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Office of Sponsored Programs

# **Administrative Policies and Procedures**

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# Introduction

The mission of the Office of Sponsored Programs (OSP) is to help increase external funding and to provide administrative oversight for all sponsored awards.

In order to ensure a coordinated, effective, and strategic approach to sponsored funding, this office serves as a clearinghouse to make the progression of proposal development through award close-out a seamless and straightforward process. We serve as a liaison between the grant recipient and other institutional constituencies to ensure appropriate implementation of grant-funded projects and proper stewardship of resources entrusted to the University by our various funding agencies.

This document contains OSP's administrative policies and procedures, put in place for purposes of compliance with federal, state, local, and institutional requirements and regulations. These policies are **not** a comprehensive list of sponsored program policies that must be followed. OSP and all parties involved with sponsored programs at Fairmont State are also subject to:

1. The Code of Federal Regulations, Title 2, Subpart A, Chapter 2, Part 200;
2. West Virginia Code §12-4-14;
3. Fairmont State University's Board of Governors Policies and Procedures; and
4. Any policies put in place by the applicable external funding agencies.

In the event of a discrepancy between OSP's administrative policies and any of the policies listed above, the above policies shall take precedence.

All administrative policies are subject to revision and regular review by OSP.

# Institutional Approval Process for Requesting External Funding

[Revised 02/17/2025]

Fairmont State University encourages faculty and staff to pursue external funding in support of research and programs that advance the mission of the University. All requests for external funding, whether from federal, state, or private sources, must be approved through the Office of Sponsored Programs (OSP) prior to submission to ensure that the proposed project or program is compatible with institutional priorities and to evaluate the need for matching funds, facilities and administrative costs, and other institutional commitments in order to assess costs versus benefits of the grant.

**The Office of Sponsored Programs serves as the first point of contact for faculty and staff seeking external funds.** In addition to providing oversight, coordination, and review of all requests for external funding, OSP also supports effective proposal development and assists with the submission process.

Proposals or requests for funding to private funding organizations such as private foundations and corporate foundations will be submitted through the Fairmont State Foundation, Inc. (the Foundation). These proposals must be reviewed and approved by OSP, and OSP will assist as needed in the proposal preparation and submission of private funding requests.

Those seeking external funding should notify their supervisor early in the proposal development process to ensure that the planned project/program aligns with institutional priorities at the departmental or unit level. To facilitate this notification and to garner appropriate institutional support at the preliminary juncture, the **Declaration of Intent to Apply for Funding Form** should be completed and submitted for review and signature to OSP. OSP will orchestrate the review and approval process through SignNow.

Once the Declaration of Intent is approved, OSP will assist with proposal development. While OSP provides resources, support, and assistance, it is important to note that it is the responsibility of each individual or unit seeking a grant to prepare the appropriate proposal and/or application materials.

At least ten working days before the funding agency's deadline, a **Proposal Certification Form** must be completed and submitted to OSP along with a final proposal draft and budget. OSP will route the completed form and application materials for review and approval to the applicable Department Chair(s), Dean(s)/Director(s), Foundation President, Provost, Grants Accounting representative, and Finance & Administration representative. Once institutional approval has been secured, OSP will notify the proposer that their application has been approved for submission.

No request for external funding should be submitted without the express written approval of OSP.

Prior to submission, the Principal Investigator (PI) or project director (PD) will be required to complete a Conflict of Interest Disclosure Form and sign the PI/PD Acknowledgement of Responsibilities document.

# PI Post-Award Procedures

[Revised 03/13/2025]

## New PI Onboarding

New PI Onboarding is required to be completed by all first-time PIs (or PIs who began in their role before these procedures were enacted) within 30 days of award notification. The initial training will be conducted in person with OSP staff.

## Required Updates and Renewal

August 15<sup>th</sup> through September 15<sup>th</sup> is OSP's established timeframe for compliance review for required updates and renewal of the following: a) PI Onboarding b) PI Acknowledgement of Responsibilities Form, and c) Conflict of Interest (COI) Disclosure Form.

PIs must renew their training annually by completing an online review and certification quiz and signing the PI Acknowledgement of Responsibilities Form. They must also complete an updated COI Disclosure Form at this time. If the initial Onboarding and signature of the COI Disclosure Form were completed no more than six months prior to August 15<sup>th</sup>, then the PI will not be required to complete the training again until the following August/September timeframe. For example, if a new award was received on March 10, 2025 and the PI Onboarding and Conflict of Interest Disclosure Form were completed on March 25, 2025, then the COI Disclosure Form and PI Onboarding renewal would not need to be completed again until August 15-September 15, 2026.

# PI Eligibility Policy

[Revised 02/17/2025]

Fairmont State University allows individuals with the proper level of training, skill, authority, and responsibility to direct research, projects, and other sponsored programs by granting them Principal Investigator (PI) or Project Director (PD) status. The PI/PD is the individual responsible for the conduct of the sponsored project.

