

GRANTS

Policy Number: 701GS

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Revised Dates: 6/27/17; 11/09/2020

Scope

The Policy on Grants applies to faculty, staff, predoctoral researchers, summer scholars and applicants ("Covered Individuals") to The Graduate School of the Stowers Institute for Medical Research ("The School").

Purpose

This policy sets forth the roles, responsibilities, procedures, and requirements for the submission, approval, and management of grants and other external funds at the Stowers Institute for Medical Research ("SIMR").

The School is included in the Stowers Group of Companies ("SGC") Organizations and has adopted the following policy as its own. The School contracts with SGC's Grants Administration for action regarding this policy.

Policy

Covered Individuals, individually or collaboratively are encouraged to seek external funding for research projects that are consistent with the mission of the School and SIMR. In addition to the established procedures related to the conduct of research, the Covered Individual(s) who receives external funding has a responsibility for managing research projects and complying with all requisite rules and regulations related to the use of grant funds. Many relevant rules and regulations affecting federal research grants are promulgated through U.S. Office of Management and Budget Circulars A-110 and A-122.

Grant Application and Review Process

- identification of funding opportunities
- pre-proposal process
- proposal preparation
- proposal review and approval
- proposal submission
- award acceptance
- award set-up
- ongoing award management
- interim/annual technical and financial reports
- award close-out
- policy compliance & ongoing training
- audit

Identification of Funding Opportunities

SIMR is open to many different funding mechanisms, including research grants, consortium agreements, and subcontracts with other research institutions; travel and conference/meeting support grants; and fellowships and training grants.

- Covered Individuals holding appointments at the level of Director or Assistant, Associate and Full Investigator may submit proposals for grants to support research.
- With approval of the Scientific Director and the head of the involved laboratory, Covered Individuals holding appointments as Research Investigator, Senior Research Associate, or Research Scientist may apply as the PI or Co-PI of a grant. However, SIMR will not provide any additional support of space, research funds, or salary. The head of the involved laboratory may approve support to the successful grant applicant from that which is part of the commitment to the head of the involved laboratory by SIMR.
- Predoctoral Researchers, Postdoctoral Research Associates, Postdoctoral Fellows, and Research Specialists may apply for fellowships if sponsored by a Covered Individual at the rank of Director, Assistant, Associate, and full Investigator with approval by the Scientific Director.

Before proposals (formal) are prepared for submission to private foundations, the proposal must be cleared through the Office of the SIMR President and CEO to avoid conflicting requests being directed to the same foundation, and must be in compliance with the non-profit status of SIMR.

Pre-Proposal Process

As soon as a Covered Individual has contact with an external entity regarding a potential grant application, research collaboration, or fellowship award, Grants Administration must be contacted to initiate its role in evaluating eligibility, compliance, and requirements for the submission process.

Proposal Preparation

The Covered Individual who will serve as the Principal Investigator for a proposed research project is responsible for the preparation of the proposal. It must be in compliance with SIMR policy and the guidance supplied by the anticipated supporting entity.

While proposal formats may vary based on sponsor or award type, the following items must be incorporated into all proposals:

1. Title page: The full legal name of SIMR must appear on the front page of the proposal. The proposal must also be signed by the President and CEO of SIMR or his/her designee. The President and CEO is the only official authorized by the Board of SIMR to commit SIMR to conduct the research.
2. Fringe Benefits: Fringe benefits include such items as Social Security taxes, retirement programs, health insurance, life insurance, and disability insurance. Fringe benefit costs must be included in any research proposal for which salary support is requested. Average rates for various categories of positions are used for assessing the charges to the grant.

The Office of Grants Administration maintains information on the current fringe benefit rate.

