

# **UNIVERSITY OF MARY WASHINGTON**

## **External Grants Policies**

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## Introduction to UMW Grant Policies

**All proposals** to be submitted for external funding **MUST** receive prior administrative approval by a number of UMW officials. This includes proposals requesting **external** funding support for faculty fellowships, sabbatical projects, travel support, etc.

Currently, the pre-approval procedure is being coordinated on a temporary basis by [John Morello](#) in the Office of the Provost (GW Hall 309, x:1269). In addition, all early correspondence, including any letters of intent, is to be routed through John Morello (Office of the Provost) for approval before submission.

The following signatures are required on all proposal pre-approvals:

- Project Director;
- Department Chair or Supervisor;
- Dean of the Faculty (for faculty grants — or other area vice president in the case of staff proposals);
- Provost (faculty grants);
- Vice President for Administration and Finance (all grants)

Faculty and staff members who wish to pursue sponsored programs (such as a contract to perform certain work for an external group or entity) must also receive preliminary approval from appropriate administrators before proceeding to submit the proposal for the sponsored work.

Grants, contracts and other external/sponsored agreements are awarded to the University of Mar Washington. They are **not** awarded to the individual(s) responsible for the conduct of the research program or project activity. Even though external/sponsored support is often awarded to UMW because of the expertise of faculty and/or staff members who initiate the funding proposal, it is UMW that assumes full legal responsibility for the program/activity and UMW will be responsible for ensuring that the project is carried out in accordance with all of the sponsor's requirements.

## Approval Process for External Grants

***All applicants for external funding must follow these steps before submitting the proposal.*** This internal review process applies in all cases where a UMW employee (faculty member, staff member, or administrator) seeks to make an application to receive funding for a project from an external source — a government grant, foundation grant, contract, subcontract, etc. These procedures should be followed in all cases, including instances where UMW persons are involved as collaborators on a grant project being submitted by another institution.

**FIRST, a faculty member should obtain permission from both her/his department chair and academic (college) dean** to pursue the research or special program in question. Notify the department chair and college dean before proceeding to step 2. Staff members should obtain permission from their immediate supervisor before proceeding to step 2.

SECOND, make initial contact with [John Morello](#), Provost's Office, to indicate that you are planning to submit a proposal to an external funding source. You may call (654-1269) or email to make this initial contact. The purpose of this step is to indicate that you are interested in pursuing an application, and it puts the office on notice about your intentions so that your application process may be effectively supported. Please make this initial contact as soon as it is feasible for you to do so, and before the “deadline dates” indicated below. If there is any reason why you should not proceed with your intended project, or if additional information is required about the project you are pursuing, you will be notified at the initial contact step.

THIRD, obtain the necessary approval to submit the application. ALL APPLICATIONS FOR EXTERNAL FUNDING MUST BE PRE-APPROVED BY UMW OFFICIALS BEFORE THE APPLICATION IS SUBMITTED.

In order to be cleared to submit the proposal, you must complete the [External Grant Cover Sheet](#), available from this website, and submit it with the required attachments: (1) project narrative, (2) budget outline, and (3) the completed [External Grants Checklist](#). The cover sheet was last revised on November 18, 2011, and the checklist was last revised on December 6, 2011 — be sure to use the new forms. Both are Microsoft Word forms that you can copy to your computer, input the necessary information, and save the changes (so that you will have a record of these documents on your computer).

Send all materials to [John Morello](#), Provost's Office. Because the cover sheet and checklist require signatures, submit all documents and attachments in hard copy. Submit these materials at least one week before the online submission deadline (if the grant is to be submitted electronically), or two weeks before a “received by” deadline (if the application is to be mailed). Be sure that both the principal investigator and supervisor/department chair have signed the cover sheet before you submit it. The principal investigator signs the external grants checklist.

When the proposal is under review, you will be notified about any changes recommended or required before it is submitted. Once the proposal receives all required approvals, it will be cleared for submission. In most cases, with the exception of those

grants that must be submitted by the Authorized Organizational Representation (AOR), the principal investigator/project director is responsible for submitting the proposal. In the case of National Science Foundation grants, or most federal grants that must be submitted via Grants.gov, John Morello (the UMW AOR) will submit them.

FOURTH, stay in touch while the proposal is under review. If the proposal is funded, or if you receive other written notification from the funder, please send a copy of the award notification to John Morello. If the project is rejected, contact [John Morello](#) so that the application file may be closed.

FIFTH, understand the fund management and reporting responsibilities (should the grant be funded). After receiving a grant award, the project director will be contacted by the Office of Business and Finance regarding specific procedures required to set up the accounting procedures required to administer and support the grant.

The grant project director is responsible for completing all substantive project reporting that the funding organization may require. For financial reporting, the project director is expected to work closely with John Morello and Anthony Dahm (UMW Accounting) to ensure that all required financial reports are submitted accurately and in a timely fashion.

Contact John Morello, Provost's Office, if you have questions about any of these procedures.

### Budget Preparation Guidance

Generally, a budget for an externally supported project will include information on these components:

- Direct Costs
- Facilities and Administration (F & A) costs, sometimes called Indirect Costs or Overhead
- Cost Sharing
- Justifications (explanations for why the budget items are necessary for the project)

Granting entities usually have explicit instructions regarding the preparation of budget materials. Follow those instructions. Listed below are resources to assist you in understanding, generally, the sorts of expenses often included in a project budget. Be sure the particular grant for which you are applying allows a given cost item before you decide to approve it. Also, please note that [OMB Circular A-21](#) establishes certain costs that are not allowable on federal grants, and this guidance is generally applicable to all grants regardless of the funding source. UMW will not approve the submission of an external grant proposal that seeks funding for expenses that would be deemed as improper or unallowable.

