCEDURE

16.) Researcher completes Learner Registration through the Collaborative Institutional Training Initiative, selecting Lincoln Memorial University as the Organization Affiliation.

17.) Researcher registers for training modules related to applicable research.

18.) Researcher achieves certification for completing training through CITI. These certifications are kept on file and are accessible by the ORGSP.

19.) Researcher provides proof of certification when proposed research is under review by IACUC, IRB, and/or IBCSC.

**X. CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

**XI. DOCUMENT HISTORY**

Effective: 4.24.2024

➤ [CITI Training](#)

# RG:05

## Misconduct in Research Policy

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### I. PURPOSE

Lincoln Memorial University is committed to maintaining high standards of ethical conduct in all aspects of its work including research and education. The University examines and investigates claims of research misconduct, taking care to safeguard the rights of the University, the people making the claims, and the accused. Moreover, the University is required by federal laws to establish clear protocols for handling cases involving claims of research misconduct.

### II. POLICY STATEMENT

LMU discourages research misconduct in all forms and promotes an atmosphere where potential misconduct is dealt with candidly. Therefore, in accordance with the University's procedures for accusations of research misconduct, the institution mandates that claims of research misconduct be reported quickly and will take appropriate action to resolve such accusations.

### III. DEFINITIONS

**Research Misconduct:** As defined by 42 C.F.R. § 93.103, fabrication, falsification, and/or plagiarism. It does not include honest error or differences of opinion.

**Fabrication:** Making up data or results and recording or reporting them.

**Falsification:** 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:** Appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

### IV. AUDIENCE

All University faculty and staff who participate in research, training, scholarships, publishing, or other activities linked to research carried out under the University's auspices are subject to this policy and its supporting processes. Students are also covered by this policy, but only if they are involved in a project that is supported by an outside sponsor for research. Principal investigators working with students are responsible for students' awareness of this policy.

### V. COMPLIANCE

Failure to follow this policy can result in loss of grant funding, the ability to apply for future grant opportunities through the University, and/or disciplinary action by the Exec. Vice President for Academic Affairs.

### VI. ROLES AND RESPONSIBILITIES

**Faculty/Staff Primary Investigators:** Completes RCR instruction through the Collaborative Institutional Training Initiative (CITI) and is aware of the Misconduct in Research Policy. If working with students, ensures that students are aware of the Misconduct in Research Policy.

**Dean/Chair:** Ensures that graduate students, postdoctoral fellows, other postgraduate trainees, faculty, staff, and undergraduate students within a program/school/college are aware of the Misconduct in Research Policy.

**Office of Research, Grants, and Sponsored Programs:** Provides access to Responsible Conduct of Research training through the Collaborative Institutional Training Initiative (CITI), which covers research misconduct. Assures that individuals awarded funding from certain federal sponsors have completed required RCR training before funding is accepted. Likewise, if a case of Misconduct in Research is confirmed, the ORGSP reports the incident to the appropriate federal agency that funds the project.

**Exec. Vice President for Academic Affairs:** Receives reports of Misconduct in Research. Leads inquiries and appoints a Research Investigation Committee to explore potential cases of Misconduct in Research.

**Research Misconduct Investigation Committee:** A body of four faculty members headed by the Exec. Vice President for Academic Affairs that investigates and objectively considers cases of Research Misconduct.

## VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

- [42 C.F.R. § 93.103 Research Misconduct](#)

## IX. PROCEDURE

### 20.) Misconduct in Research Allegation

- Reports of Misconduct in Research are to be sent in written form to the Exec. Vice President for Academic Affairs as soon as possible.
- Exec. Vice President for Academic Affairs convenes the Research Misconduct Investigation (RMI) Committee.
- RMI Committee reviews evidence and objectively discusses the case as a body. Reports its findings to the Exec. Vice President for Academic Affairs.
- Exec. Vice President for Academic Affairs reviews findings and initiates a resolution to the case.

## X. CONTACT INFORMATION

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

## XI. DOCUMENT HISTORY

Effective: 4.24.2024

- [CITI Training](#)



## R&G:06

### Internal Control Policy

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#### I. PURPOSE

This policy is set in place to document the internal controls in the Office of Research, Grants, and Sponsored Programs.

#### II. POLICY STATEMENT

##### *Control Environment*

The office of Research, Grants, and Sponsored Programs at Lincoln Memorial University is committed to an environment focused on transparency and ethical reporting. The office does this through ensuring that every employee is aware of and has acknowledged the ORGSP handbook that outlines the office's internal structure and responsibilities. Staff are also encouraged and required to undergo formal training to give each employee a better understanding of their responsibilities and campus-wide expectations. ORGSP is additionally subject to financial audits performed by an independent auditor at the discretion of each granting agency. This serves as a check that management and personnel are acting in accordance with all applicable laws and regulations. Furthermore, ORGSP staff work closely with the finance department, as well as with grantors and grantees, creating a system of checks and balances within the financial realm of recordkeeping.

##### *Risk Assessment*

ORGSP is susceptible to specific reporting requirements that vary between grants. Personnel within the office are aware of these deadlines and follow protocol to ensure reporting requirements have been fulfilled. Accurate and timely financial reporting is ensured and supported through consistent and detailed tracking performed within the office. There is always the risk of fraudulent activity, which our office does understand. The office handles this risk by ensuring that internal controls are in place and that proper approvals must be given before transactions take place. The movement of most tracking and awarding to computer systems has had a positive impact on our office. Via shared documentation and open record access, a continuous process of monitoring takes place within each grant.

##### *Control Activities*

As discussed before, the ORGSP office maintains open communication with others who are involved in activities through the office. Document sharing is highly encouraged, however, ORGSP maintains the control to edit documents when needed. The office also reconciles its balances with finance and each grantee periodically.

To show control and accountability for all funds, property and other assets related to federal grant awards, the University will manage each federal award in compliance with federal statutes, regulations and terms of the federal awarding agency. The Office of Research, Grants, and Sponsored Programs will compare expenditures with budget amounts for each federal award on a routine schedule.

The Finance Office will ensure payments on federal grant awards are prompt with minimal time elapsing between transfer of funds (from United States Treasury or pass-

through entity) and the distribution of the funds. The Office of Research, Grants and Sponsored Programs has written procedures for this process that meet requirements of 2.CFR.200.305.

As prescribed in Subpart E – Cost Principles under 2 CFR Part 200, for a given cost to be charged to a federal award the cost must be allowable, reasonable, and allocable. Procedures for determining these requirements are in LMU Policy on Costing Principles for Sponsored Projects.

#### *Information and Communication*

The ORGSP office tracks grant activity across Lincoln Memorial University’s campus. They use relevant information provided by grantees and grantors to ensure that accurate data is presented. The office uses this compilation of data to track balances for each grant and shares the information with the grantee and the finance department. The office also shares this information with the grantors through reporting requirements and for audits when applicable.

The University will take reasonable measures to safeguard protected personally identifiable information and other information the federal awarding agency or pass-through entity designates as sensitive (consistent with applicable federal, state and local laws regarding privacy and obligations of confidentiality).

#### *Monitoring Activities*

ORGSP is always looking for ways to improve its structure and functioning. The office is always in the process of auditing itself through cross functional collaboration with the finance department, as well as staying in compliance with reporting requirements from each grantor. When deficiencies are noted, the department takes immediate action to handle the situation efficiently.

Should any issues of noncompliance arise, such as those identified in audit findings, the University will take prompt action to investigate and manage.

#### **IV. AUDIENCE**

This policy applies to all employees of ORGSP and other offices involved in the financial management of grant funds.

#### **V. COMPLIANCE**

Failure to comply with this policy will put the University at a significant risk for internal control deficiencies.

#### **VI. ROLES AND RESPONSIBILITIES**

**ORGSP:** Complies with policy and actively participates in the segregation of duties within the office.

#### **VII. STANDARDS**

- 2 CFR 200

**VIII. PROCEDURE**

Positions:

Post-Award Grant Manager  
Executive Director of ORGSP

Post-Award Grant Manager	Executive Director
<ul style="list-style-type: none"> <li>- Approves purchasing documentation related to grants</li> <li>- Requests appropriate restricted budget transfers from grant accounts</li> <li>- Prepares bank deposits</li> <li>- Creates invoices</li> <li>- Creates internal ORGSP purchasing documentation</li> <li>- Assists in development of final financial reports</li> </ul>	<ul style="list-style-type: none"> <li>- Opens mail</li> <li>- Approves restricted budget transfers from grant accounts</li> <li>- Approves internal ORGSP purchasing documentation</li> <li>- Approves final financial reports</li> </ul>

Narrative:

ORGSP maintains appropriate segregation of duties within its office. No one person is responsible for initiating transactions, approving transactions, recording transactions, reconciling balances, handling assets, and reviewing reports. Adequate segregation of duties reduces the likelihood that errors will remain undetected by providing for separate processing by different individuals at various stages of a transaction. Regarding reporting, the Post-Award Grant Manager will assist with the creation of the final financial report to ensure its accuracy. Once created and verified by the Post-Award Grant Manager, the Executive Director will also review and certify the financial report barring no misstatements are found. Within ORGSP, the Post-Award Grant Manager and Executive Director properly segregate all responsibilities. Outside of ORGSP and related to its restricted accounts, ORGSP works with finance and P.I.'s/ Department heads to appropriately segregate all matters related to the financial management of grants and sponsored projects.

**Procedure for Receiving Funds and Handling Checks**

Segregation of Duties Chart:

Process	Post-Award Grant Manager	Executive Director
Receives check/mail	X	
Opens documentation		X
Posts to Colleague / Creates Deposit	X	
Reviews, Seals, & Initials Deposit		X
Scan documentation	X	
Delivers Deposit to DAR		X
Reconciles Account	X	

Narrative:

When funds are received in ORGSP, the Post-Award Grant Manager receives the mail/check. It is then taken to the executive director to open the mail / review the documentation. Once opened and reviewed, the Post-Award Grant Manager posts the receipt of funds into the Colleague system and creates the deposit. After this step, the Executive Director will review,

initial, and seal the deposit. The Post-Award Grant Manager then scans this documentation and immediately returns to the Executive Director. The Executive Director delivers all sealed documentation to DAR to be deposited. Finally, the Post-Award Grant Manager will reconcile the restricted account the funds were to be posted to and ensure that it accurately reflects funds received.

**IX. CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

**X. DOCUMENT HISTORY**

Effective Date: 4.24.24

## RG:07

### Subaward and Monitoring Policy

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#### VII. PURPOSE

Lincoln Memorial University is committed to maintaining high standards of ethical conduct in research and grants management. Appropriate monitoring of subaward recipients ensures that the University responsibly manages research and finances to meet the expectations and requirements of sponsors.

#### VIII. POLICY STATEMENT

Lincoln Memorial University is accountable to its sponsors for managing money and achieving performance goals as a pass-through entity, even after a Subrecipient has some control over the execution of its funded project activity. The University appraises and tracks Subrecipients' programmatic and financial performance in addition to determining their ability to oversee a Subaward. The University's goal is to oversee the appropriate use of sponsor money, the achievement of performance targets, and the compliance of Subrecipients with all relevant laws, rules, and prime award terms and conditions, particularly [OMB Uniform Guidance 2 CFR §200](#). Based on pertinent risk considerations, the University may, where necessary, implement certain restrictions for Subrecipients. This policy does not apply to consultant agreements or the procurement of goods or services from Contractors.

#### III. DEFINITIONS

**Pass-through Entity:** per [§ 75.2](#), “a non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.”

**Performance Goal:** Per [§ 75.2](#), “means a target level of performance expressed as a tangible, measurable objective, against which actual achievement can be compared, including a goal expressed as a quantitative standard, value, or rate. In some instances (e.g., discretionary research awards), this may be limited to the requirement to submit technical performance reports (to be evaluated in accordance with agency policy).”

**Principal Investigator/Program Director (PI/PD):** Per [§ 75.2](#), “the individual (s) designated by the recipient to direct the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity.”

**Subaward:** Per [§ 75.2](#), “an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.”

**Subrecipient:** Per [§ 75.2](#), “a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.”

#### IV. AUDIENCE

Faculty and staff of Lincoln Memorial University who are the Principal Investigator and/or Program Director (PI/PD), Department Administrators, the ORGSP, and Subrecipients.

#### V. COMPLIANCE

Failure to follow this policy can result in loss of grant funding, the ability to apply for future grant opportunities through the University, and/or disciplinary action by the Exec. Vice President for Academic Affairs.

#### VI. ROLES AND RESPONSIBILITIES

**PI/PD:** Collects Subrecipient Commitment Form from potential Subaward Recipients for designation and risk assessment review during the Pre-Award period. In the Post-Award period, follows guidance on Subrecipient monitoring and reporting provided by the ORGSP, and at minimum submits yearly reports for the ORGSP review and filing. Notify the ORGSP immediately if Subrecipient diverts from sponsor requirements.

