Research Policies

BRIDGE FUND REQUEST POLICY

SLT 3.2

Date of Last Update:
July 31, 2008

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY STATEMENT

Grand Valley State University does not encourage creating nor approving a Request to Add a New Fund (RANF) and establishing a FOAP prior to the official receipt of a fully executed award. A **fully executed** award is an externally sponsored agreement (grant, contract, or cooperative agreement) that is signed by the duly authorized official of both the external sponsor and Grand Valley State University. It is important to note that any expenses incurred prior to an award and without the appropriate approvals place the University at risk.

However, in some extraordinary situations, effective project management or research necessitates incurring expenses prior to the receipt of a fully executed award. In such cases, Principal Investigators may request a “bridge fund” be established in anticipation of the fully executed award. Principal Investigators should contact the Office of Sponsored Programs (OSP) to initiate a Bridge Fund Request.

PROCEDURES

In an effort to minimize the risk to the University, the Office of Sponsored Programs will verify with the sponsor the allowability of pre-award costs, the anticipated award amount, and the period of performance. Once OSP receives verification in writing from the sponsor’s grants or contracts officer, the responsible Principal Investigator, Chair/Unit Head, Dean, and University Authorizing Official are all required to agree in writing to proceed with the expenditure of University funds in anticipation of the award. This agreement will be prepared by OSP in consultation with the Office of Business and Finance. It will be the responsibility of the

Principal Investigator to obtain the required signatures of the appropriate Chair/Unit Head, Dean, University Authorizing Official, and Executive Officer (Office of the Provost).

The Bridge Fund Request will be processed in a manner similar to the Request to Add A New Fund. However, attached to the Bridge Fund Request will be:

1. Written verification from the sponsor (signed by the sponsor Grants/Contracts Officer) received by OSP

2. Bridge Fund Request Agreement signed by the Chair/Unit Head, Dean, and University Authorizing Official

3. A copy of the proposal application, narrative & budget

A Bridge Fund Request shall not exceed 15% of the anticipated GVSU award amount. The maximum allowable amount requested will be verified by OSP in consultation with the Office of Business & Finance. If the award is for multiple years, the Bridge Fund Request shall not exceed 15% of the anticipated GVSU award amount for the first year of the funding. Upon the official receipt of the fully executed award, the bridge fund transition into the official FOAP for the project.

Should funding not be received from the sponsor (e.g. the award start date is delayed, or the costs are determined to be unallowable, etc.) coverage of costs incurred on the project becomes the responsibility of the Department Chair/Unit Head having initiated and signed the initial Bridge Fund Request form.

This policy was effective August 1, 2007 and will be revisited for any revisions, changes, or sunset within one year of its effective date.

Contact Office of Sponsored Programs

Phone: (616) 331-6826

Website: http://gvsu.edu/grants

CONFLICT OF INTEREST IN RESEARCH POLICY

SLT 3.4

Date of Last Update:
October 21, 2022

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY STATEMENT

The University is committed to transparency, integrity of scholarship, and independence as it pursues its mission to create, preserve, and disseminate knowledge through teaching, research, and community service. Accordingly, Grand Valley State University allows and encourages faculty and staff to engage in outside activities and relationships that enhance the mission of the University.

External sponsors, whether public or private, regularly institute conflict of interest disclosure requirements that the University must abide by in order to accept the funds and participate in the activity. The purpose of such requirements is to promote objectivity in research and to provide a reasonable expectation that the design, conduct, and reporting of sponsored activities will be free from bias arising from conflicting interests of participating personnel.

All GVSU personnel who meet the definition of “Investigator” on externally sponsored research applications, or serve as an “Investigator” on externally sponsored agreements, administered through the Center for Scholarly and Creative Excellence (CSCE) are required to submit a conflict of interest and commitment disclosure to the Office of Research Compliance and Integrity. An “Investigator” is defined as any person, regardless of title or position, who has independent responsibility for some aspect of the design, conduct, or reporting of the research, scholarly, or educational activity. Investigators include Principal Investigators, Co-Investigators, and all other individuals identified in the grant documents (e.g. application, budget, progress reports, etc.) submitted to the sponsor by GVSU, if the individual contributes to the development or execution of a project in a substantive, measurable way, whether or not they receive compensation.

The required disclosure by Investigators must be submitted prior to entering into an agreement or submitting a proposal for award to an external sponsor, and at least annually while the agreement/award is active. An annual disclosure is required even if no conflicts exist. An updated disclosure is also required within 30 days of any new conflict arising or an existing conflict ending or changing in a material way. The Office of Research Compliance and Integrity (ORCI) shall be responsible for reviewing the disclosures and, in conjunction with the Research Integrity Officer (RIO), developing and instituting an adequate mitigation plan for the management of any potential conflicts related to sponsored research and agreements

administered by the CSCE. The RIO serves as the designated institutional official and has the final authority to approve and oversee mitigation plans.

GVSU personnel must also comply with the University's Conflict of Interest Policy (SLT 10.1) and subsidiary policies, such as those in place with the Institutional Review Board (IRB) and the Institutional Animal Care and Use Committee (IACUC). Additionally, University personnel working on research funded by the Public Health Service (PHS) and/or other agencies that abide by PHS COI regulations, are subject to additional requirements in accordance with 42 C.F.R. Part 50.601 and 45 C.F.R. Part 94.5. Additional reporting requirements may be required under these other policies and regulations.

The table below provides references to the applicable procedures to follow based upon the type of research/sponsored activity submission.

For more information about conflicts of interest and commitment in research and sponsored activities, please visit the GVSU Conflicts of Interest and Commitment in Research & Sponsored Activities webpage or contact the ORCI at 616-331-3197 or rci@gvsu.edu.

TABLES

Procedures for conflicts of interest in research and sponsored activities.

Submission Type	Policy/Procedures	Responsible Office/Committee
External funding applications and agreements administered by CSCE (i.e., sponsored program submissions, service agreements, testing agreements, material transfer agreements, data use agreements, research collaboration agreements, educational affiliation agreements, non-disclosure agreements)	C-01: Procedures for Reporting Conflicts of Interest and Commitment in Research and Sponsored Activities	Office of Research Compliance and Integrity
Institutional Review Board Protocol	IRB Policy 320: Researcher Conflict of Interest	Institutional Review Board
Institutional Animal Care and Use Committee Protocol	IACUC Policy 3.30: IACUC Protocol Personnel Conflict of Interest	Institutional Animal Care and Use Committee

COPYRIGHT POLICY

SLT 3.5

Date of Last Update:
May 06, 2015

Approved By:

- Senior Leadership Team

Responsible Office:
University Libraries

POLICY STATEMENT

The Grand Valley State University Libraries are committed to following all applicable laws regarding copyright and other intellectual property. This includes not only preserving the rights of creators and owners of copyright, but also supporting the rights of users of copyrighted material, including fair use and other exemptions from copyright. This policy outlines the role of the University Libraries in providing education, information, and support regarding copyright, in order to fulfill our mission of advancing intellectual growth and discovery at GVSU.