DIRECT COSTS cover expenses that can be identified with a specific project, or that can be directly assigned to a project with relative ease and a high degree of accuracy. These costs must be allowable by both the University and the sponsor. For further information on allowable costs, see [OMB Circular A-21](#).

Direct costs typically include the following:

**Personnel** — Salaries or wages actually paid by a grant, fellowship, or contract must be consistent with University policy. As a general rule, for amounts to be budgeted in future budget years of a project, include a 3-4% increase to account for inflation.

**Fringe Benefits** — In addition to salary, associated fringe benefits should also be included on the budget. For nine-month teaching faculty requesting salary for a summer project, include 7.65% of the salary amount to cover the cost of the University's share of FICA. (This is the only fringe benefit that pertains to summer salary for nine-month teaching faculty.)

For grants that would replace a full-time faculty member's salary during a portion of a normal contract year (e.g. a full semester), all fringe benefits must be covered. Use a figure of 33% of the salary amount in such cases.

For students or part-time wage employees to be hired as a part of the grant, figure 7.65% of the total wage amount to be paid to such workers.

**Equipment** — Fixed assets with a value in excess of \$2,000 and a projected life cycle of more than one year. Federal guidelines, for example, state equipment items are fixed assets costing more than \$5,000. For UMW guidelines on purchasing that might pertain to equipment secured under a grant, see [http://www.umw.edu/purchasing/faculty\\_staff/default.php](http://www.umw.edu/purchasing/faculty_staff/default.php).

Also see [http://www.umw.edu/grantsoffice/policies/equipment\\_purchases.php](http://www.umw.edu/grantsoffice/policies/equipment_purchases.php) for ownership details about equipment that might have been purchased as part of a grant.

**Travel** — The cost of transportation, lodging and meals. All Commonwealth of Virginia travel regulations are strictly applied to external grant travel. See <http://www.umw.edu/ap/travel/default.php>

**Materials & Supplies** — Items such as laboratory supplies, animals, instructional material, software, and equipment costing less than \$5,000. Itemize such requests as clearly as possible.

**Consultant Services** — A consultant is not a UMW employee. This is an "outside" individual is hired to provide advice or perform a specific service for a fee. All UMW faculty who contribute a professional service on a grant project must be included as

part of the personnel budget for the grant. Itemize their expenses (such as stipends or salary and any travel expenses).

**Publication Costs** — Funds to cost of preparing and publishing research results produced by the project, such as reports, reprints, page charges, illustrations, and so forth.

**Subcontracts** — A legal agreement between the UMW as the primary contractor or grantee and another party. A subcontract is used when a major portion of the grant work will be performed by a second party.

When UMW is to be included as a subcontractor of a grant awarded to another institution or entity, that agreement must be reviewed in advance following the same steps as if it were a grant being submitted by UMW. All contracts involving UMW must be signed by the Executive Vice President. Contact [John Morello](#) in the Office of the Provost (GW Hall 309, x:1269) for additional guidance.

When a UMW proposal includes a subcontract as a part of the proposed budget, a subcontract agreement between UMW and the subcontractor must be created and signed by both the UMW Executive Vice President and the appropriate, authorized official at the institution with which UMW will have the subcontract.

**Other Direct Costs** — This category includes items such as rental of space, funds for equipment maintenance contracts and repairs, stipends for research participants, and so forth. Tuition would also fall into this category, unless the granting entity has different instructions. If the grant will provide compensation for persons serving as research subjects, the applicable portions of the UMW Gift Policy relating to [payment of research participants](#) must be followed.

**Adjusted Tuition Charged as Part of a Grant** — In some cases, the grant proposal may desire to charge a reduced rate for UMW tuition in the case of a grant that will be subsidizing tuition costs as a direct cost. Any such agreement must be approved in advance. Contact John Morello in the Office of the Provost for additional guidance.

## FACILITIES AND ADMINISTRATION (F&A) COSTS

General guidance is available [here](#). Be sure to understand and follow the granting entity's specific guidelines related to these costs. In some cases, the F & A costs are calculated on the basis of the salaries and fringe benefits included as direct costs. Other times, the F&A cost may be calculated on the basis of all direct costs. Again, consult the specific regulations established by the granting entity.

## COST SHARING

Any cost sharing proposed by a grant project must be discussed in advance and approved before a grant project containing such an arrangement is submitted to a funding entity. Consult the general cost sharing advice presented [here](#). Federal

regulations state that cost sharing may be a consideration in the evaluation of a grant application in only those cases where the grant program guidelines require it. Including cost sharing in a grant proposal that doesn't expressly request it will not necessarily help your proposal.

## JUSTIFICATION

A typical budget justification would be one to two pages of text explaining the costs listed on the budget outline. The budget outline might list a personnel cost as a dollar figure; the justification would explain that that personnel cost is for a one-course teaching load reduction, or two months of summary salary plus FICA. Usually, the granting entity provides guidelines for the amount of detail to be provided in a budget justification.

## Budget – Post Award Management

Once notified of an award, a copy of the budget as awarded by the sponsor will be sent by the Associate Provost for Academic Affairs to the University's Director of Accounting. The Director of Accounting will establish a budget account for the project and will maintain it within the limits set by the sponsor for the period(s) of the project. The Project Director is required to submit the required forms and other paperwork required by the Director of Accounting to establish the grant's budget account.

Expenditures of grant funds will be made in strict accordance with the sponsors requirements and the procedures of the University of Mary Washington and the Commonwealth of Virginia. University requirements and procedures for travel, purchasing and other expenditures will apply.

**Any revisions** from the approved budget must be requested by the Project Director, reviewed by the Director of Accounting and the Associate Provost, and approved by the funding sponsor.