**Dean/Chair:** Ensures that PI/PD submits at minimum a yearly Subrecipient monitoring policy to the ORGSP. Provides PI/PD with the resources needed to collect this yearly information.

**IACUC, IRB, IBCSC:** Reviews subaward agreements that include IACUC, IRB, and IBCSC review. Institutes committee-specific monitoring if an Inter-Institutional Agreement is utilized.

**Risk Assessment:** With the ORGSP, reviews Subrecipient for risk.

**Office of Research, Grants, and Sponsored Programs:** Provides guidance on differentiating between a Subrecipient and a Contractor. With Risk Assessment and/or Legal Counsel, calculates risk of Subrecipient. Stores subrecipient assurances and monitoring reports from PI/PD. Authorizes reports that requirements found in [2 CFR §200](#) are met. Confirms that Subrecipients are audited as required by Subpart F of the Uniform Guidance.

#### VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

##### [OMB Uniform Guidance 2 CFR §200](#)

- [§ 200.331 Subrecipient and contractor determinations](#)
- [§ 200.332 Requirements for pass-through entities:](#) Pass-through entities of Federal grants must evaluate each subrecipient's risk of noncompliance to determine the appropriate monitoring level, monitor subrecipient organizations' activities to ensure that the subaward is in compliance with applicable Federal statutes and regulations and the terms of the subaward, and confirm that subrecipients are audited as required by Subpart F of the Uniform Guidance.

Some non-federal sponsors may also require evidence of due diligence to demonstrate proper use of funds.

**IX. PROCEDURE**

- 1.) Determine whether the recipient of sponsored funds is defined by the sponsor as a Subrecipient or a Contractor.
- 2.) Assess Subrecipient's risk.
- 3.) Specify monitoring actions that are in line with the amount of perceived risk as stated in the Subaward agreement.
- 4.) Advise Subrecipients of terms and conditions of the sponsored award.
- 5.) Monitor cost and activities of Subrecipients.
- 6.) Verify performance goals are met by Subrecipients.
- 7.) Provide any training or technical assistance on program-related matters.
- 8.) Store subrecipient reports.

**X. CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

**XI. DOCUMENT HISTORY**

Effective: 4.24.2024

- [Subrecipient Commitment Form](#)

## RG:08

### Capital Expenditures with Granted Funds

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#### IX. PURPOSE

Lincoln Memorial University is committed to the responsibility of accurately recording, tracking, and managing capital assets provided through granted funds. Responsible stewardship is essential to maintaining the trust of past, current, and future sponsors.

#### X. POLICY STATEMENT

Only with the agreement of the pass-through organization or granting agency may equipment be acquired through grants. As a result, the PD/PI must confirm that the necessary authorization has been granted in accordance with the grant's requirements before making any equipment purchases. The grant's terms and conditions must be followed while purchasing and using such equipment.

Equipment over the value of \$1,000.00, or defined as "pilferable" by the federal government, will be documented, and include the following information:

- 1.) Equipment description
- 2.) Serial number or other identification number
- 3.) Source of the funding, along with the University's internal grant line account number and the federal award number (if applicable)
- 4.) Who holds the title to the property
- 5.) The date the equipment was acquired
- 6.) The cost of the equipment at time of purchase
- 7.) Depreciation method
- 8.) Useful life
- 9.) Vendor name
- 10.) The location of the equipment

#### III. DEFINITIONS

**Equipment:** as defined by 2 CFR 200.1, tangible personal property (including information technology systems) having a useful life of more than one year and per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity (\$1,000) for financial statement purposes, or \$5,000.

**Pilferable Items:** Equipment items that may be easily lost or stolen, but which may be under \$5,000. These include, but are not limited to: cell phones, iPads, tablets, iPods, graphing calculators, software, projectors, cameras, camcorders, DVD players, computer equipment, and televisions.

#### IV. AUDIENCE

Primary Investigators/Project Directors (PI/PD) and other assigned individuals who purchase equipment and other capital expenditures as related to a grant are subject to this



policy.

## V. COMPLIANCE

Failure to follow this policy can result in loss of grant funding, the ability to apply for future grant opportunities through the University, and/or disciplinary action by the Exec. Vice President for Academic Affairs.

## VI. ROLES AND RESPONSIBILITIES

**PD/PI** Ensures that proper authorization has been granted under the terms of the grant. Records materials received as a part of grants, catalogs the required documentation information related to those items, and sends the ORGSP the records of received items. Places tags on equipment items.

**Office of Research, Grants, and Sponsored Projects:** The Post-Award Manager of the ORGSP maintains records within the grant file of capital expenditures. Identifies capital assets as defined by both the University and the federal government and works with the Risk, Insurance and Commercial Property Coordinator to assign tagging information.

**Risk, Insurance and Commercial Property Coordinator:** Assigns tags to identified equipment. Informs the ORGSP of assigned tags and provides physical tags to PI/PD for equipment placement.

## VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

Any funds awarded by the federal government to Lincoln Memorial University is governed by [2 CFR 200](#) – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, published by the Office of Management and Budget (OMB).

## IX. PROCEDURE

- 1.) PI/PD orders equipment in accordance with grant requirements.
- 2.) Upon receipt of equipment, the PI/PD records equipment documentation as identified in this policy.
- 3.) The PI/PD sends documentation to the Post-Award Manager at the ORGSP.
- 4.) The Post-Award Manager reviews purchase and identifies equipment that is over \$1,000 and/or pilferable.
- 5.) The Post-Award Manager sends the identified list to the Risk, Insurance and Commercial Property Coordinator.
- 6.) The Risk, Insurance and Commercial Property Coordinator assigns tags and sends the information to the ORGSP and the tags to the PI/PD.
- 7.) The PI/PD applies tags to the equipment.
- 8.) The PI/PD ensures that the equipment remains in the designated location throughout the life of the grant.

## X. CONTACT INFORMATION

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

**XI. DOCUMENT HISTORY**

Effective: 04.24.2024

## RG:09

### Incentive Pay Plan Policy

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#### I. PURPOSE

The incentive pay plan allows payment of additional compensation from funds generated from external funding sources through recovery of base salary. It seeks to reward faculty members with incentive pay equal to no more than 50% of the amount of salary “recovered” from external funding sources.

#### II. POLICY STATEMENT

The incentive pay plan allows payment of additional compensation from funds generated from external funding sources through recovery of base salary. Incentive compensation may not exceed 50% of the amount recovered. Salary recovery funds shall be allocated as follows:

- a.) To the department to compensate for costs incurred in replacing the faculty member’s contributions to the department.
- b.) To incentive compensation.

Salary recovery funds left after faculty replacement costs and incentive compensation remain with the department for its discretionary use. This amount cannot be calculated until the precise amount of salary recovery for the semester is known.

To request payment following each semester, faculty must submit an incentive pay request email and attach a copy of their semester’s effort.

#### III. DEFINITIONS

**Incentive pay:** a one-time lump sum payment which is tied to an incentive plan and does not become a part of base salary.

#### IV. AUDIENCE

This policy applies to University faculty and staff who acquire additional compensation from funds generated from external funding sources through recovery of base salary.

#### V. COMPLIANCE

Failure to follow this policy can result in lost incentive pay as a form of additional compensation for faculty members.

#### VI. ROLES AND RESPONSIBILITIES

**Applicant:** Initiates Incentive Pay Plan agreement by completing the Incentive Pay Plan Agreement form. Must obtain external funding for their base salary, negotiate an agreement with their Chair and Dean prior to submission of the grant application,

verify work performed by signing the semester's effort report form, and initiate payment by completing an incentive pay request email.

**Dean/Chairs:** Approve agreements at the departmental level. Deans/Chairs may determine that other situations require additional funding for the department prior to paying the incentive to faculty. Negotiates percentages with faculty applicant.

**Office of Research, Grants, and Sponsored Programs:** Under the direction of the Executive Director, administers and provides guidance on the Intellectual Property Policy.

## VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES (IF ANY)

In order to comply with federal cost principles in [OMB Circular A-21](#), it is important that the cost to the external sponsor remain unchanged as a result of the incentive pay plan. In general, federal grants do not allow extra compensation to be directly charged. Thus, it is unallowable to direct charge incentive pay to a federal grant.

Federal cost principles permit direct charging of a percentage of base salary commensurate with the faculty's level of effort on the federal grant. University funds "recovered" by direct charging base salary to external funding sources can then be used for incentive pay provided that no Tennessee law is violated. Tennessee law limits the number of extra hours faculty are allowed to work and so extra compensation is limited by Tennessee law. In contrast, Tennessee law does not limit incentive pay because incentive pay requires no additional hours of work.

Lincoln Memorial University's incentive pay plan is based on the understanding and limitation that compensation exceeding the base salary will be derived from external funding sources.

Incentive compensation is more money for the same work; extra compensation is more money for more work. Faculty may receive both incentive compensation and extra compensation if the situation warrants. Put another way, payment of extra compensation does not preclude the payment of incentive compensation.

Situations will arise in which the external funding source can pay extra compensation or incentive compensation. Since incentive compensation is limited to 50% of the amount recovered, faculty may be able to receive more money by choosing extra compensation. However, this is appropriate only if more work is performed. Faculty receiving release time to work on the externally funded project should not receive extra compensation.

## IX. PROCEDURE

1. Before any incentive can be paid, the needs of the University must first be met. The most common need of the University is to employ a temporary instructor to replace faculty who receive a course release.
2. At the discretion of the chair and dean, other situations may require additional funding for the department prior to paying the incentive to faculty.
3. Historically, the University has controlled 100% of the salary recoveries. With the advent of the incentive pay plan, 100% of these salary recoveries will be at the discretion of the deans and chairs. Chairs and deans are not required to pay the maximum incentive of 50% to the faculty. Rather, chairs and deans may negotiate incentive percentages less than 50% in order to meet department and college needs.
4. Faculty should document the expected course load or other assigned duties upon which the agreement was based.

**X. CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

**XI. DOCUMENT HISTORY**

Effective Date: 04.24.2024

- [Incentive Pay Plan Agreement Form](#)

# RG:10

## Procurement Policy

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### I. PURPOSE

This policy is set in place to ensure federal compliance within all federally funded grants. This policy applies to all grants containing federal funds received on behalf of the University and is in place to ensure that the best deal has been obtained through open and free competition.

### II. POLICY STATEMENT

All federally funded grants and sponsored projects must abide by the purchasing guidelines listed below. This threshold can be met by the purchase of one or more like-items.

Threshold	Purchasing Requirement
\$200.00	Purchase requisition only
\$7,500	One quote required
\$15,000	Two quotes required
\$25,000	Three quotes required
\$50,000	Public solicitation of bids required

**Avoiding Conflicts of Interest:** The University shall avoid real or apparent organizational conflicts of interests and non-competitive practices among contractors with procurement supported by Federal funds.

**Construction Projects:** It is the responsibility of the University to ensure that all construction projects that are federally funded solicit U.S. - produced materials to build, alter, repair, or maintain infrastructure projects. (Build America, Buy America Act).

**Sole Source Exception:** The above purchasing requirement may be waived in instances of sole source purchases. These determinations must be approved by ORGSP and documentation as to the justification of this sole source should be filed with ORGSP.

**Emergency Purchases:** Purchasing requirements listed above may be waived in emergency situations where time restrictions become apparent. In these instances, a good-faith effort should be made by the PI/PD to still follow these procedures. Ways to accelerate the process may include requesting quotations by email and informing ORGSP of the emergency purchase(s) needing to take place. If procedures cannot be followed, the purchase must be approved by the Executive Director of ORGSP before the transaction is initiated.

### III. DEFINITIONS

**Procurement:** The acquisition of goods or services (including construction) from non-Federal sources by using competitive procedures and awarding a contract.

**Sole Source Purchases:** Purchases from a single entity due to the uniqueness of the item or service which causes only one provider to be able to carry out the service/purchase.

### IV. AUDIENCE

This policy applies to Lincoln Memorial University staff, faculty, students, and clubs/organizations who are making grant/sponsored project purchases with federal funds.

### V. COMPLIANCE

Failure to follow this policy can result in unapproved purchases and could ultimately cause loss of funding.

### VI. ROLES AND RESPONSIBILITIES

**Principal Investigator (PI)/Program Director (PD):** Initiates the procurement of goods and services. The PI/PD of the grant is responsible for obtaining the appropriate level of competitive sourcing based on the purchasing requirement listed above. The PI/PD should choose the vendor with which the lowest and best deal has been granted. They are also responsible for ensuring that the vendor is licensed and has the authority to perform the work.

**Post Award Grants Manager:** Ensures compliance with procurement policy. Reviews all documentation and chosen vendor. The post award grants manager should investigate any decisions made where the vendor with the lowest quote/bid was not chosen. He/she is responsible for approving the chosen vendor.

### VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

- 200 CFR 200.318
- Federal contract relevant to the federal funds being spent.