3. Indirect Costs: Indirect Costs are costs of shared services associated with the conduct of research but not charged directly to the research project. Indirect costs must be recovered for any research project on the SIMR campus or by any Covered Individual at any location.
 - Federal: Indirect costs on Federal grants are computed on the basis of instructions from the U.S. Office of Management and Budget. The Office of Grants Administration maintains information on current indirect cost rates for on-campus and off-campus research.
 - Non-Federal: The indirect cost rate for non-Federal sponsors is generally the same as the federally negotiated rate, but it may vary depending on the sponsor. Non-federal grants with less than 10% indirect costs will not be accepted unless approved by the President and CEO.
4. Use of cooperating institution: Formal consortium agreements are prepared when any substantial portion of a research project is to be performed by another institution. In such case, the research proposal must contain a statement of work, detailed budget and justification, letter of commitment, "other support" page, and checklist from the cooperating institution. The standard consortium agreement that should be used can be obtained from Grants Administration.

Proposal Review and Approval

An application package containing the sponsor proposal must be circulated internally for approval by appropriate SGC personnel and final approval by the SIMR President and CEO prior to submission.

A request must be initiated via SIMR's electronic Laboratory Information Management System (LIMS) for approval no later than 2 weeks prior to the sponsor's submission deadline. The purpose of internal review is: 1) for SIMR officials to indicate support of the proposal; 2) for the applicant to confirm his/her eligibility to accept the award; 3) for the applicant to identify any conflicts of interest, financial or otherwise, that may affect the project; and 4) for the applicant to identify any specific clearances that must be obtained. A draft of the research strategy or specific aims with enough information to infer the major experiments being proposed and the resources required to conduct the proposed research is sufficient at this time.

Only the SIMR President and CEO has authority to enter into formal agreements and bind the SGC. All grants made to SIMR and commitments made under these formal agreements are commitments of SIMR, and only Grants Administration acting on behalf of SIMR is empowered to request and accept grants and to contract on behalf of SIMR. Therefore, all proposals for funding for research, training, and other research-related activities made in the name of SIMR must be overseen, approved, and submitted by the Office of Grants Administration.

Grants and fellowship proposals, which seek an award in the name of Covered Individual for which SIMR will be administering or overseeing distribution of funds, must be approved and

submitted by Grants Administration. If a proposal not processed through SIMR is funded, there is the risk of the award not being accepted by SIMR. At the very least, the scientist's access to the funds may be delayed.

Prior to submission, the applicant must file an updated Statement of Significant Financial Interest (Form F202L) with the Office of the SIMR President and CEO, or verify that the previously filed statement is complete and current. Any conflicts, financial or otherwise, that might, or might appear to affect the design, conduct, or reporting of a project must be disclosed.

Any sponsor restrictions on rights to patents and inventions must be disclosed to and approved by the Office of the SIMR President and CEO prior to submission of the proposal. The intellectual property policy of SIMR covers inventions, discoveries, trade secrets, technology, and computer software developed by Covered Individuals. SIMR handles all legal and business matters involving protection and commercialization of intellectual property and shares the resulting income with the inventor. Disclosure of all new inventions or other intellectual property must be submitted to the Office of the SIMR President and CEO.

A research study funded by external grants or contracts may not be conducted in SGC facilities or by a SIMR scientist without an agreement signed by the SIMR President and CEO prior to the beginning of the study.

The following required clearances from the appropriate committee/department identified below must be obtained if applicable to the research project.

1. Laboratory Animals

If animals are involved in the research study, the protocol must be reviewed by the Institutional Animal Care and Use Committee (IACUC), regardless of whether funding is being sought. Protocols are subject to continuing review.

2. Radioactive materials

If the research study involves radioactive materials or exposure of personnel and/or subjects to radioactivity of any kind, including X-rays, the investigator must contact the Radioactivity Safety Officer to obtain approval.

3. Human cell lines

If human cell lines are involved in the research, the investigator must contact the Human Protection Administrator and arrange for approval by the appropriate Institutional Review Board.

4. Biosafety or recombinant DNA

If biosafety or recombinant DNA is involved, the principal investigator must contact the Institutional Biosafety Committee to obtain approval.

