

JACKSONVILLE STATE UNIVERSITY
Manual of Policies and Procedures

POLICY NUMBER: II:05:01

DATE: May 1, 1987

REVISION/REVIEW DATES: Nov 1988. May 1997. Nov 2007. June 2011. May 2019. Oct. 2020. May 2026

SUBJECT: Grant/Sponsored Program Approval

APPROVED: Dr. Don C. Killingsworth, Jr., President

PURPOSE

Jacksonville State University's (JSU's) grant and sponsored program approval process is designed to facilitate the submission of competitive funding applications and to ensure adequate support and oversight of all externally funded projects. This policy ensures compliance with the Office of Management and Budget (OMB) Uniform Guidance ([2 CFR 200](#)), including requirements for internal controls (§200.303), financial management (§200.302), institutional oversight of sponsored programs (§200.300), and standard application requirements (§200.206), and required certifications (§200.415). This policy applies to all externally funded grants, contracts, and cooperative agreements, including federal, state, local, and private sponsors.

POLICY

JSU's Office of Sponsored Programs (OSP) holds responsibility for assisting faculty and staff in the location of potential funding opportunities and with the application and submission process, ensuring that JSU's standards for performance are achieved by providing expertise to guide faculty through the life cycle of a project. JSU will maintain internal controls in accordance with 2 CFR 200.303. Accordingly, OSP ensures that all proposals and awards comply with Uniform Guidance requirements, including standard application components (§200.206), required certifications (§200.415), documentation of institutional commitments (§200.300(b) and 200.302), and subrecipient risk assessment and monitoring obligations (§200.331–§200.332).

All applications for grants and sponsored programs must be routed through the OSP for internal review and JSU approval prior to submission in compliance with 2 CFR 200.300(b) and 200.415. All institutional commitments, including cost share and resource commitments, will be documented and retained in accordance with 2 CFR 200.302 and 200.334 to ensure verifiability during an audit. No Principal Investigator (PI) or Project Director (PD) should ever submit a proposal on behalf of JSU without the knowledge and consent of the OSP.

The OSP also supports faculty and staff to develop topic-specific research centers, allowing faculty and staff to collaborate, publish findings, and receive recognition for research efforts, with the OSP providing assistance in the internal and external (Alabama Commission on Higher Education) approval process for centers.

The Office of Management and Budget (OMB) Uniform Guidance, 2.CFR.200, is a set of regulations that impact the proposals made for federal funding, how grants and contracts are managed, and the cost principles that guide research and sponsored activities at JSU. Ultimately, the administration of grants will be the responsibility of the PI/PD, including all financial reporting responsibilities. The OSP and Grant Accountant (GA) will provide policy guidance and best practice support for both grant administration and financial reporting.

JSU will ensure that personnel assigned to sponsored programs have sufficient capacity to meet project commitments. Consistent with 2 CFR 200.430, all personnel expenses must reflect actual effort, be allocable to the project, and be supported by internal controls that ensure accuracy and allowability. JSU may limit the number of sponsored projects assigned to an employee when necessary to ensure compliance with 2 CFR 200.430 regarding reasonable and allocable effort.

Identifying External Funding Opportunities

The OSP will assist faculty and staff in locating funding opportunities, developing new proposals (including budget development, with assistance of the GA), and obtaining required approvals within JSU.

Intent to Apply Form (ITAF)

An ITAF must be submitted at least two weeks or more prior to the Proposal due date. The ITAF is submitted by the Primary PI/PD after a requested Pre-Proposal Planning (PP) Meeting has been completed. A request for this meeting can be made by emailing OSP@jsu.edu and attaching the Notice of Funding Opportunity. The meeting can be done in person or via Teams and generally takes 30 minutes where the OSP team will review the proposal submission requirements and go over what is expected of key personnel associated with the proposal.

The ITAF must be submitted within 3 (three) days of the PP meeting and is the notification to the OSP, immediate supervisor, and Dean of the PIs plans for grant proposal submission and is particularly important when the project is complex, has funder-imposed limitations and/or match requirements, requires interdisciplinary involvement and approvals, and/or will include partnerships which may result in subawards and/or contractual agreements. The early notification supports internal controls and risk assessment for proposal feasibility and compliance.

A Conflict of Interest Disclosure Form ([Form 101](#)) must be completed, signed, and submitted prior to proposal submission when required by the sponsor, prior to the expenditure of any award funds, and annually by the PI/PD and any required JSU employee assigned to the grant, as required by the JSU Policy [I:01:15](#), Conflict of Interest for Grants/Sponsored Projects and 2 CFR 200.112, 2 CFR 200.113, 2 CFR 200.415, and 2 CFR 200.300(b). See [Policy I.01.15](#) for more information.