PROCEDURES

The University Libraries work to educate and support our students, faculty, and staff by serving as an information resource on copyright law as well as the rights of creators, owners, and users of copyrighted materials. We provide detailed resources for understanding and working with copyright through our copyright guide: http://www.gvsu.edu/library/copyright

We also offer educational programming, individual consultations, and other services related to copyright issues. For more information on the copyright services we provide, or for support with a copyright issue, please contact a librarianhttps://www.gvsu.edu/library/librarians

The University Libraries offer education and information, but we do not enforce others' compliance with copyright law, nor do we provide legal advice. We can help faculty, students, and staff understand how copyright law works in general, and provide information on specific issues, but the final responsibility for ethical and legal use of copyrighted materials rests with

the user. This responsibility extends to the use of technology provided by the Libraries, such as scanners and photocopiers.

The University Libraries do take responsibility for adhering to copyright law when using copyrighted materials in our mediated services, including course reserves and Document Delivery, and we make internal decisions accordingly. However, we cannot make decisions for other users; we can only provide information and education. For legal advice pertaining to copyright and other intellectual property issues, we recommend that you contact the Division of Legal, Compliance & Risk Management.

EXPORT CONTROL POLICY

SLT 3.6

Date of Last Update:
April 24, 2019

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY STATEMENT

All personnel at Grand Valley State University, including faculty at all levels, staff, students, visiting scholars, and all other persons herein referred to as “GVSU Personnel” retained by or working at the University must comply with all U.S. export control laws and regulations while teaching, conducting research, or providing service activities at or on behalf of the University. No GVSU Personnel may engage in any export activity that is prohibited by the U.S. Department of Commerce, the U.S. Department of State, the U.S. Department of Treasury’s Office of Foreign Assets Control, or any other government agency that enforces export laws/regulations. Similarly, GVSU Personnel may not transfer any controlled item, including technology and technical data, to any foreign nationals inside or outside the United States territory without approved documentation.

Compliance with export control laws and regulations must be considered and if necessary achieved *before* engaging in science or technology-based research, executing contracts or other agreements, purchasing high-technology devices or software, or traveling

internationally. GVSU Personnel are responsible for the following:

(i) Ensuring their educational, research, and other University activities are conducted properly and in compliance with export control regulations, all requirements of this policy, and any technology control plan on which they are included;

(ii) Ensuring contracts and service agreements entered into on behalf of the University include the appropriate export control language;

(iii) Notifying the Office of Research Compliance and Integrity at least 30 days prior to traveling on behalf of the University to any of the following locations:

(1) Embargoed and/or targeted sanctioned countries identified by the Export Administration Regulations and/or the Office of Foreign Assets Control, and

(2) Prohibited countries identified by the International Traffic in Arms Regulations

(iv) Obtaining pre-approval from the Office of Research Compliance and Integrity to take or ship any University property to an embargoed, targeted sanctioned, and/or prohibited country as defined in (iii) above; and

(v) Ensuring University business is not conducted with any individual or entity on a prohibited party list published by the Departments of Commerce, State, or the Treasury

It is essential that all GVSU Personnel keep current with information and training provided by the University. The Vice Provost for Research and Innovation (VPRI), or designee, is the University's Empowered Official who is responsible for overseeing the University's export compliance program.

The University's Empowered Official or designee, is legally empowered to sign license applications or other requests for approval on behalf of the University and has authority to:

(i) Enquire into any aspect of a proposed export or temporary import by the University,
(ii) Verify the legality of the transaction and the accuracy of the information to be submitted, and
(iii) Refuse to sign any license application or other request for approval without prejudice or other adverse recourse.

For more information about export controls, please contact the Office of Research Compliance and Integrity at 616-331-3197 (https://www.gvsu.edu/export/).

EXTERNALLY SPONSORED PROJECTS POLICY

SLT 3.11

Date of Last Update:
February 05, 2025

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY

This document establishes Grand Valley State University's (University) official policy governing the administration of proposals, awards, contracts, and agreements for *externally sponsored projects*. Externally Sponsored Projects do **not** include Purchasing Agreements but **may** include some Philanthropic Gifts for Academic Support and/or Research.

The purpose of this policy is to help ensure that all proposals and awards for externally sponsored projects conform to federal regulations, including the Office of Management and Budget 2 CFR 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (a.k.a., the Uniform Guidance)—and are consistent with GVSU's academic and business policies and sound fiscal practices.

POLICY STATEMENT

Only an Authorized Organizational Representative of the University may submit proposals to fund and/or otherwise support externally sponsored projects on behalf of the University.

In addition, an Authorized Organizational Representative may accept on behalf of the University any Externally Sponsored Project award resulting from such proposal submissions or other solicitation processes. Externally Sponsored Projects received without prior approval will only be accepted at the discretion of an Authorized Organizational Representative.

All requests for funding (e.g., proposal, assistance, application, cooperative agreement, consortium agreement, letter, etc.), whether electronic or not, seeking external support for research and other sponsored projects must be submitted to the Office of Sponsored Programs (OSP) for review and approval prior to submission to external sponsors.

Externally Sponsored Projects will be administered by the appropriate Authorized Organizational Representative as defined below.

DEFINITIONS

Assistance Action: The main purpose of an assistance action is to transfer money, property, services, or anything of value to the recipient in order to accomplish a public purpose of support or stimulation. The agency must have legal authority to award assistance agreements for this purpose. Grants or Cooperative agreements are used to award assistance funds.

Authorized Organizational Representative: An Authorized Organizational Representative is either the Vice Provost for Research Administration or Vice President for University Development and any University employee(s) to whom they have delegated oversight responsibility for the administration and management of Externally Sponsored Projects at the University. Only an Authorized Organizational Representative has the authority to submit proposals, accept awards, and sign contracts and agreements for Externally Sponsored Projects on behalf of the University.

Externally Sponsored Project: Externally Sponsored Projects include projects supported by way of grants and cooperative agreements (direct Assistance Actions); incoming or outgoing sub-recipient agreements or subawards (pass-through Assistance Actions); certain incoming or outgoing contracts (i.e., *externally sponsored* Procurement Actions), including direct contracts, service agreements, and consulting agreements; pass-through subcontracts and service agreements; and certain other agreements, including master collaboration agreements, material transfer agreements, and data-use agreements—whether funded or unfunded. Externally Sponsored Projects do **not** include Purchasing Agreements but **may** include some Philanthropic Gifts as outlined in more detail in the Sponsored Project or Gift Guide (link). Since the term Grant can refer to a Sponsored Project or a Philanthropic Gift, it is important to consider both the intent of the funding and the requirements of the grant to determine its management. The funder's description of the funds as a gift, sponsored project, or other terminology does not affect GVSU's classification of it as a Sponsored Agreement or Philanthropic Gift.

Philanthropic Gift: A philanthropic gift is an instrument by which an outside donor voluntarily transfers money, services, or property from a donor to the University. There is no expectation of direct economic benefit or the provision of goods or services to the donor, although donors can place stipulations on gifts that direct the funds to the donors' areas of interest. University Development will determine the charitable nature of this type of giving in accordance with Council for Advancement and Support of Education (CASE) Global Reporting Standards and Internal Revenue Service (IRS) guidelines, which may differ from reporting for financial statement purposes. Philanthropic Gifts do **not** include Purchasing Agreements but **may** include some Externally Sponsored Projects as outlined in the Sponsored Project or Gift

Guide.