### VIII. PROCEDURE

When it comes to the attention of the PI/PD that work or items must be sourced through competitive bidding, the PI/PD should notify the office of research grants and sponsored programs (ORGSP). ORGSP will then assist the PI/PD, if needed, in public solicitation of these items/services. If a lesser requirement is needed (i.e. quotes) for solicitation, ORGSP does not need to be notified before solicitation. The PI/PD is responsible for conducting bid tabulations and making an informed decision on which vendor to choose. Once the PI/PD has chosen a vendor (whether it be through the bidding process or requests for quotes), this decision should then be communicated and approved by ORGSP before the vendor is awarded the contract. This communication must be in writing and all instances where the lowest

bidder is not the chosen vendor must include the reasoning of the decision. Once this decision has been approved by ORGSP, the purchase can be made, or the contract created.

**IX. CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

**X. DOCUMENT HISTORY**

Effective Date: 04.24.2024



# RG:11

## Cost Sharing/ Matching Policy

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### I. PURPOSE

Cost sharing activities occur when a portion of a sponsored program or grant is not paid for by the sponsor/ granting agency. These costs/ in-kind are to be paid for by the University to assist with the project. This policy is to ensure that such costs are properly approved and recognized by the University prior to grant application and acceptance.

### II. POLICY STATEMENT

All grant applications must originate within the Office of Research, Grants, and Sponsored Programs. Grant applications that include cost sharing activities must be approved by the ORGSP Executive Director, the Department Head, and the Executive Vice President for Finance no matter the type of cost sharing (mandatory, voluntary committed, voluntary uncommitted, or third party).

All cost sharing activities must have the pre-approved budget transfer transferred at the beginning of the project into the new grant account before spending can begin.

### III. DEFINITIONS

**Mandatory Cost Sharing:** Funds required by the sponsor/ granting agency as a condition of accepting an award.

**Voluntary Committed Cost Sharing:** Funds not required by the sponsor/ granting agency. However, if committed in the proposal and following application documentation, it is legally binding and must be provided by the University.

**Voluntary Uncommitted Cost Sharing:** Funds not required by the sponsor/ granting agency and not required to be tracked and reported on. This type of cost-sharing is not included in the proposal.

**Third Party Cost Sharing:** Funds or in-kind provided by a separate non-federal entity not associated with the University. The third party can support through cash or in-kind contributions. This type of cost sharing must meet the Uniform Guidance that defines allowable cost sharing expenditures.

### IV. AUDIENCE

This policy applies to any grant applicant/ department who intends to apply for a grant in which cost sharing is applicable and expected.

### V. COMPLIANCE

Failure to follow this policy will result in grant awards not being accepted by the University if University sponsored funding is required.

## VI. ROLES AND RESPONSIBILITIES

**Grant Applicant:** Responsible for notifying ORGSP of their intent to apply and reviewing the budget proposed with the grant with ORGSP. The grant applicant must obtain approval from their department regarding any cost-sharing that will come from their respective departmental budget. The grant applicant must ensure that approval from the ORGSP, the Executive Vice President for Finance, and their own department head has been granted prior to submitting any application.

**ORGSP:** Responsible for reviewing the proposed budget and ensuring that the Executive Vice President for Finance is aware of any cost sharing requirements.

**Executive Vice President for Finance:** Responsible for approving or denying cost sharing/matching requests in writing. This approval must contain the budget line from which the costs are being contributed from.

**Department Head:** Responsible for approving or denying cost sharing/matching requests and the final grant application.

## VIII. PROCEDURE

Once a grant applicant has located a grant they wish to apply for, they should notify the ORGSP. Formation of the grant budget is typically constructed during the application process. If any cost-sharing is required or requested with the grant, approval from the ORGSP Executive Director, the Executive Vice President for Finance, and the Department head must be obtained. Once these approvals are in place, the grant applicant may continue with constructing their grant application. The approval from the Executive Vice President for Finance must be in writing and indicate the budget line from which the costs are being contributed from.

If the grant is approved and awarded, funds must be moved into the new grant account created by ORGSP prior to the spending of any funds. It is the responsibility of the PI/PD of the grant to supply the Budget Adjustment Form to ORGSP for approval. Once ORGSP has approved, the Budget Adjustment Form will be sent to finance for final approval and transfer.

## IX. CONTACT INFORMATION

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

## X. DOCUMENT HISTORY

Effective Date: 04.24.2024

## RG:12

### Conflict of Interest in Research Policy

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#### XI. PURPOSE

LMU is committed to maintaining high standards of ethical conduct in research. Appropriate awareness of conflicts of interest and how it can affect the quality of research as well as sponsored awards receipt is critical for all faculty, staff, and students who are engaged in research. Likewise, federal regulations and guidelines regarding financial conflicts of interest in research mandate that research funded by federal grants, cooperative agreements, or contracts be conducted, designed, and reported without bias.

#### XII. POLICY STATEMENT

All faculty, staff, and students engaged as a Primary Investigator in sponsored research at the University must disclose activities that cast doubt on the integrity of research design, conduct, and reporting. This includes activities that either create a conflict of interest or that produce the appearance of a conflict of interest.

When significant financial interests or other personal factors could jeopardize or appear to jeopardize professional judgment or integrity in the conduct or reporting of research or performance in administration, management, instruction, or other university obligations, there is a conflict of interest. According to federal regulations, participants in externally financed research must fully disclose any substantial financial interests. A conflict of interest is not an accusation and does not imply that an employee's judgment has been compromised.

Any Significant Financial Interest (SFI) must be disclosed by completion of the ORGSP Conflict of Interest in Research form by the deadline for research funding applications. The PI must either annually submit an updated disclosure of SFIs or acknowledge no change to previous disclosures.

Should a new SFI arise during the sponsored project period (including marriage, inheritance, or purchase), the PI must reach out to ORGSP within 30 days of knowledge to determine if the conflict of interest needs to be managed, mitigated, reduced, or eliminated. Should management be required, the Investigator, Chair of the Department, and the Dean of the Investigator's school must work with the Office of Research, Grants, and Sponsored Programs on the creation of a management plan. After the management plan is approved by the Executive Director of ORGSP, it may be utilized. While this is under review by the ORGSP, the PI may not engage in the research until the PI agrees to comply with the finalized management plan.

#### III. DEFINITIONS

**Significant Financial Interest (SFI):** a financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse/domestic partner and dependent children) that reasonably appear to be related to the Investigator's institutional responsibilities:

- *With regard to any publicly traded entity*, a SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure plus the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as

determined through reference to public prices or other reasonable measures of fair market value.

- *With regard to any non-publicly traded entity*, a SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse/domestic partner or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest). An Investigator does not need to know the specific dollar value of an ownership interest because any equity interest in a non-publicly traded entity is a SFI even if the value is unknown.
- *With regard to intellectual property rights and interests* (e.g., patents, copyrights), a SFI exists upon receipt of income of greater than \$5,000 related to such rights and interests.

#### IV. AUDIENCE

This policy applies to any faculty, staff, or student member who conducts research within the University.

#### V. COMPLIANCE

Failure to follow this policy can result in loss of grant funding, the ability to apply for future grant opportunities through the University, and/or disciplinary action by the Executive Vice President for Academic Affairs.

#### VI. ROLES AND RESPONSIBILITIES

**Investigator:** Completes RCR instruction through the Collaborative Institutional Training Initiative (CITI). Completes and regularly updates the Conflict of Interest Form and adheres to Management Plan if necessary.

**Dean/Chair:** Works with the ORGSP to mitigate any potential Conflicts of Interest and collaborates on Management Plans.

**Office of Research, Grants, and Sponsored Projects:** Provides access to CITI training, the Conflict of Interest Form, and guides the development and safekeeping of any Management Plan. Notifies federal agencies if an SFI is determined during the course of an award.

**Executive Vice President for Academic Affairs:** Determines appropriate action if compliance for this policy is not met.

#### VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

Promoting Objectivity in Research, [42 CFR Part 50](#) and [45 CFR Part 94](#)  
[National Institutes of Health Financial Conflict of Interest Policy](#)

#### IX. PROCEDURE

1. CITI Training: The University utilizes the Collaborative Institutional Training Initiative (CITI) to provide the LMU community with a general overview of conflict of interest

policies and regulations. This overview is designed to assist faculty, staff and students with acquiring a basic level of understanding. The module takes approximately 45 minutes and includes a brief series of questions. This training is required for all Investigators conducting research at LMU.

2. **Disclosing Conflicts of Interest:** Key personnel on specific federal and other sponsored research projects must complete a Financial Conflict of Interest Form (see Forms) assessing their significant financial and personal interests and disclose any potential conflicts to LMU. This is the first step in identifying, evaluating, and managing situations involving a conflict of interest.
3. **Managing Conflicts of Interest:** If the ORGSP determines that a conflict of interest exists, the Investigator, Chair of the Department, and the Dean of the Investigator's school works with the Office of Research, Grants, and Sponsored Programs on the creation of a management plan. The management plan must be followed throughout the life of the award. All Conflict of Interest forms and management plans will be confidentially maintained within the ORGSP.
4. **New SFI:** Should a new SFI arise during the sponsored project period (including marriage, inheritance, or purchase), the PI must reach out to ORGSP within 30 days of knowledge.
5. **PHS-funded research:** When Investigators apply for U.S. Public Health Service (PHS)-funded research (directly or flowing through another agency), the University must abide by the Financial Conflict of Interest (FCOI) regulation set by the PHS. All Investigators (defined by the PHS as the Project Director or Principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research) applying for funds from the Agency for Healthcare Research and Quality (AHRQ), Agency for Toxic Substances and Disease Registry (ATSDR), Centers for Disease Control and Prevention (CDC), Food and Drug Administration (FDA), Health Resources and Services Administration (HRSA), Indian Health Service (IHS), National Institutes of Health (NIH), Substance Abuse and Mental Health Services Administration (SAMHSA) will be subject to the following provisions:

5a.) *Disclosing Conflicts of Interest*

Each Investigator must submit a disclosure form before applying for a PHS grant. This form must list any financial interests that the investigator believes are reasonably related to their institutional responsibilities and are held by them, their spouses, or any dependent children. The ORGSP must receive the disclosure form. If the researcher receives PHS funding, they must additionally update the disclosure at least once a year throughout the grant's duration and within 30 days after learning about or acquiring a new substantial financial interest. The LMU Conflict of Interest in Research Policy shall be followed when reviewing and managing disclosures.

5b.) *CITI Conflict of Interest Training*

Investigators must finish the LMU-mandated CITI training for Conflicts of Interest before beginning a PHS-funded research study. If

the Conflict of Interest Policy is changed to influence the requirements for Investigators, if an Investigator is new to the University, or if an Investigator is not in accordance with this policy or a management plan, this training must be redone at least every four years and must be finished right away.

5c.) *Public Access of Disclosed Significant Financial Interest*

Any significant financial interest disclosed to the University that fits the following criteria will have information about it made accessible to the public request:

- The disclosed significant financial interest is still held by the senior/key personnel of the active PHS project; [NOTE: Senior/key personnel are defined as a PHS Project Director or Principal Investigator and any other person who makes a significant, quantifiable contribution to the scientific development or execution of a project and is mentioned in the grant application, progress report, or any other report submitted by the institution, regardless of whether they are paid through the grant.]
- The University determines that the significant financial interest is related to the PHS-funded research; and,
- The University determines that the significant financial interest is a financial conflict of interest.

The information request must be made to the Executive Director of ORGSP who will respond within five (5) business days of receipt of the request. Disclosed information will be provided to the extent required by applicable PHS regulations and state law.

5d.) *Subrecipients*

If the University conducts the PHS-funded research through a subrecipient, the University will include provisions determining whether the University's or the subrecipient's policy on Conflict of Interest in Research will apply to the subrecipient investigators in a written agreement with the subrecipient. The subrecipient will attest as part of the agreement that its policy conforms with the PHS requirements on Objectivity in Research if the subrecipient's policy will be applicable. For the University to send reports to PHS on time, the agreement must also stipulate the time(s) during which the subrecipient must notify it of any financial conflicts of interest that are discovered. As an alternative, if the University's Conflict of Interest in Research Policy is in effect, the agreement should provide timeframes for the subrecipient to send the University all subrecipient investigator declarations of substantial financial interests. These time frames must be long enough to allow the University to meet the PHS regulations-required deadlines for evaluation, administration, and reporting.

**X. CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Projects.

**XI. DOCUMENT HISTORY**

Effective: 10-16-2024

➤ [CITI Training](#)

## RG:13

### Sponsored International Research Collaboration

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#### XIII. PURPOSE

Lincoln Memorial University places high importance on fostering global ties and believes that the free interchange of ideas among researchers and students worldwide is essential to preparing the University's students for an interconnected world. However, to guarantee federal regulation compliance, protect the intellectual property of University employees and students, and ease administrative obligations that may result from sponsored foreign cooperation, proper identification and approval of sponsored international research collaboration is required.

#### XIV. POLICY STATEMENT

To meet compliance with federal, non-federal, and international regulations and expectations, Lincoln Memorial University will compile and review information about its sponsored international research activities to provide effective and compliant administration.