## Principal Investigator or Project Director Eligibility

Though certain programs or sponsors may identify criteria for PI/PD eligibility, the institution has generally defined PI/PDs as:

- 1.) Full-time or part-time probationary or tenured faculty members with any of the following titles: Full Professor, Associate Professor, Assistant Professor, or Instructor.
- 2.) Full-time or part-time staff members or administrators whose experience and position within the University align with the scope and responsibility of the sponsored project. Undergraduate and graduate students at Fairmont State are not eligible to serve as PIs. For any student-initiated project, a faculty or staff mentor may serve as PI.

Special circumstances may dictate that an employee not meeting the above requirements could serve as a Principal Investigator if needed. In cases where the sponsoring agency has requirements or restrictions beyond Fairmont State's policy, the sponsor's requirements will take precedence over institutional guidelines for that project.

## Co-Principal Investigator Eligibility

Co-Principal Investigators (Co-PIs) are senior project personnel that share responsibility for the direction of a sponsored program, usually to a lesser extent, with a PI.

The same eligibility requirements for a PI are applicable to a Co-PI. Some programs or sponsors consider PIs and Co-PIs to share equal responsibility on a project.

Fairmont State considers the PI to be the individual ultimately responsible for the design, management, and execution of a sponsored program or research project, as well as for meeting the reporting requirements and maintaining compliance with applicable laws, regulations, and institutional policy governing the conduct of the project.

# Conflict of Interest Policy

[Revised 03/13/2025]

## Office of Sponsored Programs Policy

To avoid any possible conflict of interest in the conduct of grant or contract activities, the following safeguards are established, as mandated by federal law<sup>1</sup>, to prevent employees, consultants, or subrecipients from using their positions for purposes that are, or give the appearance of being, motivated by a desire for private gain for themselves or others, such as those with whom they have family, business, or other ties. Adopting this policy not only complies with federal requirements but also helps ensure that high standards of scientific and academic integrity govern the conduct of sponsored projects, thereby bolstering public understanding and trust in science and research. Accordingly, this policy is effective immediately.

### Implementation

At the time a grant is submitted to an extramural sponsor and registered in the Office of Sponsored Programs (OSP), whether to a governmental or nongovernmental sponsor, the Principal Investigator or Project Director, along with any other Fairmont State employee or subrecipient involved in the grant, must file a Conflict of Interest Disclosure Form with OSP. The following provisions apply.

1. Each Principal Investigator and/or Project Director<sup>2</sup>, along with any other Fairmont State employee involved in the grant, must disclose to the Director of the Office of Sponsored Programs all significant financial interests<sup>3</sup> of the Investigator, including those of the employee's spouse and dependent children, that would reasonably appear to be:
  - a. affected by the research or education activities proposed for funding,
  - b. in entities whose financial interests would reasonably appear to be affected by such activities, or
  - c. reasonably appear to be related to the investigator's institutional responsibilities.
2. While the initial disclosure must be provided at the time the proposal is submitted, each disclosure must be updated annually or sooner if new reportable significant financial interests are obtained. If the annual disclosure is not completed, OSP will not submit any proposals on behalf of the Principal Investigator. Updated Conflict of Interest (COI) Disclosure Forms (along with PI Onboarding refresher training) are due annually between August 15<sup>th</sup> and September 15<sup>th</sup>. If the initial COI Disclosure Form (and Onboarding) were



completed within the prior six months, the update (and refresher training) can be postponed until the following August/September timeframe.

3. If an actual or potential conflict of interest exists, the Director of Sponsored Programs will determine what conditions or restrictions, if any, should be imposed to manage, reduce, or eliminate such conflicts<sup>4</sup>. These conditions or restrictions might include, but are not limited to, the following:
  - a. Public disclosure of significant financial interests,
  - b. Monitoring of research by independent reviewers,
  - c. Modification of the research plan,
  - d. Disqualification from participation in the portion of the grant or contract that would be affected by the significant financial interests,
  - e. Divestiture of significant financial interests, and/or
  - f. Severance of relationships that create actual or potential conflicts.

If the Director determines that imposing conditions or restrictions would be either ineffective or inequitable and that the potential negative impacts that may arise from a significant financial interest are outweighed by interests of scientific or academic progress, technology transfer, or the public health and welfare, then the Director may allow the research to go forward without imposing such conditions or restrictions.

Each condition or restriction, if imposed, will include adequate enforcement mechanisms which allow for sanctions where appropriate. Faculty members may appeal decisions of the Director by presenting their cases in writing to the Provost, who will consider the pertinent facts in consultation with an ad hoc Conflict of Interest Advisory Board. Failure to file a complete Conflict of Interest Disclosure Form or to comply with any conditions or restrictions imposed on the conduct of the project all constitutes grounds for University discipline up to and including termination of employment. Specific sanctions will be determined by the Provost after a timely review of pertinent facts. Further, OSP will keep pertinent agencies appropriately informed.

4. OSP and responsible parties will maintain records of all financial disclosures and of all actions taken to resolve actual or potential conflicts of interest until at least three years after the termination or completion of the award to which those records relate, or the resolution of any government action involving those records, whichever is longer.

## Public Health Service (PHS) and Department of Energy (DOE) Investigators

All investigators under a Public Health Service (PHS) Agency<sup>5</sup> or Department of Energy<sup>6</sup> (DOE) Award including the PI, Co-PI, Senior/Key Personnel, and anyone responsible for the purpose, design, conduct, or reporting of the sponsored research are required to complete a training on financial conflicts of interest (FCOI) and to disclose significant financial interests (SFIs). Guidelines for these SFIs differs for PHS awards.

