Sponsored Projects

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General Description

Policy Summary:

This policy describes the institutional rules and regulations with regard to applying to external funding, such as a grant or contract, to support research, scholarship, creative work, or public service.

Purpose:

The purpose of this policy is to ensure that the conduct of sponsored activities at the University will be controlled by the specific statements in this policy and guided at all times by the following primary and basic objectives:

   1. The advancement, dissemination, and preservation of knowledge through teaching, research,
     and scholarship at the undergraduate and graduate levels.

   2. The protection and advancement of the interests and welfare of the University.

   3. The advancement and protection of the public interest and public welfare.

Scope:

All faculty and staff who are submitting projects for external funding, such as grants and contracts, that will be financially managed by Trinity are subject to this policy. Likewise, this policy applies to faculty and staff who will be using Trinity resources (e.g., space, technology, equipment, personnel) to accomplish activities funded by an external sponsor.

Exceptions:

Faculty and staff who are applying for financial assistance that will be awarded to them outside their period of appointment and that will not be managed by the university, or who will not be using any Trinity resources to accomplish the project activities are not subject to this policy. However, other institutional policies, such as those regarding consulting or other employment,

conflict of interest, and the oversight of relevant committees, such as IRB, Biosafety, and IACUC, will still apply.

Policy Content

A. Definitions

This scope of this policy statement applies to sponsored activities undertaken within the institutional framework of Trinity University (University) in the fields of research, scholarly or creative work, and public service. Sponsored activities shall be understood to include all organized projects with support obtained from the following sources:

1. University grants for specific projects, internally funded to meet University objectives.

2. Institutional grants from funds obtained from external sources but allocated internally at University discretion.

3. Funds obtained from sponsoring agencies, external to the University, through grants, contracts, or other written agreements, but not including gifts. Gifts are made by individual donors or foundations without an expectation of reciprocity or direct benefit.

4. In-kind services contributed by external sources where a reciprocity of services supports activities of mutual value and benefit.

Sponsored projects supported by external funds must be in writing and may take the form of, including by not only, grants, fellowships, contracts, subcontracts, sub-recipient agreements, memoranda of understanding or agreement, or letters of award made between the external sponsor and the University.

B. Objectives

The conduct of sponsored activities at the University will be controlled by the specific statements in this policy document and guided at all times by the following primary and basic objectives.

1. The advancement, dissemination, and preservation of knowledge through teaching, research, and scholarship at the undergraduate and graduate levels.

2. The protection and advancement of the interests and welfare of the University.

3. The advancement and protection of the public interest and public welfare.

C. Eligibility and Approval Requirements

Tenured and tenure track faculty members, permanent, full-time lecturers and instructors, and permanent, full-time staff members are eligible to prepare proposals for sponsored funding. Tenure track faculty are eligible upon acceptance of a Letter of Appointment (LOA), prior to the start date of the LOA. Visiting professors and postdoctoral fellows are eligible to prepare and submit proposals as long as the proposed project performance period is within the period of their current appointment. Retired and Emeritus faculty members are eligible to submit proposals, as long as they can fulfill the responsibilities of a principal investigator (PI) or project director (PD).

All proposed projects to be sponsored by external resources must be ultimately approved by the prospective project director's or principal investigator's department chair or direct supervisor and by the Senior Director of Research and Sponsored Programs (Senior Director) prior to submission of a proposal to the external sponsor, except approval is not required prior to submitting a Letter of Intent or a pre-proposal.

A few sponsored activities are supported by funding provided directly to the scholar, not to the University. Nonetheless, the policies and procedures discussed in this policy pertain to the scholar's activities, unless the sponsored activities
- are to be performed exclusively outside the scholar's period of appointment;
- completely without reliance on University resources, including financial management services by the institution of the awarded funds.

The work must be performed in compliance with the University's Conflict of Interest and Consulting policies. In addition, policies related to compliance (Use of Human Subjects; Animal Care, Intellectual Property; Biosafety; Responsible Conduct of Research; and Scientific Misconduct) must be followed, as applicable.

D. Investigator Responsibilities

Faculty or staff members who propose to carry out a sponsored program at the University agree to comply with the following provisions:

A. The proposed project will be carried out within the framework of a regular department or through the cooperation of several departments and will be directed by members of the faculty or staff. The project must be consistent with the overall mission and strategic objectives of the University.