Procurement Action: The main purpose of a procurement action is to acquire property or services by purchase, lease, or barter for the use or direct benefit of the purchaser (whether the purchaser is the university purchasing from an outside entity or an outside entity purchasing services from the university). An agreement or contract is used as the legal instrument to award a Procurement Action.

Purchasing Agreement: An agreement entered into by the University through its Procurement Services Office and an outside vendor or supplier to purchase goods and/or services. Examples of non-sponsored purchasing agreements include software licenses, pricing agreements, equipment maintenance agreements, custodial and facilities services, landscaping services, and office supply-vendor agreements.

For more information about this policy and the procedures established to ensure compliance with it, please contact the Office of Sponsored Programs at 616-331-6826 or osp@gvsu.edu.

ALLOWABLE COST POLICY

SLT 3.11.1

Date of Last Update:
September 04, 2019

Approved By:

- Senior Leadership Team

Responsible Office:
Office of Sponsored Programs

POLICY

All costs proposed to be charged on externally sponsored projects (as defined at SLT 3.11: EXTERNALLY SPONSORED PROJECTS POLICY) at Grand Valley State University (the University) must comply with the Federal cost principles prescribed in 2 CFR 200 Subpart E, §200.400; the policies of the sponsoring agency; the specific funding solicitation for which the cost is proposed; and all applicable policies of the University.

Specifically, in order to be deemed an **allowable cost** on such a project, the cost of any

particular item must:

1. Be **necessary and *reasonable*** for the performance of the awarded project. That is, the project cannot be performed without the item and a reasonable and prudent person would incur the cost of the item under the circumstances prevailing at the time the decision was made to propose or incur the cost (§200.403-404).
2. Be fully **allocable** to the particular awarded project or be proportionally allocable to it and another cost objective according to the relative benefit derived (§200.405).
3. Be **treated consistently**. A cost may not be assigned to a sponsored project as a Direct Cost if any other cost incurred for the same purpose in like circumstances has been allocated to the awarded project as an Indirect Cost. University policies governing the treatment of costs must apply uniformly to both sponsored- and non-sponsored activities. Like expenses must be treated the same in like circumstances (§200.400(e)).

Such costs much also meet one of the following two criteria:

1. Be an item or category of cost that is **not expressly disallowed by the federal government** (guidance available at §200.420-475, General Provisions for Selected Items of Cost); **the sponsor** (as documented in sponsor policy statements and in the applicable sponsor funding solicitation); **or the University** (as defined below under Unallowable Costs and documented in the Business and Finance Procedures and the University-Wide Policies); OR
2. Be an otherwise unallowable cost that is **expressly allowed by the sponsor**, whether as stipulated in an award or proposal-solicitation document or as documented in a prior written approval request duly executed by an Authorized Organizational Representative of the University. If an expense does not meet the above criteria, it must not be charged to an externally sponsored project at the University.

DEFINITIONS

Direct Costs are expenses that are specifically associated with a particular externally sponsored project that can be directly assigned to such activities with a high degree of accuracy.

Indirect Costs (also referred to as Facilities & Administration [F&A] or overhead costs) are expenses that cannot be identified specifically with a particular project or activity. Indirect costs benefit multiple activities and programming objectives. In order to capture the amount of indirect costs that should be allocated to a grant, the University has calculated an indirect cost rate, approved by the federal government.

The indirect costs included in this rate are made up of two broad categories: Facilities and

Administration.

Facilities costs include:

- Custodial and Maintenance
- Utilities
- Grounds Services
- Parking Operations, less parking fines and fees
- Property and Liability Insurance
- Facility Planning and Management
- Engineering Planning and Management
- Depreciation

Administration costs include all the expenses incurred in providing the following university services:

- Central Administration
- Business & Finance, including financial audit
- Human Resources
- Legal Services
- Inclusion & Equity
- Library Operations
- Administrative Computer Operations
- Grants and Research Administration
- Department Administration, as defined by the federal government to be 20% of Dean and Dean's assistant compensation
- Mail Services
- Public Safety
- University Communications

Federal Cost Principles are the Federal regulations that govern expenditures on federal awards and which also apply to non-federal awards to GVSU because of the University's required federal compliance under 2 CFR 200 Subpart F: Audit Reporting.

Prior Written Approval is a formal permission the University must document before it proposes or incurs a special or unusual cost that may be deemed unallowable under the federal cost principles under normal circumstances.

Requests for prior written approval must be rationalized in writing as allowable under an "unlike circumstances" justification by the University personnel who wish to propose the special or unusual costs. The requests are then reviewed, approved, and (assuming approval

is granted) formally submitted to the sponsoring agency by the Authorized Organizational Representative of the University (as defined in SLT 3.11: EXTERNALLY SPONSORED PROJECTS POLICY).

In accordance with the Uniform Guidance at 2 CFR 200, prior written approval from the sponsor is explicitly required (either in the awarded proposal budget, during award negotiation, or prior to incurrence of costs in the event that the expense is to be proposed post-award) for a number of items, including the following:

1. Administrative expenses (§200.413(c))
2. Change of scope (§200.308 (c)(1))
3. Cost sharing or matching (§200.308 (c)(7))
4. Entertainment costs (§200.438)
5. Equipment and other capital expenditures (§200.313, 439)
6. Exchange rates (§200.440)
7. Fines, penalties, damages and other settlements (§200.441)
8. Fixed amount subawards (§200.332)
9. Fund raising and investment management expenses (§200.442)
10. Memberships in any civic or community organization (§200.457 (c))
11. Organization costs (§200.455)
12. Participant support costs, any transfer of budget (§200.308 (c)(5))and (§200.456)
13. Rearrangement and reconversion expenses (Renovations) (§200.462)
14. Selling and marketing costs (§200.467)
15. Subawards, any changes or transfers (§200.308) (c)(6))
16. Supplemental compensation for incidental activities (§200.430 (h) (ii))
17. Use of program income (§200.307)

Unallowable Costs are costs that could be considered appropriate and reasonable, but which are not eligible for reimbursement by the federal government and therefore to ensure consistent treatment under the federal cost principles, are not allowable on any sponsored program. Exceptions are possible with a strong justification for unlike circumstances and with prior written approval (as defined above) from the Authorized Organizational Representative of the University and the sponsor.

Unallowable costs include:

1. Advertising and public relations
2. Advisory councils
3. Alcoholic beverages
4. Alumni/ae activities

5. Bad debt expense
6. Collections of improper payments
7. Commencement and convocation costs
8. Contributions and donations
9. Entertainment costs
10. Fines, penalties, damages and other settlements
11. Fund raising and investment management costs
12. Lobbying
13. Intra-Institution of Higher Education (IHE) Consulting
14. Losses on other awards or contracts
15. Club, social, dining club or lobbying organization memberships
16. Proposal costs
17. Meals and travel associated with lobbying, fund raising, alumni activities
18. Student activities
19. Passports and immigration visas

For more information about this policy and the procedures established to ensure compliance with it, please contact the Office of Sponsored Programs at 616-331-6826 or osp@gvsu.edu.