##### *Training*

Individuals who desire to participate in sponsored international research must complete CITI training modules "Undue Foreign Influence: Risks and Mitigations" and "Export Compliance."

##### *Human/animal participants*

Conducting research involving human and animal participants in foreign countries requires adhering to ethical standards that are both U.S.-based (IRB, IACUC, HIPPA, Code of Federal Regulations) and internationally recognized (Declaration of Helsinki, International Conference on Harmonization – Good Clinical Practice E6). Additionally, special attention may need to be given to the rights and well-being of international participants within diverse cultural environments and local regulatory frameworks. The entity with the stricter standard must be adhered to for research to occur. The PI's IRB/ICAUC application MUST note if research and/or research subjects will be outside of the United States.

##### *Export Control*

PIs/PDs who wish to engage in sponsored international collaborations should be familiar with export control regulations. Exports can apply to technology, information, instruction, software, bioagents, and toxins among other goods. While some research projects fall under public domain, others may necessitate licenses. The PI/PD must contact ORGSP as soon as it is known that any exports will be exchanged as a part of the international research agreement so that it can be checked against the export determination matrix by the Export Control Subcommittee.

##### *Biological/chemical transfers*

The exchange of biological and chemical transfers across international lines includes export law and potentially uniform biological material transfer agreements. The process to initiate these agreements should include research administration from the ORGSP and the collaborating institution's research administrators.



#### *Data management*

Some federal funding agencies require that data management plans be submitted with collaborative projects. So that PI's/PD's sponsored international project meets both funding requirements and federal and international law, the PI/PD must contact the ORGSP when initiating a data management plan and/or Data Use Agreement.

#### *Foreign exchange rates*

The PI/PD must consult the ORGSP as they formulate project budgets – the office will assist in identifying exchange rates and establishing payment timelines and expectations. All award agreements must state the award amount in the United States Dollar (USD).

#### *Contract/Agreement Language*

Before a project or submission with an international partner begins, the ORGSP and LMU Office of the General Counsel must review any document and ensure that the agreement is issued in English. Final authorization of any foreign agreement is designated to the President of Lincoln Memorial University.

#### *Prohibited Collaboration*

PIs/PDs should not engage in research collaborations with foreign entities identified by the [United States Secretary of State's list of the "Country of Particular Concern List,"](#) ["Special Watch List Countries,"](#) and ["Entities of Particular Concern."](#) Likewise, collaboration with persons or institutions in sanctioned entities is prohibited.

### III. DEFINITIONS

**Country/Entities of Particular Concern:** *a designation given by the United States Secretary of State to a country that has engaged in or tolerated severe violations of religious freedom.*

**Export:** The US government defines an export as the transfer or disclosure of an item outside of the United States, or the transfer of a controlled item or information within the US to a foreign national. This includes physical movement of items across the border, as well as oral, written, electronic, or visual disclosure. The term "export" can also apply to services performed for the benefit of a foreign person.

**International Research Collaboration:** *the act of partnering with different organizations in academia, government, or the private sector in nations and territories outside of the United States, working together across countries in scientific or engineering investigations.*

**Sponsored Research:** a type of research activity that is funded by an external organization, such as a government agency, private sponsor, or non-profit organization. Under this policy, LMU might act as a recipient of sponsored research or a provider.

**Country/Entities of Particular Concern:** *a designation given by the United States Secretary of State to a country that has engaged in or tolerated severe violations of religious freedom.*

### IV. AUDIENCE

Faculty, staff, and students of Lincoln Memorial University who seek to enter into international

agreements involving sponsored research.

## V. COMPLIANCE

Failure to follow this policy can result in loss of grant funding, the ability to apply for future grant opportunities through the University, and/or disciplinary action up to and including termination of employment by the Executive Vice President for Academic Affairs.

## VI. ROLES AND RESPONSIBILITIES

**PI/PD:** The Primary Investigator/Project Director assumes responsibility for notifying the ORGSP and any necessary compliance committee and/or subcommittee (IACUC, IRB, IBCSC, ECAS) if they are engaging in a sponsored international research project.

**Dean/Chair:** Ensures that graduate students, postdoctoral fellows, other postgraduate trainees, faculty, staff, and undergraduate students within a program/school/college are aware of the Sponsored International Research Collaboration policy.

**IACUC, IRB, IBCSC, ESAC:** Reviews research proposals and ensures researchers have met training requirements and compliance before an international sponsored research project is approved.

**Office of Research, Grants, and Sponsored Projects:** Provides access to training through the Collaborative Institutional Training Initiative (CITI). Assures PIs/PDs who notify the Office about sponsored international research projects have completed CITI training, properly notified the appropriate compliance committees, works with the PI/PD on reviewing and approving international agreements and budgets, collaborates with the LMU Office of General Counsel in reviewing international agreements, and submits any such agreements to the Executive Vice President for Academic Affairs and ultimately the President of the University for final approval.

**Office of the General Counsel:** Addresses questions related to international compliance. Reviews international agreements along with the ORGSP.

**Executive Vice President for Academic Affairs:** Reviews sponsored internal research agreements and determines whether the application will move to the President of the University.

**President of the University:** Authorizing authority for all international agreements.

## VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

[Code of Federal Regulations](#)

## **IX. PROCEDURE**

- 21.) PI/PD completes CITI training on “Undue Foreign Influence: Risks and Mitigations” and “Export Compliance.”
- 22.) PI/PD notifies the ORGSP of its intent to collaborate on a sponsored research project with an international entity.
- 23.) The PI/PD with the assistance of the ORGSP ensures that the proper compliance committee(s)/subcommittee is notified of the sponsored research collaboration.
- 24.) The compliance committee(s)/subcommittee initiates review of the project and shares its determinations of whether the project can move forward with the PI/PD and the ORGSP.
- 25.) The ORGSP works with the PI/PD to review agreements and ensures any agreement is in English and currency is in USD.
- 26.) The ORGSP submits the reviewed agreements to the LMU Office of Legal Counsel for further review.
- 27.) If an agreement is approved, it moves on to the Executive Vice President for Academic Affairs and then the President of the University for official authorization.
- 28.) Following any authorized agreement, the ORGSP and Office of the General Counsel assist the PI/PD with the creation of data management plans, export agreements, and/or other related matters.

## **X. CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Projects.

## **XI. DOCUMENT HISTORY**

Effective: XX-XX-XXX

- [CITI Training](#)

# FIN: 20:01

## FINANCIAL MANAGEMENT OF FEDERAL GRANT FUNDS

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### I. PURPOSE

The purpose of this policy is to ensure correct financial management of federal and federal flow through grant funds. Through administration of this policy, the university ensures its financial management system provides for the proper expending and accounting for federal grant funds.

### II. POLICY STATEMENT

The financial management of federal grant funds are subject to 2 CFR 200.302, which establishes the requirements for financial systems for non-federal entities. This requirement is part of the “Uniform Guidance - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.” This applies to all federal agreements (grants and cooperative agreements), including federal funds received by the university from other organizations and state agencies (federal flow-through funds).

### III. DEFINITIONS

- Federal Awarding Agency: Federal agency that provides a federal award directly to a non-federal entity.
- Federal Program:
  - a) All federal awards which are assigned a single number in the CFDA.
  - b) When no CFDA number is assigned, all federal awards to non-federal entities from the same agency made for the same purpose must be combined and considered one program.
- Non-federal Entity: State, local government, Indian tribe, institution of higher education (IHE), or not for profit organization that carries out a federal award as a recipient or sub-recipient.
- Pass-through Entity: Non-federal entity that provides a sub-award to a sub-recipient to carry out part of a federal program.

### IV. AUDIENCE

This policy applies to any employee who develops, submits, reviews, approves, or otherwise assists in the creation and receipt of grant applications and funds.

### V. COMPLIANCE

Failure to comply with this policy and related Federal or State laws, regulations, or University policies may result in consequences, including but not limited to, loss of current and future awards.

### VI. ROLES and RESPONSIBILITIES

**Office of Research, Grants, and Sponsored Programs:** ORGSP is responsible for providing the supportive infrastructure needed to ensure correct financial management of federal and federal flow through grant funds.

**Finance Office:** ensures payments on federal grant awards are prompt with minimal time elapsing between transfer of funds (from United States Treasury or pass-through entity) and

the distribution of the funds.

**Primary Investigator and/or Co-Investigator:** Makes award expenditures in accordance with both the grantor's and University's policies and procedures.

## VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

2 CFR part 200.302 Financial Management (of Subpart D Post Federal Award Requirements): [https://www.ecfr.gov/cgi-bin/text-idx?SID=a32963af34d3c94b854882a21e8d77e9&mc=true&node=se2.1.200\\_1302&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=a32963af34d3c94b854882a21e8d77e9&mc=true&node=se2.1.200_1302&rgn=div8)

2 CFR part 200.328 Financial Reporting (of Subpart D Post Federal Award Requirements): <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR36520e4111dce32>

2 CFR Part 200 Subpart E Cost Principles: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E>

2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>

## VIII. PROCEDURES

### 1. Identification

The university will identify, in its financial system, all federal grant awards received and expended, and the federal programs under which they were received (CFDA title and number, award identification and year, name of federal agency and name of pass-through entity if applicable).

### 2. Reporting and Records

The university will provide accurate, current, and complete disclosure of financial results of each federal grant award or program in accordance with 2 CFR 200.327. Reports will be made in a timely manner and as indicated by the federal awarding agency. The university shall monitor and report program performance to the federal awarding agency as required.

The source and application of federal grant funds will be recorded and will contain information on authorizations, obligations, unobligated assets and expenditures as well as any income or interest if applicable. The Office of Research, Grants and Sponsored Programs will maintain these records and support documentation.

### 3. Internal Controls

*Control Environment:* The Office of Research, Grants, and Sponsored Programs at Lincoln Memorial University is committed to an environment focused on transparency and ethical reporting. The office does this through ensuring that every employee is aware of and has acknowledged the ORGSP handbook that outlines the office's internal structure and responsibilities. Staff are also encouraged and required to undergo formal training to give each employee a better understanding of their responsibilities and campus-wide expectations. ORGSP is additionally subject to financial audits performed by an independent auditor at the discretion of each granting agency. This serves as a check that management and personnel are acting in accordance with all applicable laws and regulations. Furthermore, ORGSP staff work closely with the finance department, as well as with grantors and grantees, creating a system of checks and balances within the financial realm of recordkeeping.

*Risk Assessment:* ORGSP is susceptible to specific reporting requirements that vary between grants. Personnel within the office are aware of these deadlines and follow protocol to ensure reporting requirements have been fulfilled. Accurate and timely financial reporting is ensured and supported through consistent and detailed tracking performed within the office. There is always the risk of fraudulent activity, which our office does understand. The office handles this risk by ensuring that internal controls are in place and that proper approvals must be given before transactions take place. The movement of most tracking and awarding to computer systems has had a positive impact on our office. Via shared documentation and open record access, a continuous process of monitoring takes place within each grant.

*Control Activities:* ORGSP maintains open communication with others who are involved in activities through the office. Document sharing is highly encouraged, however, ORGSP maintains the control to edit documents when needed. The office also reconciles its balances with finance and each grantee periodically.

To show control and accountability for all funds, property and other assets related to federal grant awards, the university will manage each federal award in compliance with federal statutes, regulations and terms of the federal awarding agency. The Office of Research, Grants, and Sponsored Programs will compare expenditures with budget amounts for each federal award on a routine schedule.

The Finance Office will ensure payments on federal grant awards are prompt with minimal time elapsing between transfer of funds (from United States Treasury or pass-through entity) and the distribution of the funds. The Office of Research, Grants and Sponsored Programs has written procedures for this process that meet requirements of 2.CFR.200.305.

As prescribed in Subpart E – Cost Principles under 2 CFR Part 200, for a given cost to be charged to a federal award the cost must be allowable, reasonable and allocable. Procedures for determining these requirements are in LMU Policy on Costing Principles for Sponsored Projects.

*Information and Communication:* The ORGSP office tracks grant activity across Lincoln Memorial University's campus. They use relevant information provided by grantees and grantors to ensure that accurate data is presented. The office uses this compilation of data to track balances for each grant and shares the information with the grantee and the finance

department. The office also shares this information with the grantors through reporting requirements and for audits when applicable.

The university will take reasonable measures to safeguard protected personally identifiable information and other information the federal awarding agency or pass-through entity designates as sensitive (consistent with applicable federal, state and local laws regarding privacy and obligations of confidentiality).

*Monitoring Activities:* ORGSP is always looking for ways to improve its structure and functioning. The office is always in the process of auditing itself through cross functional collaboration with the finance department, as well as staying in compliance with reporting requirements from each grantor. When deficiencies are noted, the department takes immediate action to handle the situation efficiently.

Should any issues of noncompliance arise, such as those identified in audit findings, the university will take prompt action to investigate and manage.