The Principal Investigator/Project Director **must not** make any commitments or expenditures until the grant is officially awarded and accepted or the contract has been fully executed.

Without a sponsor approval for project extension, the Principal Investigator/Project Director **must not** make any commitments or expenditures after the completion date of the project.

The Director of Accounting, working with the Project Director and the Associate Provost as required, will prepare and submit fiscal reports, statements and other administrative documents required for grants and contracts projects. Non fiscal reports, statements, project progress reports are the responsibility of the Project Director. The Associate Provost will work with Project Directors to ensure that such reports are prepared effectively and submitted in a timely fashion. In order to ensure accurate record keeping, the Associate Provost will either submit the report on behalf of the Project



Director or the Project Director will provide a copy of the report to the Associate Provost when it is submitted.

## **Conflict of Interest**

As a part of the grant/contract application process, the Principal Investigator must positively state on the [External Grant Cover Sheet](#) that there is an absence of a financial or other interest or affiliation held by them or a member of their immediate family in the sponsoring organization or in companies from which goods and services will be obtained under the outside supported activity. This statement must also cover any co-investigators and other grant/contract-supported staff at UMW.

Should it be that the case there is a conflict of interest, the individual must disclose that conflict by completing the Statement of Economic Interest [form](#).

For purposes of submitting an external grant application from UMW to an external sponsoring entity, the proposer must submit the Statement of Economic Interest form if he or she (or any member of the immediate family) has a significant financial conflict of interest in the project, defined as \$10,000 or 3% ownership or a \$10,000 income per annum from the proposed granting entity.

For additional guidance on the details of this requirement, contact [John T. Morello](#), Associate Provost, George Washington hall, room 309 (or call 540-654-1269).

## **Data Management Plans Required by Federal Grant Funding Agencies**

A data management plan is a formal document that outlines what a grant project will do with its data during and after the project. The plan describes the data that will be created, the standards used to describe the data (metadata), who owns the data, who can access the data, how long the data will be preserved (and/or made accessible), and what facilities and equipment will be necessary to disseminate, share, and/or preserve the data.

Many (but not all) federal funding agencies require data management plans as part of a grant proposal application. Persons seeking to make a grant application to a federal funding source should ascertain what the data management plan requirements are and ensure that the grant proposal provides the required data management plan details.

Here are some examples of data management plan requirements:

### **National Institutes of Health**

"The NIH expects and supports the timely release and sharing of final research data from NIH-supported studies for use by other researchers. ...[I]nvestigators submitting an NIH application seeking \$500,000 or more in direct costs in any single year are expected to include a plan for data sharing or state why data sharing is not possible."

Link to additional information:

[http://grants.nih.gov/grants/policy/data\\_sharing/data\\_sharing\\_guidance.htm](http://grants.nih.gov/grants/policy/data_sharing/data_sharing_guidance.htm)

### **National Science Foundation**

"Investigators are expected to share with other researchers, at no more than incremental cost and within a reasonable time, the primary data, samples, physical collections and other supporting materials created or gathered in the course of work under NSF grants. Grantees are expected to encourage and facilitate such sharing."

"Proposals submitted to NSF must include a supplementary document of no more than two pages labeled 'Data Management Plan'. This supplementary document should describe how the proposal will conform to NSF policy on the dissemination and sharing of research results."

Link to additional information: <http://www.nsf.gov/bfa/dias/policy/dmp.jsp>

### **National Endowment for the Humanities**

Generally, the NEH grant programs do not have an explicit data management requirement. One exception is the Digital Humanities Implementation Grant program:

"The data management plan (DMP) should be short (no more than two pages) and will be submitted as a document supplementing a grant application. The plan will need to address two main topics: (1) What data are generated by your research? (2) What is your plan for managing the data?"

"The data management plan will be evaluated as part of each proposal. Proposals must include sufficient information to enable peer reviewers to assess an applicant's data management plan. The plan should reflect best practices in the applicant's area of research, and it should be appropriate to the data that the project will generate. The plan should describe how the project team will manage and disseminate data generated by the project. NEH will also require the grantee to discuss compliance with the DMP in post-award reports."

Link to additional information:

[http://www.neh.gov/files/grants/data\\_management\\_plans\\_2014.pdf](http://www.neh.gov/files/grants/data_management_plans_2014.pdf)

### **Guidance on the development of data management plans**

As a first step, **contact the Associate Provost for Academic Affairs for guidance** on the development of the particular data management plans details that will be required for

submission of the grant project. The Associate Provost will involve other University officials as necessary (such as the CIO and the University Librarian) in the development and review of any proposed data management plan before the grant project is submitted.

Here is [one example of a recently-developed data management plan](#) submitted as part of a UMW NSF grant proposal.

## Equipment Purchases

In general, fixed and moveable equipment are considered fixed assets of the University of Mary Washington and, as such, are owned by the University and not by a specific individual, department or operating unit. The University has sole ownership of all equipment acquired regardless of source of funding or method of acquisition.

In certain rare cases, there may be exceptions to this general policy. If the equipment was acquired through a sponsored project, and the federal government or other sponsor explicitly retained title to it, that equipment would not be considered a fixed asset of UMW. If the grant sponsor furnished equipment merely for the duration of the project, such equipment would also not be a fixed asset of UMW. Equipment acquired on short-term loan from another institution, or leased, is similarly not a fixed UMW asset.

Should a faculty member choose to leave UMW prior to the conclusion of a sponsored project, and seek to transfer this project and its equipment to a new institution, the faculty member must contact both the grant sponsor and [John Morello](#) (Office of the Provost, GW Hall 309, x:1269) in order to determine if such a transfer is possible, and under which conditions. Typically, the granting entity will terminate the existing award and then issue an award to the new institution. Approval of a request to transfer equipment purchased through the grant will be dependent upon the nature of the ownership of the equipment (whether or not it became a UMW fixed asset or title to the equipment was retained by the granting entity).

