



RESEARCH POLICY 4 (RP-4) (FORMER RP/TAP-44) GOVERNMENTAL, CORPORATE, FOUNDATION AND PRIVATELY SPONSORED GRANTS AND AWARDS

1. Policy Scope

Requests for proposals from faculty or staff who are seeking external funding from federal, state or local government agencies must be directed to the Office of Research and Innovation for review prior to submission to the applicable government agency to ensure that proposals are consistent with the goals and objectives of the University and that research is conducted in accordance with all University and federal, state, and local regulations, policies, and guidelines. In addition, some research proposals must also be approved by various University Research Committees prior to submission as further discussed herein. Requests for proposals from faculty members or staff who are seeking research grants from foundations, corporate, and private sources are addressed in Section 4 of this Research Policy. Staff who submit grants are not eligible for bonus income as outlined in sections 2.10.3 and 3.

2. Policy Statement

Proposals from faculty or staff who are seeking external sponsored funding from federal, state or local government agencies must be submitted to the Office of Research and Innovation for review prior to submission to the applicable government agency. The Office of Research and Innovation administers and approves all submissions, including grant budgets. Principal Investigators (PIs) who have not previously obtained an external research grant are encouraged to submit their proposal to the Associate Provost for Interdisciplinary Research and Strategic Initiatives for review prior to submission for feedback on the readiness of the proposal for submission. All proposals must be completed in accordance with RP-1 and the guidelines set forth herein, as well as the requirements of the relevant sponsoring agency.

2.1 Protection from Research Risks

Duquesne University adheres to all federal regulations, policies, and guidelines for the conduct of safe and ethical research. Accordingly, in addition to a review by the Office of Research and Innovation, certain research activities must also be reviewed and approved by various University Research Committees, as follows:

- 2.1.1 Institutional Review Board for the Protection of Human Subjects (IRB): All research conducted at or by Duquesne University faculty, staff or students that involves human subjects must be approved by the IRB before the research begins and, when necessary, reviewed periodically during the course of the project. For additional information, refer to RP-2, The Use of Human Subjects in Research.
- 2.1.2 Institutional Animal Care and Use Committee (IACUC): All research conducted at or by Duquesne University faculty, staff, or students that involves live vertebrate animals must be approved by the IACUC before the research begins.
- 2.1.3 Institutional Biosafety Committee: All research conducted at Duquesne University

that involves recombinant DNA molecules, pathogens, or viruses, or those that are covered by federal regulations must be approved by the Institutional Biosafety Committee before the research begins.

- 2.1.4 Radiation Safety: All research conducted at Duquesne University involving radioisotopes and other radioactive substances must be approved in advance by the Radiation Safety Committee, which also monitors radioactive waste containment and disposal.

2.2 Required Signatures and Approvals

- 2.2.1 All proposal submissions must be compliant with RP 1 – Procedures for Submitting External Sponsored Projects.
- 2.2.2 All proposals must be approved by the Department Chair or Program Director, the Dean, and the Director of Business and Grants Administration. (Please refer to RP-1, Procedure for Submitting External Grant Proposals). Before submission, the faculty or staff member serving as the PI must complete a Proposal Approval Form (PAF), per the current process displayed on the Office of Research and Innovation website.
- 2.2.3 The Office of Research and Innovation requires a Proposal Approval Form (PAF) for all proposals regardless of the amount of funding requested. The PAF must be submitted **three (3) weeks** prior to the submission deadline.
- 2.2.4 With rare exceptions, proposals are submitted on behalf of Duquesne University by the Office of Research and Innovation directly to the government agency. In the event that a PI must submit a proposal directly, the PI is required to submit the PAF and secure appropriate signatures.

2.3 Cost Sharing and Matching Funds

If an proposal requires matching funds or a University cost share, the terms of the agreement must be documented in writing and approved by the PI's Department Chair, Dean, Vice Provost for Research and Provost in advance of submitting the application. Staff submitting such a proposal are required to obtain approval from their supervisor.