IX. **CONTACT INFORMATION**

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

X. **DOCUMENT HISTORY**

Effective: 08.16.2023

The LMU Policy on Financial Management of Federal Grant Funds is effective as of August 16, 2023, and shall remain effective until amended or terminated by the President.

# FIN 20:02

## COST PRINCIPLES FOR SPONSORED PROJECTS

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### I. PURPOSE

The purpose of this policy is to ensure direct costs are necessary, reasonable, allowable, and allocable to a particular sponsored project and administered consistently across all sponsored projects. By administering this policy, the university ensures that direct costs and associated facilities and administrative (F&A, indirect, overhead) costs are presented appropriately in proposal budgets and charged consistently to separate and distinct funds in the university's accounting system. This policy applies to all funding, federal and nonfederal, accepted by the Office of Research, Grants, and Sponsored Programs (ORGSP) on behalf of the university.

### II. POLICY STATEMENT

Federal awards/sub-awards issued on or after December 26, 2014 are subject to 2 CFR Part 200 (commonly referred to as Uniform Guidance—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards but hereinafter referred to as “2 CFR Part 200”). This federal regulation incorporates the Cost Accounting Standards (CAS) located in 48 CFR 9905.501, 9905.502, 9905.505, 9905.506 , and 48 CFR 9900 through 9999 and 48 CFR part

30 (FAR Part 30) which establish the principle that costs will be consistently treated as direct or F&A costs. The standards apply to all federal agreements (grants, contracts, and cooperative agreements), including federal funds received by the university from other organizations and state agencies (federal flow-through funds).

Direct costs on sponsored projects are those costs that can be clearly associated with a specific project and can be assigned easily with a high degree of accuracy. Costs incurred for the same purpose in similar circumstances must be treated consistently as either direct cost or F&A cost.

As prescribed in Subpart E – Cost Principles under “2 CFR Part 200,” for a given cost to be charged to a sponsored award the cost must be allowable, reasonable, and allocable and all of the criteria outlined in Sections 1, 2, & 3 below must be met.

#### 1. Allowable

For a cost to be allowable (2 CFR 200.403), it must:

- Be necessary and reasonable for the performance of the federal award;
- Not be designated as “unallowable” under federal regulations for selected items of cost;
- Adhere to sponsor-specific policies and award-specific terms and conditions;
- Adhere to state and university policies, procedures and regulations regarding specific items of cost;
- Be given consistent treatment, i.e., a cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an F&A cost;
- Not be included as a cost or used to meet cost sharing or matching requirements on any other federally financed project.



## 2. Reasonable

For a cost to be reasonable (2 CFR 200.404), it must be:

- Generally recognized as ordinary and necessary for the performance of the federal award;
- Reasonably priced based on sound business practices;
- Compliant with state and university procurement policies and procedures;
- Compliant with federal and state laws and regulations and terms and conditions of the federal award;
- Comparably priced for the geographic area; and
- Reasonable as determined by a prudent business person.

## 3. Allocable

For a cost to be allocable (2 CFR 200.405), it must:

- Be incurred solely to advance the work funded under the federal award; and
- Benefit the sponsored project and other work of the university in proportions that can be clearly documented through reasonable methods:
  - If a cost benefits two or more projects or activities in proportions that can be determined and documented without undue effort or expense, the cost must be allocated to the projects based on the proportional benefit.
  - If a cost benefits two or more projects or activities in proportions that cannot be determined with normal precision because of the interrelationship of the work involved, then the costs may be allocated or transferred to benefited projects on any reasonably documented basis, such as the Principal Investigator's documented estimate.
  - Supplies and equipment may not be purchased simply to use an unobligated balance remaining at the end of a project or used to restock inventory to replenish supplies used during the life of the project.

## III. DEFINITIONS

- **Administrative and Clerical Salaries and Wages:** Costs normally included in departmental administration expenses and typically refer to employees in secretarial positions and office services; however, the nature of the task being performed and not the class title determines if the work is classified as administrative or clerical.
- **Cost Sharing:** Refers to the portion of the total costs of a sponsored project borne by LMU.
- **Direct Costs:** Costs that can be identified and associated with a particular sponsored project, instructional activity, or any other institutional activity, or can be directly assigned to such activities relatively easily and with a high degree of accuracy. Examples of direct costs include salary, travel, equipment, supplies, etc.

- **Facilities and Administrative (F&A) Costs:** Generally, support costs that cannot be identified readily and specifically with a particular sponsored project. As an example, departmental clerical salaries, utility costs, etc. F&A costs are known sometimes as “indirect costs” or “overhead costs.” Examples include costs for building and equipment depreciation and use, physical plant operation and maintenance, general administration and general expenses, departmental administration, sponsored projects administration, library expenses and student administration and services.

#### IV. AUDIENCE

This policy applies to any employee who develops, submits, reviews, approves, or otherwise assists in the creation and receipt of grant applications and funds.

#### V. COMPLIANCE

Failure to comply with this policy and related Federal or State laws, regulations, or University policies may result in consequences, including but not limited to, loss of current and future awards

#### VI. ROLES AND RESPONSIBILITIES

**The Office of Research, Grants, and Sponsored Programs:** ORGSP is responsible for providing the supportive infrastructure needed to ensure correct financial management of federal and federal flow through grant funds.

**The Finance Office:** Ensures payments on federal grant awards are prompt with minimal time elapsing between transfer of funds (from United States Treasury or pass-through entity) and the distribution of the funds.

**Primary Investigator and/or Co-Investigator:** Makes award expenditures in accordance with both the grantor's and University's policies and procedures.

#### VII. PROCEDURES

When categorizing the various types of costs as either direct costs or F&A costs, the university shall be consistent to ensure costs incurred for the same purpose in like circumstances are consistently treated as either direct costs or as F&A costs. In other words, when the purpose is the same and circumstances alike, the university may not deem an expense a direct cost under one project and an F&A cost under another project (see Federal Cost Accounting Standards).

It is the university’s policy to charge the maximum F&A cost rate allowable on all sponsored projects, regardless of the source. For federal funding agencies, the university applies the current rates established through its most recent F&A Rate Agreement, as negotiated with the federal government, unless otherwise dictated by the federal funding agency. For private, nonprofit funding sources, the university documents and abides by each sponsor's individual F&A rate policy, where F&A reimbursement may range from zero percent on up.

##### 1. Administrative/Clerical Salary Support Integral to a Project

The salaries of administrative and clerical staff should normally be treated as F&A costs. Direct charging of these costs may be appropriate **only if all of the following conditions are met:**

- A. Administrative or clerical services are integral (essential, vital, or fundamental) to a project or activity;
  - i. The definition of the term “integral” in this context means the nature and purpose of the sponsored project lends itself to administrative and clerical personnel being essential to the completion and fulfillment of the stated aims and objectives. This type of involvement of administrative and clerical personnel in direct support of the project deliverables is different, separate and apart from standard or routine levels of administrative support that are expected in the successful management of any sponsored award.
  - ii. The duties/roles below are examples of normal administrative support not considered integral to a project or activity:
    - Assisting with proposal processing
    - Monitoring projects for fiscal and administrative compliance
    - Assisting with general correspondence internally and with collaborators
    - Assisting with technical/project reports
    - Ordering supplies/equipment
    - Managing human resource responsibilities
    - Making meeting/travel arrangements for research faculty and students
- B. Individuals involved can be specifically identified with the project or activity;
- C. Such costs are explicitly included in the budget or have the prior written approval of the federal awarding agency.
  - i. Some federal projects do not require a detailed budget as part of the proposal process, such as modular grants awarded by the National Institutes of Health (NIH). In such cases, these costs could be documented in a budget justification, statement of work, or other submitted proposal document.
  - ii. In order to obtain written approval for costs not specifically included in the budget, documentation of the unlike circumstances and integral nature of certain costs associated with a specific project must be submitted to the sponsor for review and approval.
- D. The costs are not also recovered as F&A costs. It would be inappropriate to charge the cost of such activity directly to the award if the costs of performing the same type of activity are also included as allocable costs in the university’s administrative cost pools.

## **2. General Administrative Expenses Integral to a Project**

Items such as office supplies, postage, local telephone costs and memberships must normally be treated as F&A costs. If directly related to a specific award, certain costs that otherwise would be treated as F&A costs may be allowed as direct costs, providing the cost satisfies the same conditions applicable to administrative and clerical staff exceptions as stated in section 4.1.

While this policy applies to all sponsored agreements, federal and non-federal, the costs identified as “normally F&A” may be directly charged to a non-federal project if the cost can be specifically identified with the particular sponsored project or directly assigned with

a high degree of accuracy and permitted by the sponsor's policy or otherwise approved by the sponsor.

### **3. Unallowable Charges**

The Uniform Guidance deems certain costs simply unallowable and will not allow such costs to be budgeted as direct costs or F&A costs. Examples of disallowed costs include expenses for alcoholic beverages, entertainment, fund-raising and lobbying activities.

## **V. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES**

2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>

2 CFR Part 200 Subpart E Cost Principles: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E>

48 CFR Part 99 Subchapter B Part 9905 Cost Accounting Standards for Educational Institutions:  
<https://www.ecfr.gov/current/title-48/chapter-99/subchapter-B/part-9905>

## **VI. CONTACT INFORMATION**

For more information regarding this policy please contact the Office of Research, Grants, and Sponsored Programs.

## **VII. DOCUMENT HISTORY**

Effective: 08.16.2023

**ASSURANCE of  
PROTECTION from  
RESEARCH RISK**

Regardless of funding source, all activities performed by LMU faculty or students that involve human subjects, animal subjects, the appropriate University review board and/or committee must review the use of recombinant DNA, the use of biohazards, or international research collaboration. It is the responsibility of the PI/PD to ensure this step in the application process. If a grant application involves one or more of these requirements, the ORGSP will request proof of application status before the grant can be submitted. Some federal agencies will allow a grant to be submitted when approval from the appropriate review board/committee is pending. In these cases, the grant may be allowed to proceed.

### **Institutional Review Board (IRB)**

All proposals that involve research to be performed by LMU faculty or students that will in any way involve human subjects must be reviewed by the IRB. The IRB's primary responsibility is to assure LMU researchers operate within the provisions of the Federalwide Assurance of Compliance filed with the U.S. Department of Health and Human Services (DHHS) Office for Human Research Protections (OHRP) at 45 CFR 46.

### **Institutional Animal Care and Use Committee (IACUC)**

All animal care and use is under the oversight of the IACUC. The IACUC conforms to the general public health service guidelines (PHS policy at IV.A.3.B) concerning membership. IACUC responsibilities include the inspection of the animal facilities as well as all laboratories that use animals. The IACUC must approve all protocols before animals may be used and must certify that all individuals are appropriately trained.

### **Institutional Biological and Chemical Safety Committee (IBCSC)**

IBCSC is the cornerstone of institutional oversight on research involving biological materials and chemicals. The IBCSC must approval protocols that include

- HHS or USDA Select Agents
- Recombinant DNA
- Biologic agents that create infectious or biohazardous materials
- Generation of carbon particulates
- Hazardous or potentially hazardous chemical use

IBCSC must certify that all individuals are appropriately trained in the above.

### **Export Control Advisory Subcommittee (ECAS)**

All research collaborations that involve work with a foreign entity or institution are required to undergo review by the ECAS. The ECAS is made up of members of the ORGSP, the LMU Office of the General Counsel, IACUC, IRB, and IBCSC and appointed by the Executive Vice President for Academic Affairs. The ECAS makes recommendations to the Ex. VPAA on

- Collaborative proposals brought forth by LMU faculty and staff
- Help to establish policies, training materials, record-keeping requirements, and recommendations related to export control concerns
- Development and recommendations for the LMU Export Control Manual
- Oversight on LMU export control
- Training for the LMU community on export control

# **GRANT PROPOSAL COMPONENTS**

Funding agencies' application guidelines usually provide the framework for the sequence and content of the proposal. While the format will vary from one agency to another, a sponsor usually requests certain basic components. Unless otherwise stated in the grant application guidelines, these basic components could include one or all of the following:

- Project summary (or abstract)
- Project narrative
- Introduction/review of literature
- Needs statement/statement of problem
- Objectives
- Action Plan/Methodology
- Personnel
- Facilities and resources
- Timeframe
- Evaluation
- Publication/dissemination
- Appendices
- Budget
- Vitae/bibliographical sketches
- Bibliographical references
- Letters of support

### **Project Summary/Abstract**

The proposal must contain a summary of the proposed activity, usually not more than one page in length. The summary should include **a statement of objectives, methods to be employed and the potential impact or significance of the proposed activity to the advancement of knowledge or education**. Reviewers will probably read this section first to gain an overview of the proposed project. Interest often can be captured at this point if the summary is written in clear and concise terms.

### **Project Description or Narrative**

This principal part of the proposal, or the narrative, varies in length, but usually does not exceed 15 pages. It is a detailed statement of the work to be undertaken. Overall, it should discuss potential advances that are expected as a result of the proposed activity, and the specific contributions the proposed work will make toward expanding or developing the knowledge or technology base. It is the basis for determining the merit of the proposal and may include several components depending on application guidelines.