For PHS awards, a “significant financial interest” refers to:

- 1) A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator’s spouse and dependent children) that reasonably appears to be related to the Investigator’s institutional responsibilities:
  - a) With regard to any publicly traded entity, an SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
  - b) With regard to any non-publicly traded entity, an SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
  - c) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
- 2) Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e. that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education. The institution’s FCOI policy will specify the details of this disclosure, which will include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. In accordance with the institution’s FCOI policy, the institutional official(s) will determine if further information is needed, including a determination or

disclosure of monetary value, in order to determine whether the travel constitutes an FCOI with the PHS-funded research.

- 3) The term significant financial interest does not include the following types of financial interests: salary, royalties, or other remuneration paid by the institution to the Investigator if the Investigator is currently employed or otherwise appointed by the institution, including intellectual property rights assigned to the institution and agreements to share in royalties related to such rights; any ownership interest in the institution held by the Investigator, if the institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an institution of higher education as defined by 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education; or income from a service on advisory committees or review panels for a federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

The FCOI training is available through the National Institutes of Health and is linked [here](#). To conduct research, this training must be completed every four years and immediately when any of the following circumstances apply:

- 1) The institution revises its financial conflict of interest policies or procedures in any manner that affects the requirements of the investigators,
- 2) An investigator is new to the institution, or
- 3) An institution finds that an investigator is not in compliance with the institution's financial conflict of interest policy or management plan.

You must review the FCOI training, complete the quiz, and download the certificate which you will then send to [osp@fairmontstate.edu](mailto:osp@fairmontstate.edu) as proof you have completed the FCOI training requirements.

Regarding SFIs, you must disclose your SFI and any SFIs of your spouse and/or dependents when your funding proposal is submitted to the University or before you work on an award subject to additional FCOI compliance. You must update your disclosure annually and within 30 days of any newly acquired or discovered SFIs.

## NOTES

<sup>1</sup> PHS: 60 FR 35810-35819; NSF: 60 FR35820-35823, both issued in the Federal Register (FR) on July 11, 1995.

<sup>2</sup> The terms "Principal Investigator" and "Project Director" include Co-PIs/co-PDs, other key project personnel, and any other person identified on the proposed project who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding.

<sup>3</sup> "Significant financial interest" means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The term does not include (1) salary, royalties, or other remuneration from Fairmont State University; (2) income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities; (3) income from service on advisory committees or review panels for public or nonprofit entities; (4) an equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, meets both of the following tests: does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and does not represent more than a 5% ownership interest in a single entity; or (5) salary, royalties, or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children, are not expected to exceed \$10,000 during the next twelve month period.

<sup>4</sup> An actual or potential conflict exists when the Director of Sponsored Programs, in consultation with others as appropriate (e.g., department chair, academic dean, graduate dean, general counsel, internal auditor), reasonably determines that a significant financial interest could affect the design, conduct, or reporting of the research, educational, or service activities proposed for funding.

<sup>5</sup> Public Health Service (PHS) Agencies include the following: Administration for Children and Families (ACF); Administration on Aging; Agency for Healthcare Research and Quality (AHRQ); Agency for Toxic Substances and Disease Registry; Office of the Assistant Secretary for Health (OASH); Centers for Disease Control and Prevention (CDC); Food and Drug Administration (FDA); Federal Occupational Health (FOH); Health Resources and Services Administration (HRSA); Indian Health Service (IHS); National Institutes of Health (NIH); Office of Global Affairs (OGA); Office of Public Health & Science (OPHS); and Substance Abuse and Mental Health Services Administration (SAMHSA).

<sup>6</sup> As required by 2 CFR 200.112, DOE established an interim COI policy governing financial conflicts of interest and organizational conflicts of interest concerning applicants for, and recipients of, Federal financial assistance awards from DOE. Per 2 CFR 200.112, “[t]he Federal awarding agency must establish conflict of interest policies for Federal awards. The non-Federal entity must disclose in writing any potential conflict of interest to the Federal awarding agency or pass-through entity in accordance with applicable Federal awarding agency policy.”

# Time and Effort Reporting and Certification Policy

[Revised 02/17/2025]

**As a recipient of federal funding, Fairmont State University is required to comply with the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”) for certifying effort expended on sponsored awards. Fairmont State University requires all individuals who receive federal sponsored funding to comply with University policies and sponsoring agency regulations regarding the proposing, charging, and reporting of effort on those awards.**

## Reason for Policy

[The Uniform Guidance Subpart E §200.430](#) contains the federal regulatory requirements for internal controls over certifying time expended on sponsored projects. The University’s practice is to utilize an after-the-fact effort reporting system to certify that salaries charged, or cost shared to sponsored awards, are reasonable and consistent with the work performed. Actual effort expended on each project should be certified by the Principal Investigator, who should have first-hand knowledge of the employees’ compensated activities, at the end of specified reporting periods. The effort certification should be a reasonable estimate of how time was expended. Section 200.430(C.x.) states, “It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards for IHEs [Institutions of Higher Education] a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.”