2.4 Conflict of Interest

Duquesne University RP-7, Conflict of Interest in Sponsored Grants and Awards, sets forth procedures and guidelines to be followed in resolving actual and potential applicant's conflicts of financial interests pertaining to sponsored grants and awards. To comply with RP-7, the conflict of interest section on the Proposal Approval Form (PAF) must be completed and the form signed by the PI for all proposals sent to government agencies. (Please also refer to TAP 33: Conflict of Interest.)

2.5 Personnel Requests and Allowable Stipends

All personnel requests must comply with the government agency rules, Duquesne University

policies, and Internal Revenue Service regulations. Allowable stipends/honoraria for a PI or other exempt or non-exempt University personnel may be allowed if specifically acknowledged in the agency's guidelines and/or solicitation. See Appendix A.

2.6 Principal Investigator's Responsibilities

Duquesne University is the official recipient of all sponsored grants and awards and is, therefore, legally accountable to the government agency sponsoring the research grant. The PI is responsible for the proper fiscal management and conduct of the research grant, and for complying with all terms, conditions, legal requirements, and University policies. For the employment of project staff, research assistants, postdoctoral fellows, or other salaried personnel funded by grants and awards, a contractual agreement signed by the grant-funded personnel and the appropriate Dean is required; all offers of employment must conform with policies and procedures of the Office of Human Resources.

In addition, the PI must ensure that all project members are familiar with and abide by the intellectual property and publication clauses of the sponsoring agency as well as University RP-5, Intellectual Property. Inventions and copyrightable material produced under sponsored grants and awards are governed by the specific terms of the award received from the sponsoring entity. Faculty are encouraged to consult with the Associate Provost for Regulatory Affairs and Applied Innovation for direction and feedback.

The PI is responsible for the timely submission of all progress/interim and final project reports, if required by the government agency sponsoring the research grant. Financial information for this report will be provided by Research Accounting. A copy of the report should be submitted to the Office of Research for their files prior to submission.

2.7 Official Notification of Award

A PI who receives notice of a research grant award is required to notify the Office of Research and Innovation. The Office administers all sponsored grant and award budgets, assists with preparation of required reports and final close-out activities, and administers, monitors, and approves all changes to budgets and project periods for sponsored grants and awards. Notices of acceptance or rejection may be received by the PI directly, or the Office of Research and Innovation, the President, or the Provost; therefore, it is critical that PIs take the initiative to contact the Office of Research and Innovation when a notice has been received.

2.8 Opening and Closing a University Account

Upon receiving notification that funding has been secured, the Office of Research and Innovation will work with Post-Award Services and the Controller's office to secure a University account with line item budget categories matching the budget approved by the sponsoring entity. The Office of Research and Innovation will also inform appropriate members of the University community, via an award letter, that an account has been activated and provide the name of the authorized signer(s), usually the PIs/PDs on this account.

2.9 Budget Monitoring and Revisions

Post Award Services (Research Accounting) administers, monitors, and approves all changes to budgets or project periods for sponsored grants and awards. Online password protected access to grant and award budgets is available to PIs/PDs via the Self-Service Banner system. During the period of performance, the Office of Research and Innovation, in conjunction with Post Award Services, will provide financial and administrative assistance to the PI/PD and will be responsible for the submission of all financial and administrative reports to the sponsoring entity.

2.10 Grant Overhead Sharing

F&A (Indirect, or Overhead) Costs are those that are incurred for common or joint activities of the University and therefore cannot be identified readily or specifically with a particular sponsored grant or award, instructional activity, or other University activity. Expenses incurred for general departmental and institutional business are recognized as indirect costs. Duquesne University establishes these rates with the Department of Health and Human Services as part of a negotiated rate agreement. When applying to sponsoring entities that accept the University's negotiated Facilities and Administrative rate, F&A costs must be included in the budget.

Proposal budgets should reflect all direct and indirect costs. It is the policy of Duquesne to seek the full indirect cost rate whenever it is allowed by a sponsoring entity. Some agencies and programs within the federal government pay a lesser rate, as do non-government sponsors. Duquesne applies the appropriate F&A rate against every eligible dollar of direct cost that is spent on the sponsored project. This means that the University only recovers F&A when the PI spends the funds budgeted for direct costs.