### **Introduction or Background Information/Review of Literature**

This provides a limited explanation of the proposed activity, the theory or rationale behind it, and the efforts that have been devoted to it in the past are typical kinds of explanations. This section must demonstrate to the reader or reviewer that the applicant has a familiarity with current thinking on the topic and awareness of how the proposed project relates to present trends.



### **Need Statement/Statement of Problem**

The need statement explains why the program, services, or research is needed at this time, or at a particular university, or for a particular population. The sponsoring agency must be convinced that there is a measurable or verifiable need for the activities described in the remainder of the proposal.

### **Objective(s)**

The objective(s) furnish the purpose, aim, or goal(s) of the project. In establishing this section, it is essential that project planners are specific in describing their objectives.

### **Action Plan or Methodology**

The activities or methodologies to be employed must be carefully detailed. The proposal writer may include in this section a description of his or her preliminary work completed on the proposal activity. Grant reviewers are especially concerned about the relevance of each plan or methodology to the objectives of the project and the familiarity of the writer with the proposed plan of action.

### **Personnel**

The personnel section of the proposal should convince the reviewers that the project team members have the expertise to conduct the proposed activities. The PI/PD of a sponsored project must be a full-time member of the LMU faculty or staff unless otherwise approved by the divisional VP. A brief description of each team member should be prepared, indicating his or her professional experience and how he or she will contribute to the project.

### **Facilities and Resources**

The emphasis in this section should be on the institutional facilities and resources that are beneficial to the project. Facilities and resources such as media rooms, libraries, special service units, research apparatus, laboratories, conference rooms, media equipment, computer technology, collaborations and partnership may be described in a proposal. The information provided is used by reviewers to assess the adequacy of the institutional facilities and resources available for performance of the work proposed in the project.

### **Timeframe**

The timeframe should specify dates for completion of all activities or tasks and their sequence and interdependence. The ability to stay on schedule is one of the most important aspects of project management.

### **Evaluation / Progress / Performance**

A very important part of a project is a well-designed plan for evaluation. All funding agencies highly stress the importance of a proper assessment of the achievement of project goals and objectives. Evaluation can be formative (process) and summative (product). Formative evaluation provides feedback as a program progresses and it facilitates appropriate decision making on a day-to-day basis. Summative evaluation measures program attainments, including the outcome of the project and the achievement of goals.

### **Publication or Dissemination**

To be useful, research results must be disseminated. This section of the proposal should describe who would be informed of project results, which results will be reported, and in what form the results will be disseminated.

### **Appendices**

These are additions of information or materials appended to the proposal that may not be essential to the proposal. Carefully check the sponsoring agent's guidelines and/or contact the program director to determine what is allowed as appendices and what would be most appropriately included in the body of the narrative. Agencies may not return originals or special attachments.

### **Vitae/Biographical Sketches**

Well-designed and up-to-date vitae are required for all senior personnel, major users, and technical personnel listed in the proposal. Each vitae (**usually two pages**) should include information on the individual's (a) education, (b) research experiences, (c) special skills or abilities, (d) usually up to five publications or presentations most relevant to the work proposed, and (e) usually up to five other significant publications or presentations. This section allows reviewers to decide whether personnel are capable of carrying out the proposed activity.

### **Bibliographical References**

A listing of pertinent reference(s), journal style, to the work described in the proposal is required, if applicable.

### **Letters of Support**

Support from such key persons as the collaborating institution's president or vice presidents, local and state leaders, laboratory, industry, or agency executives, and any members of a proposed partnership or collaboration are encouraged and sometimes required.

### **Budget Page and Budget Justification**

The budget section of the proposal should reflect the **total** cost of the proposed project with the anticipated level of salaries, release time, extra compensation, travel, contracts, equipment, supplies, publication or document dissemination costs, consultant services, computer services, participant support, and all cost sharing and matching funds from **all** sources clearly indicated. This section should be prepared carefully as mistakes could lead to: (a) a poor score from reviewers; and (b) an unacceptable liability to the University, possibly resulting in non-acceptance of a funding award.

The budget justification (usually does not exceed three pages) should explain and justify major cost items, any unusual situations or inclusions, and the proposed institutional cost sharing. Each major budget item must be clearly justified or explained, including a description of the responsibilities of any listed personnel and an explanation of their role in meeting the objectives of the project. The PI/PD must note from the application guidelines which costs cannot be covered by the granting agency and must be assumed by LMU as an indication of its commitment to the proposed project and ascertain whether a budget requires approval by others such as the VP for Finance (cost sharing).

## **Budgeting Guidelines**

The budget is the PI/PD's best estimate of the total cost to conduct the proposed project and in funding, required from the sponsor. It is important to keep in mind that, upon submission of the proposal, the budget becomes a **firm commitment** on the part of the University to perform the proposed work at the proposed costs. The budget must anticipate and appropriately reflect **all** activities included in the proposal.

The first step in preparing a proposal budget should always be to review the application materials and guidelines provided by the sponsor. Budget forms or formats provided by the sponsor should always be used. In addition to specifying a form or format, sponsor guidelines will also provide information concerning (a) limitations, if any, on funds which the sponsor will provide; (b) allow ability of specific types of costs; (c) requirements for costs sharing or matching; and (d) any other special financial information.

Two distinctly different types of cost comprise the total cost of any sponsored program: direct costs and indirect costs, often called Facilities and Administration (F&A) costs. Direct costs are those costs which the University's accounting system can easily and accurately identify with, and charge to, specific projects. F&A costs are incurred while providing facilities and support services simultaneously to many or all of the University's sponsored programs.

## **Direct Costs**

### *Salaries & Wages*

Salaries and wages of faculty and staff are a direct cost of the proposed project and should be budgeted in proportion to the fraction of full-time effort each faculty and staff member will devote to the project. For example, if the PI/PD will devote 25% of his or her time to the proposed project, 25% of his or her salary should be included in the proposed budget. Included in this section of the budget should be all personnel who will work on the project, with the PI/PD appearing first, then other senior personnel or research assistants. For each person or position, the following information typically is included for each period: (1) the percentage of effort each will devote to the project; (2) the annual base salary; (and if applicable fringe benefit rate) and (3) the total salary support requested from the sponsor. For academic year employees, salary requests for the academic year and summer months should be listed separately. The respective dean and divisional VP must approve faculty effort.

### *Administrative Support Salaries*

Salaries for administrative support can be budgeted on federal applications if the services can be justified and dedicated to the work of the project. Applications for large center grants and programs that require extensive administrative support may allow administrative support subject to agency approval. Charges are not allowed for general departmental secretarial support. This policy is also applied to non-federal applications to maintain consistency for audit purposes.

### *Fringe Benefits*

The fringe benefit rate of 28% is an average rate that represents LMU's cost for normally charged fringe benefits for faculty and staff salaries.

### *Equipment*

Equipment means an article of non-expendable tangible person property having a useful life of more than one year and an acquisition cost of \$5,000 or more per item. Only items that meet this definition should be budgeted on the "Equipment" line of budgets. Items less than \$5,000 each should be listed in the "Supply" category. (All Federally Funded Equipment purchases must follow guidelines set forth by OMB 2 CFR 200.313)

### *Materials and Supplies*

Included in this category are all expendable supplies and tangible property having a cost of less than \$5,000 or a useful life expectancy of less than one year. Supplies should be listed in the budget by type (i.e., office supplies, laboratory supplies, etc.) and estimated costs. (All Federally Funded Supply purchases must follow guidelines set forth by OMB 2 CFR 200.314)

### *Travel*

Itemize the expenses for each person that will travel in conjunction with the responsibilities of the proposal. Each trip should be listed separately and include the (a) destination, duration and purpose of the trip; (b) persons traveling; (c) round trip coach airfare; (d) surface transportation charges; (e) per diem or actual hotel and meal costs as allowed by sponsor or the University; and (f) any other related expenses such as conference registration costs.

### *Consultants*

Consultants should be named and/or their specialty identified in the budget. The budget should also detail the consultant's daily or job rates, number of days employed, travel costs, and any related expenses.

### *Subcontractor*

List the total for all subcontracts on a "Subcontract" budget line. Verify that the subcontractor's statement of work is included in the body of the proposal and that there is an appropriate budget. The subcontractor should prepare a detailed budget for each year and a cumulative budget using the subcontractor's fringe benefit and overhead rates. A copy of the subcontractor's negotiated Facilities & Administrative Rate Agreement should be forwarded to the ORGSP. An officially authorized representative who is contractually committing the organization should endorse the subcontractor's proposal.

## **Facilities & Administrative Costs (F&A) / Indirect Costs**

Facilities and Administrative Cost (indirect costs) are incurred while providing facilities and support services to many or all of the University's sponsored programs. LMU's Indirect Cost Rate Agreement was negotiated with the Department of Health and Human Services and is 32.2% on campus and 11.2% off campus. The rate is effective from 06/30/2023 to 07/01/2027

Internally, LMU formalized an Indirect Cost Allocation Formula to specifically redirect the F&A costs to better support external funding efforts. The formula is as follows:

- 50% is allotted to the general fund.
  - The President gives 10% of these funds to the University's Mini Grants Program.
- 25% is allotted to the Dean of the PI/PD.

- 25% is allotted to the ORGSP for its research enhancement discretionary account.

### **University Cost Sharing**

The University may share in the cost of a sponsored program when there is a difference between the total cost of performing a project and the funding provided by the sponsor. Cost sharing may be in either direct or F&A costs (Indirect Costs). However, cost sharing of Facilities & Administrative costs is subject to sponsor and University policy. Cost sharing should be proposed only when required by the sponsor or strongly encouraged and should not exceed the levels required by the sponsor. Voluntary cost sharing should be avoided.

The amount and types of cost sharing may vary among agencies and are generally classified as follows:

- Cash Contributions – Represent the recipient’s cash outlay, including the outlay of money contributed to the recipient by non-federal third parties. These contributions also included personnel time and, when allowed, unrecovered indirect costs.
- In-Kind Contributions – Represent the value of non-cash contributions provided by the recipient. In-Kind contributions may be in the form of charges for real property, and the value of goods and service directly benefiting and specifically identifiable to the project or program

### **Budget Revisions**

There is considerable variation in sponsor policies relative to budget revisions. Accordingly, award terms and/or sponsor agency guidelines must be consulted when revisions are contemplated. To the extent possible, budget revisions should reflect all necessary reallocations of resources that are foreseen through the end of the budget period. Some budget revisions require the approval from the sponsoring agency; therefore, all requests for budget revisions must be submitted to the ORGSP.

For budget revisions requiring prior sponsor approval, the PI/PD, working with the ORGSP, will prepare the request letter and submit it to the sponsor, typically to the sponsor administrator or program officer as designated in the award. With approval from the sponsor, the ORGSP will then accept the budget revision.

# **AWARD TYPES**

*An award may be in the form of a grant, sub-grant, contract, sub-contract and/or cooperative agreement. The type of service or product and the degree of contractor/grantee involvement will determine the type of award given. Grants are usually given in evidence of an end product and deliverable. Contracts require deliverables within a restricted timeline and budget. Cooperative agreements are instruments that allow the sponsor and the University to share both the conduct and benefit of the product.*

### **Contracts**

Contract types vary according to (1) the degree and timing of responsibility assumed by the contractor for the cost of performance and (2) the amount and nature of the profit incentive offered to the contractor for achieving or exceeding the specified standards or goals. The contract types are grouped into two broad categories: fixed-price contracts and cost reimbursable. The specific contract types range from firm-fixed-price, cost-plus fixed-fee type, incentive type, and cost-reimbursement type contracts that provide for payment of allowable incurred costs to the extent prescribed in the contract. Contracts are subject to the review and approval of LMU's Legal Counsel, the Office of Finance and in some cases the review of the Executive Director of the ORGSP.

### **Grants**

Grants are awards of financial assistance in the form of money provided for a specific purpose or service.

### **Cooperative Agreements**

Cooperative agreements are issued by awarding agencies and are similar to grants. The basic difference between the two is determined by the degree of the awarding agency's involvement.

### **Sub-Contracts/Sub-Grants/Subawards**

Sub-contracts/sub-grants/subawards are awards of financial assistance that are authorized and made under the terms of an existing contract or grant and usually are governed by the same terms and conditions as the prime contract or grant unless otherwise specified.

# **ASSURANCES and CERTIFICATIONS**



*All federal agencies require that the University have in place policies related to the topics listed below. Grant guidelines often include this requirement which dictates that a certificate of compliance must be submitted prior to the grant or contract award.*

### **Anti-Lobbying (Required since 1989)**

Standard Form LLL, Disclosure of Lobbying Activities certificate provides that no federally appropriated funds have been paid or will be paid, by or on behalf of the person signing the assurances; to any person for influencing or attempting to influence an officer or an employee of any agency; a member of congress, an officer or employee of congress, or an employee of a member of congress in connection with the awarding of any federal contract or grant; the making of any federal loans; the entering into of a cooperative agreement; and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement. Further, the certification provides that if any funds other than federally appropriated funds have been paid or will be paid for the services mentioned above, the PI/PD should complete and submit Standard Form LLL-A, "Disclosure Form to Reporting Lobbying," in accordance with its instructions. If this certification is a pre-award requirement, appropriate forms and signatures should be a part of the application package or may be secured from the ORGSP.

