

SUL ROSS STATE UNIVERSITY

A Member of the Texas State University System

SRSU Policy: Externally Sponsored Programs: Pre-Award Policy

SRSU Policy ID: APM 2.21.1

Policy Reviewed by: Dean of Research and Sponsored Programs

Approval Authority: Executive Vice President and Provost

Approval Date: October 28, 2025

Next Review Date: October 28, 2030

POLICY SCOPE

Sul Ross State University (“University”) encourages faculty and staff to pursue sponsored program activities in their areas of expertise. This policy covers the pre-award phase of externally sponsored programs - preparation, review, and approval of proposals. Its purpose is to ensure that the University properly manages funds, departmental workloads, complies with legal and fiduciary responsibilities, and maintains the highest standards of academic performance, research, scholarship, and administration. “Externally sponsored programs” are defined as those activities, funded whole or in part, by sources external to the University (“sponsor(s)”) for which there is an expectation (implied or specifically stated) on the part of the sponsor(s) for performance, deliverable(s), or outcome(s). To be covered under this policy, the sponsor must require the University to enter into a formal agreement such as a grant, contract, cooperative agreement, or other legally binding means of transfer.

This policy does not apply to programs covered by other University policies, such as contracts for the simple sale of goods or services, rental of University equipment/facilities, or similar agreements. These are handled by the Vice President for Finance and Operations. Programs funded by informal agreements such as gifts/donations are the responsibility of the appropriate Chair/Director or Dean. Solicitations for donations are covered by a separate Fund-Raising Policy Statement in the APM and are handled by the Office of Development and Advancement.

Programs that are covered by this Externally-Sponsored Programs policy typically have one or more of the following characteristics:

- funding sources include governmental entities, either directly or indirectly as a pass- through.
- funding sources include entities outside of the U.S. (“foreign entities”).
- the sponsor requires a formal written agreement.
- the sponsor requires the University to submit a Scope of Work or other project plan.
- the sponsor reimburses actual expenses only (i.e., the program is not ‘fixed price’).
- the project generally serves the ‘public good’ rather than primarily benefiting the sponsor.
- the sponsor requires the return of unused funds at the program’s conclusion.

SUL ROSS STATE UNIVERSITY

A Member of the Texas State University System

The only persons legally authorized to bind the University in any agreement are the President and the Authorized Organizational Representative (AOR) designated by the President. Faculty and staff cannot make verbal or written commitments to sponsors, including the 'acceptance' of 'pre-approved' projects sent directly to them by the sponsor. Sponsor requirements beyond simply using a donation for a specific project need to be formalized in a written agreement at the discretion of the Vice President for Finance and Operations. If a 'donor' requires the University to sign a formal agreement, then this Externally Sponsored Programs policy applies.

APPLYING FOR EXTERNALLY SPONSORED PROGRAMS

The Office of Research and Sponsored Programs (ORSP) assists with identifying potential funding sources, developing proposals, and coordinating the internal review and approval process.

Sponsored programs may support research, education, scholarly, creative, service, and outreach activities. Proposals shall be aligned with and contribute to the mission of the University.

Programs undertaken with private sponsors must not violate the APM policy on "Competition with Private Enterprise." An internal review and approval procedure is required prior to proposal submission to verify compliance.

All sponsored programs must have a Principal Investigator (research projects)/Project Director (non-research projects) who is qualified and available to manage the project to completion within the limits of University and sponsor policies. Information and assistance are provided to the PI/PD during the pre-award process by ORSP.

A PI/PD wishing to submit a proposal to a sponsor is encouraged to discuss with their Chair, Director, or Dean their plans as early as possible to ensure the program will be acceptable to the University. The PI/PD should also inform ORSP immediately of their intent to submit a proposal. Thereafter, ORSP will maintain a calendar of all such intents including deadlines, timelines, etc. and will monitor the proposal process for appropriate progress.

PROPOSAL PREPARATION

Proposals shall be reviewed and approved by the appropriate Department Chair, Director, Dean, and/or Vice President as well as the Dean of Research and Sponsored Programs. When applicable, review by the Vice President for Finance and Operations is also required. All proposals must be submitted using the *University Approval Form for Externally Sponsored Programs and Projects*.

SUL ROSS STATE UNIVERSITY

A Member of the Texas State University System

ORSP requires a minimum of 10 working days to process a completed proposal before being submitted to a sponsor. Any exceptions to this timeline require approval from the Dean of Research and Sponsored Programs. The PI/PD should contact ORSP immediately to ensure the proposal can be completed within this timeframe.