Duquesne University distributes 100% of all recovered indirect costs from externally sponsored projects as detailed below. Grants for which salary is cost shared are not eligible (except for cases where the cost sharing is mandated because the individual's salary exceeds the NIH or other federal agency's salary cap). Research Accounting administers F&A Costs received and transfers the appropriate share to restricted accounts monthly as shown below. Although there is no predetermined time limit for spending these funds, and funds can roll over into subsequent years, it is important to have an active and productive use of such funds at all levels.

- 2.10.1 Approximately one third (33%) of the actual indirect cost recovery is retained by the University to maintain facilities and operations.
- 2.10.2 Approximately one third (33%) will be returned to the Provost for discretionary use in support of faculty start-up funding, research and scholarship. The Provost will allot a portion of these funds to the Office of Research and Innovation to support faculty development including grant writing workshops, statistical supports, or other activities.
- 2.10.3 Approximately one third (34%) will be returned to the School or College of the Faculty member who serves as Principal Investigator (or the Administrative Unit if the PI is a staff member). The Dean of the School or College will be responsible for developing a procedure for allocating such funds within the School. Faculty

PIs will receive 14% of the funds as a bonus and/or research account as determined by the PI (these funds will be available only in the form of a research account for staff who serve as PIs). Research bonuses shall be paid annually and PIs must be actively working full time for the University on this date in order to be eligible under this Research Policy (in the case of multiple PIs the allocation will be determined during the proposal development phase, or if there are any administrative changes or disputes in the grant management, the Vice Provost for Research and Innovation, in consultation with the Provost, will make the appropriate determination as to the distribution of the funds). All remaining funds (20%) must be used in support or development of further research. Appropriate expenses consistent with this Research Policy could include:

- travel to meet with a program officer or for another purpose connected with sponsored programs, present papers, give invited talks, etc.
- supplies in support of research
- equipment with a research or sponsored project purpose
- publication costs associated with activities from a sponsored project
- Undergraduate students, graduate students, temporary help to assist with a sponsored project (such as gathering data)
- other non-personnel costs that support a sponsored project
- cost share, required or voluntary
- grant proposal review or writing assistance
- laboratory enhancements
- research-related recruitment costs or faculty startup packages
- Please note the funds should NOT be used for personnel costs other than for students or temporary help working on research or sponsored projects. Supplemental pay or summer salary for the PI and other investigators is not an appropriate use of recovered indirect funds.

3. Additional Supplemental Income for Faculty

Faculty who have at least 50% buy-out of their IBS charged to externally sponsored projects (9-month appointees with salary paid from a grant(s) during the academic year and 12-month appointees with salary paid from a grant(s) during the fiscal year) may be eligible for an additional compensation from their School or College as part of a holistic performance review. Faculty with at least 50% buy-out of their IBS can earn up to \$50,000 maximum bonus annually (inclusive of any bonus from F&A as well as any bonus from salary savings). Cost shared awards are not eligible toward this threshold.

4. Submission of Proposals to Foundations, Corporate or Private Sources

Externally sponsored proposals from faculty or staff who are seeking funding from foundations, corporate, or private sources must be directed to the Office of Civic Engagement and External Relations for assistance. Generally, however, the requirements of this Research Policy also apply to research grant proposals to foundations, corporate, and private sources. The Office of Research and Innovation may also assist faculty with preparing and submitting budgets for these research grant

proposals. All such research grant proposals must be approved in advance by the Office of Civic Engagement and External Relations, which has the responsibility for assuring that all such requests reflect the University's priorities and policies, including all TAPs and Research Policies, as well as all local, state, and federal rules, regulations, and laws.

5. Exceptions

Exceptions to this Research policy and procedures require approval from the Vice Provost for Research and normally will be made with the agreement of the administrators having supervisory responsibility for the employee. Any exceptions must be in full accordance with the regulations of the sponsoring entity.

6. Related Documents

This Research Policy works in conjunction with the following Research and University Policies, which are fully applicable. To the extent there is any conflict between this Research Policy and any of the Research or University Policies listed below, the University retains the sole discretion to determine which takes precedent.