COST SHARING POLICY FOR EXTERNALLY SPONSORED PROJECTS

SLT 3.11.2

Date of Last Update:
September 04, 2019

Approved By:

- Senior Leadership Team

Responsible Office:
Office of Sponsored Programs

POLICY

Grand Valley State University (the University) shall minimize cost sharing on all externally sponsored projects (as defined at SLT 3.11: EXTERNALLY SPONSORED PROJECTS POLICY).

The University will allow cost sharing on such projects under the following conditions:

1. When it is required by the sponsoring agency (Mandatory Cost Sharing) as documented in a proposal solicitation, program description, sponsor policy, Catalog of Federal Domestic Assistance record, broad agency announcement or other official sponsor document.
2. When a reasonable justification is made that provision of Voluntary Cost-Sharing (whether Committed or Uncommitted) will improve the competitiveness of a proposal.

Further, in cases under which the University will allow cost sharing:

1. The proposed cost sharing must be thoroughly and accurately quantified;
2. The proposed cost sharing must represent an allowable cost (as defined in SLT 3.11.1 ALLOWABLE COST POLICY);
3. The proposed cost sharing must be limited to what is required by the sponsor (Mandatory Cost Sharing) or to what is deemed reasonable by the Appointing Officer (as defined in BOT 4.1.1: GENERAL PERSONNEL POLICIES FOR FACULTY AND STAFF – PERSONNEL ADMINISTRATION) who has authority over the resources proposed to be committed (Voluntary Cost Sharing);
4. The approval to subsidize all proposed cost sharing must be documented by the Appointing Officer who has authority over the resources proposed to be committed;
5. The quantification and approval of cost-sharing subsidies must be documented and approved by the Authorized Organizational Representative of the University (as defined at SLT 3.11: EXTERNALLY SPONSORED PROJECTS POLICY) using the standard systems and processes of the Office of Sponsored Programs; AND
6. All approved cost sharing included in an awarded externally sponsored project must be monitored, tracked, and reported by the Grants Accounting office in accordance with all applicable federal and sponsor requirements.

DEFINITIONS

Cost Sharing: Cost sharing is that portion of an externally sponsored project cost that is not reimbursed by the sponsor (whether federal or non-federal) and therefore represents a commitment of institutional resources that would generally otherwise be devoted to other University purposes.

There are three forms of cost sharing:

1. Mandatory Cost Sharing, which is required by the sponsor as an award condition and becomes an obligation once an award is made;
2. Voluntary Committed Cost Sharing, which is voluntarily offered and documented in a

proposal submission and therefore becomes an obligation once an award is made; and
3. Voluntary Uncommitted Cost Sharing, in which voluntary cost sharing is intended, but not explicitly committed (documented) in a proposal, and therefore not a binding commitment that must be tracked and reported.

For more information about this policy and the procedures established to ensure compliance with it, please contact the Office of Sponsored Programs at 616-331-6826 or osp@gvsu.edu.

SUPPLEMENTAL COMPENSATION ON EXTERNALLY SPONSORED PROJECTS POLICY

SLT 3.11.3

Date of Last Update:
September 04, 2019

Approved By:

- Senior Leadership Team

Responsible Office:
Office of Sponsored Programs

POLICY

Grand Valley State University (the University) normally does not allow for compensation charges in excess of an individual's Institutional Base Salary on any Externally Sponsored Project (as defined in SLT 3.11: EXTERNALLY SPONSORED PROJECTS POLICY). In most cases, funding from such projects must supplant, not supplement Institutional Base Salary during the Base-funded Appointment Period.

In the absence of unusual circumstances and specific Prior Written Approval (as defined in SLT 3.11.1: ALLOWABLE COSTS POLICY) from the appropriate University and/or sponsor officials as described in this policy, faculty member compensation for sponsored-project work at the University must offset Institutional Base Salary through:

1. The use of Significant Focus Time (as defined in SG 3.01: FACULTY RESPONSIBILITIES);
2. The application of Reassigned Time (as defined in SG 3.03: REASSIGNED TIME); or
3. Some combination of Significant Focus Time and Reassigned Time.

Absent Prior Written Approval for Supplemental Compensation following procedures stated below, Administrative/Professional staff members must also offset Institutional Base Salary to

participate in externally sponsored projects (supplant, not supplement). Such offsets shall require a reorganization of established job duties in the staff member's organizational unit that is approved by the staff member's Appointing Officer and Executive Officer.

In order to charge Supplemental Compensation to federally funded Externally Sponsored Project accounts at the University, the work performed must be justifiable as Intra-Institution of Higher Education Consulting as defined at2 CFR 200.430—COMPENSATION; PERSONNEL SERVICES, which limits such charges according to their adherence to specific criteria. Such consulting must be:

1. Across departmental lines or involve a separate or remote location that is at least 30 miles away from the employee's University campus office;
2. Outside the scope of the employee's regular appointment as documented in the employee's appointment letter;
3. Short term in nature; and
4. Provided for in the sponsored agreement, or approved in writing by the sponsoring agency prior to the incurrence of applicable expenses.

In order to charge Supplemental Compensation to a non-federal Externally Sponsored Project account, the allocation is subject to the prior written approval of the Vice Provost for Research Administration as well as the sponsoring agency.

DEFINITIONS

Base Appointment Period at the University generally falls into one of two categories:

1. An Academic Year Appointment is comprised of the nine-month span from August 6 of a given calendar year to May 5 of the following calendar year.
2. A 12-month Appointment is comprised of the twelve-month span from August 6 of a given calendar year to August 5 of the following calendar year.

Institutional Base Salary is the annual salary the University pays for an employee's appointment, regardless of appointment category and whether the employee's time is spent on research, teaching, administration, patient care, or other University responsibilities. Institutional Base Salary does not include bonuses, one-time payments, incentive pay, or income that an employee is permitted to earn outside of their University responsibilities such as Private Consulting.

Private Consulting refers to works for hire performed by a University employee outside of their University responsibilities. To be deemed private consulting, work must be performed

without the use of any University resources, including administrative services of any kind, facilities (classroom, clinical, meeting, or office space), supplies, equipment, computing resources, and any other service or resource owned by the University. Any outside employment must be approved in advance by the Appointing Officer (BOT 4.1.10). Consulting services that require the use of University resources are subject to SLT 3.17: SERVICE AND CONSULTING AGREEMENTS POLICY.

Supplemental Compensation, also known as extra salary or extra service pay, is compensation a University employee receives in excess of Institutional Base Salary; Supplemental Compensation represents payments for services outside the normal scope of employment.

For more information about this policy and the procedures established to ensure compliance with it, please contact the Office of Sponsored Programs at 616-331-6826 or osp@gvsu.edu.