ORSP, with the assistance of Accounting Services, maintains various documents on the University's website which provide guidance as well as policies and procedures that must be followed. The PI/PD bears the primary responsibility for the accuracy of all material in the proposal and for compliance with all federal, state, private, Texas State University System, and Sul Ross State University policies. The sponsor's approval of a proposal that includes program activities and/or budget items that do not conform to the policies covering the program does not constitute a de-facto acceptance by the sponsor to undertake such activities. When questionable items are subsequently identified, ORSP and Accounting Services must be notified to determine an appropriate course of action.

Each proposal must be accompanied by a completed *University Approval Form for Externally Sponsored Programs and Projects* and other required ORSP forms, with the proper signatures prior to submission. Proposals involving human or animal subjects, hazardous materials, bio-safety or radioactive materials will require the prior approval from the appropriate oversight body (e.g., Institutional Review Board - IRB, Institutional Animal Care and Use Committee - IACUC, Safety Coordinator, etc.).

The PI/PD must ensure resources will be available when a program requires equipment, facilities, personnel, etc. that are not under the direct control of the PI/PD. The responsible department should be contacted as early as possible and the need for these resources should be disclosed on *University Approval Form for Externally Sponsored Programs and Projects*. Resources controlled by an entity outside the University require a "letter of commitment" signed by a legal representative of that entity even if there is no monetary value associated with the resources provided.

Additionally, proposals that include institutionalized positions, institutionalized service contracts for equipment or software, or that do not include indirect costs of 24.3% of Modified Total Direct Costs must receive prior approval from the President or Vice President for Finance and Operations.

BUDGET PREPARATION

Matching Funds (must be pre-approved only if institutional funds are to be used as match): The budget must reflect the minimum match required unless the application documents specifically state that projects with higher match commitments have a higher probability of being awarded. In each case, the match amount and the source must be clearly defined.

Infrastructure Costs: The *University Approval Form for Externally Sponsored Programs and Projects* should also clearly indicate any infrastructure costs not included in the grant.

SUL ROSS STATE UNIVERSITY

A Member of the Texas State University System

Indirect Costs: The PI/PD is required to request the maximum amount allowed for indirect costs unless the funder caps indirect costs at a lesser amount. Any IDC rate below 24.3% must be approved by either the President or Vice President for Finance and Operations.

During the proposal preparation phase, early consultation with ORSP and/or Accounting Services will help to facilitate budget acceptance. Any issues or conflicts should be brought to the attention of ORSP who will recommend further action as necessary.

ADMINISTRATIVE REVIEW, APPROVAL AND SUBMISSION OF PROPOSAL

The *University Approval Form for Externally Sponsored Programs and Projects* along with the completed proposal and related documents must be routed to ORSP for approval.

Failure to route a proposal for review and approval with enough time to meet sponsor deadlines may cause ORSP to be unable to submit the proposal.

ORSP will submit the proposal to the sponsor after all approvals have been obtained. The President and AOR are the only individuals legally authorized to sign when the sponsor's paperwork calls for the signature of an "authorized organizational representative" or other 'legally authorized' person.

It is not uncommon for a sponsor to request additional information and/or changes after a proposal is submitted, but before an award is made. If, in the judgment of ORSP and the PI/PD, these items do not materially change the nature of the program, ORSP with the help of the PI/PD, is authorized to provide such information/changes to the sponsor. However, if the sponsor requires new signatures on any forms, they must be re-routed to the President or AOR.

The PI/PD will not be reimbursed for any expenditures related to the proposal until the award has been officially accepted and expenditure accounts have been established within the University's accounting system. Expenditure accounts will only be approved once the award document has been received.

SPONSOR'S NOTIFICATION OF PROPOSAL ACCEPTANCE/REJECTION

When notification of an award acceptance/rejection is received, the notification should be forwarded to ORSP.

If the sponsor requires the signing of additional documents upon award acceptance, they must be forwarded to ORSP. ORSP will route the documents for signatures, as appropriate. Only the President or AOR are authorized to sign legal agreements. Any individual signing a legal contract without proper authorization may be held personally liable by the University and/or the State of Texas for any unauthorized expenditures.

SUL ROSS STATE UNIVERSITY

A Member of the Texas State University System

Once an award has been properly signed by all parties, ORSP will forward copies of the documents to Accounting Services, including the sponsor's initial Request for Proposal (RFP) documents or other application guidelines provided by the sponsor. Accounting Services will then request a new fund number to be established in the University's accounting system. The PI/PD **may not** begin incurring expenditures prior to final signatures without the express written approval of Accounting Services.

If a program includes activities to be carried-out by a sub awardee, ORSP will prepare subaward documents for signature as soon as possible after receiving a notification of award from the sponsor.

In addition to the normal disciplinary actions available, violations of any policies relating to externally sponsored programs by the PI/PD may result in the PI/PD being prohibited from applying for or participating in any future externally sponsored programs.

Please see *Administrative Policy Manual*, "Externally Sponsored Programs: Post-Award Policies and Procedures" for policy covering a program after an award is received from the sponsor.