

SECTION L

GOVERNMENT, FOUNDATION AND CORPORATE GRANT ACTIVITIES

The administration encourages faculty to prepare requests for grants from the government, private foundations or other sources in order to pursue research, professional service, or instructional projects.

I. Submission and Administration of Grants

Individuals planning to submit an application to a government agency or a private foundation must consult with the dean of the college and the graduate dean and vice provost for research at an early stage in the development of their proposal, because grant applications require institutional clearance and endorsement. An internal transmittal form is available from the graduate dean and vice provost for research for that purpose. Faculty members must consult with the vice president for institutional advancement concerning any proposal to be submitted to a private charitable foundation *before* support is solicited *in any way*.

At least two weeks should be allowed for internal clearance of a proposal prior to its deadline for submission, but early involvement in grant preparation by the graduate dean and vice provost for research will speed up final approval. After approval of the academic unit leader and college dean is obtained, the transmittal form, along with a copy of the proposal and a copy of the agency guidelines which were used in preparing the proposal, should be given to the graduate dean and vice provost for research to be circulated to the vice president for institutional advancement, the senior vice president for finance and operations and CFO, and the provost and executive vice president for their approval. Once the required signatures are obtained, the transmittal form is returned to the grant or project director, who may then submit the proposal to the agency.

The institution must comply with several requirements both in applying for and receiving federal and state funds. The University must certify that the institution and its employees are aware of applicable regulatory requirements concerning lobbying, drug-free workplace, debt-delinquency, scientific misconduct, affirmative action, animal welfare, human subject research, and debarment and suspension by a federal agency. In addition, expenditures incurred by the University under a grant are subject to audit requirements. In the preparation of grant budgets, the individual should be aware of the specific audit requirements at the time of grant submission, and consult the Office of Business and Finance to assess the cost implications. The graduate dean and vice provost for research, with assistance from the staff of the senior vice president for finance and operations and CFO, will help applicants in the preparation of their budget.

Indirect costs that cannot be easily identified with a specific project, but are expended to meet the requirements of the project, must be included in the budget. They include a share of expenses for items such as operation and maintenance, library, depreciation, academic unit administration, and sponsored project administration. The percentage to be used will be indicated by notice from the senior vice president for finance and operations and CFO's

office. The submission of grants in which the indirect cost rate is lower than the current University rate requires approval by the senior vice president for finance and operations and CFO.

Fringe benefits for persons employed on sponsored projects will be treated as a direct cost, and include costs incurred for the employer's share of FICA tax, unemployment insurance, life insurance, disability insurance, medical insurance, retirement benefits, and cost of tuition remission. A fringe-benefit cost rate should be obtained from the office of business and finance.

Advice is available from the graduate dean and vice provost for research and the vice president for institutional advancement regarding the agency most likely to be interested in a particular project and information regarding proposal format and deadlines.

Administration of grants or contracts: Each grant or contract project director is responsible for insuring that the grant or contract is administered in compliance with sponsor and university processes and procedures. The timely preparation and submission of program reports and other required documentation is the responsibility of the project director.

Required Governmental Payroll Verification: In accordance with OMB Circular A-21, A-110, A-133, and other federal grant and contract regulation such as EDGAR, wages of University personnel (a) paid by a federal grant or contract, or (b) charged to a federal grant or contract as a matching or cost-sharing contribution by the University, must be supported by *A Time and Effort Report* to be given to the project director, who will forward it to the graduate dean and vice provost for research within 30 days after the end of each semester. Report forms are available from the associate provost to graduate studies and sponsored research.

- A. Professorial and administrative personnel must prepare the report once each semester and forward it to the project director within 30 days after the end of the semester. The time of all other personnel (for example secretaries, tutor-counselors, instructional assistants etc.) must be similarly accounted for if they are not assigned solely to one project.
- B. Each report should account for 100% of the activity for which the employee is compensated, and which is required in fulfillment of the employee's obligations to the University. The report will reasonably reflect the percentage of activity applicable to each federal grant or contract and each major function of the University during the past semester.
- C. The reports will reflect an after-the-fact reporting of the estimated percentage of activity of each employee. Charges to the grant or contract may be made initially on the basis of estimates made before the services are performed, provided that such charges are promptly adjusted if significant differences are indicated by activity reports.
- D. It is the responsibility of each grant or project director to insure that the reports are prepared and submitted to the graduate dean and vice provost for research.

- E. If reports are not received on a timely basis, payroll checks may be delayed. Copies of the federal regulation and the form are available from the graduate dean and vice provost for research.