## Facilities and Administrative Costs

Because the University of Mary Washington does not currently have a federally-negotiated rate for Facilities and Administrative (F&A) costs, including these costs in some grant proposals (sometimes referred to as "indirect costs") is sometimes problematic. Some granting agencies or organizations will not allow for indirect costs unless the applicant's institution has a federally negotiated rate.

Facilities and Administrative costs are those indirect costs associated with the performance of a sponsored research activity (such as a grant or a contract). They are shared expenses related to the use of university facilities and administrative support. Facilities costs include but are not limited to the costs and depreciation for use of buildings and equipment; interest on the debt associated with buildings and equipment; and expenses for operations and maintenance expenses. Administrative costs include

the proportion of all costs related to the personnel and supplies provided by the various administrative offices that support any aspect of the management of an external grant or contract.

If it is possible to claim an amount for indirect costs without relying on the federally-negotiated rate, the following guidelines apply:

1. use whatever percentage the sponsoring agency will allow, although in some cases (given the overall budget) you may decide to claim a lower indirect cost rate in the interest of making the project proposal as attractive as possible;
2. if the sponsoring entity has no established policy on indirect costs, use these figures: 25% of all salaries, fringe benefits, and other direct costs on government sponsored grants and contracts, and a rate of 10% of all expenses on non-government grant applications where permissible.

As a part of the internal reviewing process, UMW officials will approve the indirect costs proposed as a part of the budget. In accordance with Commonwealth of Virginia policy, 33% of any facilities and administration costs recovered on an externally-funded grant or contract will be transferred to the institution's E & G revenues. The remainder will be retained by UMW to support the extension and enhancement of research activities at the university.

## **Federal Guidelines and Regulations**

### ***OMB Circulars***

The following series of circulars from the Office of Management and Budget (OMB) are relevant to research administration of federally-awarded grants and contracts. UMW will submit external grant proposals that are in compliance with the guidelines and regulations outlined in the relevant circulars (listed below).

[A-21](#) –Cost Principles for Educational Institutions

[A-110](#) — Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations

[A-133](#) — Audits of States, Local Governments, and Non-Profit Organizations

### **Federal Acquisition Regulations (FAR)**

Most federal contracts incorporate a number of FAR clauses that must be reviewed by relevant UMW officials and offices before accepting the agreement.

### **Code of Federal Regulations (CFR)**

A listing of the general, permanent rules published in the Federal Register by executive departments and agencies of the federal government.

## **Grant-Funded Release Time**

The primary mission of University of Mary Washington is teaching. Grant funds requested to support release time, which would reduce a faculty member's teaching load, must be reviewed as a part of the pre-submission process. Released time requested should be in support of activities consistent with the institution's mission and priorities. All such arrangements must be approved by the appropriate department chair, appropriate college dean, and the Provost before a grant proposal is submitted.

## **Hiring Non-student Grant Employees**

If an awarded external grant or contract budget includes an amount for hiring workers who are not current UMW students, all hiring activities must be processed through the established procedures for hiring classified employees as set forth by the UMW Office of Human Resources. (For hiring student workers, see those [procedures](#).)

The first step in this process is the generation of a Personnel Requisition, which will be handled by the Office of the Provost. Before requesting that the requisition be submitted, the grant project director must have already established a grant account through the Office of Business and Finance. (See step 3 of the "[Post Award Procedures](#)" information.) The existence of a grant account number is essential in order to properly charge the grant for the costs associated with the employee being hired.

A grant- or contract-funded position is classified as restricted, meaning that the position will end when the external funding ends.

When the Position Requisition has been reviewed and approved, the project director will be contacted by the Office of Human Resources regarding the remaining steps required to establish a new position in [Careers.umw](#) so that recruiting and hiring activities may proceed. Before initiating hiring activities, the grant project director should review the relevant sections of the UMW Supervisors Manual, at [http://www.umw.edu/employeedevelopment/supervisor\\_handbook\\_umw\\_lo6/default.php](http://www.umw.edu/employeedevelopment/supervisor_handbook_umw_lo6/default.php)

## **Institutional Approvals for Specific Types of Research**

All research projects submitted on behalf of the institution and its faculty and staff must comply with all applicable federal, state, and institution policies and regulations before they are approved for submission. Contact Holly Schiffrin, chair of the [UMW Institutional Review Board](#), for more information.

## Intellectual Property

The UMW Board of Visitors adopted a policy on intellectual property on September 19, 1987. The policy applies to all University employees, whether their appointments are permanent or temporary, full-time or part-time, salaried, on wages or on contract, paid by state funds or by outside sponsors. It also applies to students of the University enrolled in programs of study leading to degrees and to visitors who may from time to time participate in University programs or activities. The complete Intellectual Property Policy is available at [here](#):

One section of that policy has particular relevance to intellectual property resulting from work that was supported by external grants or contracts. Current UMW policy states the following:

"Materials or inventions developed by University employees, students, or visitors in the course of contractual or consulting work for outside organizations, or as supported by funds and facilities awarded as grants to the University by governmental, commercial, industrial or other organizations, shall not be considered as having been made or developed with specific University support, except in situations where the University itself is party to the contract or consulting agreement and declares proprietary interest, or the University's proprietary interest is defined and made a specific part of the conditions of the grant. Accordingly, the rights to such materials or inventions shall remain with the individual, subject to any agreement there may be in the actual contract, consulting agreement, or grant."