Proposal Submission

After the proposal is finalized, the completed application package or completed submission components (proposed research strategy with all supporting documents) must be uploaded to LIMS for approval by the Office of the SIMR President and CEO. Approval by the SIMR President

and CEO will be communicated to the applicant and confers permission for Grants Administration to submit the proposal. When Grants Administration is making the official submission on behalf of the applicant, a written confirmation acknowledging the sponsoring agency's terms and providing permission to submit must be provided by the applicant to Grants Administration before submission can occur. Grants Administration may take up to one business day after receipt of the final application and acknowledgement statement to submit the application. Additionally, in the case of submissions to the NIH, Grants Administration strongly encourages an additional four-hour window to resolve administrative errors and/or warnings post-submission, per the NIH guidelines. If the pre-submission procedures outlined above have not been followed, Grants Administration will attempt to complete the submission in a timely manner but cannot guarantee its occurrence within one business day.

Award Acceptance

If the proposal is accepted and an agreement successfully negotiated, the award is made to SIMR and can be accepted only with the signature of the SIMR President and CEO, the official authorized to commit SIMR to conduct the research. When the notice of award is received, it must be turned over promptly to Grants Administration to begin the process to establish an account. If applicable, checks must be made out to the Stowers Institute for Medical Research and sent to the Director of Financial Accounting at P.O. Box 412411, Kansas City, MO 64141-2411. Scientists are responsible for using the correct name and address in any part of the proposal or grant documents regarding payments.

Negotiating, receiving, and processing the official awards and contracts from the above proposals are the responsibility of Grants Administration.

Award Set-Up

The grants accounting team will establish an account to which award related expenses will be coded in the SGC's accounting system. At that time, Grants Administration and grants accounting will also meet with the award recipient and administrative support personnel to discuss award terms and conditions and ongoing accounting and compliance procedures.

Ongoing Award Management

The principal investigator of a funded research project is responsible for the day-to-day administration and direction of the research project. Accordingly, the principal investigator is obligated to read and follow all grant provisions, especially on budget limitations, safety and security, inventions, required reports, and compliance with the terms and policies of the granting agency. If other individuals are participating in the research study, the principal investigator must advise them of pertinent provisions of the grant or contract.

Grants Administration is responsible for correspondence with sponsors regarding changes to the original proposal, prior approvals (pre-award costs, budget changes, purchases of equipment not in the original budget, no-cost extensions, etc.), and transfers of awards to new investigators and/or new institutions. The grants accounting team is responsible for obtaining the final scientific progress reports. Any changes or re-budgeting must be discussed with Grants

Administration, and any correspondence addressed to the sponsor regarding the grant must be co-signed by the SIMR President and CEO.

If a Covered Individual is terminating his or her appointment with the SGC, the Office of Grants Administration must be notified immediately. If the Covered Individual wishes to request a transfer of extramural research support to another institution, specific approval must be obtained from SIMR, the institution to which the grant is to be transferred, and the funding agency.

Equipment purchased with funds from an active grant may be transferred from the SGC to another institution if the grant itself is being transferred to that institution. Equipment purchased with SGC funds is subject to the policy on "Equipment Disposition Process Upon PI Departure."

Interim / Annual Technical and Financial Reports

The principal investigator is responsible for complying with all reporting requirements and filing deadlines, as specified by the sponsor in the agreement. Reports will be prepared by the principal investigator and forwarded to grants accounting for transmittal to the sponsor. Formal financial reports will be prepared by grants accounting and sent directly to the sponsor.

Award Closeout

The principal investigator is responsible for scientific progress or invention disclosure reports. The grants accounting team will complete and submit any required financial reports. Any budget overruns must be resolved by the principal investigator prior to closing the account.

Policy Compliance & Ongoing Training

To assist principal investigators in knowing and understanding their compliance obligations, SIMR regularly communicates requirements to all principal investigators and requires attendance of the principal investigators' administrative support at certain scheduled educational sessions devoted to compliance obligations.

A-133 Audit

SIMR is required by federal law to undergo an annual audit to ensure the policies and procedures carried out by SIMR's investigators and support personnel are conducted in compliance with federal regulations. This audit is coordinated by Accounting/Finance in conjunction with Grants Administration.

This policy was approved by the GSSIMR Board of Directors on September 5, 2018.

This policy was last updated by the GSSIMR Board of Directors on November 09, 2020.

This policy will be reviewed by the GSSIMR Board of Directors in 2022.