### **Conflict of Interest**

LMU policy prohibits legal relationships that create or may create the appearance of personal conflicts of interest. LMU provides that it shall be unlawful for any full-time employee, for himself or on behalf of any business, or for any business in which such employee or members of his family have a substantial interest, to transact any business with an agency by which employee is employed. A substantial interest is defined as the direct or indirect ownership of more than 25% of the assets of stock of any business.

### **Drug-Free Workplace**

The Drug-Free Workplace regulation requires that for all grants awarded after March 18, 1989, the applicant must provide certification that it will maintain a drug-free workplace. In compliance with the Drug-Free Workplace Act of 1989, the Higher Education Act of 1965 (Section 1213) and the Drug-Free Schools and Communities Amendments of 1989 (P.L. 101-226, Section 22) Lincoln Memorial University has adopted a drug policy for its students and employees. The policy serves as the guidelines for disciplinary actions necessitated by alcohol and drug use during University related activities on and off campus.

### **Debarment and Suspension**

Certification regarding debarment, suspension, and other responsibility matters is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 34 CFR Part 85, Section 85.510, Participants' responsibilities. This common rule restricts subawards and contracts with certain parties that are debarred, suspended or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. The prospective applicant certifies to the best of his or her knowledge and belief that its principals: (a) are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency; (b) have not been convicted of or had a civil judgment rendered against them for fraud or a criminal offense in connection with obtaining or

performing a public transaction; (c) are not presently indicted for or otherwise criminally or civilly charged by a government entity; and (d) have not had one or more public transactions terminated for cause or default within a three-year period preceding the application/proposal. In the event that this form is not part of the application package, a copy may be obtained from the ORGSP.

### **Scientific Misconduct Policy**

This certification specifies that all allegations of misconduct in science or academics shall be reviewed to determine if an investigation is warranted; documents relating to the allegations are to be kept on file; and a determination made as to whether or not a full investigation is warranted will be made by the office of the President. During the various stages of the investigation, steps should be taken to maintain confidentiality. Persons involved in the investigation will be required to sign a certification of confidentiality. The ORGSP must be notified in the event that there is any reasonable evidence that possible criminal violation is found during an inquiry or investigation related to an externally funded project.

### **Responsible Conduct of Research**

LMU is committed to maintaining high standards of ethical conduct in all aspects of its work including research and education. Appropriate instruction in Responsible Conduct of Research (RCR) is an essential component of the professional development of our faculty and students at all career levels. LMU has chosen a program to provide training in key RCR topics. However, an academic researcher's exposure to RCR is not limited to a specific experience. The University shares responsibility with its senior researchers, course instructors and other mentors for ensuring that our students, trainees and faculty at all career levels have formal and informal opportunities to observe, model, evaluate and discuss responsible research behaviors during their time at LMU. RCR training is an important component of research education at LMU regardless of discipline, career aspiration, or source of research support. However, the University recognizes specific obligations to certain federal sponsors.

#### *Goals*

- Reinforce the University's commitment to excellence in research
- Introduce trainees to fundamental principles of Responsible Conduct of Research
- Provide an overview of terms, concepts and policies related to RCR
- Develop skills to identify and address ethical dilemmas in research
- Describe campus resources available to support researchers with RCR concerns
- Assess each trainee's mastery of core principles
- Foster a culture of open discussion of ethical dilemmas in classroom, laboratory and office settings.

#### *Covered Population*

RCR training is strongly recommended for all graduate students, postdoctoral fellows, other postgraduate trainees and junior faculty, as well as undergraduate students engaged in research. Participation is required for the following individuals:

- Undergraduate students, graduate students, postdoctoral researchers supported by NSF grants to the University. Support includes both salary support and funding for research expenses, e.g. dissertation improvement grants.
- Trainees at all career levels supported by NIH grants in programs defined by NOT-OD-10-019. RCR training received during a previous career stage (e.g. undergraduate,

graduate, postdoctoral, junior faculty), either at LMU or elsewhere, does not exempt a trainee from this requirement.

**Timing and Frequency:** Trainees will be required to complete their training before the start of their funded project.

**Training Details:** LMU has chosen an online module provided by the Collaborative Institutional Training Initiative (CITI) base at the University of Miami (FL). Additional training by the University will be provided that will allow for face-to-face interaction and instruction when necessary.

### **Export Controls**

Any Lincoln Memorial University faculty, staff, or student researcher engaging in international collaboration must submit an [Export Control Questionnaire](#) prior to applying to the ORGSP and the Export Control Advisory Subcommittee to sign a research contract with a foreign entity.

Export control laws are federal regulations that govern how certain information, technologies, and commodities can be transmitted overseas to anyone - including U.S. citizens - or to foreign nationals on U.S. soil.

Export Control regulations are federal laws that prohibit the unlicensed export of certain commodities or information for reasons of national security or protections of trade. Export controls usually arise for one or more of the following reasons:

- The nature of the export has actual or potential military applications or economic protection issues;
- Government concerns about the destination country, organization, or individual, and
- Government concerns about the declared or suspected end use or the end user of the export

#### *What is an Export?*

An export is any oral, written, electronic or visual disclosure, shipment, transfer or transmission of commodities, technology, information, technical data, assistance or software codes to

- anyone outside the U.S. including a U.S. citizen
- a "foreign national" wherever they are (deemed export)
- a foreign embassy or affiliate

#### *Who is a Foreign National?*

A "Foreign National" is any person who is NOT a:

- U.S. Citizen or National
- U.S. Lawful Permanent Resident
- Person Granted Asylum
- Person Granted Refugee Status
- Temporary Resident

"Foreign Nationals" include:

- Persons in the U.S. in non-immigrant status
- Persons unlawfully in the U.S.

*Why are Certain Exports Controlled?*

Exports may be controlled due to any of the following factors:

- National Security
- Proliferation of chemical and biological weapons
- Nuclear Nonproliferation
- Missile Technology
- Anti-Terrorism (*Cuba, Iran, North Korea, Libya, Sudan and Syria*)
- Crime Control
- High Performance Computer
- Regional Stability
- Short Supply
- U.N. Sanctions

**COLLABORATIONS  
WITH OUTSIDE  
INSTITUTIONS and  
ENTITIES,  
Domestic & Foreign**

*Programmatic, fiscal, and administrative arrangements between LMU and collaborating institutions are crucial to ensure effective collaboration on a joint sponsored project. In cases of subawards, administrative support will come from the ORGSP as well as the sponsored programs office of the collaborating institution. Depending on which institution takes the lead on the project, that office will handle the final application for award; the subaward institution will complete subaward agreements and/or an MOU to signal its willingness to enter a joint project.*

### **Subrecipient Commitment Form**

Any subrecipient commitment form issued by LMU and committed to by the collaborating institution will detail contact information for the collaborating institution's sponsored programs administrator, financial contact, and authorized official. Compliance is detailed in this award, noting the potential of any human or animal subject involvement, as well as any potential biological hazards. The agreement likewise establishes whether any financial conflicts of interest might exist and ensures that both parties maintain an institutional plan to meet requirements related to the Responsible Conduct of Research. These are the first steps for establishing subaward compliance monitoring and communication between the two institutions – should an award be made, a subaward agreement will be issued by LMU.

### **Memorandum of Understanding**

A Memorandum of Understanding (MOU) drafted between LMU and the collaborating institution outlines the non-fiscal conditions of the consortium partnership that are described within activities of this application. These include the duration, objectives, and mutual commitments in addition to the responsibilities of LMU and the collaborating institution in the decision-making processes. It details the expectations of research collaboration, including the joint research activities that will take place and intellectual property rights management between the two institutions.

### **Communication Plan**

A communication plan between the PIs ensures that clear communication occurs between both parties throughout the relationship. This plan can include regularly scheduled meetings, site visits, and a shared data management plan. This is sometimes requested by sponsors to demonstrate how the two institutions will work together throughout the project.

### **Material Transfer Agreement**

A Material Transfer Agreement (MTA) is a legally binding contract that governs the transfer of tangible research materials between two organizations, typically from a provider (such as a university or research institution) to a recipient (another institution or researcher). An MTA is essential for research because it protects the interests of both the provider and the recipient of research materials, ensures legal compliance, defines intellectual property rights, and establishes clear terms for the transfer and use of materials. It helps prevent disputes and misunderstandings that could arise during collaborative research projects involving the exchange of materials.

### **Data Use Agreement**

If a PI intends to disclose a restricted data set with a recipient who is not listed in the original IRB application for a project, the LMU IRB must be notified, and a Data Use Agreement must be initiated. This sets the boundaries of sharing limited data sets (protected health information that excludes direct identifiers of individuals or of relatives, employers, or household members of an individual who is the subject of a research project). The language in this agreement can also be utilized by the PI to demonstrate LMU's commitment to data protection to sponsors.

## **Contract Research Organization**

A Contract Research Organization (CRO) is a company or organization that provides outsourced research services. For any researcher desiring to pursue federally funded research that involves animals, a CRO arrangement should be pursued until LMU acquires Public Health Service Approved Animal Welfare Assurance. To initiate a relationship with a CRO, the PI/PD must contact the ORGSP and complete work with both the office and IACUC to complete an Inter-Institutional Agreement: Domestic Collaborating Organizations Form.

## **International Collaborations**

Collaborations with international entities provide an excellent opportunity to expand research endeavors. However, PIs/PDs who are considering international cooperations should immediately be in touch with the ORGSP, IRB, IACUC, and/or IBCSC when initiating a research project that includes international cooperation and/or funding. Review will take place by the Export Control Advisory Subcommittee, made up of members of the ORGSP, LMU Office of the General Counsel, IACUC, IRB, and IBCSC and appointed by the Executive Vice President for Academic Affairs. Its recommendation will be taken into consideration by the Executive Vice President for Academic Affairs, who is empowered to signal to the President of the University that the project meets compliance to be authorized.

### *Prohibited Collaboration*

PIs/PDs should not engage in research collaborations with foreign entities identified by the [United States Secretary of State's list of the "Country of Particular Concern List," "Special Watch List Countries," and "Entities of Particular Concern."](https://www.state.gov/countries-of-particular-concern-special-watch-list-countries-entities-of-particular-concern/) To review these lists, please visit <https://www.state.gov/countries-of-particular-concern-special-watch-list-countries-entities-of-particular-concern/>

### *Human/animal participants*

Conducting research involving human and animal participants in foreign countries requires adhering to ethical standards that are both U.S.-based (IRB, IACUC, HIPPA, Code of Federal Regulations) and internationally recognized (Declaration of Helsinki, International Conference on Harmonization – Good Clinical Practice E6). Additionally, special attention may need to be given to the rights and well-being of international participants within diverse cultural environments and local regulatory frameworks. The entity with the stricter standard must be adhered to for research to occur. The PI's IRB/ICAUC application MUST note if research and/or research subjects will be outside of the United States.

### *Export Control*

PIs/PDs who wish to engage in international collaborations should be familiar with export control regulations. Exports can apply to technology, information, instruction, software, bioagents, and toxins among other goods. While some research projects fall under public domain, others may necessitate licenses. Please contact the ORGSP as soon as you know that any exports will be exchanged as a part of the international research agreement so that it can be checked against the export determination matrix by the Export Control Subcommittee.

### *Biological/chemical transfers*

The exchange of biological and chemical transfers across international lines includes export

law and potentially uniform biological material transfer agreements. The process to initiate these agreements should include research administration from the ORGSP and the collaborating institution's research administrators.

*Data management*

Some federal funding agencies require that data management plans be submitted with collaborative projects. So that your international project meets both funding requirements and federal and international law, please reach out to the ORGSP when initiating your data management plan and/or Data Use Agreement.

*Foreign exchange rates*

Please consult with the ORGSP as you formulate budgets for your project – the office can assist in identifying exchange rates and establishing payment timelines and expectations. All award agreements should state the award amount in the United States Dollar (USD).

*Contract/Agreement Language*

Before a project or submission with an international partner begins, the ORGSP and LMU Office of the General Counsel must review any document and ensure that the agreement is issued in English. Final authorization of any foreign agreement is designated to the President of Lincoln Memorial University.



# **POST-AWARD COMPONENTS**

### **Change of PI/PD**

When a change in PI/PD on a sponsored project becomes necessary, sponsor approval/notification may be required. Requests to change a PI/PD should be routed to the ORGSP for processing. The request should include the name of the nominated replacement, along with a current biographical sketch and a full justification for the requested change. The ORGSP will submit, or assist in the submission, of the request to the sponsor, if required, and will update the award file.

