



POLICY STATEMENT 83 GRANTS AND SPONSORED PROGRAMS

POLICY DIGEST

Primary Monitoring Unit: Academic Affairs
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I. AUTHORITY AND GUIDELINES

Louisiana State University at Eunice was established in 1964 by the Louisiana Legislature through act [R.S. 17:1521](#) and is a two-year campus of the Louisiana State University and Agricultural and Mechanical College. The State Constitution of 1974 [Article VIII section 7-A](#) identifies the Board of Supervisors as the management board of the Louisiana State University and Agricultural and Mechanical College. Since its establishment, the LSU Board of Supervisors has had the specific legal authority over LSU Eunice as indicated by [Article I](#) of the LSU Board of Supervisors Bylaws (September 13, 2021).

LSU Eunice sets policies and procedures relating to grant development and management guided by documents of the LSU Board of Supervisors Bylaws & Regulations. [Article VI of the LSU Board of Supervisors Regulations](#) (September 13, 2021) outlines terms and conditions that apply to acquiring gifts and grants by all units of LSU. Acquisition of gifts and grants is encouraged according to this regulation: “Instruction and research are so inseparable and essential to the highest efficiency of a university that the University looks with favor upon acceptable proposals for research and related contracts with State and Federal agencies and with private individuals and corporations.”

Two LSU Permanent Memoranda discuss topics relating to grant development. [LSU PM-10:](#) (September 26, 1991): Indirect Cost Allowances on Grants and Contracts relays LSU policy relating to indirect cost rates to be charged on grants. [LSU PM-27](#) (April 21, 1998): Policy on Placement of Sponsored Agreements relays additional information relating to authority for external funds received. [LSU PM-27](#) requires that all sponsored agreements (federal, state, and private) obtained by University employees be awarded to the University.

II. CONTROL OF EXTERNALLY FUNDED PROGRAMS

All monies, programs, and intellectual property (LSU Eunice PS No 59: Intellectual Property) acquired by faculty or staff of LSU at Eunice that uses the University name, the official University title for the applicant, requires use of state and/or University property, involves employee time and effort, or includes student participation remains at all times within the full control of the University. [LSU PM-27](#) states that, “Effective immediately, it is the policy of this University that all sponsored agreements (federal, state, and private) obtained by University employees be awarded to the University.” Accordingly, grants submitted by faculty or staff of LSU Eunice must be awarded to the University with the knowledge of LSU Eunice

44 administrators and with final approval provided by the University Chancellor. A copy of the
45 required Routing Form for grants submitted by LSU Eunice is available on the [Office of Grants](#)
46 website.

47 Further, proposed projects must be consistent with University, Division, and Program visions
48 and missions. Although the primary mission of LSU Eunice is teaching, individuals who choose
49 to conduct research are encouraged to pursue grant funding. Examples of grant purposes
50 include (but are not limited to):

- 51 A. promoting teaching excellence,
- 52 B. enhancing learning opportunities for students,
- 53 C. acquiring cutting edge technology for teaching labs,
- 54 D. professional development,
- 55 E. curriculum development,
- 56 F. demonstration and model projects, and
- 57 G. incorporating current computer software and applications in the processes of
58 administration, teaching, learning, and assessment.

59 **III. GRANT MANAGEMENT**

60 The Principal Investigator, program/project manager, or otherwise designated grant
61 director/coordinator (hereafter referred to as the PI/PD) maintains responsibility for execution of
62 the grant work plan according to the agreed-upon timeline. Other responsibilities include budget
63 management, including ordering of all supplies and equipment; timely progress and financial
64 reports, as specified in the grant contract; development or supervision of the development of
65 deliverables; formative and summative program evaluation activities; and initiation of any
66 contract amendments or extensions of the original timeline necessary for successful completion
67 of the project. When a project incorporates an outside evaluator, the PI/PD serves as liaison
68 between the University project staff and the evaluator.

69 When a grant is awarded to the University, funding entities will provide a contract that can be
70 negotiated based on the level of funding offered. In instances where a separate contract is not
71 developed, the original proposal (or mutually agreed upon amended proposal) becomes a
72 binding contract that guides the implementation and management of the grant award. The
73 University is legally bound to adhere to the terms of the contract or the original or amended
74 grant. The Grants Office is the official repository of all funded grants.

75 **IV. EXPENDITURE AND MANAGEMENT OF EXTERNAL FUNDS**

76 The University and the PI/PD are bound by the policies of the federal, state, or private grant
77 maker relating to the use of grant funds. Examples of relevant policies and guidelines that may
78 apply depending on funding source are:

- 79 A. Office of Management and Budget, 2 CFR Chapter I, Chapter II, Part 200, et al, Uniform
80 Administrative Requirements, Cost Principles, and Audit Requirements for Federal

81 Awards, published on December 26, 2013 in the Federal Register (informally referred to
82 as the Supercircular or the Omni Circular).

83 B. Education Department General Administrative Regulations (EDGAR). These
84 administrative regulations relate to grants funded by the U.S. Department of Education
85 and reference 34 CFR Parts 75 through 81 and 2 CFR Part 200. (CFR refers to the
86 Code of Federal Regulations).

87 C. Additional cost principles or administrative guidelines published by a U.S. federal agency
88 or department that awards a grant may be more (but not less) restrictive than the above
89 OMB circulars.