II. Policies Concerning Faculty on Sponsored Activities

A. Faculty Salary Paid by Grant – Academic Year

1. When faculty members work on grants that are administered by Roosevelt University, faculty time is charged against the grant at its full rate (including benefits), prorated by the proportion of time the faculty member devotes to the grant. If a grant pays a lower rate, this requires special permission by the senior vice president for finance and operations and CFO and the provost and executive vice president.
2. In all proposals for grants and in all budgets submitted for approval, the proportion of time devoted to the grant for the regular academic year and for the summer, therefore, must be specified either in terms of “course-load equivalents” or as a percentage of total time.
3. For the purpose of grant accounting, one course will be considered to be the equivalent of approximately 1/10 or 10% of faculty time. One course per semester (two courses per academic year) will be considered 20% of faculty time. This assumes that teaching and the activities associated with teaching account for about 70% of faculty time during the fall and spring terms, with the other 30% accounted for by research and service.
4. Faculty must get the approval of the dean and the provost and executive vice president for any arrangement with a granting agency that requires reimbursement below this level.
5. When release time for a grant or contract does not coincide with the regular university calendar (i.e., August 15 - December 31 and January 1 - April 30), the dean of the college, in consultation with the provost and executive vice president and the senior vice president for finance and operations and CFO, will negotiate with the faculty member how his/her time will be accounted (for example, teach an extra course during the summer) so that time owed for salary paid can be reimbursed to the University in an appropriate way. A memorandum of understanding regarding the faculty member’s obligation shall be attached to the University’s internal approval form.

Agreement concerning the allocation of faculty time generally must precede University approval of a grant or contract proposal. Faculty should consult with the dean of their college concerning release time required by a grant. The dean and provost and executive vice president must approve such release-time requests. The University may disapprove a grant or contract application in instances where this negotiation cannot be concluded to the satisfaction of the parties involved.

B. Policy Concerning Faculty Overload During the Academic Year

When working on a grant, faculty may carry an overload of no more than two courses per academic year, in accordance with the provisions of Section H, J; this is equivalent to at most a 20% overload per academic year.

C. Faculty Salary Paid by Grant During the Summer

University policy concerning the monthly earnings of faculty hired under the provisions of a grant is to pay one-ninth of the stipulated contract salary for the academic year for each additional month of the grant. Summer vacation time cannot be charged to a grant.

D. Faculty Benefits Paid by Grant

Policy concerning payment of benefits to full-time faculty on sponsored activities are described in the *Employee Benefit Handbook*. Faculty members working on a contract or grant are entitled to the same benefits as regular full-time faculty; therefore the grant must provide funds to pay the employer's share of the employee benefits. Full-time faculty who are hired on a grant or contract during the summer and who receive additional compensation receive retirement benefits only on their regular University contract salary.

III. Policy Re. Fringe Benefits for Full-Time Professional Personnel Working on Grants

Full-time professional personnel working on grants will receive fringe benefits as follows:

<u>Type of Professional Personnel</u>	<u>Fringe Benefits</u>
Research Associate	Same as Assistant Professor
Research Assistant	Same as Instructor
Professional given faculty appointment, including "visiting" appointment	Same as regular faculty at rank of appointment
Other professional personnel	Same as administrative benefits

Faculty members given a "visiting" title, other than those working on grants, will not be entitled to retirement benefits among their fringe benefits.

Grants are hereby defined to mean funds for a research or special project provided by an outside, non-Roosevelt agency.

This policy is effective as of October 18, 1973.

IV. Administrative Policies and Procedures for Misconduct in Research

At Roosevelt University, allegations of misconduct in research will be treated with the utmost seriousness and will be examined carefully and responsibly to maintain confidence in the integrity of faculty research, as well as to protect the rights of individuals whose reputations may have been brought into question. The procedures outlined below for responding to allegations against faculty are based on the Model Policy developed by the Office of Research Integrity (ORI)(as revised February, 1997). These procedures are intended to provide a framework for careful and thorough investigation of allegations in a variety of circumstances. However, particular circumstances in an individual case may dictate variation from the normal procedure in the best interest of Roosevelt University and the parties involved.

At Roosevelt University, the graduate dean and vice provost for research will serve as the research integrity officer under the direction of the provost and executive vice president, who will be the deciding official in cases of research misconduct. The research integrity officer will have primary responsibility for implementation of the procedures set forth in this document. The deciding official will receive the inquiry and/or investigation report, and, in consultation with the research integrity officer, will determine whether to conduct an investigation, whether misconduct occurred, whether to impose sanctions, and whether to take other appropriate administrative actions.

A. General Policies and Principles

1. Scientific misconduct means fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting, or reporting research. It does not include honest error or honest differences in interpretations or judgments of data (ORI, 1997).
2. All employees or individuals associated with Roosevelt University have an obligation to report observed, suspected or apparent misconduct in science to the research integrity officer, and to provide relevant evidence.
3. The research integrity officer will monitor the treatment of individuals who bring allegations of misconduct, and those who cooperate in inquiries or investigations. Employees should immediately report any alleged or apparent retaliation to the research integrity officer. The institution will protect the privacy of those who report misconduct in good faith to the maximum extent possible.
4. Inquiries and investigations will be conducted in a manner that will insure fair treatment to the respondent(s) in the inquiry or investigation and confidentiality to the extent possible without compromising public health and safety or thoroughly carrying out the inquiry or investigation.