## Total University Effort

Total University Effort (TUE) is defined as all professional activity—including but not limited to sponsored activities, teaching, administrative duties, and clinical practice, regardless of when (daytime, evening, weekends) or where (on site, at home, traveling) the activities occur—for which a faculty member, staff member, or other individual is compensated by Fairmont State University.

An individual’s TUE is always equal to 100%. TUE may be broken down into various accounts and jobs.

## Effort Reporting

Fairmont State faculty, staff, or other individuals who are listed as a PI, Co-PI, or Senior Personnel in the budget of a federal grant must apportion their effort based on the composite of all activities they perform as part of their University appointment and document it quarterly on an effort certification report form. They do so by calculating

how they devote their time to each of their major activities, averaging over the quarter and allowing for fluctuations in duties. Mandatory and voluntarily committed cost sharing included on the proposal budget page or budget justification are also documented. The effort reporting reflects an after-the-fact reporting for effort both paid and cost shared.

### Procedure

The Principal Investigator of a federally sponsored program/project is responsible for distributing report forms to all employees who worked on their federally funded sponsored account(s) and collecting the completed forms. The Principal Investigator is responsible for reviewing and certifying each completed report. The report(s) must be submitted to the Office of Sponsored Programs through SignNow within fifteen (15) business days following the last date of each reporting period.

- The PI should review the accuracy of the effort for that given time period.
- The PI is only certifying the work that was done on the account for which they are responsible.
- All accounts are to be listed because effort is 100% of work completed for Fairmont State University.
- Total effort cannot exceed 100%.
- There should never be negative effort on the report.
- The percentage of effort for the sponsored program account(s) should be reflective of the approved proposal submitted to the sponsor or award documents received from the sponsor.

### Non-Compliance

If signed reports are not received within fifteen (15) business days, a reminder e-mail will be sent to the PI and his/her immediate supervisor/department head.

If reports are still not received after thirty (30) business days, an e-mail will be sent to the appropriate next-level supervisor as notification of the overdue reports.

At any time, the University may undergo an audit to determine whether the effort certifications are accurate and complete. Severe penalties, cost disallowance, and reduced or terminated funding could result from inaccurate, incomplete, or untimely effort certifications. As a result, the institution must have zero tolerance for any employees who fail to comply.

Effort certification is considered a part of an employee's job responsibilities. Failure to fulfill this duty and to adhere to University policies and procedures could result in the following actions being implemented unless there are extenuating circumstances:

- Award agreements will not be executed, and accounts will not be established for spending external funds for new or continuing projects for a PI with a past due effort report.
- Salaries, fringes, and F&A that have been charged and not certified will be removed from the sponsored project account and onto a departmental fund.



# Temporary Appointment Procedure for Grants

[Revised 06/23/2025]

**Situation A: Providing payments to a PI, Co-PI, Senior, or Other Personnel who have effort assigned to them in the awarded grant budget** (typically only applies to a federal award)

1. Ask your **Budget Manager** to enter the Temporary Appointment, including the base wage **ONLY** (without fringes), into PeopleAdmin **BEFORE** any work has begun. If you or your budget manager are unsure of the amount of the wage without fringes, contact the Office of Sponsored Programs.
2. The Temporary Appointment should be made starting at the beginning of the performance period to the end of the performance period of that grant year.
  - a. Example: You are a PI who will be working on a grant throughout the entire grant year. Your grant year is from October 1 to September 30. Therefore, your Temporary Appointment should be made indicating this time period.
3. Grant PI, Co-PI, Senior, and Other Personnel will be required to complete Effort Reporting quarterly by indicating the percentage of time actually spent on the grant during that quarter.
4. It is the responsibility of the PI to notify OSP if they, their Co-PI, and/or any Senior or Other Personnel intend to leave Fairmont State and will no longer be participating on the grant. The granting agency will then need to be notified of and approve any changes in personnel.
5. It is the responsibility of the PI to notify OSP if they, their Co-PI, and/or any Senior or Other Personnel fall below their indicated percentage of effort on the grant. Any reduction in effort must be reported immediately to OSP.

**Situation B: Providing payments to an hourly Temporary Appointment**

*This process should be completed if the person is a Fairmont State employee who **does not** have effort assigned to them in the awarded grant budget as a PI, Co-PI, Senior, or Other Personnel but who will be paid on an hourly basis for work performed during the grant period.*

1. Ask your **Budget Manager** to enter the Temporary Appointment, including the hourly wage **ONLY** (without fringes), into PeopleAdmin **BEFORE** any work has begun. If you or your budget manager are unsure of the amount of the wage without fringes, contact the Office of Sponsored Programs.
2. The Temporary Appointment should be made starting at the beginning of the performance period to the end of the performance period of that grant year.

- a. Example: If the person will be working on a grant throughout the semester, and the semester is from August 15 to December 15, then the Temporary Appointment should be made indicating this time period.
3. The Temporary Appointment should clearly state the following at the beginning of the job description: *“This is an HOURLY Temporary Appointment, not to exceed \$XXX.”* The job description should also have written in detail exactly what is expected of this person to do.
4. This person will complete the GRANTS TIMESHEET and should document their time daily. The PI will sign off and send it to Payroll at the end of each pay period. This person will only be paid for the time that was submitted.

