

# **The Texas A&M University System Health Science Center**

## **Guidelines for the Administration of Research Grants and Contracts**

Supplements TAMUS Regulation 15.01.01 and HSC Internal Policy 15.01.01.Z1.01

### **1. GENERAL**

All Health Science Center (HSC) pre-award activities for external funding, including HSC proposals submitted through the Texas A&M University System Health Science Center Research Foundation (RF), must adhere to HSC Rules and System Regulation and Policies. Any research or sponsored project proposal to an external sponsor which involves HSC faculty, facilities, or resources (i.e., matching funds, equipment use, faculty time, cost-sharing, etc.) must be approved by the Office of the Vice President of Research and Graduate Studies (OVPRGS).

The OVPRGS or the RF are responsible for sponsored project proposal administration and acceptance of awards on behalf of the HSC.

### **2. INTERNAL REVIEW AND PROCESSING**

Each proposal for external funding must be approved by the project principal investigator, department head or director, dean or appropriate vice president, and the OVPRGS.

2.1 The principal investigator is responsible for: proposal budget, technical content, quality and preparation of the proposal, the presentation of his or her ideas for a project, coordination with compliance committees, and compliance with applicable HSC Rules and Internal Policies, and System Policies and Regulations. The principle investigator is delegated the overall responsibility for the technical and fiscal management of the project.

2.2 The department head (or equivalent for interdisciplinary or intercollegiate faculty) is responsible for certifying: the academic soundness of the project, compatibility of the project with the principal investigator's other commitments, availability of space and facilities, cost-sharing commitments, that the project is in keeping with department objectives, and that the proposal should be submitted to the agency named.

2.3 The dean of the college is responsible for determining: the appropriateness of the project within college programs and that facilities and resources will be available.

2.4 The OVPRGS is responsible for: ensuring that the project content meets with acceptable rules and standards, including intellectual property; reviewing the proposal to ensure that matters involving conflict of interest, human subjects, DNA research, hazardous substances, experimental use of animals, and other compliance issues have been identified and approved; resolving any academic policy issues that may arise at this

level; reviewing the document for institutional commitments such as cost sharing; reviewing the budget for accuracy and completeness; and ensuring appropriate approvals.

### **3. FACILITY AND ADMINISTRATIVE (F&A) COSTS**

Facilities and Administrative costs are defined as costs that cannot be uniquely associated with a particular project but which are nonetheless incurred by institutions due to the project. They include expenses such as departmental accounting and clerical support, computer network support, equipment depreciation, building and facilities operation and maintenance, library, and sponsored projects administration. These costs are budgeted and charged as a percentage of some of the direct cost elements.

Facility and Administrative costs are real costs that are necessary for the operation and conduct of research and other sponsored projects. Proposal budgets submitted to external sponsors should charge the approved F&A rate as negotiated by TAMUS with the responsible federal agency, currently the U.S. Department of Health and Human Services (DHHS). With the exception of some non-profit organizations which limit F&A costs as a matter of policy, proposals for projects not recovering the negotiated F&A rate require approval by the OVRGS. This approval should be in the form of a request from the principal investigator for the HSC to assume (through cost sharing) all or part of the F&A costs charged to a research or sponsored project.

Requests for F&A cost sharing (waivers) should be initiated by the relevant principal investigator (PI) and must be approved by the PI's Department Head and Dean or Director. Requests are then submitted by the Dean to the Office of the Vice President for Research and Graduate Studies. The request should include the exact rate requested and an explanation of how the proposed F&A cost sharing will benefit the research and educational missions of the HSC.

Approval of requests for F&A cost sharing will be granted only for compelling reasons. As a means of determining the costs and benefits of requests for F&A cost sharing, the following factors will be taken into consideration:

- 3.1 The grounds on which the F&A cost sharing might be justified to other faculty whose projects recover full F&A costs;
- 3.2 The total cost to the Health Science Center;
- 3.3 The likelihood that an award would be seriously jeopardized without F&A cost sharing, and the potential effect of the loss on the faculty member's research program;
- 3.4 The benefit of F&A cost sharing to new or junior faculty members or in support of research efforts in new directions which otherwise might not be sufficiently developed to attract typical peer-reviewed awards;
- 3.5 The effect of F&A cost sharing in increasing direct costs available for student support.

