Shepherd University
Grant Submission and Management Policy

1. Purpose and Scope
1.1 Purpose
The purpose of this policy is to establish procedures and requirements for the timely submission and institutional review of proposals seeking external support of research, training, and service projects and programs; and comprehensive management of those projects in the post award cycle.

1.2 Scope
a) All proposals requesting extramural support (proposals) through a grant to Shepherd University (SU) or Shepherd Entrepreneurship and Research Corporation (SERC), that may result in the award of a grant, contract, or cooperative agreement, including new, continuation, and renewal requests, are within the scope of this policy unless expressly excluded by the terms hereof. Proposals must be reviewed and confirmed by the Office of Sponsored Programs (OSP) and Institutional Review Team (IRT) prior to being forwarded to a prospective external sponsor for funding consideration. All post award management and key personnel are expected to meet the expectations provided for in this policy. Failure to meet these expectations could result in personnel ineligibility to apply for future funding or noncompliant personnel to be removed from active grant funded projects.

b) The following are exceptions to the general provisions of this policy:

i) This policy does not apply to proposals for a gift or sponsorship to the University, rather than a grant. All such gift proposals must be approved by the Vice President for Development or the President.

ii) This policy does not apply to agreements for SU, SUF or SERC to perform/ provide contractual services to an external entity.

iii) For good cause as determined by them, the Provost or the President may direct variances or exceptions to these policy provisions as to a specific proposal, but staff should never presume that such an exception will be provided for and no exception as to any proposal shall be deemed precedent setting as to any subsequent proposal.

2. Proposal Elements:
a) A complete proposal package for review by OSP and IRT may include, but is not limited to, the following components:

- Abstract – one (1) page - project summary includes a brief description of organization, compelling problem to be addressed, brief description of the proposed program, brief description of evaluation plan for the program, and overall cost and requested amount of the program

- Narrative - length often specified by funder - project, activities, methods, projected outcomes
- Budget - Excel document with formulas
- Budget narrative – must align with budget and delineate the effort committed by project team, if any.
- Executive summary - 1-2 paragraph summary of project for SU promotional purposes

Other documents may be requested by the funder or OSP. These should be included in the complete proposal package as submitted to the OSP for IRT by the deadline provided.

The complete proposal package is subject to modification by the OSP and IRT.

b) Miscellaneous Proposal Guidelines:

Funders may require cost share as part of the budget. However, if it is not required by the funder and pre-approved by OSP and IRT, the PI/PD is not to *volunteer* cost share.

Cash cost share will be documented in the proposal development period by completion of a Cost Sharing Commitment Form by the PD/PI. This form will be signed by the Dean/Direct Supervisor and the Provost/ Senior Supervisor of the PI/PD.

Pre-proposal documents (i.e. white papers, letters of intent) do not need to be approved by the OSP *unless* budget information is included, but sharing of these documents with OSP and IRT can enhance and expedite the proposal development process.

If indirects are allowed, the proposal should include indirects at the rate allowable by the funder. SU's federally negotiated on-campus indirect cost rate is 45%.

3. Procedures

a) Limited submission opportunities:

Under circumstances of limited opportunity submissions, the OSP will coordinate with designees of the executive officers under whom prospective PIs /PDs report, to determine which project(s) provide the most direct benefit(s) to the university and current strategic plan and/or address pressing needs for the campus community.

b) Institutional Review Team (IRT):

All proposals must first be reviewed by relevant supervisors and stakeholders to ensure that a. the benefits of the project are aligned with the university's mission; b. the costs of implementing the project are expected and acceptable; and c. the university is equipped to successfully implement the project.

The complete proposal package is expected to be submitted to the OSP no less than ten (10) business days prior to the funder's due date, for OSP and IRT review. Delinquent submission to OSP may materially imperil timely submission to the funder.

IRT review will typically span five (5) business days.

Suggested changes to a proposal package are not required for submission but are determined to be beneficial to the potential results of the application, and may be expressly referred to the supervising executive officer of the PI / PD.

Required changes are mandatory edits that must be incorporated into the proposal package prior to submission.

Please see Institutional Review FAQs for more information about IRT.

Deadlines:

An "Intent to Submit" form is expected to be completed no less than one calendar month prior to the funder's due date.

The OSP will respond to Intent to Submit submissions within 48 hours (2 business days).

The final two weeks prior to submission is designated for additional editing and rectifying any proposal issues or institutional concerns.

If the funder has a rolling deadline for submission, the timeline still applies, and an internal deadline will be determined following the initial Intent to Submit.

Submission of Proposals:

OSP will make all submissions of Proposals unless otherwise indicated.

The complete proposal package, as approved by both OSP and IRT, is the version that will be submitted to the funder.

Award Contracts, Negotiations, and Signatories:

OSP oversees all negotiations and award contract signatures.

PI/PDs are not authorized to sign award contracts, other than as coordinated by OSP and in the form of a co-signature with an official signatory of the University. PI/PDs may not give the impression that they are negotiating on behalf of the University.

Whenever applicable as indicated by the award documents and agency guidance, the AOR, as determined in [45 CFR 155.227](), should sign proposal and award documents. The Authorized Organizational Representative (AOR) or Authorized Official (AO) or Authorized Representative (AR) is an individual authorized to sign on behalf of Shepherd who can act on behalf of the University to assume the obligations imposed by laws, regulations, requirements, and conditions that apply to grant applications or grant awards. The AOR is authorized to sign grant proposals, grant awards and externally funded contracts. Authorized signatories on contracts that have financial terms is limited to President and/or Chief Financial Officer. The Provost is authorized to sign off on non-monetary academic MoUs, and the Director of OSP is authorized to administer the online grants systems on behalf of SU.