**Situation C: Providing a payment to other personnel who do not have effort assigned to them in an awarded grant budget**

*This process should be completed if the person is a Fairmont State employee who **does not** have effort assigned to them in the awarded grant budget as a PI, Co-PI, Senior, or Other Personnel nor are they receiving an hourly Temporary Appointment.*

1. Complete the Temporary Appointment Verification Form and send it to your **Budget Manager** to enter the Temporary Appointment into PeopleAdmin **AFTER** the person's tasks have been completed.
2. Send the completed Temporary Appointment Verification Form to **Christy Burner** to keep on file.
3. The person will receive payment after each of their job duties/tasks have been completed.

# Annual Salary Increase Policy for Multi-Year Grant-Funded Employees

[Revised 05/20/2025]

Each employee whose position is either fully or split-funded by a multi-year grant will receive an annual salary increase of equal percentage to any annual salary increase given by the institution to non-grant-funded full-time employees, regardless of any raises written into the grant budget.

**Scenario 1:** A multi-year grant's budget allows for a 3% raise per year for an employee. One year, the institution gives a 2% raise to all full-time employees. During this year, the grant-funded employee also receives a 2% raise. The remaining 1% could be reallocated within the same budget period to another budget category or carried over to the following year as deemed appropriate.

**Scenario 2:** A multi-year grant's budget allows for a 3% raise per year for an employee. One year, the institution gives a 4% raise to all full-time employees. During this year, the grant-funded employee also receives a 4% raise. If the raise percentage written into the budget for a grant-funded employee is less than the amount given by the institution to all full-time employees, carryover and/or funds reallocated from existing budget categories could be used to cover the difference. If needed, the Office of Sponsored Programs will contact the funding agency to request approval for funds to be reallocated. If this request is denied, institutional funds will be used.

**To ensure any institutionally-directed pay raises can be most effectively fulfilled for grant-funded employees, all multi-year grant proposals are to include a 3% annual salary increase and equivalent increase in fringe benefits, unless expressly prohibited by the funding agency.**

Please note: Individuals who are 100% grant funded may not receive their stipend until the new grant year.

# Temporary Dependent Care Policy for Federal Grants

[Revised 02/17/2025]

Temporary care of dependents that i) exceed regular dependent care costs and ii) directly result from travel to conferences, are allowable to be charged to federal grants if the costs:

- a. Result directly from travel related to the federally funded project;
- b. Are consistent with Fairmont State University's standard travel policy; and
- c. Are confined to the period of travel.

Note that this allowance is limited. It applies only to temporary costs arising from attendance at conferences, not to all travel that might arise in the performance of a federally funded project. Travel expenses for dependents are generally not allowed.

# Participant Support Costs Policy

[Revised 5/27/2025]

## Definition

A participant is an individual participating in or attending program activities under a federal award who is not responsible for the implementation of that award. Participant support costs refer to direct costs that support participants and their involvement in a federal award.

## Acceptable Uses

Examples of acceptable participant support costs include stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid directly to or on behalf of participants.

## Unacceptable Uses

Individuals delivering or developing program activities, such as consultants, project personnel, and recipient or subrecipient staff members, cannot be considered participants. Funds budgeted for participant support cannot be used for employee participation in meetings, conferences, symposia, training projects, etc. Employee participation in these events should not be included in the participant support line but should instead be charged to other budget categories.

## F&A (Indirect) Cost Calculations

Participant support costs are excluded from indirect cost recovery calculations.

## Accounting & Documentation

The PI must be able to separately identify participant support costs by maintaining a shadow budget and all related documentation to demonstrate that participant support costs charged are allocable, allowable, and reasonable. The PI is required to submit a copy of the shadow budget to OSP at the end of their award period yearly.

# Record Retention Policy

[Revised 02/17/2025]

As a grantee or contractor, Fairmont State University is responsible for retaining records related to a sponsored project award. Records related to sponsored projects are retained in accordance with sponsor requirements. Most records produced under federal, state, or other granting agencies have a specific retention period expressed in the contract. Those grant requirements must be adhered to even if they are longer than the normal University retention period. Please refer to the specific award terms and conditions which may vary.

The Office of Sponsored Programs (OSP) is the official custodian of the non-financial grant related records, including non-funded proposals. Non-Financial Grant Records to be retained by OSP include final proposals and related correspondence, including notice of award or declination (both funded and not). Post-award documentation may include project summaries, grant authorizations, contract documents; project budget change and adjustment forms; subcontracts or sub-award agreements; grants and contracts; monthly budget summary statements; patent/invention reports; related documentation and correspondence; grant change request form; no cost extension; and final programmatic reports.

The majority of sponsored projects have legal requirements as to how long project records, particularly financial records, must be retained. These guidelines recognize these legal requirements as well as the substantial physical and fiscal resources required to retain technical, clinical, financial, or other project records.