FACILITIES AND ADMINISTRATIVE COST POLICY

SLT 3.11.4

Date of Last Update:
July 13, 2016

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY STATEMENT

Grand Valley State University's Facilities and Administrative (F&A) rate (also known as the indirect-cost rate) is established in accordance with the Federal Office of Management and Budget under 2 CFR 200 Uniform Guidance (previously A-21). The rate is negotiated between the University and the U.S. Department of Health and Human Services, the cognizant federal agency that oversees the administration of sponsored agreements at the University. The University's F&A rate reflects the cost of real, auditable expenses incurred in the conduct of sponsored research and programs. Included among these costs are depreciation costs of buildings and equipment, maintenance and repairs, janitorial services, utilities, hazardous waste disposal, libraries, and general administrative costs such as sponsored programs

administration, departmental administration, and general administration (accounting, purchasing, legal services, personnel, and compliance). These costs are "indirect" because they are not easily identified with a specific project and therefore are not included in the "direct" portion of the budget. Such indirect costs support the conduct of research and other sponsored programs, regardless of the source of funding, and therefore must be applied to all sponsored projects. For reasons of sound management and equitable stewardship of resources used in support of all sponsored activities, it is expected that all sponsored projects recover full F&A costs.

PROCEDURES

Facilities & Administrative (F&A) Cost Recovery Policy:
It is the University's policy that all proposals and agreements for sponsored research, including subawards and industry contracts, are subject to the recovery of facilities and administrative costs (F&A) at the University's approved and published rate. In some cases, the sponsor has a written policy, uniformly applied, prohibiting F&A costs or restricting the payment of such costs to a lower rate. An exception to the University's F&A cost recovery policy may be warranted if it is clearly in the best interest of the University to accept the award with less than full F&A cost recovery. Any reduction (defined as a waiver of F&A) is strongly discouraged and requires prior approval from the Vice Provost for Research Administration. This exception does not apply to for-profit (industry) sponsors, as such sponsors are expected to provide full F&A when funding a sponsored project. Designation of a sponsored award as a gift will not preclude the recovery of indirect costs if such costs are allowed by the donor.

Facilities & Administrative (F&A) Cost Return and Use Policy:
Each year, the University returns a portion of the recovered F&A costs as appropriate to those generating the grants and contracts. This return of F&A costs generally occurs at the end of each fiscal year and is based upon the F&A costs recovered on sponsored projects during the preceding fiscal year (July 1 - June 30). For sponsored awards originating within academic units with a tenure stream Faculty Principal Investigator, recovered funds are distributed as follows.

- Faculty Principal Investigator – 12.5%*
- Faculty Home Department – 7.5%
- Appointing Officer of unit generating the recovered funds – 20%
- Provost – 20%
- General Fund (Facilities Infrastructure) – 40%

For all other proposals, recovered funds are distributed as follows.

- Appointing Officer of unit generating the recovered funds – 40%
- Provost – 20%
- General Fund (Facilities Infrastructure) – 40%

It is anticipated that, when appropriate, recovered funds will be used strategically for research initiatives, faculty start-ups, bridge funding and required cost share, and to provide the necessary administrative support for research projects. Indirect cost recovery funds cannot be used to increase the principal investigator's annual compensation.

Indirect cost revenue recovered on Financial Aid expenditures will not be allocated and all proceeds will be returned to the General Fund.

Charter Schools are not considered a sponsored program and therefore not affected by this policy.

*Note: if the recovered funds allocated to the Faculty PI are less than $500, funds will be deposited into departmental FOAPs rather than individual Faculty PI FOAPS

GENERAL RESPONSIBILITIES OF PRINCIPAL INVESTIGATORS/PROJECT DIRECTORS POLICY

SLT 3.11.5

Date of Last Update:
April 03, 2013

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY STATEMENT

The Principal Investigator/Project Director is responsible for a variety of general responsibilities, which are outlined in the following section.

PROCEDURES

Responsibilities

The following General Responsibilities form shall be provided by OSP to each Principal Investigator at the time of award. The Principal Investigator is responsible for signing and returning the original to OSP within five business days of its receipt. The original shall be retained in the award OSP record file in accordance with record retention guidelines. **The Principal Investigator/Project Manager is responsible for:**

- Compliance with the award terms and conditions. Notifying OSP of potential scope, budget or schedule shifts, and requesting/obtaining Authorizing Official review and approval of such, if required.
- Obtaining signatures on the (Request to Add a New Fund (RANF) form, and submitting the RANF to the Office of Business & Finance. A copy of the original proposal, notice of award, budget, and other official documents must be attached to the RANF form. The RANF will not be processed without these attachments.
- Ensuring that the Salary Request is prepared and signed by the Unit Head/Dean and other appropriate individuals. Salary Request letters accompany the signed RANF form.
- Management of the grant, contract/subcontract, or cooperative agreement and conducting the project to meet project goals and objectives while adhering to agency guidelines and GVSU policies and procedures.
- Ensuring that all individuals involved in the administrative and financial aspects of the award receive BANNER training.

  The Office of Grants Accounting will assist with the invoicing and accounting process. The PI is also responsible for ensuring that all grant expenditures are reviewed on a monthly basis (at a minimum) and ensuring that those expenses incurred are approved in the BANNER system.

- Ensuring that for those items acquired or purchased under the terms of the award and with grant funds that sponsor requirements and GVSU Purchasing Procedures are followed.
- Ensuring that all project expenditures are directly related to the project and necessary to meet project goals and objectives. Knowing the cost sharing requirements that were committed in the budget approved by the agency and GVSU and insuring that these obligations are met.
- Certifying the time/effort of personnel paid by the grant, contract/subcontract, or cooperative agreement, or cost sharing/matching time on the project.
- Completing a Conflict of Interest Financial Disclosure form, and having no conflict of interest that could affect the conduct of the project. Any such possible conflict of interest must be reported to OSP as soon as it is apparent.

- Ensuring that the PI as well as all undergraduate, graduate, or post-doctoral students receive Responsible Conduct of Research training, if required by the sponsor. PIs and students are required to sign a Completion of Training form confirming the date, receipt, and satisfactory completion of this training. The form must be returned to OSP for the record file.
- Ensuring that GVSU policies and federal regulations governing the protection of human research subjects are followed. Ensuring the adherence to federal governing regulations and GVSU Animal Care and Use Policy for the use of animals in research.
- Ensuring compliance with the GVSU policy on Political Activity, as well as ensuring compliance with the terms and conditions of an award governing such activity.
- Submitting required reports and/or documentation in a timely manner.
- Certifying that the PI, and any subcontractor or sub-recipient on this project, is not debarred, suspended or proposed for debarment by any federal entity. The PI agrees to notify the University (both OSP and Purchasing Dept.) of any change in this status, should one occur, until such time as an award is made under a procurement action. See www.sam.gov.