## Materials Purchases

Whenever grant funds are used to purchase any materials used on an externally-funded grant project made with UMW grant funds (such as software, books, DVDs, supplies and the like), those materials become the property of the University of Maryland. They have been purchased with funds that have been conveyed to the University for use on a specific project and, as such, are not the personal property of the researcher but are the property of the University. These items are not to be retained by the researcher but are instead to be turned over to the University when the grant project is completed. Contact [John Morello](#) (Office of the Provost, GW Hall 309, x:1269) for instructions regarding the appropriate disposition of any items purchased with external grant funds that will have a useable life after the completion of the grant-funded project.

All purchases of goods and services must follow Commonwealth and University regulations, such as using mandatory sources and observing bidding requirements. Contact Purchasing (extension 1127) for an explanation of the proper procedures.

Should a faculty member choose to leave UMW prior to the conclusion of a sponsored project, and seek to transfer this project and its materials to a new institution, the faculty member must contact both the grant sponsor and the [John Morello](#) (Office of the Provost, GW Hall 309, x:1269) in order to determine if such a transfer is possible, and

under which conditions. Typically, the granting entity will terminate the existing award and then issue an award to the new institution. Approval of a request to transfer materials already purchased through the grant will be dependent upon the nature of the ownership of the item (whether or not it became a UMW fixed asset or title to it was retained by the granting entity).

## **Payments for Research Participants**

Compensating persons to participate in a research project falls under the UMW gift policy. The project must adhere to the general guidelines found at:

<http://adminfinance.umw.edu/ap/gift-giving/research-participant-payment>

In addition, several sections of the UMW full policy on gift-giving may be relevant, depending on the nature of the research project, the participants involved, and the manner of compensation to be provided. The full policy is found at:

<http://adminfinance.umw.edu/ap/gift-giving>

Direct questions about these procedures to the Accounts Payable Office. They can be reached by phoning 540-654-1226 or by emailing [payables@umw.edu](mailto:payables@umw.edu)

## **Personnel Activity Reporting**

OMB Circular A-21, "Cost Principles for Educational Institutions," requires that persons receiving federal grants or contracts verify the effort devoted to sponsored projects. This applies to both direct and pass-through federal grants and contracts. The statement of effort must be defensible if audited.

The UMW Personnel Activity Report [form](#) is used to meet the requirements of OMB Circular A-21 and is designed to produce an after-the-fact certification of wages and salaries charged to federally funded projects. All UMW employees directly paid from federal contracts and grants or directly paid from federal pass-through contracts and grants must complete this form.

The form is to be completed quarterly, and is due two weeks after the end of the quarter in which effort is reported (e.g. April 15 for the quarter ending March 31). Submit the form to the Academic Affairs Office, George Washington Hall, 309.

In cases where the grant activity corresponds with the dates of an individual's academic year or annual contract, salary and effort must total 100% (counting the UMW contract plus any grant or contract awarded). In cases of faculty on nine-month academic year contracts, the salary and effort total including the academic year contract, a UMW summer teaching contract, and all grants (including internally-awarded UMW grants) must not exceed 133% of the individual's academic year contract.

Because proper completion personnel activity reports is a federal requirement, an incomplete or improperly completed personnel activity report could cost UMW money in



the form of audit disallowances and might also jeopardize future federal research funding.

## Projects Involving Recombinant DNA

The National Institutes of Health (NIH) publishes [Guidelines for Research Involving Recombinant DNA Molecules](#).

## Proposal Preparation

Externally sponsored projects involve all those meeting at least one of the following criteria:

- The sponsor is a federal, state, or local government agency, a quasi governmental agency, or a nonprofit organization which receives a majority of its funding from a government source;
- The sponsor is a foundation, corporation, or nonprofit organization and refers to the award as a grant to be used for specific purposes other than as an endowment;
- The sponsoring agency/organization refers to the award as a contract, cooperative agreement, subgrant, subcontract, or purchase order;
- The sponsor specifies that the funds are to be used for research, program development and/or operation, curriculum development, training, or some other specific activity identified in a specific scope of work;
- Funds provided by the sponsoring agency/organization cover the cost of performance of a specified scope of work or set of activities or to provide a specific product, service, or other deliverable outcome within a specified period of time;
- The sponsor specifies how funds will be used, usually through an approved line item budget identifying expenses by activity, function, and/or project period.

In preparing a project proposal for submission to an external funding source (sponsor), the project director assumes responsibility for ensuring that the project proposal is (1) completely prepared and is accurate in its technical content; (2) adheres to the conventions of proper scholarship, including proper attribution and citation of textual matter and graphics used; (3) complies with federal standards for integrity in research (such as the National Science Foundation's "Misconduct in Science" policy); (4) has been prepared in accordance with the proposal requirements established by the sponsoring agency; and (5) that the facilities, space, equipment, and other UMW resources necessary to complete this project have been arranged with the university officials responsible to make commitments for the use of those resources should the project be funded.

All proposals to external funding sources must be reviewed and pre-approved prior to submission. See the [steps required for proposal pre-approval](#).



In preparing a proposal for submission to an external funding source, a number of individuals/offices bear certain responsibilities.

**The Principal Investigator/Project Director** prepares and submits the grant or contract proposal and is responsible for carrying out the project as it is outlined in the proposal. The Principal Investigator/Project Director is further responsible for administering the project according to the terms of the grant or contract and applicable UMW and Commonwealth of Virginia regulations.

**The Department Chair (or staff member's supervisor)** is responsible for approving the project's scope and ensuring that it conforms to the objectives of that department or administrative unit. In providing approval, the Department Chair or supervisor signifies that facilities and personnel under the Chair's/Supervisor's jurisdiction are available and can be committed as proposed to accomplish the project.

**The College Dean** (for faculty grants) reviews proposals to ensure that the described project is consistent with the missions of the University and the College. The Dean's review confirms that the quality of the proposal is such that it will be seen as a credit to the University and the College, and that the proposal is free of any questions regarding potential ethical issues that might reflect negatively on the University or the College.

