

Procedure for USA-funded research projects

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Description:

The procedure applies to research projects funded from the USA, federal as well as private funders, where Stockholm University enters into an agreement with the funder or with a main applicant, including subawards/subrecipient awards (agreements with main applicant).

1 Introduction

The procedure applies to research projects with grants from funders in the United States of America (USA), federal as well as private, where Stockholm University enters into an agreement with (i) the funder (grant agreement/contract) or (ii) a main applicant (e.g. PTE = Pass-Through Entity, usually a US university). This includes subawards/subrecipient awards (agreements with main applicants).

Stockholm University, as a legal entity, signs these agreements. This has prompted the University to establish a special administrative procedure for funding from the USA and to develop administrative support in the implementation of the projects. The procedure aims to ensure high quality and good practices in the administrative support.

In addition, the decision-making and delegation policy of Stockholm University and the provisions of the University's governing documents apply.

Research funding from federal authorities in the United States is subject to a wide-ranging common regulatory framework (notably the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as well as to rules which are specific to a given authority and to a certain grant agreement. Most major foundations and other private funders also refer, in whole or in part, to the federal regulations. Private funders also have their own regulations to a greater or lesser extent.

Specific requirements apply to research on humans funded by the US Department of Health and Human Services, as well as research with funding from other federal authorities which have adopted the Federal Policy for the Protection of Human Subjects (usually referred to as “The Common Rule”). Among other things, ethical oversight by an “Institutional Review Board (IRB)” may be required.

The procedure is intended for the core activities of the University carrying out research as well as administrative staff providing support to departments and centres organisationally placed under a faculty.

2 Procedure for USA-funded research projects

2.1 Pre-application support

All research applications must be approved by the head of department/director of the department/centre concerned organisationally placed under a faculty. Approval is obtained in writing by the Office for Research, Engagement and Innovation Services (REIS) and is kept at REIS.

REIS assists the researcher and the department/centre organisationally placed under a faculty in preparing the submission of the application. In order to ensure that support can be provided, REIS should be contacted by the researcher at least ten (10) working days prior to the final date for submission and provided with complete information on the requirements for the application.

REIS shall inform the responsible researcher of the importance of determining whether an ethical review of the research project is needed. If necessary, REIS offers support on research ethics issues.

The researcher completes the application and submits a PI assurance (PI = Principal Investigator), confirming that the content is correct. REIS submits the application when it is complete, for example by approving it in the funder's digital system. The application must be ready to be submitted no later than two (2) working days prior to the final date for submission.

2.2 Support in processing agreements

When funding has been granted, a phase will be initiated in which agreements are processed. REIS is responsible for processing these agreements.

2.2.1 Contracts and subcontracts

The researcher informs the head of department/director reporting directly to the dean of the faculty that the funding has been granted. REIS obtains and saves written approval that the grant will be accepted from the head of department/director reporting directly to the dean of the faculty and from the Deputy Vice President.

REIS ensures that the contract proposal from (i) the funder or (ii) the PTE (main applicant) is reviewed either by REIS or by the legal counsels at the Office of the President. The legal counsels review all contracts where a grant to SU exceeds the equivalent of 6 million SEK, or half a million SEK in the case of commissioned research. REIS communicates comments from the review to the researcher, the department/centre organisationally placed under a faculty and negotiates the contract with the funder/main applicant.

The approved contract proposal results in an agreement with (i) the funder or (ii) the main applicant which is signed by the head of REIS. For grants to SU exceeding the equivalent of 6 million SEK, the contracts are signed by the President. In the President's decision-making meetings, REIS reports the agreement for signing by the President.

REIS registers and files the contract.

2.3 Support during the funding period

REIS continuously assists the researcher and the department/centre organisationally placed under a faculty during the funding period in administrative, legal and research ethical matters. Day-to-day work during the project is carried out at the department/centre organisationally placed under a faculty. The department/centre organisationally placed under a faculty orders a project identification number in the University's financial system.

2.3.1 Amendment of contracts and subcontracts

If changes occur within a contract or subcontract, it must be amended. This is initiated (in most cases) by the funder or the main applicant. In most cases, multi-year projects are also prolonged annually through an amendment. REIS handles the University's administrative activities concerning an amendment of contract or subcontract together with the responsible researcher and in consultation with the department/centre organisationally placed under a faculty and, if necessary, the legal counsels at the Office of the President.

Amendments to contracts and subcontracts are registered and filed in the same way as the original contract.

2.3.2 Ethics review and reporting

REIS assists the researcher and department/centre organisationally placed under a faculty if support is needed in research ethical matters. This includes coordinating the review which some projects need to go through by an Institutional Review Board (IRB). See also “Routine for Institutional Review Board (IRB) ethical review of research at Stockholm University”¹.

2.4 Financial reporting and auditing

A cost report must be prepared at the involved department/centre organisationally placed under a faculty, in consultation with the researcher, and, if necessary, with the support of REIS.

The cost report must be reviewed and checked by the administrative staff responsible for the project's finances at the department.

If the University receives 750,000 USD (or more) per year in total federal funding, the University must either (i) undergo a so-called "single audit" (covering the entire academic institution) or (ii) submit a grant-specific audit report to the funder or the main applicant. Both audits must be commissioned or procured from an external audit firm. The funder can also initiate a review of the institution (e.g. a Foreign Organization System (FOS) Review). REIS provides assistance to the University and the department/centre organisationally placed under a faculty in matters such as described in this paragraph.

2.5 Projects shared between two or more departments/centres organisationally placed under a faculty

If, at the time of the application, it is clear that the project is to be shared between two or more departments/centres organisationally placed under a faculty, the heads/directors of all the departments/centres involved must approve the application.

Furthermore, all the heads/directors of departments/centres involved must accept to receive the external funding which is granted. The heads of department/directors are also responsible for establishing agreements between the departments/centres involved on the allocation of matters such as responsibilities, tasks and budget. REIS assists the departments in this.

Project identification numbers are ordered by the departments/centres organisationally placed under a faculty engaged in the project, where the sum of the external funding of all project identification numbers corresponds to the total amount granted in the contract.

3 Follow-up of the procedure

Follow-up of the procedure is the responsibility of REIS. The follow-up is carried out when necessary.

¹ [Research - Staff \(su.se\)](https://www.su.se/research-staff)