SERVICE AND CONSULTING AGREEMENTS POLICY

SLT 3.11.6

Date of Last Update:
October 15, 2018

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY STATEMENT

This document establishes Grand Valley State University's (University) official policy governing the approval and management of service or consulting agreements that employees through the University, meaning cases in which the University would be the contracting party. These are agreements under which Principal Investigator (PI)-Eligible faculty and/or Administrative/Professional (A/P) staff members are obligated to provide specified services or "deliverables" and that do not fall squarely within the traditional framework of research or

teaching activities. While these agreements may have research, scholarly, or other benefits to the University, those benefits are a secondary aspect, not the primary purpose of the activity. The terms “service agreement” or “consulting agreement” are intended to be descriptive; such agreements could have other labels or titles.

In some cases, employees who may consider providing services independently of the University as consultants will do this for their own account, on their own time, and using their own resources and subject to applicable University policies. However, review and approval of all proposed service and consulting agreements under this policy is required to ensure compliance with employment, tax, and intellectual-property law; regulatory requirements governing research and the use of certain kinds of data; and institutional policies regarding student engagement in externally funded activity and the appropriate use of University resources.

The University should be the contracting party only when justified by compelling reasons that meet the General Criteria of this policy. There are occasions, however, when a PI-Eligible faculty or AP staff member wants to provide a service through the university. For example, the activity may have a strong academic and/or university programmatic component and the faculty or A/P staff member may want to be able to use university facilities, resources, staff, or students to carry out the proposed contractual activity. In those circumstances, **this policy allows for the University to act as the contracting party**, **but only if the activity in question meets the General Criteria of this policy.**

By way of illustration, but without limitation, services that PI-Eligible faculty and A/P staff members may seek to provide through this policy may include:

- Performing an evaluation or assessment of an external program, such as an educational program or public-health initiative;
- Establishing rating criteria, such as standards for measuring health or safety outcomes;
- Providing technical assistance to a foreign government in areas such as social, health or economic services;
- Delivering professional-development services;
- Partnering with industry to engage students in technical projects the delivery of which will contribute to the educational goals of the students involved; and/or
- Assisting a city government in its urban planning.

PROCEDURES

This policy designates authority to the Vice Provost for Research Administration or their

designee to establish such operational procedures as deemed necessary to implement the policy, and ensure operational efficiency, proper oversight of compliance and financial management, and ensure the success of externally sponsored projects at the University.

DEFINITIONS

Authorized Organizational Representative (AOR): The official to whom the Provost delegates authority to submit proposals to fund and/or otherwise support externally sponsored projects on behalf of the University and to accept on behalf of the University any awards, contracts, or agreements resulting from such proposal submissions or other solicitation processes.

PI-Eligible: University faculty and AP staff members who are documented as eligible to serve as a Principal Investigator as defined in the University's Principal Investigator Eligibility Policy.

Benefits and Risks

Often, participating in service agreements involves high-profile and challenging projects that may benefit members of the university community by, for example:

- Adding significantly to faculty, staff, and student expertise;
- Demonstrable connections to curricular and co-curricular development, new teaching cases, program development in executive education, and professional development;
- Engaging faculty in domestic and international matters that are highly relevant to their teaching and scholarship, or employees in their administrative responsibilities; and/or
- Initiating or reinforcing strong institutional relationships that can serve long-term University interests.

Though there may be much to recommend the pursuit of these opportunities, especially where there is substantial potential to advance scholarship, education, and service, these arrangements may also pose risks that need to be managed. **Service and Consulting Agreements are more complicated for the University to manage than routine sponsored-project agreements because of the expectations of the external entities, who perceive themselves as clients or customers rather than sponsors.**

The following potential risk factors will be considered in the evaluation of Service and Consulting Agreements:

- The University, as the contracting party in these agreements, bears the risk of liability or reputational harm for non-performance or poor performance of agreed-upon tasks and for unsatisfactory contract "deliverables." Potential risks reach beyond the payments to

the University and could include monetary damages from the downstream effects of contested performance.

- Unlike in sponsored-project arrangements (i.e., assistance awards, such as grants or cooperative agreements), in which the sponsor may be presumed to be committed to the principles of objective science or the enhancement of the public welfare, “clients” or “customers” in service arrangements may be more focused on obtaining specific results and will likely be more involved in directing performance of the services. Institutional integrity and impartiality may be called into question if expectations are not properly managed at the outset.
- **The use of the University’s students and staff to assist in these projects also raises unique policy issues.** The University has a duty to students in particular. They should not be made to work on projects unless the work advances their educational goals. The interests of employees, students, and the institution must be safeguarded in the negotiation of such arrangements to assure them that they may generate and publish works of scholarship, receive proper credit for their work, obtain appropriate intellectual property or other proprietary rights in the work product, and avoid confidentiality or other obligations that may compromise transparency and injure reputations.

- Special attention must be paid to assure that these arrangements comply with the university’s obligations as a tax-exempt organization (e.g., IRS regulations regarding Unrelated Business Income).

General Criteria

The proposed Service and Consulting Agreement must:

1. Advance the core mission of the academic or non-academic organizational units that will carry it out;
2. Provide a significant institutional and/or public benefit; and,
3. If students are to participate in the activity, provide both a learning experience that advances student educational goals and that students will be free to use and disclose details of the experience in their academic and career pursuits, unless a Non-disclosure Agreement has been approved by the Office of the Vice Provost for Research Administration.

The determination as to whether a proposed Service and Consulting Agreement meets these criteria shall be the responsibility of the employee’s Appointing Officer. Such determinations

shall be documented using University procedures for sponsored activity.

In addition, the proposed Service and Consulting Agreement must:

1. Present manageable and limited risks;
2. Be accurately budgeted to generate sufficient revenue to pay for full performance that includes both the direct charges associated with the activity and the university's full federal negotiated facilities & administrative cost rate;
3. Be properly accounted for from a tax perspective;
4. Be reviewed and processed by the Technology Commercialization Office and the Office of Sponsored Programs (which may include the execution of a non-disclosure agreement to protect the intellectual property of the parties to the agreement; and
5. Receive approval from the employee's Appointing Officer.
6. Be approved and submitted by the Vice Provost of Research Administration and/or designee.

And finally, once the Service and Consulting Agreement is fully executed, and throughout the performance of the contractual scope of work, the PI and responsible organizational unit must ensure that the activity complies with:

1. The contracted scope of work, timeline, and all agreed deliverables;
2. All applicable federal and state laws and regulations (e.g., export controls, use of human or animal subjects, intellectual property rights, disclosure and mitigation of financial and other conflicts of interest); and
3. All relevant University policies, such as invoicing for payment via the central accounting office of the University, and the use of the University's name, facilities, equipment, supplies, and other resources.

PRINCIPAL INVESTIGATOR ELIGIBILITY POLICY

SLT 3.11.7

Date of Last Update:
October 15, 2018

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY

This policy establishes the eligibility requirements for and the duties and responsibilities of all Principal Investigators (PI) at Grand Valley State University (University). The policy also provides for the establishment of formal processes to request and approve exceptions to the PI eligibility requirements.

POLICY STATEMENT

For each externally sponsored project, it is customary to designate as PI **one person** who bears ultimate responsibility for scientific, technical, and programmatic decisions, and all financial, administrative, and compliance matters relating to the project. It is the policy of Grand Valley State University that only eligible University faculty, staff, and trainees and appointees (when appropriate) may serve as the PI on externally sponsored projects to be carried out on behalf of the University.