## Instructions

### Original records

- a. If original records are paper, electronic versions may be substituted provided that they are subject to periodic quality control reviews, cannot be altered, and remain readable.
  - b. University central offices maintain official records (including proposals, awards, financial transactions, invention disclosures, and others). However, program records are maintained by PIs, and departments hold some source records and details related to the official records.
  - c. Be aware of confidentiality and inclusion of personal or proprietary information in the records. Use limited-access storage for documents containing personal, proprietary, or confidential information.
2. Technical/Program records are retained by the PI.

- a. Retain progress reports and final technical reports for at least 3 years after submission to the sponsor. Refer to your specific award terms and conditions, which may vary.
  - b. Retain the original data and all project records. After the required retention period, the PI may make the decision to retain the records or to discard them when the records are determined to be no longer useful for research or educational purposes.
  - c. Retain clinical study data in accordance with the clinical study agreement.
    - i. Review the clinical study agreement for a provision specifying the required period of retention for source documents. The requirement may differ based on the type of study and other factors.
    - ii. For clinical studies involving children, records are to be retained indefinitely.
    - iii. In the event of faculty transfer, clinical study data must remain at the University.
- 3. Fiscal records are retained by the University central offices but departments may have source records that support the transaction records.
  - a. Federal awards: Federal record retention requirements can be found in Subpart D § 200.333 of the Uniform Guidance, which states, “Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient.”
  - b. Local government awards: Review award terms and conditions. It is recommended that all records for projects funded under State awards (MOU’s, grants, agreements) be retained for 6 years.
  - c. Other awards: Review award terms and conditions and sponsor policies. If the sponsor or award document does not specify a specific time period to retain project records, follow the federal requirement and retain records for 3 years after a final payment under the award.
- 4. Guidelines for discarding and destroying records
  - a. Shred paper documents containing personal, proprietary, or confidential information, using a cross-cut shredding device or deposited in the University’s approved contracted secure shredding containers provided in each building.
  - b. Electronic data must be securely removed from any disk, tape, USB drive, hard drive, photocopier, facsimile machine, or other device with electronic storage before the device is transferred or discarded. Deletion of an

electronic record may not eliminate all remnants of the record. Contact the department of Information for Technology for advice.



# Facilities and Administrative (F&A or Indirects) Costs Policy

[Revised 06/23/2025]

Facilities and administrative costs (F&A), also known as indirect costs, are federally allowable costs incurred from certain sponsored awards to cover the expenses for institutional facility use and institutional administrative services. These indirect costs are requested/budgeted in addition to the direct costs needed to administer the project/program.

The Office of Sponsored Programs (OSP) requires that proposed budgets contain the full negotiated F&A rate, as currently approved. Fairmont State's current F&A rate is available on OSP's website [here](#). Exceptions to the F&A rate must be authorized by OSP. Exceptions may be permitted if the sponsor's guidelines specifically state that F&A costs are prohibited or that a different rate must be used. OSP will assist in determining the appropriate F&A rate and in securing guidelines verifying sponsor policy on F&A.

Most awards from state and private agencies do not allow F&A costs to be charged. Many, but not all, federal awards do allow F&A costs. However, even when F&A costs are allowed on an award, there can often be a cap or limit by percentage or set amount for the period of performance of the grant. OSP will help determine when these costs are allowable and how they can be applied.

The Finance Office calculates the F&A expense for each applicable grant budget based on the actual monthly salary and fringe costs posted to that particular grant budget.

When the F&A expense is posted to a grant budget, the corresponding recovered revenue is placed in an institutional reserve fund. The current institutional procedure for use of recovered F&A is to allocate a portion to the grant's PI and the dean of the PI's college; the remaining funds are used to cover institutional expenses.

F&A Fund Distribution	
70%	Institutional F&A Fund
30%	Departmental F&A Funds <ul style="list-style-type: none"><li>• 50% to Dean/VP</li><li>• 50% to PI</li></ul>

F&A funds allocated to the PI and Dean/VP must be spent by June 30 of the fiscal year in which the grant was awarded, unless granted an extension by OSP. To request an extension, a plan must be submitted to OSP detailing how and when the funds are to be used.

If a PI leaves the University with unspent F&A funds, those funds will be allocated to the new PI of the grant. If the grant has ended or moved with the original PI, the unspent F&A funds will revert to institutional funds. If a Dean/VP leaves the University with unspent F&A funds, they will be carried over to the next Dean/VP.

This policy is in effect as of July 1, 2025. Any Deans or Department Chairs who have previously been allocated F&A funds have until June 30, 2026 to spend any remaining F&A funds. After this deadline, any unspent funds will revert to institutional funds.

# Faculty Grant Writing Incentive Policy

[revised 05/19/2025]

## **Program Details & Purpose**

The purpose of the Grant Writing Incentive Program is to support faculty exploring research or creative endeavors beyond the scope of their regular contract responsibilities. The Office of Sponsored Programs (OSP) wants to encourage more faculty engagement in grantsmanship on campus by offering incentive funding to write grant proposals. Projects that will enhance the reputation of Fairmont State University and the professional standing of the recipient are especially encouraged. Incentive funding has been allocated to encourage and motivate Fairmont State faculty to pursue competitive external funding.