**The Associate Provost for Academic Affairs**, on behalf of the Provost, ensures that the proposal is complete, effectively presented, complies with all proposal requirements as established by the sponsor, is consistent with UMW policies covering external grants and contracts, and that any commitments for cost sharing or matching funds, use of UMW facilities and equipment or services have been fully agreed upon by all necessary offices and are documented in writing before the proposal is submitted. The Associate Provost (who functions as the University's AOR/SRO) confirms any certifications as required by the sponsoring/funding agency or source.

**The Vice President for Administration and Finance**, on behalf of the President, examine each proposal and reviews the contractual details and requirements to ensure that they are consistent with UMW and Commonwealth of Virginia requirements and policies. The Vice President also ensures that all proper arrangements have been made to support the administration and financial/accounting requirements associated with the project.

***If the proposal is funded by the granting (sponsoring) agency***, and if funding is accepted by UMW, the Project Director agrees to conduct the project in accordance with all terms and conditions as established by the sponsor. The project director also agrees to assume full responsibility for providing the proper stewardship of the funds provided, for maintaining proper records as required, and for submitting in a timely fashion all required narrative project reports and other documents as may be required

by the terms established by the project sponsor. UMW's Director of Accounting (or designee) will be responsible for establishing the account to manage and track grant/contract funds, will oversee invoicing/payments procedures as required by the grant, and will submit required financial reports and statements as per the terms of the grant/contract agreement.

## Publicity

Notifications of external funding awards are usually printed in the Provost's Newsletter, *On Campus Walk*. These announcements are usually brief and provide general details such as the name of the funding source, names of project directors, amount of the award, general nature of the project and its duration, and so forth. Any additional publicity should be handled by the University's Office of University Relations. Project Directors should make contact with that office if they desire to provide additional publicity regarding a particular funding award.

## Standards for Summer Salary

Faculty members requesting a summer salary to be funded by an external grant should observe any relevant regulations established by the funding source regarding the limit on such salaries. For example, the National Science Foundation and some other major federal agencies limit the summer salary to a figure that is two-ninths of the person's academic year salary. Summer salary obtained through external grants will not affect a faculty member's eligibility for summer session teaching at UMW, although faculty members should carefully consider whether they will have the time necessary to both work on the grant project and teach. Any external funding received may be taken in consideration when evaluating an application for an internal UMW grant (such as a summer stipend, Faculty Development Grant) that would support the same project that has received external funds.

In addition, faculty members should be aware that Commonwealth of Virginia policy establishes a limit on the maximum amount that may be earned in the summer session. Total summer salary from all sources must not exceed a percent of the full-time academic year salary; the percent is based on a proportion of the academic year salary so that the pay for summer work would not be paid at a rate that exceeded the rate of pay the faculty member makes during the academic year. At UMW, that figure is 33% of the faculty member academic year base salary.

## Students As Research or Program Support

If the proposed project intends to hire students in research or program support roles, the hiring process must follow all the regulations required for all other student employment at UMW. Those regulations are available at <http://adminfinance.umw.edu/financialaid/student-employment/>

In planning a budget that will include student workers, be sure to add the University's share of FICA (7.65% of the amount that the grant will pay the student worker). Also, keep in mind that any income earned by the student on the grant may affect that student's eligibility for financial aid. The UMW Office of Financial Aid coordinates all student employment on campus and will advise students accordingly when they apply to be employed by the grant.

When hiring student workers on an external grant or contract, the project director becomes the student's employment supervisor and, as such, is required to comply with all of UMW's established requirements for the supervision of student employees. These requirements are available at <http://adminfinance.umw.edu/financialaid/student-employment/required-forms-for-supervisors>

## **UMW Staff Administrative and Clerical Support**

As a general rule, it is normally not appropriate to include a request for secretarial or administrative support in the proposed budget for an external grant. The federal government, for example, has determined that such an expense is an indirect cost that would be covered by the facilities and administrative (F & A) cost added to the proposed budget. (See OMB Circular A-21, section F-6-B-2.) In some cases, however, it might be appropriate to include administrative and secretarial costs as a separate budget item if the activities to be performed are significant and would amount to more than what would reasonably be expected to be performed as a part of normal administrative support. Another important factor is whether or not the guidelines provided by the granting entity make explicit reference to how to handle secretarial support as a part of the budget request. Contact [John Morello](#) (Office of the Provost, GW Hall 309, x:1269) for guidance if questions arise regarding how to accomplish the clerical program support that will be required as a part of a particular grant project.

## **Use of Animals**

The UMW Animal Assurance Policy and Procedures are found at:  
<http://provost.umw.edu/animal-welfare-assurance/>

Dr. Deborah O'Dell, Associate Professor of Biology, is the chair of the UMW Animal Care and Use Committee. Her contact information is:

Department of Biological Sciences  
email: [dodell@umw.edu](mailto:dodell@umw.edu)  
phone: (540) 654-1417  
office: Jepson Science Center, Room 433

## **Use of Human Subjects**

According to the Code of Virginia (Title 37.1-234 through 238) human research is defined as "any...investigation designed to develop or contribute to general knowledge

and which utilizes human subjects who may be exposed to the possibility of physical or psychological injury as a consequence of participation as subjects..."

A researcher desiring to apply for a grant that will use human subjects in its research, must contact Dr. Holly Schiffrin, Associate Professor of Psychology, and Chair of the Institutional Review Board. It is the policy of the institution that, prior to initiation, all research activities by faculty, students, or employees that involve the use of human subjects (i.e., individuals about whom data or information is obtained) be approved by the Institutional Review Board or be certified exempt from review. Failure to gain committee approval prior to collecting data can result in a forfeiture of data or other penalties.