90 D. Policies published by the Board of Regents or other state entity that grants funds, for
91 example:

92 1. Individual policies for various grants published on the Board of Regents web space,

93 2. RFPs or contracts published by the Board of Regents that incorporate policies
94 relating to individual sources of funds (see the Board of Regents, Office of
95 Sponsored Projects), and

96 3. RFPs and funding manuals published by the Louisiana Community & Technical
97 College System for state grant programs managed by that entity (for example, Rapid
98 Response and Carl D. Perkins Career & Technical Education grants).

99 E. Policies and guidelines provided by private funding sources, such as private foundations,
100 corporate foundations, or other non-federal/non-state entity. These guidelines may be
101 published on a funder's web space or provided in hard copy upon initiation of a grant
102 contract.

103 In addition to the guidance offered by the above publications and manuals, LSU Eunice PI/PDs
104 are expected to abide by the following policies/procedures of LSU Eunice:

105 A. Purchases by University Personnel which offers guidelines for purchasing supplies,
106 equipment, and other items irrespective of the source of funds available in the Employee
107 Handbook.

108 B. Fraudulent and Unethical Behavior Policy which outlines behaviors that are not
109 permitted pertaining to the use of LSU Eunice grant funds available in the Employee
110 Handbook.

111 C. Louisiana State University Travel Regulations as defined in [LSU PM-13](#).

112 D. LSU Eunice [PS-74](#): Principal Investigator's Manual for Research Involving Human
113 Subjects relates to projects which will incorporate human subjects as part of research
114 design.

115 **V. INDIRECT COSTS**

116 Grants and contracts frequently have costs for the campus (referred to as Indirect Costs) that
117 are beyond the scope of the direct costs which are included in the grant budget. Indirect Costs

118 may include (but are not limited to) the following: accounting assistance provided by the Office
119 of Business Affairs, reference assistance provided by the LeDoux librarians, utilities and
120 maintenance of space/building used to accomplish grant activities, and other services provided
121 by the University which are not included in the grant budget. Items included in the grant budget
122 are considered direct costs.

123 Other terms sometimes used to indicate indirect costs are Facilities and Administrative (F&A)
124 costs, administrative costs, and overhead. These costs are described as costs incurred by the
125 University in the conduct of a grant program that are difficult to itemize. [LSU PM-10](#) states:

126 The sponsored programs in which LSU is extensively engaged causes the University to
127 incur indirect costs which cannot be specifically identified with the sponsored project.
128 These expenses are nevertheless significant and must in most instances be recovered.
129 The University would otherwise be required to underwrite a greater share of the cost of
130 such indirect expenses than it is presently doing.

131 State grant funding sources frequently do not allow any indirect costs. This is justified by the fact
132 that public institutions of higher education receive funds from the state in other contexts, such
133 as state appropriations for operating budgets. This helps eliminate the possibility of supplanting.
134 Supplanting is defined as using federal or state funds to fund items the organization would
135 normally fund without a grant.

136 The officially designated agency of the federal government that negotiates allowable indirect
137 rates with LSU Eunice is the Department of Health and Human Services. Rates are set by the
138 agency for programs that occur on campus (generally a higher rate) and programs that occur off
139 campus (a lesser amount). These negotiated rates generally apply for a two-year period and
140 then are re-negotiated. The rates are set according to a proposal submitted by the University
141 outlining the various costs that may be incurred in the conduct of federal grants. Copies of
142 current rates may be obtained from the Office of Business Affairs or the Office of Grants on
143 campus.

144 The above rates apply to grants with federal entities. At times, these rates may be used on
145 private funding sources if the funding entity recognizes the need to provide services not directly
146 outlined in the grant. Some federal departments set an upper limit on the indirect rate that may
147 be charged to a grant. This applies to the U.S. Department of Education (DoE) relating to TRIO
148 and other educational grants. According to EDGAR, DoE limits the allowable indirect rate to 8%
149 (34 CFR Part 75, Section 75.562). LSU Eunice encourages the inclusion of an indirect cost in all
150 grants where such costs are allowable. State agencies handling “pass through” grants (federal
151 or state funds received by one designated agency and then granted or allocated to another
152 entity) may set indirect or administrative caps on funds. These caps cannot exceed the
153 maximum allowable and will frequently be more restrictive than the maximum allowable amount
154 specified by the original granting entity.

155 **VI. SUPPORT FOR GRANT DEVELOPMENT**

156 The mission of the LSU Eunice Office of Grants is to promote the processes of grant research,
157 planning, development, and review by faculty and staff. Funding from public and private external
158 sources supports the strategic goals and priorities of the institution and individual programs.
159 Funding is sought to promote institutional growth, enhance teaching and learning, and meet
160 needs of our students and communities.

- 161 Services available to faculty and staff who wish to explore grant development include:
- 162 A. Planning and coordination of grant writing workshops,
 - 163 B. Assist in identifying potential funding sources,
 - 164 C. Input in grant planning and brainstorming of key concepts,
 - 165 D. Dissemination of timely grant-related information,
 - 166 E. Review of grants for adherence to funders' guidelines,
 - 167 F. Review of expenditures to assure compliance with funding agency requirements,
 - 168 G. Coordination of the Perkins Grant in support of career and technical education, and
 - 169 H. Assist faculty and staff members in proposal development and preparation.

170 VII. RESOURCES AVAILABLE

171 Resources are available to assist with grant development and submission. Documents that may
172 be used in grant planning and development are as follows:

- 173 A. [Grant Routing and Approval Signature Form](#)
- 174 B. [Brainstorming Guidelines](#)
- 175 C. [Preliminary Grant Planning Instrument](#)
- 176 D. [Grant Flow Chart](#)
- 177 E. [Grant Development Timeline](#)