B. The project must conform with the University standards of academic freedom, including the right to publish results and freely disseminate discoveries and new knowledge. Any restrictions on publication must be agreed to by the prospective project director and approved by the Senior Director of Research and Sponsored Programs

(Senior Director) in consultation with the corresponding school dean.

C. The faculty member will assure that the proposed project meets the following requirements:

1. Adequate facilities and space will be available for the successful conduct of the proposed sponsored project.

2. The designated and negotiated share of the time and talent of those members of the faculty, technical personnel, student assistants, and staff who have committed to perform the sponsored project will be made available. This may require a letter of support from another department or unit.

3. The technical capacity of the personnel to perform the proposed project effectively and to meet the sponsor's requirements is assured.

4. The project does not divert the University resources from the attainment of the strategic goals of the University.

5. The budget for the proposed project should be adequate for the work proposed, including allowances for salary increases, such as for cost of living, promotion and tenure, and contingencies.

6. Any University contribution in the form of direct funds, indirect expenses, or specific resources should be specifically provided for and approved by the appropriate administrator.

The above will be a basis for evaluation of projects and approval.

The project must not conflict in any way with University administrative regulations or academic policy regarding employment and employee relations, fiscal policy and procedures, purchasing, intellectual property policy, conflict of interest policy, policy on use of human subjects in research, policy on use of animals in research, responsible conduct of research policy, or biosafety policy.

In cases of conflict between the policies of the University and the outside supporting agency, the University policy will have priority. Exceptions must be approved by the appropriate academic and administrative authorities of the University.

E. University Responsibilities

A. To the Investigator

The Office of the Provost/Vice President for Academic Affairs is the central office charged with maintaining an overview of the internal research commitments of the University as well as research, training, demonstration, equipment, and course improvement projects sponsored by external sources.

When a proposal by a faculty member to undertake a sponsored program has been signed by the Senior Director, the University is understood to have assumed certain general and specific obligations to the investigator:

1. An appropriate and reasonable adjustment in teaching requirements may be made with the approval of the Department Chair to permit a faculty member to carry out a program for which sponsorship is being sought.

2. Equivalent full-time responsibilities will be based upon teaching loads customary in each department.

3. The University will provide administrative assistance to assist faculty in the conduct of approved sponsored projects including maintenance of records.

4. The appropriate department(s) of the University will provide and maintain adequate space, facilities, utilities, and equipment for the conduct of the sponsored project.

5. Under no circumstances will either an individual's existing tenure privileges or University salary be affected by reason of involvement in approved sponsored projects.

6. The University will not without just cause cancel or withdraw any commitments it has made in accepting a grant or contract for sponsored support with regard to such items as facilities, professional assistance, or an appropriate share of the time of the personnel concerned.

7. Failure of the University to meet the obligations specified herein shall be appealed to the Provost and then to the President of the University.

B. To the Sponsoring Agency

In accepting a project for sponsored effort, the University assumes all obligations specified or referred to in the award instrument. In addition, the University accepts the following general obligations to a sponsoring agency:

1. Appropriate staffing levels will be maintained to provide adequate control over expenditures of the sponsored funds and property. Staff also will prepare and submit the necessary financial reports as required by the sponsor.

2. For such purposes as maintenance of records and financial controls, provision of facilities and space, purchasing procedures, and property control, the University will not discriminate in its policies and administrative controls between its own funds and those obtained from a sponsor.

3. Personnel salaries and employee benefits paid from external sponsored funds will be consistent with University rates and standards and with the policies of the sponsor.

4. The use of federal funds will comply with the U.S. Office of Management and Budget (OMB) Uniform Guidance; the grant, contract, or other written agreement; and any accompanying terms and conditions. The use of non-federal funds will comply with the sponsor's terms and conditions.

F. Proposal Development

A. Internal Review Process Prior to Submission

Faculty time: Requests for compensation and percent of faculty time must be included in the proposal and require prior approval from the faculty member's departmental chair and the Senior Director. Fringe benefits must also be included in the proposal budget as well as indirect costs if allowed by the sponsor.

a. Regular and distinguished faculty members are appointed to 9-month contracts leaving three months during the summer without a contractual obligation to the University. Faculty members may propose and be compensated for this summer time in a sponsored project, at the monthly rate of their current year contract according to upper limits Given the University's interest in supporting a work/life balance, faculty members are advised to discuss the amount of time with their department chair prior to proposing a full three months of compensated time on a single or multiple sponsored project(s). Being compensated for more than two months in the summer must conform to associated policy regarding this topic that is in the Faculty Handbook.

b. When a faculty member estimates that more time than 25% (or 50% for distinguished faculty) is required during the academic year to conduct the proposed project (equivalent to the protected research time), they may request a course release. Requests for a course release must be made to the supervising department chair. If the proposal applicant is a department chair, then the request must be made to the corresponding school dean. A chair may approve or deny a request for course release, or the amount of course release requested, depending on the teaching needs of the department or other considerations. However, once granted, and documented in Trinity's Internal Proposal Authorization (IPA) form with all required approvals, the university commits to providing approved course releases upon grant award.