Project directors are also required to comply with the terms and procedures of the UMW policy on the use of human subjects. The complete policy and the necessary forms are available at: <http://provost.umw.edu/irb/>

The policy describes the UMW Institutional Review Board, which serves to ensure that participants in research are treated fairly and ethically. Research projects conducted by members of the UMW community that involve human participants must be submitted to the review board for approval unless it meets the criteria for exempt status (as detailed in the UMW policy). The review process must be completed before a grant proposal is approved for submission.

UMW has a federally-registered IRB; the IRB number is 00008306. The IRB received Federalwide Assurance (FWA) on June 14, 2011. Through the receipt of FWA, UMW has committed to the Department of Health and Human Services (HHS) that it will comply with the requirements in the HHS Protection of Human Subjects regulations at 45 CFR part 46. FWA is the only type of assurance currently accepted and approved by the Office of Human Research Protections. UMW's FWA number is FWA00017476.

## Use of UMW Equipment

If a proposed external grant or contract will require the use of UMW owned equipment as a part of the project, such use must be approved by the department head or program director of the unit where the equipment resides and is normally used.

If applicable, the arrangement to use the equipment must include reimbursement of the cost of use of the equipment. Cost of use fees or supplies required to operate the equipment should be included as part of the direct costs of the proposed grant or contract. Laboratory supplies (e.g., chemicals) and specialized shop or equipment costs may be treated as a direct cost so long as they are directly identifiable and clearly relevant to the intended research objective of the project being proposed.

The proposer of the grant must arrange to use the equipment on a schedule that will not create an interference or conflict with the ways that the equipment is normally used (such as in connection with teaching a laboratory course).

## Use of External Funds to Pay Salary

University of Mary Washington will not accept grant funding which would require faculty effort exceeding a regular full-time load and would increase an employee's total compensation for the academic year beyond the agreed upon full time salary. In no case will federal and private funds be used to pay an employee more than 100% of his or her regular academic year compensation. Summer school is not considered part of the regular academic year.

While specific terms may vary in some cases, most granting agencies do not award funds to augment the total salary or salary rate of faculty members during the period covered by the term of faculty appointment or to reimburse faculty members for consulting or other time in addition to a regular full-time organizational salary covering the same general period of employment. For example, the National Science Foundation (NSF) states their policy this way (*NSF Grant Proposal Guide*): "NSF regards research as one of the normal functions of faculty members at institutions of higher education. Compensation for time normally spent on research within the term of appointment is deemed to be included within the faculty member's regular organizational salary."

In some cases, the NSF (or other granting agencies) may approve exceptions (such as for weekend and evening classes or work at remote locations). Any intent to provide salary compensation above the base salary would have to be disclosed in the proposal budget, justified in the budget justification, and must be specifically approved by the granting agency.

## Use of UMW Facilities

Persons wishing to propose external grants or contracts involving the use of UMW facilities as a part of the project must consider several important points as the project is developed and its proposed budget is formulated. Any use of any UMW facilities must be approved in advance by the individual who has the authority to make a commitment for the use of the particular space in question.

UMW facilities must be used in a manner consistent with the intended purpose of the space in question. Priority will be given to those activities related to the academic, residential, cultural, and recreational programs of the university, and requests to use UMW spaces in connection with external grants must not interfere with the primary purposes for which the spaces are usually used (e.g. as a classroom, chemistry lab, meeting room for university-sponsored groups, and so forth). The facilities must be used in a safe, professional manner and in ways that will not endanger the university community or the general public.

To ensure accurate communication, the person developing the external grant proposal should seek to have written confirmation that the necessary space(s) will be available at the times required for the proposed external grant or contract.

In some cases, use of UMW facilities may entail a charge for use of the space. Such costs, if applicable, should be added to the proposed budget for the project. Depending on the nature of the grant or contract activity, use fees are variable. Before submitting a proposed grant or contract for internal review prior to its submission to the granting entity, the person writing the grant should contact the relevant UMW office and determine what charges, if any, will be required for use of UMW space on the project.

For the use of facilities on the UMW Fredericksburg campus, please contact Susan Knick, Director of Scheduling and Events. Her telephone is 540-654-1234. For the use of facilities on the Stafford campus, contact Sue Lafayette, Program Coordinator at the College of Graduate and Professional Studies. Her telephone is 540-286-8012.

## Appendices: UMW External Grants Forms

### **1. External Grants Cover Sheet**

This form includes basic contact information about the proposer, the agency where the grant application (or contract proposal) will be submitted, the amount to be requested, deadlines for submission, IRB requirements, the conflict of interest statement/disclosure, and a number of statements that the applicant agrees to by signing.

### **2. External Grants Checklist**

This form outlines a number of UMW policies that may pertain to the particular grant/contract and asks that the proposer acknowledge awareness of and the responsibility to follow those policies.

**UNIVERSITY OF MARY WASHINGTON**  
**EXTERNAL GRANT PROPOSAL COVER SHEET**

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Project Title: \_\_\_\_\_

Project Director/Principal Investigator: \_\_\_\_\_

Department: \_\_\_\_\_

-----  
Name and Address of Granting Agency: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

UMW Institutional Review Board Approval ☐

Date Received: \_\_\_\_\_

IRB Approval Not Required ☐

-----  
Granting Agency's Telephone: \_\_\_\_\_

Granting Agency's Fax: \_\_\_\_\_

Grant Deadline Date: \_\_\_\_\_

Deadline Type: Send by ☐ or Receive by ☐

-----  
Total Amount of Funds Requested: \$ \_\_\_\_\_

Indirect Cost Rate Used: \_\_\_\_\_

UMW Cost Sharing (attach justification): \$ \_\_\_\_\_

Cost Sharing is: In-Kind ☐ **or** Actual Contribution ☐

☐ **CONFLICT OF INTEREST DISCLOSURE (please check):** I do not have a significant financial conflict of interest in this project (defined as \$10,000 or 3% ownership or a \$10,000 income per annum from the proposed granting entity). No member of my family has a financial conflict of interest. **If the box is not checked,** complete the *Statement of Economic Interests Form* and attach it to this application.

