

RG:01

Pre-Award Policy

I. PURPOSE

The Office of Research, Grants and Sponsored Programs, under the auspices of the Executive Vice President for Academic Affairs, is formally charged with providing services to faculty and staff for securing and managing external support from federal, state, and other sources. It acts as a check for Project Directors and Primary Investigators to ensure compliance throughout the grant process. This policy ensures that proper procedures are followed at the beginning of an award.

II. POLICY STATEMENT

All proposals which use the name and resources of Lincoln Memorial University and which may result in an award to the University or an award to an individual functioning in a University capacity involving restricted funds must adhere to University policies and procedures for submitting a proposal, accepting an award and administering the project (see RG and FIN Policies). Award proposals must be reviewed and processed through the Office of Research, Grants and Sponsored Programs to assure compliance and the ability of the University to manage the award.

The Primary Investigator/Project Director assumes responsibility for directing the project or program being supported by the grant. The PI/PD must be a full-time employee of the University, and in the case where students apply for external funding, a faculty or staff mentor must be attached to the project as a co-PI/PD. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity. The PI/PD works with the ORGSP to submit all necessary documentation and reports to the awarding sponsor.

The Executive Vice President of Academic Affairs is formally charged with the responsibility to commit the University on proposal submissions. This includes related certifications required by funding agencies during the proposal and award process. The Executive Director of the ORGSP is the designated staff person to manage all federal electronic grants systems and is the Authorizing Official who submits applications on the University's behalf. The President is the Authorizing Official to commit the University in all related matters involving grants and sponsored programs.

Regardless of funding source, all activities performed by LMU faculty or students that involve human subjects, animal subjects, the use of recombinant DNA, or the use of biohazards must be reviewed by the appropriate University review board and/or committee. It is the responsibility of the PI/PD to ensure this step in the application process. If a grant application involves one or more of these requirements, the ORGSP will request proof of application status before the grant can be submitted. Some federal agencies will allow a grant to be submitted when an approval from the

appropriate review board/committee is pending. In these cases, the grant may be allowed to proceed.

Should an award be funded, official acceptance of an award for the University will be made by the PI/PD and the ORGSP under the authority of the Exec. VPAA.

However, in certain instances, such as in awards involving international programs and/or agreements, the President will make an official acceptance. The PI/PD is prohibited from signing agreements for research and development support (including grants and contracts), cooperative agreements, teaming agreements, federal and state disclosures and regulatory compliance, patents or copyright licenses, protection from research risk assurances, product sharing, equipment loans or gifts. These and similar agreements bind the University to certain obligations and, as such, can only be signed by the President or an approved authorized University official.

III. DEFINITIONS

Principal Investigator/Program Director (PI/PD): Per [§ 75.2](#), “the individual (s) designated by the recipient to direct the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity.”

IV. AUDIENCE

Faculty, staff, and students of Lincoln Memorial University who apply for external awards.

V. COMPLIANCE

Any proposal not submitted as stipulated in this policy will be subject to forfeiture. The PI/PD should ensure that every effort is made to follow the stated guidelines. Proposals submitted without the proper University authorization will not be signed after the fact, even if funding is awarded later.

VI. ROLES AND RESPONSIBILITIES

PI/PD: Primary Investigator/Project Director assumes responsibility for directing the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity. The PI/PD works with the ORGSP to submit all necessary documentation and reports to the awarding sponsor.

Dean/Chair: The Dean/Chair assumes responsibility for reviewing the application of the PI/PD and assuring that the grant falls within the scope and mission of the school and that it has adequate resources for the application. The Dean/Chair authorizes the grant to move forward for the Chief Financial Officer’s signature (if applicable) and that of the Exec. VPAA.

IACUC, IRB, IBCSC: Reviews all activities performed by LMU faculty or students that involve human subjects, animal subjects, the use of recombinant DNA, or the use of biohazards

Office of Research, Grants, and Sponsored Projects: The ORGSP will assist faculty and staff in identifying and preparing research, educational, and service grants and other funding opportunities.

General Counsel: Provides input, guidance, and advisement on any award contracts.

Chief Financial Officer: Approves the use of matching funds.

Executive Vice President of Academic Affairs: Formally charged with the responsibility to commit the University on proposal submissions.

President: Commits the University in all related matters involving grants and sponsored programs

VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

[OMB Uniform Guidance 2 CFR §200](#)

[FIN:20.1](#) and [FIN:20.2](#)

[Research and Grants Policies](#)

The IRB's primary responsibility is to assure LMU researchers operate within the provisions of the Federalwide Assurance of Compliance filed with the U.S. Department of Health and Human Services (DHHS) Office for Human Research Protections (OHRP) at [45 CFR 46](#).

All animal care and use is under the oversight of the IACUC. The IACUC conforms to the general public health service guidelines ([PHS policy at IV.A.3.B](#)) concerning membership.

IX. PROCEDURE

- 1.) The first step in the grant submission process involves the completion of an intent to apply form by the PI/PD. This form is available on the "Forms" page of the ORGSP Website. The Dean must also sign, certifying that the application is within the scope and mission of the school and that the school has adequate resources for the project. This form notifies the ORGSP that an application is forthcoming so that time and resource management can be allotted to moving through the application process.
- 2.) Regardless of funding source, all activities performed by LMU faculty or students that involve human subjects, animal subjects, the use of recombinant DNA, or the use of biohazards must be reviewed by the appropriate University review board and/or

- committee. It is the responsibility of the PI/PD to ensure this step in the application process. If a grant application involves one or more of these requirements, the ORGSP will request proof of application status before the grant can be submitted. Some federal agencies will allow a grant to be submitted when an approval from the appropriate review board/committee is pending. In these cases, the grant may be allowed to proceed.
- 3.) Once the PI/PD completes the application (complete with narrative and budget), it along with the Internal Routing Form must be completed. The Dean must also sign, certifying that the application is within the scope and mission of the school and that the school has adequate resources for the project. This document is submitted to the ORGSP.
 - 4.) All proposals seeking sponsored funding should be submitted to the ORGSP five (5) business days before the application deadline to allow for additional signatures if needed and proper budget review.
 - 5.) Executive Director of the ORGSP reviews applications for completion, to confirm the University's ability to meet compliance, and to review the budget. Additional input is sought from the Post-Award Manager to assure the ability of the University to manage the award in the post-award phase.
 - 6.) After the ORGSP review, the internal routing form is submitted with the completed grant with signatures from the PI/PD, the Dean, the Chief Financial Officer (in the case of matching funds/cost sharing) and the Exec. Vice President for Academic Affairs for approval.
 - 7.) After the Exec. VPAA's signature is acquired, the ORGSP will notify the PI/PD that they can submit their application. In the case of federal awards, the Executive Director will submit the application through the appropriate portals as Authorizing Official.

X. CONTACT INFORMATION

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

XI. DOCUMENT HISTORY

Effective: 04-24-2024

- [Intent to Apply](#)
- [Internal Routing Form](#)
- [Checklist: Submit Proposal](#)
- [ORGSP Handbook](#)