### **No-Cost Extensions**

A "no-cost extension" is an action to extend the time authorized to complete a project without any additional funding. These extensions are not available for every award. Therefore, the funding agency and/or grant guidelines should be contacted to first determine if this is allowable. It is important to remember, when additional time is required, it is better to request a no-cost extension than to simply be late completing the project. The sponsor may not approve requests that are not submitted in a timely manner or those have not been adequately justified. The PI/PD should notify the ORGSP office as soon as they know that a sponsored award will not be completed on time.

### **Time and Effort Reporting**

Time & Effort Reporting is required by federal regulations. LMU follows the guidelines set forth in OMB Circular 2 CFR 200, to confirm that the percentages allocated to each activity represent a reasonable estimate of the work performed.

The actual salary paid is based on the percent FTE that was determined at the time of grant award. This is the estimated amount of effort employees would spend on grant activities based on the Principal Investigator's budget. The effort is reported as a percentage of total wages for the period of the report. If an employee worked for more than one account, or for more than one department, the total salary is reported at 100 percent for the period, which may change the departmental share.

Because Federal regulations require that the estimated effort be compared to actual effort and any significant deviation be reported, reports are prepared and distributed each semester, for a prior semester.

All effort reports must:

- Be reviewed, signed and returned in a timely manner, preferably within 45 days.
- Be signed by the employee, Principal Investigator (PI), or other responsible official who has knowledge of the actual work performed.
- Reasonably reflect the actual work performed, as a percentage of the total salary for that period of time. Reflect any significant differences between the estimated and actual percentage.

### **Project Final Closeout**

Closeout of a project means that the period of performance or the time allotted for work and completion is due and it is time to cease expenditure and bring all activities to an end. Closeout

also means the submission of all final deliverables/final reports (financial, progress, property, subcontract, patent, etc.). Upon submission of all required documents to the sponsor, the project file is placed in the closed files and retained in accordance with the appropriate retention schedule (normally, records must be retained for three years after submission of the Final Financial Report, or in the case of litigation, records must be retained until final resolution).

# **GLOSSARY of COMMON TERMS**

*Listed below in alphabetical order are terms often encountered by those involved in grant writing, submission, and management. Many of these terms are found and discussed throughout this handbook in respect to LMU policy but are defined in more general terms in this section.*

#### Academic Release Time

Many funding agencies will provide funding to pay a portion or all of the salary for faculty to be released from regular teaching duties to carry out projects during the academic year. When proposals request release time, it is the responsibility of the PI/PD to secure approval from the respective departmental chair/supervisor and dean/division VP.

#### Acknowledgement of Funding Sources

Any publication, recording, performance, presentation or other scholarly activity that is the result of a sponsored project should acknowledge the resources contributing financial support. This acknowledgment should recognize all funding sources including the University's contribution to projects. As an example, if funds were provided by the VPAA for internal development efforts and the project resulted in a publication, performance, presentation, etc., the University should be acknowledged for providing this support.

#### Authorizing Official

The President and VPAA are formally charged with the responsibility to commit the University on proposal submissions, acceptance of awards and contracts. This includes related certifications required by funding agencies during the proposal and award process. The Executive Director of the ORGSP is the designated staff person to manage all federal electronic grants systems.

#### Certifications

There are various certifications (sometimes called assurances) required at the time of proposal submission and/or award acceptance. These are used to assure federal agencies that the University has applicable policies and procedures in place to successfully carry out the project. These certifications require authorized signatures; authorized university officials include the President and the VPAA. The Executive Director of the ORGSP is the designated staff person to submit electronic certifications.

#### Contracts

A contract is a financial assistance mechanism used by a federal and/or non-federal funding agency for specific inquiry directed towards particular areas of research and development, instruction or other sponsored activities needed by the funding agency. A contract usually involves defined deliverables and/or services expected to be performed by the grantee within a specified project period. Contract performance is closely monitored by the funding agency to ensure accomplishment of contract goals or deliverables.

A contract is usually issued as either a fixed-priced contract or a cost-reimbursement contract. A fixed-priced contract is used when the agency agrees to pay a "fixed amount" regardless of the actual costs of the project. That is, price adjustments are not made after the award of the contract, regardless of the actual costs of the performance of the work. Therefore, if a fixed-priced contract is under budgeted, the University must absorb the cost difference.

A cost-reimbursement contract is used when the agency agrees to pay the University for costs that are allowable, allocable and reasonable in performing the project. The agency will usually

establish a "not-to-exceed cost" or a "cost ceiling" for the contract. Once that ceiling has been reached, the University stops work and incurs no further liability.

Only authorized university officials may sign a contract between a funding agency and the University. Authorized officials include the President and the VPAA.

### Cooperative Agreements

Cooperative agreements, as a financial assistance mechanism, are similar to grants in that they are awarded by the funding agency to assist and support research and related activities. They differ in the fact that grants require minimal or no involvement of the awarding agency during the performance of project activities while cooperative agreements involve substantial cooperation and/or coordination between the funding agency and the University.

Only authorized University officials may sign a cooperative agreement. Authorized officials include the President and the VPAA. The Executive Director of the ORGSP is the designated staff person to submit cooperative agreements electronically.

### Cost Sharing

The University may be required to contribute to the costs of a sponsored program/project as stated in funding agency guidelines. In some cases, these expenses may be in the form of "in-kind" costs such as contributed effort of personnel (salary and fringe benefits) who are supported by non-sponsored funds. At other times, there may be a requirement for "cash," particularly for equipment related projects. All cash match commitments must have the approval of the VP for Finance.

When cost sharing funds are required, the PI/PD is required to discuss these needs first with the respective chair/director and dean and then with the Director of the ORGSP. Grant proposal budgets which include a commitment of matching salary funds by the institution must have the prior approval of the PI/PD's divisional VP.

Cost sharing may also come from non-University, third-party arrangements. These arrangements must be documented at the time of proposal submission. The University is required to document all cost sharing/matching funds just as it tracks agency dollars. These become auditable expenditures and the primary responsibility for documentation rests with the PI/PD.

### External Support

External support to the University may be described as sponsored programs or projects awarded because of an application to a funding agency by the University on behalf of a faculty or staff member. These programs/projects usually involve research, instruction, or other activities and are usually submitted based on defined guidelines established by the funding agency.

### Facilities and Administrative Costs (F&A)

Facilities and Administrative costs (also called indirect costs) are actual costs incurred by the University that cannot be readily identified or associated with a single sponsored project or activity. These costs are normal business activities of the University such as utilities, public safety, libraries, building and equipment use and maintenance, accounting, payroll, and academic and sponsored administration.

The determination of F&A costs rates is based on a cost proposal submitted by the University to its respective federal cognizant agency, the Department of Health and Human Services (HHS). This proposal contains all the "F&A" categories that relate to direct costs necessary to conduct the primary functions of the institution such as teaching, research and other activities. Rates are then negotiated, and a final rate agreement is signed establishing the required rates for all projects submitted to external funding sources.

Unless stated through a published rule of the sponsoring agency, F&A costs are not waived or reduced. Any reduction of rates must be documented at the time of proposal approval.

#### Distribution of Recovered F&A Costs

F&A cost recovery partially reimburses the University for actual costs incurred for conducting sponsored projects. A portion of the F&A costs recovered is distributed to the PI/PD's home school/division to underwrite project development costs. The ORGSP will assist the PI/PD in managing these funds. The PI/PD is encouraged to discuss any plans for the expenditures of these funds with their dean and divisional VP. A portion of the recovered pool of F & A costs from funded projects is distributed to the LMU's internal Mini Grants Program to provide additional funds for support of the research enterprise.

#### Fringe Benefits

Fringe benefits are actual personnel expenses associated with any salary paid by the University. Fringe rates are determined by the Finance Office. Every salary (excluding students) associated with contract and grant activity has a corresponding fringe rate to be charged. These benefits include such items as workmen's compensation, health insurance, FICA, etc.

#### Gifts

If funding is designated by an individual or organization as a gift and no financial or programmatic reports are required by the individual or organization, the Division of University Advancement is responsible for the activity.

#### Grants

Grants, as a financial assistance mechanism, are used when the idea for the research or training project is initiated by the PI/PD following the conditions and criteria established in the agency guidelines; when no substantial program involvement is anticipated between the funding agency and the institution; and when there is no expectation on the part of the funding agency for delivery of a specified product or service for the use or benefit of the funding agency. However, funding agencies do expect grantees to share with the public any results, products or model projects that further the knowledge of the discipline, the research community and/or society as a whole.

#### Human Subjects

The Institutional Review Board (IRB) assures that adequate protection of human subjects' rights and welfare are carried out in accordance with federal guidelines. The IRB, composed of representatives from all colleges as well as a community representative, is required to review all research projects involving human subjects before initiation of data collection.

### Institutional Animal Care and Use Committee (IACUC)

The IACUC is an institutional committee composed of members competent to oversee the institution's animal program, facilities, and projects involving the use of animals. The IACUC, therefore, shares with the PI/PD the responsibility for the ethical decisions made regarding the care and use of animals.

### Indirect Costs

The name has been changed by Office of Management and Budget (OMB) – Federal/White House - to Facilities and Administrative Costs (F&A). This change more accurately reflects the pool of expenses that are used to calculate these rates.

### Internal Approval of Externally Funded Projects

All projects submitted by the University must go through an internal approval via the ORGSP Routing and Approval Form. This process requires the signatures of at least the following persons: PI/PD, Dean/supervisor, divisional VP, and others as required.

### Legal Entity

Lincoln Memorial University is the legal entity for all obligations relating to contract and grant activity.

### Letters of Inquiry (sometimes called Letters of Intent)

Non-federal sponsors such as foundations and corporations will often ask for a brief (e.g., three to five pages) concept paper of the proposed project. A funding agency will usually require the letter of inquiry to include the following information: Who, What, When, How Much.

### Management of Sponsored Projects

Several offices are involved with the expenditure of restricted funds. However, the ORGSP is responsible for approving all expenditures resulting from any externally funded program. The PI/PD must contact the ORGSP to establish internal procedures immediately after award notification. Those offices will be involved with the Finance Office and the PI/PD throughout the management process relating to restricted fund accounts.

All University policies and procedures relating to expenditure of funds must be followed for all contract and grant activity. LMU's financial policies and procedures for expenditures and reimbursements utilize methods to ensure compliance with OMB 2CFR 200. (i.e., purchasing rules, property management, human resources, etc).

### Memorandum of Understanding

An MOU defines the intentions of the involved parties without creating a legally binding contract. It outlines the terms and expectations for cooperation, coordination, and collaboration. In grant applications, especially for collaborative projects, funders often require an MOU to demonstrate the commitment of partner organizations. This shows that all parties are aware of their roles and responsibilities. The PI/PD must contact the ORGSP to begin set-up of any MOU with another entity, whether or not LMU is the initiator of the agreement.

### Principal Investigator (PI) or Project Director (PD)

Only regular, full-time faculty and/or staff may serve as PI/PD on a grant and/or contract.



Sponsors may at their discretion further define and restrict those allowed to direct projects or act as PI/PD. Part-time employees may serve in these roles with their divisional VP approval.

#### Reporting Requirements

The Post Award Grants manager with assistance from the PI/PD is responsible for submitting all fiscal reports to funding agencies. The Office of Finance may also assist with these reports as needed.

#### Sponsored Research

A type of research activity that is funded by an external organization, such as a government agency, private sponsor, or non-profit organization.

#### Salaries and Wages

Compensation on sponsored projects must not exceed an employee's authorized base rate of pay at the University. The ORGSP will aid faculty/staff in calculating salaries for sponsored projects prior to formal submission of projects.

Recent changes in the OMB Circular 2 CFR 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) have caused federal agencies to review the use of salaries for administrative and clerical staff as direct costs for projects. Federal sponsors now take the position that the salaries of administrative and clerical staff should not normally be treated as direct costs. Their view is that these should be a part of the F&A costs. However, there are circumstances when these salaries may be a direct cost on a project. The ORGSP can help determine these costs for a grant application.

Grant proposal budgets which include compensation for current University employees must adhere to the following:

- The additional grant responsibilities will not interfere with the contractual obligations of the employee
- The level of compensation requested is reasonable with regard to the services rendered
- Employees cannot exceed 50% of their contractual salary and/or hours during the academic year

Exceptions to the above must be approved by the Executive Vice President for Academic Affairs.

#### Summer Salary for Faculty

Many agencies allow faculty to budget "summer salary" as part of the direct expenses associated with a project. The rate of pay will be based on the academic pay rate (9-mo. salary). Agency guidelines will stipulate if there are any restrictions or limitations relating to salary. Therefore, this becomes a part of the overall budget discussion with the ORGSP during the proposal development phase.

#### **AMENDMENTS AND REVISIONS**

**These policies may be amended or revised from time to time as the need arises. Users will be notified when changes are made and new copies of all amendments and revisions will be made available on the ORGSP web page.**

[www.lmunet.edu/orgsp](http://www.lmunet.edu/orgsp)