



Message from Provost Rick Muma

July 17, 2020

**TO: DEANS, DEPARTMENT CHAIRS, ACADEMIC CENTERS AND  
COMMUNITY SUPPORT CENTERS**

**CC: OFFICE OF RESEARCH; OFFICE OF RESEARCH COMPLIANCE,  
OFFICE OF GENERAL COUNSEL**

**FROM: RICHARD D. MUMA, EXECUTIVE VICE PRESIDENT AND  
PROVOST**

**DATE: July 17, 2020**

**SUBJECT: POLICIES AND PROCEDURES RELATED TO SUBMISSION AND  
ADMINISTRATION OF RESEARCH AND SPONSORED PROJECTS PROPOSALS  
AND AWARDS**

WSU has established a set of policies and procedures to guide the sponsored project proposal submission and award acceptance processes, as set forth in Chapter 9 of the WSU Policy Manual. These policies and procedures are in the process of being updated and revised. In the interim, we wanted to remind you of the following:

- 1. PRINCIPAL INVESTIGATOR STATUS.** Investigators named on a project must have Principal Investigator (PI) status to submit a proposal. Pursuant to WSU [Policy 9.23](#) (Eligibility to Serve as Principal Investigator),
  - a. all full-time WSU faculty, regardless of rank or tenure status, are eligible to serve as a PI on a sponsored project; provided they meet sponsor qualifications;

b. WSU staff and adjunct faculty may serve as the PI on a sponsored project with approval from their Chair and academic college Dean or Center Director, provided they meet sponsor qualifications

PI status is not usually granted to individuals who are not employed by WSU, but if there are compelling reasons for requesting this status for such individuals, then a request from the hosting department or center for “project-specific” PI status must be made **at least three (3) working weeks (15 working days) prior** to the deadline for submission of the proposal. All non-WSU project-specific PI requests must be approved by Associate Vice President of Research (or his/her designee).

**PRE-AWARD SERVICES.** All proposals for funding submitted on behalf of WSU investigators must be submitted through the Office of Research Pre-Award Services to ensure that appropriate compliance reviews have taken place, that budgetary information requested by the sponsor is correct, and that any contractual terms or other conditions specified unilaterally by the sponsor that may be inconsistent with University policy have been identified. **If the solicitation requires the applicant organization be a 501(c)3, the Office of Research – not the individual PI - will coordinate with the WSU Foundation.**

Pre-Award Services is responsible for analyzing the solicitation, completing the representations and certifications, coordinating the proposal, helping to prepare the budget, confirming sub-contractual commitments, facilitating the review of any solicitation or subsequently contractual requirements, submission of any exception letters, preparing agency application forms, assembling the proposal, implementing the review and signature process, and transmitting the proposal package to the agency.

**2. TIMING OF SUBMISSIONS.** Complete proposals must be submitted to the Office of Research by 9:00 a.m. three (3) business days prior to the sponsor due date for electronic proposals and five (5) business days prior to the sponsor due date for non-electronic proposals. Proposals that include cost share commitments or request waivers require additional time and should be submitted at least ten (10) business days prior to the sponsor’s deadline. Proposals are generally processed as received and investigators are encouraged to contact the Office of Research early in the process. Proposals that are received late may not receive a full review and are not guaranteed to be submitted on time to the sponsor.

**3. AUTHORIZATION.** The Office of Research is charged with proposal approval for externally funded programs, negotiating grants and contracts, and award management. **Note: NO PI, nor any other official of the University, is authorized to commit University resources to the conduct of research, training, or service without receipt of authorization from the Office of Research.** Departments and units within the University are not legal entities and therefore should not and cannot be parties to agreements.

**4. SPONSORED PROJECTS vs. GIFTS.** WSU researchers can receive external support for their research from multiple sources, including sponsored projects and gifts. It is the University's responsibility to properly classify these funds in order to ensure appropriate management of these funds and compliance with all regulations and terms and conditions. The determination as to whether a specific award should be treated as a sponsored award or a gift is made by the Office of Research in consultation with the WSU Foundation.

The following definitions are used as general guidelines when determining whether an award is a sponsored project or a gift.

A **gift** is a voluntary contribution of money, equipment, or other property of value made to the University, for which the contributor receives no bargained-for benefit, and requires nothing in exchange beyond recognition (in some cases) and assurance that the intent of the contribution will be honored. Although a donor may place some restrictions on the use or disposition of a gift and may require a report that demonstrates that the donor's wishes have been met, these terms do not make the gift a sponsored project. All gifts to the University are processed through the WSU Foundation.

A **sponsored project** is a transaction in which there is a specified statement of work with a related, reciprocal transfer of something of value (i.e., data, results, intellectual property, mandatory report, etc.). Sponsors typically provide funding for sponsored projects on the basis of a specific project or research plan or statement of work and budget, for a specified period of time. The plan typically involves an identified University researcher or group of researchers as the project leader(s), and specified goals and objectives,

as well as the methodologies and approaches to be used. Many sponsored projects are awarded following a competitive application process.

Sponsored projects are awarded through various mechanisms such as grants, contracts, cooperative agreements, commercially-sponsored grants and contracts, demonstration projects, and other instructional grants and contracts. All funding provided by U.S. government agencies, at the federal, state, or local level is sponsored project funding.

**5. CONFLICT OF INTEREST.** Prior to submitting any proposal, all employees must have on file a current Conflict of Interest Disclosure (see WSU [Policy 3.04](#)). Failure to accurately complete a conflict of interest disclosure may result in employment action including, but not limited to, restrictions against submitting research proposals. The annual COI disclosure form can be found under the “Employee Required Training” tab on myWSU.

*Note: WSU is in the process of updating conflict of interest policies, procedures, and disclosure requirements. Those policies, procedures, and disclosure requirements are expected to launch in Summer 2020. This may require you to re-submit any disclosures, even if you have a current disclosure on file.*

**6. STUDENT PARTICIPATION.** All sponsored projects (except services agreements) over \$25,000 per year are required to include students on the budget. Departments with a PhD program should budget at least one (1) PhD level Graduate Research Assistant on their project based on at least \$25,000 annually plus tuition. Exceptions must be approved by the Associate Vice President for Research or, if absent, the Executive Vice President and Provost.

**7. COMPLIANCE.** All research and sponsored projects affiliated with WSU must comply with federal, state, agency, and institutional guidelines. This includes compliance in several areas including, but not limited to: animal care and use, human subjects, export control, biosafety, data control, and research integrity.

**8. PROCEDURE FOR EXECUTION OF CONTRACTS AND COMMITMENT OF UNIVERSITY RESOURCES.** All university employees are expected to abide by the [memo](#) issued on April 8, 2019, regarding procedures for execution of contracts and commitment of university resources.