***Attach a copy of the grant proposal, including budget and other documents as required***

**ASSURANCES**

By signing below, I state that I understand UMW policies concerning external grants and agree to abide by them.

I further state that the proposal to be submitted is (1) complete in its technical content, (2) adheres to the conventions of proper scholarship, including proper attribution and citation of textual matter and graphics used; (3) complies with federal standards for integrity in research (such as the National Science Foundation's "Misconduct in Science" policy); and (4) has been prepared in accordance with the proposal specifications and requirements established by the sponsoring agency.

Facilities, space, equipment, and other UMW resources necessary to complete this project have been arranged with the university officials responsible to make commitments for the use of those resources should the grant be awarded.

If this proposal receives an award from the external granting agency, and funding is accepted by UMW, I agree to conduct the project in accordance with all terms and conditions as established by the sponsoring agency. Should the project be funded, I also agree to assume full responsibility for providing the proper stewardship of the funds provided, for maintaining proper records as required, and for submitting all required reports and other documents in a timely manner.

**Signatures:**

\_\_\_\_\_  
Project Director/Principal Investigator

\_\_\_\_\_  
Date

\_\_\_\_\_  
Department Chair or Direct Supervisor

\_\_\_\_\_  
Date

\_\_\_\_\_  
Academic Dean (faculty grants only)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Associate Provost

\_\_\_\_\_  
Date

\_\_\_\_\_  
Vice President, Administration and Finance

\_\_\_\_\_  
Date



## EXTERNAL GRANTS CHECKLIST

COMPLETE THIS CHECKLIST FOR ANY PROJECT YOU ARE PLANNING TO SUBMIT TO ANY EXTERNAL FUNDING ENTITY. DO THIS **BEFORE** YOU COMPLETE THE EXTERNAL GRANTS COVER SHEET. **Sign and submit this form with your external grants cover sheet and required attachments.**

<b>Employee Name:</b>	<b>Department:</b>
<b>Granting Entity:</b>	<b>Grant Time Period:</b>
<b>Proposed Project Title:</b>	

### INSTRUCTIONS

Answer the following questions about your proposed grant project. Where applicable, note the references to guidelines you should follow when preparing your proposal. Be sure that your proposed budget takes into account UMW policies and procedures as required (<http://provost.umw.edu/grantsoffice/umw-grant-policies/budgets/>).

WILL THE PROPOSED EXTERNAL GRANT OR CONTRACT ACTIVITY . . .	NO	YES
<b>1. Interfere with your ability to meet your assigned instructional and/or administrative duties?</b> If yes, please attach an explanation to your grant proposal cover sheet.		
<b>2. Require the use of UMW facilities?</b> If yes, please read the policy regarding facilities use at <a href="http://provost.umw.edu/grantsoffice/umw-grant-policies/use-of-umw-facilities/">http://provost.umw.edu/grantsoffice/umw-grant-policies/use-of-umw-facilities/</a>		
<b>3. Require the use of UMW equipment?</b> If yes, please read the policy regarding equipment use at <a href="http://provost.umw.edu/grantsoffice/umw-grant-policies/use-of-umw-equipment/">http://provost.umw.edu/grantsoffice/umw-grant-policies/use-of-umw-equipment/</a>		
<b>4. Purchase equipment as a part of the project?</b> If yes, please read the policy regarding equipment purchases and external grants at <a href="http://provost.umw.edu/grantsoffice/umw-grant-policies/equipment-purchases/">http://provost.umw.edu/grantsoffice/umw-grant-policies/equipment-purchases/</a>		
<b>5. Involve UMW staff members to provide administrative and/or clerical support (other than those who will provide grant accounting support)?</b> If yes, please read the policy regarding administrative and clerical support at <a href="http://provost.umw.edu/grantsoffice/umw-grant-policies/umw-staff-administrative-and-clerical-support/">http://provost.umw.edu/grantsoffice/umw-grant-policies/umw-staff-administrative-and-clerical-support/</a>		
<b>6. Pay UMW students to be involved as researchers or in program support roles for the project?</b> If yes, please read the policy regarding student workers at <a href="http://provost.umw.edu/grantsoffice/umw-grant-policies/students-as-research-or-program-support/">http://provost.umw.edu/grantsoffice/umw-grant-policies/students-as-research-or-program-support/</a>		
<b>7. Hire part-time workers (other than students) to assist as researchers or in program support roles?</b> If yes, please read the policy regarding hiring grant supported staff at <a href="http://provost.umw.edu/grantsoffice/umw-grant-policies/hiring-nonstudent-grant-employees/">http://provost.umw.edu/grantsoffice/umw-grant-policies/hiring-nonstudent-grant-employees/</a>		
<b>8. Require that you assign any intellectual property rights to the granting or contracting entity?</b> If yes, contact the Academic Affairs Office (x:1269) for guidance.		
<b>9. Involve UMW students or employees as research subjects?</b> If yes, please check the appropriate box on the external grant cover sheet and comply with all UMW Institutional Research Board policies found at <a href="http://provost.umw.edu/grantsoffice/umw-grant-policies/use-of-human-subjects/">http://provost.umw.edu/grantsoffice/umw-grant-policies/use-of-human-subjects/</a>		

Signed \_\_\_\_\_

Date \_\_\_\_\_

Print name \_\_\_\_\_

Title \_\_\_\_\_