Recipients may only receive one grant writing incentive per academic year. The incentive will be a stipend to support faculty in project planning, proposal writing, and application preparation leading to submission. Incentive stipends will be paid according to the chart below upon the submission of a competitive application for external funding.

The number of incentive stipends to be awarded annually is dependent upon budget availability.

## **Incentive Funding Amounts**

External Grant Amount	Incentive Stipend Amount*
\$25,000 – \$74,999	\$1,000
\$75,000 – \$149,999	\$2,000
\$150,000 – \$499,999	\$3,000
\$500,000 or higher	\$4,000

*\*This amount can be split among internal Co-PIs who are integral to proposal development. Contact OSP for further details.*

## **Eligibility Criteria**

To qualify for a grant writing incentive, a faculty member must:

- Take the lead role in proposal development, including proposal writing, budget development, and supporting materials preparation. OSP will provide support throughout the process, including proposal editing, assistance with budget development, and submission; however, the faculty member must be the main author of the proposal to receive the grant writing incentive stipend.
- Follow the proposal development procedures and timeframe established on OSP's website, including submitting a **Declaration of Intent to Apply for Funding** to OSP at least three weeks before the submission of the final proposal

and a **Proposal Certification Form** to OSP at least ten working days before the submission of the final proposal.

- Develop a proposal that is competitive, as defined by the following guidelines:
  - Compliant: the proposal must comply with all regulations addressed in the funding solicitation and other guidance from the funding agency, as well as with all federal, state, and institutional regulations.
  - Coherent: the proposal must address each component requested by the funding solicitation, and each element of the proposal must make sense in relation to the proposal as a whole.
  - Clear: the proposal must be written in a way that can be understood by a reviewer who is not an expert in the subject matter.
- Compose the proposal of primarily new written material (some reuse of portions of proposals that the faculty member has previously written is permissible, but the majority of the proposal must be newly written to qualify for an incentive stipend).

### **Application Process**

Any interested Fairmont State faculty member must complete the application process to be considered for the Grant Writing Incentive Program. The following materials are required for application review:

- Faculty Grant Writing Incentive Program Application Form
  - An abstract of the project for which funding is being sought, not to exceed 400 words
  - A timeline for proposal development and submission
  - An impact statement describing how your potential project will benefit Fairmont State University
- A copy of a current Curriculum Vitae
- Any additional materials that support your proposal (optional)

Please email application materials to the Director of the Office of Sponsored Programs, Christy Burner, at [christy.burner@fairmontstate.edu](mailto:christy.burner@fairmontstate.edu).

# Responsible Conduct of Research Policy

[revised 06/10/2025]

## Purpose

This policy establishes an educational program to ensure Fairmont State University's Principal Investigators and their research staff are knowledgeable about the responsible and ethical conduct of research and to comply with the National Science Foundation (NSF) policy on Responsible Conduct of Research (RCR) training. This policy also ensures the University's ability to assure compliance with NSF regulations.

## Scope

This policy applies to Principal Investigators, co-investigators, technicians, research staff, undergraduate students, graduate students, postdoctoral fellows and others who work on projects supported by NSF at Fairmont State University.

## Responsibilities

- **Office of Sponsored Programs (OSP)** - The Office of Sponsored Programs has primary responsibility for program management and ensures orientation, training, and support are provided to NSF-supported personnel as appropriate and consistent with this policy.
- **Institutional Review Board (IRB)** – The Institutional Review Board is responsible for reviewing all research involving human participants. In the case of this policy, Fairmont State's IRB is responsible for coordinating Collaborative Institutional Training Initiative (CITI) Responsible Conduct of Research training module access for all NSF-supported personnel.
- **Investigators** – Principal Investigators are responsible for completing these training requirements as well as ensuring all personnel supported by the project complete the requirements before gaining access to the funds or before receiving compensation for the award. In addition, mentoring is considered a critical tool in encouraging the responsible and ethical conduct of research among undergraduate and graduate students. Therefore, Principal Investigators, co-investigators, and other key research personnel are encouraged to take an active role in communicating the substance and importance of responsible conduct of research to their staff.

## Procedures

### Introduction

All Principal Investigators, co-investigators, technicians, research staff, undergraduate students, graduate students, postdoctoral fellows and other

persons who work on NSF projects must obtain RCR certification in the following manner before they can be paid from the grant.

An individual is considered certified after successful completion of the CITI Responsible Conduct of Research training. A link to CITI's web-based course can be found on Fairmont State's IRB website [here](#).

Once a course account is established, participants should choose the applicable course, Responsible Conduct of Research. The course contains a Grade Book page that displays required modules and dates of completion. Most modules are followed by a short quiz. A quiz score of 80 percent or higher constitutes a passing score and module completion.

Upon completion of the required module, a copy of the CITI Completion Report must be submitted to OSP for documentation in the grant file.

NSF-supported personnel, as identified by the Director of Sponsored Programs, may be required to complete additional CITI RCR modules prior to reviewing or beginning research protocols involving some topics. For further information, contact Fairmont State IRB.