B. Conducting the Inquiry

1. Upon receiving an allegation of scientific misconduct, the research integrity officer will assess the allegation to determine whether there is sufficient evidence to warrant an inquiry and whether public funds are involved.
2. If the research integrity officer determines that the allegation provides sufficient information to allow follow-up and falls under the definition of scientific misconduct, he/she will immediately initiate the inquiry process. The purpose of the inquiry is to make a preliminary evaluation of the available evidence to determine whether it is sufficient to warrant an investigation. The purpose of the inquiry is not to reach a final conclusion about whether misconduct definitely occurred.
3. The research integrity officer must ensure that all original research records and materials relevant to the allegation are immediately secured.
4. The research integrity officer, in consultation with the provost and executive vice president, the dean of the relevant college, and the chair of the University Senate, will appoint an inquiry committee and committee chair within 10 days of the initiation of the inquiry. Members of the inquiry committee should have the necessary expertise to evaluate the charges, and have no apparent conflicts of interest in the case. The research integrity officer will notify the respondent of the committee membership.
5. The inquiry committee will interview the initial informant, the respondent, and key witnesses as well as examine relevant research records. Committee members will decide whether there is sufficient evidence of possible scientific misconduct to recommend further investigation.
6. A written inquiry report must be prepared that states the name and title of the committee members and experts; the allegations; the public funds involved; a summary of the inquiry process used; a description of the evidence; and the committee's determination as to whether an investigation is recommended, and whether any other actions should be taken if an investigation is not recommended.
7. The research integrity officer will transmit the final report and any comments to the deciding official, who will determine whether an investigation should be conducted. This determination will be made within 60 days of the first meeting of the inquiry committee and completes the inquiry.
8. The research integrity officer will notify all parties involved of the decision.

C. Conducting the Investigation

1. The purpose of the investigation is to explore in detail the allegations, to examine the evidence in depth, and to determine specifically whether misconduct has been committed, by whom, and to what extent. The investigation will also determine whether there are additional instances of possible misconduct that would justify broadening the scope

beyond the initial allegations. The findings of the investigation will be set forth in an investigation report.

2. The research integrity officer will immediately sequester any additional pertinent research records, before or at the time the respondent is notified that an investigation has begun.
3. The research integrity officer, in consultation with the provost and executive vice president, the dean of the relevant college, and the chair of the University Senate, will appoint an investigation committee and the committee chair within 30 days of the completion of the inquiry.
4. The investigation will involve examination of all documentation including relevant research records, computer files, proposals, manuscripts, publications, correspondence, memoranda, and notes of telephone calls. Interviews of the respondent should be tape recorded and transcribed. All other interviews should be transcribed, tape recorded, or summarized.
5. The final report of the investigation must describe the policies and procedures under which the investigation was conducted, describe how and from whom information relevant to the investigation was obtained, state the findings, and explain the basis for the findings. A draft of this report will be transmitted to institutional counsel for a review of its legal sufficiency.
6. The deciding official will make the final determination whether to accept the investigation report, its findings, and the recommended institutional actions. When a decision is made, the research integrity officer will notify the respondent as well as the initial informant. The investigation should be completed within 120 days of the first meeting of the investigation committee.

D. Institutional Administrative Actions

If the deciding official determines that the alleged misconduct is substantiated by the findings, he/she will decide on the appropriate actions to be taken, after consultation with the research integrity officer. These actions may include withdrawal or correction of all pending or published papers emanating from the research where scientific misconduct was found; removal of the responsible person from the particular project; probation, suspension, salary reduction; steps leading to possible rank reduction or termination of employment; and restitution of funds as appropriate.

E. Requirements for Reporting to ORI

1. An institution's decision to initiate an investigation must be reported in writing to the director of ORI on or before the date the investigation begins.

2. ORI must also be notified of the final outcome of the investigation and must be provided with a copy of the investigation report.
3. The research integrity officer will notify ORI at any stage of the inquiry or investigation under the following circumstances:
 - a. There is an immediate health hazard involved;
 - b. there is an immediate need to protect federal funds;
 - c. there is an immediate need to protect the interest of the informant;
 - d. there is a likelihood that the alleged incident is going to be reported publicly; or
 - e. there is a reasonable indication of possible criminal violation. In this instance, the institution must inform ORI within 24 hours of obtaining that information.

F. Record Retention

After completion of a case and all ensuing actions, the research integrity officer will prepare a complete file, including the records of any inquiry or investigation and copies of all documents and other materials furnished to the research integrity officer or committees. The research integrity officer will keep the file for three years after completion of the case. ORI or other authorized Department of Health and Human Services personnel will be given access to the records upon request.