It should be noted that F&A cost sharing will not be granted in cases where the research is sponsored by a profit-making or foreign organization, where the research involves any requirements on the part of the sponsor with respect to intellectual property, or where granting the F&A cost sharing might appear to establish a precedent for future projects.

#### **4. PREPARATION, REVIEW, AND SUBMISSION OF RESEARCH AND SPONSORED PROJECT PROPOSALS**

4.1 The submission of proposals for external funding is a function of the HSC, the RF, or a TAMUS agency rather than the individual. A formal proposal to conduct a research or sponsored project with an external agency represents an offer by the HSC. In this regard, the HSC acts as the representative of TAMU System and the State of Texas.

4.2 HSC proposals for federal funding must be processed by the RF.

4.3 HSC non-federal proposals should also be administered by the RF in most cases. In certain circumstances, the principal investigator may request approval by the OVPRGS to allow administration of a project by the HSC component. The OVPRGS will consider the project's complexity, compliance risk, and recoverable F&A rate in deciding to allow internal administration. The OVPRGS will provide compliance oversight for these internal projects, which must adhere to the same policies, rules, restrictions, guidelines, and compliance standards as RF-administered projects.

4.4 The OVPRGS shall review all proposals prior to submission. A completed and approved routing and approval page must accompany every proposal. Adequate planning should be exercised to avoid conflicts between the processing of the HSC review and external funding agency deadlines.

4.5 The President has delegated responsibility for approving proposals to the Vice President for Research and Graduate Studies. The Vice President for Research and Graduate Studies has delegated the signature authority for proposals to the Assistant Vice President for Research Administration.

4.6 HSC proposals for external funding will be reviewed and the proposal routing sheet [attachment A] signed by the principal investigator, department head or director, dean, and the Vice President for Research or the Assistant Vice President for Research Administration. The review and approval of proposals may be delegated by each of these positions to designated representatives. Approval certifies: the proposal fits the mission of the department, component, and HSC; the proposal complies with Federal, State, TAMU System, and HSC policies; and the commitments for cost-sharing, matching funds, and facilities are authorized should funds be awarded.

#### **5. HSC POST-AWARD SPONSORED PROJECT ADMINISTRATION**

5.1 Contracts or grants funded from proposals submitted to an external sponsor directly through the OVPRGS should be forwarded to the OVPRGS for award processing. The

HSC Office of Finance and Administration will initialize and administer the financial aspects of approved projects. Projects subject to review and approval under other provisions, such as use of human subjects or laboratory animals, must have an approved protocol on file before financial administration of the project may be initiated.

5.2 HSC contracts or grants funded from proposals submitted by the Texas A&M HSC Research Foundation should be forwarded to the Research Foundation for processing. In any instance where an external sponsor requests the inclusion of language in an award document which deviates from standard HSC practices, such as intellectual property, publication or data rights, the Research Foundation and the OVRGS will coordinate award processing.

## **6. OBLIGATION TO INFORM SPONSORS OF CHANGES IN PRINCIPAL INVESTIGATOR STATUS**

The HSC has an obligation to disclose to a sponsor any material facts bearing on the institution's ability to carry out the program described in a project proposal. Availability of a proposed principal investigator is a material condition of any project awarded to the HSC. Notifications must be made to sponsors in the event of, but not limited to, the following circumstances related to the project's principal investigator: significant change in level of effort, absence from campus, or expiring HSC appointment. The principal investigator or department head should contact the OVRGS to coordinate appropriate notifications in any of the above circumstances.

## **7. ACTING PRINCIPAL INVESTIGATOR**

7.1 If the principal investigator will be absent from the project for more than three months or, in any case, if the principal investigator's absence from the project does not permit a sufficient level of involvement in the sponsored activity, an acting principal investigator shall be appointed by the department head or director and approved by the funding agency.

7.2 An acting principal investigator is subject to the same criteria for eligibility as a principal investigator. Designation of an individual as an acting principal investigator who would not ordinarily be eligible to be a principal investigator requires the approval of the appropriate dean and the Vice President for Research and Graduate Studies.