Course releases each semester should be budgeted in proposals at the amount equal to the commensurate cost of adjunct faculty to teach the course/s from which the faculty member will be released. The cost to hire an adjunct may vary by department. The adjunct replacement cost amount should be budgeted in the proposal along with associated fringe benefits and indirect costs, as allowed by the sponsor. Upon award, funds that were budgeted for release time will be made available to the supervising department chair to hire the adjunct replacement.

The total amount of release time across all grants that a faculty member is granted during the academic year may not cause them to go below a teaching threshold of a 1:1 teaching load annually. This is true for both regular and distinguished faculty. Any exceptions to this practice should be requested from the corresponding school dean and a rationale should be provided.

c. Contributing faculty time without compensation is considered cost sharing and is considered only in rare circumstances, since faculty time is one of University's most valuable assets. If sponsor guidelines do not permit budgeting for course releases or the amount of the sponsor funding available is insufficient, a department chair may still grant release time. However, in those cases the onus is on the department chair and the PI to find resources internal to the department to cover the release time after undertaking a strategic assessment of the value of the project to the department and university. Other types of cost sharing are discussed below.

3. Other Personnel: time and compensation for additional personnel can also be requested in a proposal. If the proposal involves hiring personnel, the project director must either (a) name the specific person in the proposal and apportion the wage correctly, or (b) identify and recruit someone for the position if an award is received. If someone must be recruited and hired, you should discuss the proper classification and salary of the position with a representative of Human Resources. In addition to wages or salaries, fringe benefits and indirect costs, as allowed, should be included in the budget.

4. Equipment or Software not available within your department but necessary for your project may be available from another source on campus. Before proposing new equipment or software, check with your department chair and colleagues to determine whether or not the requested equipment is available on campus.

5. Consulting services are allowable costs, and the use of such services must be specifically identified in the proposal. Please review the Consulting Policy if an internal consultant is planned.

6. Additional Space: If your project requires institutional space allocations, check with the appropriate office; e.g., the Registrar's Office for scheduling classroom space or the department chair for securing office space for new employees.

7. Conferences or seminars: The Office of Conferences and Special Programs should be consulted when

the proposal includes conferences and other special events to be held on campus.

8. Escalation of costs: Attention should be given to the inclusion of a realistic inflation percentage for personnel salaries and benefits, student tuition and stipends, supplies, travel, and other line items.

9. Subawards: If the project requires the involvement of another institution or organization as a subaward, the subaward must be identified in the proposal and a detailed subaward budget included. Letters of agreement between Trinity University and the subrecipient must be exchanged and included in the proposal. Subrecipients:
   a. must not have been debarred from receiving government money;
   b. must agree to comply with all federal requirements to receive an award

Not that all subaward recipients must follow Federal Conflict of Interest requirements. IF they do not have their own processes, subrecipients can comply by following Trinity University's procedure for training in financial conflict of interest, for the disclosure of Significant Financial Interests, and agree to comply with any decision of the University's administration; or, the subrecipient's employer may provide assurance that any conflicts related to the project under consideration have been managed, reduced, or eliminated pursuant to the employer's policy.

10. Indirect costs: The University requires that an indirect cost allowance (also referred to as Facility and Administrative, or F&A, charges) be charged to federal projects to cover the expense of services and facilities provided by the University, such as utilities, physical plant and equipment, insurance coverage, and administrative costs. Some private sponsors also allow indirect cost or administrative charges and the allowable indirect charge rate is often different than the university's federally negotiated rate. Indirect costs, if allowed by the sponsor, must be budgeted, unless waived by the Senior Director in consultation with the department chair. **Proposers should expect the granting of waivers or reductions of indirect costs to be *extremely* rare.**

11. Cash match and Cost Sharing: Unless required by the sponsor guidelines, institutional cash match and cost-sharing are not encouraged. Any cash match and cost sharing must be discussed with chairs, the sponsored program office, and the corresponding academic dean, as appropriate, ideally at the start of the proposal development process. Tuition remission cannot be used as cost-sharing. Faculty and staff time, if permitted to be used as cost-sharing, must come from regular, allocated funds within the departmental or institutional budgets. If a sponsor requires cost sharing or matching funds, the faculty or staff member should consider and explore sources other than University funds.