Serving as the nominal project leader to lend credibility to a proposal while delegating PI responsibility to another person (i.e. "fronting" as the PI) is never permissible and is considered a violation of this policy.

PI eligibility is conferred in one of two ways: (1) automatically, by position, and (2) via special request, both subject to training as required by this policy.

1. **Automatic Eligibility:** PI eligibility is automatically conferred upon tenured and tenure track faculty at the rank of Professor, Associate Professor, or Assistant Professor.

Special-Request Eligibility: If PI eligibility is not conferred automatically, it may be conferred by Special Request of the employee's authorizing official (dean, provost, vice president) or their designee(s)). Certain non-academic units (e.g., the University Art Gallery, Small Business Development Center, Johnson Center for Philanthropy, Van Andel Global Trade Center) may request long term PI status for the director, associate director, and other **Administrative/Professionals (regular, full-time employees), as they deem appropriate. These personnel are all subject to standard Compliance and Training requirements for PI Eligibility.**

1. *Fellowships and Training Opportunities*

Trainees (typically graduate students and post-doctoral fellows) may be eligible to be PIs on fellowship and training programs **when that designation is required by the funding agency** as documented in a funding opportunity announcement and a PI-eligible faculty or staff member is identified and documented as their sponsor/mentor. In this circumstance, a

trainee's PI eligibility is conferred and verified by the applicable Department/Unit Head's approval during the internal proposal-routing process. It is not necessary to document approval of trainee PI eligibility via Special Request.

Trainee PI status is consistent with the treatment of all Special Requests for PI eligibility, in that it is conferred on a case-by-case basis; it does not confer blanket PI eligibility status for any other externally sponsored projects.

Compliance and Training Requirements

However it is conferred, PI Eligibility Status is contingent upon the documented completion of all required compliance and sponsored-programs training. Training requirements, certification, and documentation are determined and administered collaboratively by the Vice Provost for Research Administration, the Office of Sponsored Programs, the Office of Research Compliance & Integrity, and the Controller.

PROCEDURES

This policy designates authority to the Vice Provost for Research and the Director of Sponsored Programs to establish such operational procedures as they deem necessary to implement this policy, and ensure operational efficiency, proper oversight of compliance and administration, and the success of externally sponsored projects at the University.

It is the responsibility of the Office of Sponsored Programs to review all proposals to fund externally sponsored projects to determine and document PI eligibility prior to proposal submission. Proposals put forward by individuals without documented PI eligibility will generally not be approved for submission. Awards resulting from proposals submitted by ineligible PIs who either knowingly or unwittingly circumvent the standard approval process will generally not be accepted by the University.

Responsibilities of All Principal Investigators

Although the University is legally responsible to the sponsor as the actual recipient of any externally sponsored award, the Principal Investigator (PI) is accountable for the proper fiscal management and conduct of the project. This includes managing the project within funding limitations and all of the terms of the award, assuring that the sponsor is notified when significant conditions related to project status change, and ensuring that all programmatic reporting requirements are met in a timely fashion. To assist PIs, the University provides supporting administrative services and has established procedures to help meet both sponsor and University requirements. While responsibility for the day-to-day management of project

finances may be delegated to administrative or other staff, accountability for compliance with federal requirements, University policies, and sponsor requirements ultimately rests with the PI. The full cooperation and vigilance of the PI, along with the University, is necessary to maintain the stewardship role.

1. Preparation of Proposals

Principal Investigators have primary responsibility for planning and carrying out the preparation and submission of proposals for external support. Although PIs may have administrative staff to assist with the proposal-development process, they are ultimately responsible for the quality and scientific integrity of the proposal, and for understanding and complying with all University policies for managing external support.

a. Technical Proposal

The Principal Investigator is responsible for preparing the technical proposal.

b. Proposal Budget

The Principal Investigator prepares, or directly supervises the preparation of, all aspects of the proposed budget and budget justification. This responsibility includes coordination with Procurement Services and compliance with all procurement policies and procedures. It also includes identifying any requests and sufficient resources for cost sharing (including matching funds); the need for space or space modifications (including any accommodations for large and/or unusual equipment); and the need for outside collaborators (sub-recipients, contractors, consultants). The PI ensures all costs are allowable, allocable, and reasonable for the project in accordance with the federal cost principals set out in OMB 2 CFR 200, and that all proposals include full recovery of all anticipated project costs. Full recovery includes recovery of indirect costs at GVSU's negotiated federal rate or (in the case of non-federal sponsors or federal training grants) the maximum rate allowed under published sponsor policy.

c. Regulatory Requirements

The PI is responsible for anticipating whether the research will involve human subjects, live animals as subjects, recombinant DNA, infectious agents, narcotics or biological toxins, human blood or body fluids, radioactive materials, hazardous materials, export controls, conflicts of interest, or other regulated activities requiring University review or clearance. The PI is responsible for preparing information and forms required for review by the University's Office of Research Compliance & Integrity.

d. Project Approvals

The Principal Investigator prepares, or directly supervises the preparation of, and electronically signs internal proposal-approval forms, and requests required approvals in

a timely fashion.

2. Acceptance of the Award

The PI is responsible for collaborating with the Office of Sponsored Programs in any negotiations with the sponsor relating to modifications of the project scope or budget or proposed terms and conditions of the award.

The Principal Investigator is responsible for reviewing and approving the award agreement, in conjunction with OSP, including the scope of work, budget, and the special terms and conditions of the award, and for managing the award in accordance therewith.

3. Conduct and Management of Award

The Principal Investigator is responsible for all actions required to manage and complete the scientific, programmatic, and financial aspects of the externally sponsored project in accordance with all of its terms and conditions, including the performance of all sub-recipients. The Principal Investigator is also responsible for the management of the award budget and expenditures in accordance with federal, GVSU, and sponsor requirements. This responsibility includes attesting to the allowability, allocability, and reasonableness of all expenditures. Principal investigators are responsible for routine monitoring of the status of grant accounts to prevent overdrafts and incorrect charges and to ensure that unallowable costs are not charged to an award.

The Principal Investigator is responsible for the timely submission of all required programmatic reports, interim and final. The information contained in such reports must be supported by adequate documentation. The Principal Investigator will provide copies of all required programmatic and progress reports to the OSP and the Grants Accounting office.

DEFINITIONS

Externally Sponsored Project: All grants and cooperative agreements (direct assistance actions); all incoming or outgoing sub-recipient agreements or subawards (pass-through assistance actions); certain incoming or outgoing contracts (i.e., *externally sponsored* procurement actions), including direct contracts, service agreements, and consulting agreements; pass-through subcontracts and service agreements; and certain other agreements, including master collaboration agreements, material transfer agreements, and data-use agreements—whether funded or unfunded. *Externally sponsored projects do* ***not***

include purchasing agreements or philanthropic gifts.