Developing the Proposal

The PI/PD and key personnel should work with the OSP to address any concerns that reviewers may have with the proposed grant to include the required narrative, budget, budget justification, and the required submission process. Either the PI/PD or the OSP will submit the grant proposal after it has been routed through Cayuse 424 and been approved by university leadership and the Authorizing Official Representative (AOR).

Submission and Review of the Proposal

All applications to be submitted to an external sponsor must be reviewed and approved in their final format by the Department Head, appropriate Dean, and Provost and Executive Vice President for Academic Affairs/ Senior Vice President for Finance and Administration, or other Vice President. A draft application should be submitted to the OSP and GA no later than **seven (7) business days prior to the submission deadline** to ensure adequate time for compliance reviews as part of JSU's internal control requirements. Proposals submitted after this internal deadline may not be processed in time to meet Grantor deadlines. Cayuse 424 must be used for routing applications from OSP to the, PI/PD, Department Head, Dean, Grant Accountant, Provost and Executive Vice President for Academic Affairs, Senior Vice President for Finance and Administration and CFO, any or other Vice President, OSP, AOR, and Coordinator of OSP. Once the system shows all prior approvals, the proposal is ready for submission with the proper confirmation that JSU will be able to meet any requirements included in the proposal.

The internal review in Cayuse 424 is a core component of JSU's internal control system (2 CFR 200.303 as it provides a mechanism to address key compliance issues, such as protection of human subjects, care, and use of animals in research, appropriate handling of hazardous materials and controlled substances, and export controls. Further, Internal review ensures compliance with 2 CFR 200.206 and verifies that all institutional commitments meet the prior approval standards in 2 CFR 200.308.

Internal routing ensures compliance with 2 CFR 200.300, 2 CFR 200.302, 2 CFR 200.303, and 2 CFR 200.334 regarding financial management standards, including documentation, record retention, accurate financial reporting, verification of institutional commitments, budget allowability, and internal controls.

Responsibilities of Key Participants

PI/PD - The PI/PD assumes the responsibility required by the Uniform Guidance (2 CFR 200), Grantor, and JSU Policy and Procedures, and in signing, the PI/PD agrees to comply with both external and internal requirements. The PI/PD will create the routing and approval chain and will initiate the internal routing and approval process in Cayuse 424.

Department Head - The Department Head serves as the key internal reviewer for judgment of the merits of the proposal, in terms of departmental objectives and support. Department Head review and approval affirm adequate support in human resources, space, and equipment for the project.

Dean - After review and approval by the Department Head, the appropriate Dean or immediate supervisor will be notified for review and approval. Approval may include commitment of School resources and required and/or voluntary match funds.

Appropriate Vice President or President - Approval indicates commitment of stated divisional resources and required and/or voluntary match funds, and affirms that grant objectives advance the mission, goals, and objectives of JSU.

Office of Sponsored Programs – OSP coordinates submission of grants, grant compliance, and oversight of Grant Award Modifications for all program and financial aspects of the grant during the period of performance, as well as review of all quarterly and final reports before submission for verification of compliance and project completion requirements of the Sponsor.

Grant Accountant - The GA affirms that the proposal complies with Uniform Guidance (2 CFR 200), JSU Policy, and federal or other grantor requirements including allowability, allocability, and reasonableness of costs under 2 CFR 200.403-405 and recommends approval by JSU's AOR.

Authorizing Official Representative (AOR) - The President is responsible for giving final clearance for submission of proposals to funding agencies. The President or the Senior Vice President of Finance and Administration and CFO as his/her proxy serves as the AOR, approves all grant proposals, and signs all contracts for JSU.

Additional Considerations That May Be Relevant To Proposals

Protection of Human and Animal Subjects

In accordance with 2 CFR 200.300(b), JSU will ensure compliance with all federal regulations governing human subjects (45 CFR 46) and animal subjects (7 U.S.C. 2131 et seq.).

Accordingly, JSU will not submit a proposal in which human or animal subjects are involved unless the proposal has been reviewed carefully to guarantee compliance with established policy. JSU's Human and Animal Subject Review Boards will provide information regarding protection of human or animal subjects. The Provost and Senior Vice President for Academic Affairs will not approve a proposal until the Institutional Review Board has given approval if the research merits such review. JSU [Policy II.08.01](#) and [Policy II.08.02](#) provide additional information.

