



## 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.

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 Regulations of the LSU Board of Supervisors](#) 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: Indirect Cost Allowances on Grants and Contracts](#) details the LSU policy relating to indirect cost rates to be charged on grants. [LSU PM-27: Policy on Placement of Sponsored Agreements](#) explains 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 administrators and with final approval provided by the University Chancellor. A copy of the

required Routing Form for grants submitted by LSU Eunice is available on the [Office of Grants](#) website.

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

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

### III. GRANT MANAGEMENT

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

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

### IV. EXPENDITURE AND MANAGEMENT OF EXTERNAL FUNDS

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

- A. [Office of Management and Budget, 2 CFR Chapter I, Chapter II, Part 200](#), et al, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, last amended on January 3, 2025 (informally referred to as the Supercircular or

the Omni Circular).

- B. [Education Department General Administrative Regulations](#) (EDGAR). These administrative regulations relate to grants funded by the U.S. Department of Education and reference [34 CFR Parts 75 through 81](#) and [2 CFR Part 200](#). (CFR refers to the Code of Federal Regulations).
- C. Additional cost principles or administrative guidelines published by a U.S. federal agency or department that awards a grant may be more (but not less) restrictive than the above OMB circulars.
- D. Policies published by the Board of Regents or other state entity that grants funds, for example:
  - 1. Individual policies for various grants published on the [Board of Regents](#) web space,
  - 2. RFPs or contracts published by the Board of Regents that incorporate policies relating to individual sources of funds (see the Board of Regents, Office of Sponsored Projects). For example, see [Strengthening Career and Technical Education for the 21st Century \(Perkins V\) Act Title 2: Federal Financial Assistance](#) (previously Uniform Grant Guidance), includes
    - a. [Part 180 OMB Guidelines to Agencies on Government-wide Debarment and Suspension \(Non-procurement\)](#),
    - b. [Part 3485 Non-procurement Debarment and Suspension](#),
    - c. [Title 34: Education](#), specifically
      - i. [Part 75](#) (Direct Grant Programs),
      - ii. [Part 76](#) (State Administered Formula Grant Programs),
      - iii. [Part 77](#) (Definitions That Apply to Department Regulations), and
      - iv. [Part 81](#) (General Education Provisions Act—Enforcement).
  - 3. RFPs and funding manuals published by the Louisiana Community & Technical College System for state grant programs managed by that entity (for example, Rapid Response and Carl D. Perkins Career & Technical Education grants).
- E. Policies and guidelines provided by private funding sources, such as private foundations, corporate foundations, or other non-federal/non-state entity. These guidelines may be published on a funder's web space or provided in hard copy upon initiation of a grant contract.

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

- A. Purchases by University Personnel which offers guidelines for purchasing supplies, equipment, and other items irrespective of the source of funds available in the [Employee](#)

[Handbook](#).

B. Fraudulent and Unethical Behavior Policy which outlines behaviors that are not permitted pertaining to the use of LSU Eunice grant funds available in the [Employee Handbook](#).

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

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

## V. INDIRECT COSTS

Grants and contracts frequently have costs for the campus (referred to as Indirect Costs) that are beyond the scope of the direct costs which are included in the grant budget. Indirect Costs may include (but are not limited to) the following: accounting assistance provided by the Office of Business Affairs, reference assistance provided by the LeDoux librarians, utilities and maintenance of space/building used to accomplish grant activities, and other services provided by the University which are not included in the grant budget. Items included in the grant budget are considered direct costs.

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

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

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

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

The above rates apply to grants with federal entities. At times, these rates may be used on private funding sources if the funding entity recognizes the need to provide services not directly outlined in the grant. Some federal departments set an upper limit on the indirect rate that may be charged to a grant. This applies to the U.S. Department of Education (DoE) relating to TRIO and other educational grants. According to EDGAR, DoE limits the allowable indirect rate to 8% ([34 CFR Part 75, Section 75.562](#)). LSU Eunice encourages the inclusion of an indirect cost in all

grants where such costs are allowable. State agencies handling “pass through” grants (federal or state funds received by one designated agency and then granted or allocated to another entity) may set indirect or administrative caps on funds. These caps cannot exceed the maximum allowable and will frequently be more restrictive than the maximum allowable amount specified by the original granting entity.

## **VI. SUPPORT FOR GRANT DEVELOPMENT**

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

Services available to faculty and staff who wish to explore grant development include:

- A. Planning and coordination of grant writing workshops,
- B. Assist in identifying potential funding sources,
- C. Input in grant planning and brainstorming of key concepts,
- D. Dissemination of timely grant-related information,
- E. Review of grants for adherence to funders' guidelines,
- F. Review of expenditures to assure compliance with funding agency requirements,
- G. Coordination of the Perkins Grant in support of career and technical education, and
- H. Assist faculty and staff members in proposal development and preparation.

## **VII. RESOURCES AVAILABLE**

Resources are available to assist with grant development and submission. Documents that may be used in grant planning and development are as follows and are available on the [Office of Grants Website](#):

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