Post- Award Management:

Spending on an awarded grant should not start until the funding coding (fund/org) have been assigned in a check- IN email via the OSP. Assignment of such funding coding is dependent on an official fully executed award contract, NoA, etc from the funder. Funding coding will not be assigned without such a document.

Prior approvals include any modifications to the planned project as awarded that require prior approval from the funder. All prior approvals should be processed through the OSP via the Prior Approval Form to ensure accurate record keeping and compliance.

1. Budget revision - Revisions to budgets will vary due to types of funding and projects. It is important to review the terms and conditions of your award prior to the submission of the signed contract to determine the re-budgeting latitude you as PI may have. All budget revisions must be submitted through the Office of Sponsored Programs.
2. Change in PI/PD - Most federal sponsors will require the grantee to notify them prior to the PI or other key personnel named in the Notice of Grant Award withdrawing from the project entirely, being absent from the project during any continuous period of 3 months or more, or reducing her/his time devoted to the project by 25 or more percent from the level that was approved at the time of award (for example, a proposed change from 40 percent effort to 30 percent or less effort). The federal sponsor must approve any alternate arrangement, including any replacement PI or other key personnel proposed by the grantee. Any personnel changes must be submitted through the Office of Sponsored Programs.
    a. If the Project Director exits their role at SU, the Project Director is expected to provide written confirmation of the change in Project Director to the OSP and their direct supervisor two (2) weeks prior to their final day of service. The Project Director should also advise OSP and their supervisor of any suggestions that they may have regarding a replacement Project Director.

b. If the Project Director's departure from the project occurs suddenly and/or without notice, OSP and the former director's direct supervisor, or supervising executive officer, will work with remaining members of the project team to establish a new project director through the prior approval process as indicated by the funder. This will occur as soon as possible to uphold the project timeline and aims.

3. No cost extensions - Many sponsors will permit the grantee to extend the final budget period of the project one time for a duration of up to 12 months beyond the original expiration date shown in the Grant Award Notice (GAN) if:
    a. no additional funds are required to be obligated by the awarding office,
    b. there will be no change in the project's originally approved scope or objectives,
    c. and any one of the following applies:
        i. Additional time beyond the established expiration date is required to ensure adequate completion of the originally approved project.
        ii. Continuity of grant support is required while a competing continuation application is under review.
        iii. The extension is necessary to permit an orderly phase-out of a project that will not receive continued support.
        iv. Funds remaining at the expiration of the grant is not sufficient justification for an extension.
    d. A Prior Approval Form from the PI/PD to the OSP requesting the extension, identifying the length of the extension, and a justification for the extension is needed at least 60 days prior to the original grant expiration date. This will provide the OSP sufficient time to review the request and notify the sponsor prior to the expiration date of the award.

3. Roles and Responsibilities

Purchasing: Purchases should be approved by the Project Director. Procurement processes must be adhered to, including all associated forms, prior approvals, and bid requirements. Please see the SU Procurement site for forms and details.

Reporting: Awards are made to the University, not the individual. Therefore, it is not just the individual investigator that is flagged when there is an overdue report - it is the entire institution. Agencies can and will bar the institution from further awards due to outstanding reports. The Project Director is responsible for composing and submitting reports on time for review to the OSP. Reports should be shared with OSP at least one 1 week (5 business days) from the funder's report due date. If the Project Director must submit the report, they should save the report if possible and share that report and confirm submission with the OSP for recordkeeping.

Effort Certification: The Project Director is responsible for ensuring that the Project Team submits Effort Certification forms to OSP each semester. This should be submitted by the deadline indicated on the form with the Project Director's signature on the Confirmation line. Any effort committed to grant funded projects should be clearly explained and confirmed with the project team/collaborators prior to submission of any proposal indicating effort commitment to the funder.

Compliance Training: Institutional, state and federal training requirements are subject to modification. OSP will communicate with project personnel about existing and additional training requirements. However, the responsibility for attendance of / completion of trainings lies with the project personnel.

Budget Management:

The Project Team will adhere to the budget as approved and awarded by the funder.

- Thus, actual spending will be recorded by the Project Team on an Excel sheet in addition to Banner to reconcile funding balances.
- The Project Team will organize costs on their spending Excel sheet using the same categories that are used in their budget in Banner, and reconciliations of Banner and Project Team records must be timely made.

Spending will align with the project plan/narrative as approved and awarded by the funder.

- The Project Team will expend grant funds prior to the last 30 days of the project period **or** have plans to expend grant funds prior to the end of the active project period/ final billing date.
- Spending will be planned so as not to interfere with the end of fiscal year processes. SU's fiscal year ends on June 30th.

Grant Funded Employment:

Any completely grant funded personnel roles should include mention of the grant funded nature of the role in the hiring paperwork. If the role is 100% grant funded, language will reflect that continued employment is dependent on commensurate grant funding.

Project directors are responsible for communicating with Human Resources, Student Employment, and Payroll regarding grant funded positions. This may include but is not limited to job descriptions, salary ranges, posting and hiring for the roles.

Records Management:

OSP will maintain documentation of the complete proposal package, funder key documents, and pre- and post-award resources for at least three (3) years after the closure of the period of performance.

PI/PDs are expected to maintain current files on their pending, active, and closed awards for at least three (3) years after closure of the period of performance.

For documentation of a proposal package (as submitted), solicitation, or other pre-award records, please contact the OSP.

For documentation of a notice of award, budget as approved by funder, award contract, or other post-award records, please contact the OSP.

This Grant Submission and Management Policy will be updated as necessary. Failure to comply with the policies and procedures detailed herein may result in ineligibility for funding opportunities through SU.

Revision History & Effective Date

Effective Date: 07/01/2026

Revision History: n/a