### **Required CITI Educational Module**

The following CITI basic course modules must be completed with an overall 80 percent quiz score to fulfill the educational requirements of the *Responsible Conduct of Research* course, which includes:

- Introduction to the Responsible Conduct of Research
- Research Misconduct
- Data Acquisition and Management
- Responsible Authorship and Publication
- Peer Review
- Responsible Mentoring
- Conflicts of Interest and Commitment
- Collaborative Science
- Responsible Conduct of Research with Human Subjects
- Conducting Research with Laboratory Animals
- The CITI RCR Course Completion Report

## **Enforceability**

Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act states:

*Each institution that applies for financial assistance from the Foundation for science and engineering research or education [must] describe in its grant proposal a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project.*

Accordingly, the National Science Foundation added guidelines for compliance with the America COMPETES Act to its Award Administration Guide, effective January 4, 2010. Among the key provisions are:

- Institutional certification [of compliance with Section 7009 of the America COMPETES Act] is required for each proposal.
- While training plans are not required to be included in proposals, they are subject to review, upon request.
- An institution must designate one or more persons to oversee compliance in the RCR training requirement.
- Institutions must verify that undergraduate, graduate, and postdoctoral researchers supported by NSF receive training in the responsible and ethical conduct of research.

## **Changes to This Policy**

This policy may be modified at any time to meet the changing nature of RCR training requirements. Such changes may include, but are not limited to, additional agencies requiring RCR training, changes in RCR curriculum, and changes in delivery requirements.

NOTE: Other funding agencies, such as the National Institutes of Health, may have different RCR training requirements than those described in this policy. OSP will coordinate with PIs to ensure proper compliance with training requirements as needed.

# Export Control Policy

[revised 06/03/2025]

*NOTE: This policy is pending approval.*

## **Purpose and Summary**

A critical component of the Office of Sponsored Programs (OSP) and its mission is to help increase external funding and to provide administrative oversight for all sponsored awards at Fairmont State University. Sponsored programs and projects that have an international component or are otherwise subject to export control laws and/or regulations require additional compliance measures. The University is committed to complying with U.S. export controls laws and regulations that apply to its activities, including the International Traffic in Arms Regulations (ITAR), the Export Administration Regulations (EAR), and the Office of Foreign Assets Control (OFAC) regulations.

## **Scope**

This policy applies to all students, faculty, and staff engaged in sponsored activities impacted by ITAR, EAR, OFAC, and/or restricted and denied party lists. This includes but is not limited to research, foreign national access to controlled information, international collaborations, online classes abroad, services, outreach, and international travel.

## **Definitions**

- **Export:** An export is the transfer of export-controlled data, items, equipment, materials, and software or providing a defense service to a non-U.S. person or entity. An export can occur in a number of ways, such as a physical shipment, hand-carrying an item out of the U.S., email transmission of data, presentations, discussions, visually accessing export-controlled data, etc.
- **Deemed Export:** A deemed export is the release or transmission in any form of export-controlled technology or software code within the U.S. to anyone who is not a U.S. person.
- **U.S. Person:** A U.S. person refers to an individual with U.S. citizenship, permanent residency, or protected individual status such as refugees and asylees. Corporations incorporated in the United States are U.S. persons for purposes of the ITAR and EAR.
- **Technology Control Plan (TCP):** Documentation providing protocols to safeguard the visual, physical, or electronic access by unauthorized non-U.S. persons to export-controlled data, items, equipment, materials, and software.
- **Restricted Party Screenings (RPS):** The U.S. government maintains lists of individuals or entities with whom the University and its employees may be



prohibited by law or require a license to export to or engage in certain transactions with. RPS is the process of reviewing foreign and U.S. individuals and entities to prevent illegal transactions with parties on the various federal government lists of restricted individuals, companies, and organizations.

### **Policy**

All individuals affiliated with the University who work with, or have access to, export-controlled data, items, equipment, materials, and software are required to be familiar with and fulfill the requirements of the U.S. export control laws and University export control compliance protocols regarding sponsored awards.

All individuals affiliated with the University engaging in grant-funded international activities which include, but are not limited to, collaborations, travel, online classes abroad, and services and outreach are required to be familiar with the requirements of U.S. export control laws and University export control compliance policies that impact these activities.

### **Compliance**

Penalties for export control violations are substantial, including significant fines, debarment from participation in federal contracting, loss of export privileges, and in some cases imprisonment. In addition to these severe penalties, the potential reputational damage to an institution from violation of these laws could be difficult to repair, possibly resulting in lost opportunities for attracting world-class researchers and/or decreased access to research funding through private industry and government sources.

- Primary Investigators (PIs) are responsible for (1) Assisting in the identification of activities that may intersect with export control regulations; (2) Maintaining current export control training certification; (3) Confirming with OSP that all project personnel have completed training and are cleared to access export-controlled items; and (4) Notifying OSP of potential violations.
- Training: University employees working on an export-controlled project with a Technology Control Plan (TCP) must complete export control training prior to working on a project and/or accessing export-controlled items or data. Agreements will not be processed by Contracting Services until training is confirmed as current and the TCP is in place.
- Technology Control Plan: The purpose of a Technology Control Plan (TCP) is to control the visual, physical, or electronic access by unauthorized non-U.S. persons to certain export-controlled data, items, materials, equipment, and software. Before export-controlled work can begin or export-controlled data can be received, each project member must complete online export control training.