12. University resources: The University provides many resources in support of sponsored projects. These include resources for student housing during the summer when participating in full-time research or full-time research assistantships, internships, or other activities (other than summer coursework). Request for these and similar resources must be identified and approved through the Internal Proposal Authorization (IPA) process.

13. Other requirements: Depending on project needs, appropriate institutional boards or committees may need to be consulted, such as Risk Management, the Institutional Review Board, Biosafety, or the Animal Research Committee.

B. Timeline: What to Submit and When

- Please see the document attached to this policy for a recommended timeline to follow to complete a sponsored project, along with securing the required internal approvals

- When your proposal is nearing completion, complete and route online the Internal Proposal Authorization (IPA) form. Attach the budget, budget narrative, an abstract, and any prior approvals to the Chair for review.

- If approved, the department chair will sign the IPA and forward it to the Sponsored Projects Accounting Manager (SPA-M) for review and approval. The IPA is next routed to the Office of Academic Affairs for review and approval by the Senior Director.

- The Provost, and the Senior Director as designated, have the authority to commit institutional resources and facilities and to contractually enter into grants, contracts and other agreements. Faculty and staff members are encouraged to consult freely with prospective sponsors, and to discuss conditions of sponsored projects. However, such discussions, particularly during pre-award negotiations, must be regarded as tentative pending approval by either the Provost or the Senior Director.

- Faculty and staff should consult the Office of Sponsored Programs or the Office of Development, as near to the beginning of the proposal development process as possible. Staff in these offices will assist to guide and support, proposers as needed, through Trinity's processes.

- Time must be allotted for internal administrative review. If substantive budget and/or task revisions in the proposal are requested during the review process, the original endorsements must be reaffirmed before the proposal can be submitted. Sponsors use different systems for submission and most often the Director of Sponsored Programs, the Director of Foundations, or the Director of Corporate Relations are the institutional administrators authorized to submit the proposal to the sponsor. However, submission is sponsor specific and guidance will be found in the application guidelines.

C. Internal Review Timetable

- Allow at least two days for the chair to read, request any revisions or clarifications, and

approve the proposed narrative and budget.

- Allow three business days for the SPA-M to review the budget and to check for compliance with institutional and sponsor's financial requirements.

- Allow two days for the sponsored programs staff to read the proposal, confer with the PI/PD or chair on possible changes, and approve the proposal for submission to the sponsor.

- If the scope of the project and/or the budget must be negotiated based upon the internal review, the PI/PD should revise the task schedule and budget. It may be necessary for the PI/ PD to discuss changes with the sponsored project program officer. Revisions must be submitted through the internal review process again.

Copies of the final proposal should be kept by the faculty or staff member submitting the proposal. The Offices of Sponsored Programs or of Development will also retain a copy in electronic files.

G. Research Compliance Training

Trinity University strives to ensure the highest level of safety, integrity, and ethical standards in all its research, scholarship and creative activities. To this end and also to meet the requirements of federal sponsors in areas, such as Human Subjects, Animal Use, Responsible and Ethical Conduct of Research, Financial Conflict of Interest and Biosafety, Trinity requires senior personnel and others who have significant roles in a research project to complete training in various areas research compliance. Those requirements are described as follows:

Human Subjects – Researchers who plan to engage in research—regardless of funding source—that involves human subjects must submit a protocol application for review by Trinity's Institutional Review Board (IRB) per Trinity's Human Subjects Research Policy. For federally-funded awards, all project personnel, such as principal investigators, project staff, and students, who will be involved in the design or conduct of human subjects, research must receive training. The scope of this policy includes the following personnel: Affiliated with subrecipient organizations, including foreign subrecipients; Employed by third parties; and Serving as consultants.

Trinity has chosen CITI as its training provider and, per federal guidelines, training must be completed before a funded project can begin. It is the PI's responsibility to ensure all personnel involved in the design and conduct of research involving human subjects receive the required CITI training keeping in

mind that project staff turnover and that new staff will need to be trained. Retraining must be completed every 3 years during the life of the award. Verified training received elsewhere within the last 3 years that is equivalent to that provided at Trinity will meet this requirement. Collaborators, including those at subrecipient organizations on a project managed at Trinity, must complete Trinity's human subjects research training program if they do not have access to equivalent training at their home organization.