Principal Investigator (PI): An individual with a formal affiliation with the University, normally an employee, who is or becomes eligible under this policy to submit a proposal for extramural support for a research, training, public-service, or other externally sponsored project, who personally participates in the project to a significant degree, and who has primary responsibility for the scientific, technical, programmatic, and administrative conduct and reporting of the project, including compliance and financial matters. A Principal Investigator who is the head of a training or other sponsored project may be known as a Project Director. For the purposes of this policy, the terms shall be considered equivalent. The University only recognizes one individual as the Principal Investigator and this individual must personally participate in the project to a significant degree.

Co-Investigator (Co-I): An investigator who will share responsibility for the scientific, technical, and/or administrative conduct and reporting of a research or sponsored project with the Principal Investigator. Each individual named as a Co-Principal Investigator at the University must meet the same eligibility requirements as a PI as noted above. There may be more than one Co-Principal Investigator, but one person is designated as the leader (PI) of the project. While the University allows this approach, not all sponsors allow Co-PI models. In certain cases, a sponsor (e.g., the National Institutes of Health—NIH) may allow a **Multiple Principal Investigator** model to be employed in a research or sponsored project. Such models feature multiple PIs who are expected to equally share responsibility for leadership of multidisciplinary and other types of “team science” projects that are not optimally served by the single Principal Investigator model. Such models typically require a single “Contact PI” and special justification in the form of a Multi-PI Plan that documents processes for project governance and resolution of conflicts.

TRAINING OF PERSONNEL INVOLVED IN ANIMAL RESEARCH

SLT 3.13

Date of Last Update:
July 31, 2008

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY STATEMENT

In conduction of research, all people working with laboratory animals must be qualified to do so in order to ensure the humane treatment of animals. As such, Grand Valley complies with the Animal Welfare Act as described below.

PROCEDURES

The Animal Welfare Act (AWA) Sec. 2.32 (a), (b), and (c) specify:

(a) It shall be the responsibility of the research facility to ensure that all scientists, research technicians, animal technicians, and other personnel involved in animal care, treatment, and use are qualified to perform their duties. This responsibility shall be fulfilled in part through the provision of training and instruction to those personnel.

(b) Training and instruction shall be made available, and the qualifications of personnel reviewed, with sufficient frequency to fulfill the research facility's responsibilities under this section and §2.31.

(c) Training and instruction of personnel must include guidance in at least the following areas:

(1) Humane methods of animal maintenance and experimentation, including:

(i) The basic needs of each species of animal;

(ii) Proper handling and care for the various species of animals used by the facility;

(iii) Proper pre-procedural and post-procedural care of animals; and (iv) Aseptic surgical methods and procedures;

(2) The concept, availability, and use of research or testing methods that limit the use of animals or minimize animal distress;

(3) Proper use of anesthetics, analgesics, and tranquilizers for any species of animals used by the facility;

(4) Methods whereby deficiencies in animal care and treatment are reported, including deficiencies in animal care and treatment reported by any employee of the facility. No facility employee, Committee member, or laboratory personnel shall be discriminated against or be subject to any reprisal for reporting violations of any regulation or standards under the Act;

(5) Utilization of services (e.g., National Agricultural Library, National Library of Medicine) available to provide information:

(i) On appropriate methods of animal care and use;

(ii) On alternatives to the use of live animals in research;

(iii) They could prevent unintended and unnecessary duplication of research involving animals; and

(iv) Regarding the intent and requirements of the Act.

The *PHS Policy*, Section IV.C.1.f. places the responsibility specifically with the IACUC to ensure that personnel conducting procedures on research animals are appropriately qualified and trained in those procedures. The Institutional Animal Care and Use Committee may require additional training for each individual, depending on their prior training and experience with animals.

ANIMALS ON PROPERTY OWNED OR CONTROLLED BY THE UNIVERSITY

SLT 6.1

Date of Last Update:
August 23, 2024

Approved By:

- Senior Leadership Team

Responsible Office:
Public Safety

POLICY

This Policy applies to all faculty, students, staff, contractors, vendors, and visitors.

POLICY STATEMENT

This policy is intended to enhance the safety and health of students, faculty, staff, contractors, vendors, and other visitors and to supplement the existing GVSU policies, by

providing rules and regulations regarding the presence of animals in GVSU facilities.

No person shall bring any animal(s) onto University-owned or controlled property unless otherwise permitted by this or other University policy as listed below. *

Service Animals, Service Animals in Training, and Emotional Support Animals are exempt from this policy and are permitted on University-owned or controlled property in accordance with the University's Service Animal and Emotional Support Animal Policy.

PROCEDURES

A. Permitted Animals:

1. Animals accompanied by members of the University community and visitors, provided that the animal remains on sidewalks and University walkways.
2. Animals being transported and which remain inside of a vehicle.
3. "Duty animals" under the control of a law enforcement officer or animals used for "assisted therapy" in the University Counseling Center. These animals are trained and certified to provide psychological, physiological, and law enforcement duties to individuals or groups.
4. Animals approved by the University for use in research or for instructional purposes.
5. Animals brought on campus for a special event sponsored by the University or a student organization provided that the event has been pre-approved in writing by the Dean for the sponsoring college or department or by the Office of Student Life.

B. General Requirements:

1. All animals must be licensed, vaccinated, and tagged as required by applicable law.
2. All animals must be under the control of their owner and leashed or in an appropriate animal carrier.
3. Persons bringing animals onto University owned or controlled property as permitted by this Policy are solely responsible for:

   a. Ensuring that animal droppings or other waste are picked up, thoroughly cleaned up, and properly disposed of in designated outdoor receptacles.
   b. Reimbursing the University for the costs associated with the repair of any real and/or personal property and/or University facility damaged directly or indirectly by the animal or the animal's presence.
   c. Assuming full responsibility for any harm caused to others by their animal, including medical expenses.

4. Animals may not be cleaned or groomed in rest rooms, locker rooms, or other University facilities, except as authorized by University personnel.
5. Individuals bringing animals on campus must comply with all other applicable University ordinances, policies, practices, and procedures and any applicable local, state, or federal ordinance, statute and/or regulation.

C. Enforcement of Complaints:

1. If you become aware of a violation of this policy, you are encouraged to attempt informal methods of resolution. For example, if you recognize the person violating this policy, you might contact them or their supervisor to make them aware of the problem. If that is not successful and/or if you are not comfortable approaching the person violating the policy or their supervisor, then the Department of Public Safety should be notified. The Department of Public Safety may pick up the animal and hold it for 48 hours. Animals not claimed during that time will be turned over to the county animal control officer and the owner of the animal will be responsible for any associated fees.
2. Students in violation of this policy will be referred to the University conduct process through the Dean of Students Office and may be assessed a fine of up to $250. Employees in violation of this policy will be referred to the Human Resources Office for possible disciplinary action.

D. Policy Modifications

Faculty and staff wishing to request a modification or exception to this policy as a reasonable accommodation should contact the Employee Accessibility Resources.

Students wishing to request a modification or exception to this policy as a reasonable accommodation should contact Student Accessibility Resources.

*For purposes of this Policy, “University Facility or Facilities” means any building, facility, structure, or improvement, open or enclosed, that is owned, licensed, leased by, or under the control of the University.