Research Policy	Title	Web Address
RP-1	Procedure for Submitting External Sponsored Grants and Awards	https://www.duq.edu/research/research-conduct
RP-2	The Use of Human Subjects in Research	https://www.duq.edu/research/research-conduct
RP-3	Effort Reporting on Sponsored Grants and Awards	https://www.duq.edu/research/research-conduct
RP-5	Intellectual Property	https://www.duq.edu/research/research-conduct
RP-6	Research Integrity	https://www.duq.edu/research/research-conduct
RP-7	Conflicts of Interest in Sponsored Grants and Awards	https://www.duq.edu/research/research-conduct
RP-8	Research Agreements and Private Business Use	https://www.duq.edu/research/research-conduct
TAP-33	Conflict of Interest	https://www.duq.edu/work-at-du/human-resources-home/the-administrative-policies-(taps)/33-conflict-of-interest

RP-9	Participation in Commercial Entities	https://www.duq.edu/work-at-du/human-resources-home/the-administrative-policies-(taps)/46-commercial-entities%E2%80%94faculty-staff-and-student-participation
	Guidelines for Stipends on Sponsored Awards	Appendix A

7. Contacts

Office	Telephone Number	Email Address and/or URL
Office of Research and Innovation	412-396-6326	duq.edu/research ORI@duq.edu
Office of Civic Engagement and External Relations	412.396.1363	https://www.duq.edu/civic-engagement-and-external-relations/engage-with-us

Web Address for this Research Policy: <https://www.duq.edu/research/research-conduct>

8. Effective Date and Revision History

This Research Policy is subject to periodic review and update by the Office of the Provost and the Vice Provost for Research.

09/06/22 (Previous revision was dated 03/2014)

Appendix A

Duquesne University Guidelines for Stipends on Sponsored Awards

The following guidance was developed to ensure institutional consistency and compliance when awarding stipends, fellowships or similar monetary allocations (collectively “Stipends”) to employees under sponsored awards. A Stipend is a fixed sum (not an hourly wage or salary) not considered wages for purposes of retirement compensation or bonus calculation.

Stipends on Federal Awards. *Stipends are generally not allowable on federal awards except those that explicitly permit such payments.*

Most federal agencies do not allow any type of Stipends on research grants. For example, the National Institutes of Health Grants Policy Statement states at Section 7 under “Stipends” states that “[s]tipends are not allowable under research grants even when they appear to benefit the research project.” On occasion, exceptions may be granted with prior approval from NIH or other federal agencies. For example, Stipends may be allowable to support training or research training. The scope of work in the proposal and award documents must state explicitly that training or research training of specific individuals is a purpose of the award. Should you believe that a Stipend is appropriate under a specific federal grant, please contact the Office of Research and Innovation for clarification or questions.

Stipends on Non-Federal Awards. *Stipends may be allowable on non-federal sponsored projects when explicitly permitted by the sponsor, approved by the Office of the Provost, and consistent with these guidelines.*

Stipends may be funded by non-federal sponsors such as foundations or comparable entities. When permitted, Stipends are taxable and subject to appropriate taxes. The maximum allowable compensation for a Stipend is \$10,000 per year. Faculty are not permitted to receive a work effort allocation and a Stipend on the same funded non-federal sponsored project.

A Stipend related to a non-federal award may be approved by the Office of the Provost where:

- a. the project or activity for which the Stipend will be received falls outside of the employee’s role and responsibilities; the Faculty Handbook and other employment documentation such as a job description can be evidence of an employee’s roles and responsibilities.
- b. High amounts or frequency of Stipends for a particular activity indicates that the activity is likely a part of the employee’s job responsibilities.
2. the Stipend is a fixed sum, rather than an hourly wage or salary;
3. the employee is not committing a percentage of work effort to the same sponsored award;
4. the Stipend is expressly allowed by the sponsor, included in the budget and justification, and later awarded by the sponsor; and
5. the Stipend amount aligns with the proposed activities being compensated.

To request approval of a Stipend, please contact the Office of the Provost. Stipends must follow the guidelines and timelines of the Human Resources Payroll Department, including adequate

lead time for payment processing.