Animal Care and Use: Researchers who plan to engage in research using animals must submit a protocol application to Trinity's Institutional Animal Care and Use Committee (IACUC). As part of the protocol application process, researchers must complete training in animal care and use through Trinity's training provider CITI. It is the responsibility of the PI to ensure that all personnel involved in animal care and use complete the required training.

For federal awards, guidelines stipulate: 1) training is required and must be completed before a funded project can begin and 2) retraining must be completed every 3 years during the life of the award. Verified training received elsewhere within the last 3 years that is equivalent to that provided at Trinity will meet this requirement. Collaborators, including those at subrecipient organizations, on a project managed at Trinity must complete Trinity's animal care and use training program if they do not have access to equivalent training.

Responsible and Ethical Conduct of Research (RECR): While all researchers are strongly encouraged to complete training in RECR, non-senior personnel and students participating in research on an NIH award are required to complete RECR training via Trinity's provider CITI. For awards funded by the U.S. Department of Agriculture or the National Science Foundation, in addition, to students and non-senior staff, the PI and senior personnel participating in research must also complete RECR training. Retraining must be completed every 4 years during the life of the project via CITI.

Students who have received in-person RECR training provided by the Center for Experiential Learning & Career Success for Trinity's Summer Undergraduate Research Fellowship (SURF) are exempt from this requirement. Verified RECR training that is equivalent to training provided at Trinity completed at another institution within the last 4 years will meet this requirement. Training is required to be completed as soon as possible after the award notice is received. It is the PI's responsibility to ensure that all persons involved in conducting research under an awarded project are trained in RECR.

Financial Conflicts of Interest: Principal investigators on a Public Health Service (PHS) award as well as any other person on a PHS award, regardless of title or position who is responsible for the design, conduct, or reporting of research must complete training via Trinity's provider CITI in Financial Conflict of Interest. Retraining must be completed every 4 years during the life of the award. Verified FCOI training that is equivalent to training provided at Trinity completed at another institution within the last 4 years will meet this requirement. All principal and co-investigators must disclose Significant Financial Interests at least annually as defined as and via a process described in Trinity's Conflict of

Interest policy.

Biosafety: Research plans that include the use on Trinity's campus of recombinant or synthetic DNA or that include the use of a pathogen or agent that is potentially infectious to living organisms, especially animals and humans, must be reviewed by Trinity's Institutional Biosafety Committee (IBC) prior to proposal submission. Any required follow up actions will be determined by the IBC.

H. Prohibition of Malign Foreign Talent Recruitment

Trinity University prohibits employees who are working on research currently funded by any U.S. federal agency and who are serving in that research in the role of Principal Investigator, Co-Principal Investigator, or senior/key personnel from participating in a Malign Talent Recruitment Program. This prohibition is rooted in the Chips and Science Act signed in to law in August 2022.

Federal law defines the types of prohibited recruitment activities as well as the problematic obligations associated with those recruitment activities. The law further specifies that for a recruitment program to be malign, it must be sponsored by a "country of concern" or by an entity located within the borders of such a country. It does not matter whether the entity conducting the recruitment program is sponsored by the country's government. It is still illegal and, thus, prohibited by this policy. The law defines a country of concern as: China, Iran, North Korea, Russia, or any other country designated as such by the U.S. Secretary of State.

See the matrix attached to this policy that provides the legal definition of recruitment activities, problematic recruitment obligations, and problematic country sponsorship.

I. Administration and Management of Sponsored Projects

Awards for sponsored projects are made to the University. It is the responsibility of the Senior Director as the designated institutional representative to serve as intermediary between the agency and the faculty or staff member for pre-award changes of the grant, contract, or other written instrument, and for post-award modifications, date extensions, and other administrative tasks.

The acceptance of funds to support a project will be construed as evidence that the faculty or staff member has agreed to comply with the policies, terms and conditions of the supporting agency, including:

- conducting the project in a timely and responsible manner and according to University policy and sponsor guidelines
- managing the funding and other resources judiciously,
- meeting project milestones and preparing and submitting required reports by deadline.