Equal Employment Opportunity – JSU is an equal opportunity, affirmative action institution. JSU does not discriminate on the basis of any protected status under applicable federal, state, or local law in its educational programs, activities, or employment. Discrimination, harassment, and retaliation are prohibited. The University's Equal Opportunity, Harassment, and Nondiscrimination Policy and its Affirmative Action Plan govern these commitments.

Notification of Non-Discrimination on the Basis of Sex and Grievance Procedures

JSU does not discriminate on the basis of sex in the educational programs or activities that it operates. JSU is required by Title IX of the Education Amendments of 1972 and by Department of Education regulations implementing Title IX not to discriminate in such a manner. This requirement extends to employment by the University and to admission.

Inquiries about the application of Title IX and its implementing regulations may be referred to JSU's Title IX Coordinator, to the Assistant Secretary for Civil Rights at the U.S. Department of Education, or to both.

Information regarding the Title IX grievance procedures, including how to report or file a complaint of sex discrimination or sexual harassment and how JSU will respond to such complaints, is available on the University's Title IX website: <https://www.jsu.edu/titleix/index.html> or by contacting the Title IX Coordinator (Angle Hall, Suite 319, (256) 782-5769, titleix@jsu.edu).

Intellectual Property and Fair Use Policy

JSU Policy [II.05.03](#) addresses intellectual property and fair use.

Cost Sharing

Certain granting agencies may require JSU to share in costs for the project. By policy, JSU reviews proposals for projects that require cost sharing with the view that the direct benefit will outweigh the anticipated cash investment. Unless specified by the funding agency, the PI/PD should never suggest a voluntary cash cost share of any project expenses.

All cost sharing must receive prior approval from the sponsor when required under 2 CFR 200.306, be allowable, allocable, and reasonable (§200.403–405), comply with 2 CFR 200.434, be verifiable through JSU records, and may not be used to meet cost sharing requirements of other federal awards. Policy [I.01.22](#) provides more information about cost sharing.

Indirect Costs

Facilities and Administrative (F&A) Costs — also referred to as Indirect Costs or overhead — are costs incurred for common or joint objectives that cannot be identified readily and specifically with a particular sponsored project, instructional activity, or any other institutional activity. F&A costs are real institutional expenditures, not profit, representing JSU's cost of providing the infrastructure and administrative support necessary to conduct sponsored activities (2 CFR 200.1).

In accordance with 2 CFR 200.414(c)(1), JSU will apply its federally negotiated indirect cost rate to all sponsored projects unless the sponsor has a published statutory or policy limitation. If a sponsor restricts indirect costs, documentation supporting the limitation must be retained and uploaded into Cayuse. When collaborating with subrecipients without a negotiated rate, the 15% de minimis rate under 2 CFR 200.414(f) may apply. Any deviation must be documented and approved by the President or Senior Vice President for Finance and Administration and CFO and filed with the sponsored program proposal information and retained in compliance with [Policy I.05.01](#).

Negotiating with Awarding Agency

Funding agencies generally will contact the PI/PD to clarify, alter, or determine conditions prior to awarding a grant. For minor administrative or budget changes (unless restricted by grantor), the PI/PD must consult with the Dean. When major alterations or changes become necessary, written revisions will be needed and will require signatures of the Department Head, Dean, Vice President, OSP and GA. Any changes requiring federal prior approval under 2 CFR 200.308 (such as changes in key personnel, disengagement of the PI/PD for more than three months, budget reallocation exceeding 10%, or changes in scope) must be coordinated through OSP and GA before submission to the sponsor (2 CFR 200.308(c)). PI/PDs may not request prior approval directly from a federal agency; all requests must be submitted through OSP and GA

Required Training

Required training is a key component of JSU's internal controls. Training is required for all PI/PDs and sponsored program employees. This training includes, but is not limited to, the following:

- Use of Cayuse 424.
- Conflict of Interests ([I.01.15](#)).
- Sponsored Program Confidentiality ([I.01.16](#)).
- Sub-recipient monitoring ([I.01.20](#)).
- Effort reporting ([I.01.21](#)).
- Cost Sharing and matching ([I.01.22](#)).

- Program income ([I.01.23](#)).
- Sponsored program close out process ([I.01.24](#)).
- Sponsored Program Approval ([II.05.01](#)).
- Extra Compensation for Sponsored Programs ([II.05.02.02](#)).
- Expending sponsor program funds ([IV.03.01](#), [IV.03.11](#)).
- Indirect Cost.

RESPONSIBILITY

The Senior Vice President for Finance and Administration and CFO is responsible for this policy.

EVALUATION

This policy will be reviewed at least every five (5) years by the University Controller.