A. Acceptance and changes

Sponsored agreements may require University signatures before they become effective. The faculty or staff member will be asked to thoroughly review any documents that the University receives, including any changes to the final budget and scope of work, however, only the Provost or the Senior Director, as designated, have the authority to sign. The staff in the Office of Research or other University staff members may review the final documents prior to signing.

B. Financial Account

When an award has been accepted and signed, as needed, the Sponsored Projects Accounting Manager (SPA-M) will review the terms and conditions of the award and advise the PI/PD of the establishment of the project budget account by email. Until then, no cost to the project can be incurred or paid. In setting up an award budget, the SPA-M will review the award documents and include any special conditions in the administrative notes sent to the faculty or staff member. These serve as guidelines to the PI/PD in operating and in spending funds. The administrative notes from the SPA-M will also include a listing of dates on which financial and technical reports are due. After receipt of this budget notification, the faculty or staff member in charge of the project can begin the process of staffing needs by contacting the Office of Human Resources. All employment must be done according to established University job descriptions, salary scales and policies. At times, an award is made by letter, but the written agreement lags. Under those circumstances, the Senior Director may authorize a Pre-award account if allowed by the sponsor. Each situation is considered individually.

C. Project Management

Sponsored projects are awarded to Trinity University, which has final responsibility for the successful administration of the project. However, the technical requirements and the day-to-day administration of the project are the responsibility of the faculty or staff member directing the project. The chair of the department has administrative oversight duties. The office of sponsored programs or staff in the Academic Affairs and in Development and Alumni Relations assist in administratively fulfilling the requirements. The Business Office through the SPA-M is responsible for financial accounting and audit. In addition, Human Resources and other staff and service departments will assist in the successful conduct and administration of the project.

The faculty or staff member, the Principal Investigator or Project Director (PI/PD) in charge of the project assumes the responsibility for directing the technical aspects of the project and carrying out the methodology and scope as authorized by the sponsor.

It is the responsibility of the PI/PD to:

1. Conduct the project according to the statement of work set forth in the proposal and award documents.

2. Adhere to University policies and procedures.

3. Supervise expenditures in conformity with the approved budget. Small, routine budget changes within budget categories may require the approval of the chair, the SPA-M, and sometimes, the Senior Director. Major budget changes or budget transfers between budget categories that significantly alter the project will normally require approval of the funding agency, the SPA-M and the Senior Director. The PI/PD should first contact the Office Sponsored Programs for guidance.

4. Initiate the necessary documents requesting payment for travel, purchase requisitions, payroll authorization for project employees, and other forms required for the project.

5. As requested by SPA-M review and affirm the time and effort devoted to the project by all project personnel throughout the life cycle.

6. Contact the Office of Sponsored Programs regarding potential discoveries and copyrights as required by the University Intellectual Property policy.

7. Provide institutional identification, care and maintenance of all equipment procured with project funds in accordance with the University and sponsor's regulations. Initiate request for installation and for repair and maintenance, per equipment manufacturer's recommendations. Work with the Science Facilities Director to incorporate the maintenance into the operational schedule and budget and to plan for replacement through capital requests.

8. Write and submit progress reports as required by the sponsor.

9. Closely monitor all financial transactions and reconcile with the University's financial system on a monthly basis, assuring that project funds are spent.

10. Work with the SPA-M to assure that cost-sharing obligations are recorded and fulfilled for the project.

11. Provide expenditure documentation that may be requested by the SPA-M as needed for audit purposes.

12. Provide timely notice to Human Resources of project personnel changes.

13. Confirm and file with the appropriate offices all other termination documents, e.g., invention disclosures, copyright or intellectual property disclosure disposition of property acquired with sponsored funds, and termination of any contracts.

14. Prepare and submit the final technical report to the sponsor by the required date. Send copies to the Sponsored Programs Office.

15. Coordinate with SPA-M on all final financial and budget close-out documentation required by the sponsor.

16. Maintain research and technical records at least three years from close of the sponsored project, or longer as customary or recommended by your discipline. Financial and administrative records of sponsored projects are retained by SPA-M for three years from the completion of the project, or as required by the sponsor.

J. Amendments

Proposed amendments to these policies must be reviewed by the Business Office, and the Associate Vice President for Academic Affairs: Budget and Research, and approved by the Provost.

Attachments

[Recommended Proposal Development Timeline](#)

[Matrix - Malign Foreign Talent Recruitment](#)

Related Documents

Related Content:

[TU Sponsored Projects website](#)

[TU Internal Proposal Authorization (IPA) Form](#)

Revision Management

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Vice President Approval:

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