



Campus Administrative Policy

Policy Title: Roles and Responsibilities for Sponsored Project Administration, 4-13

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Approved by: Vice Chancellor for Research

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Applies to: CU Anschutz Medical Campus
CU Denver Campus

A. INTRODUCTION

The purpose of this policy is to establish guidelines for the roles and responsibilities of Principal Investigators (PIs), their administrative units, and the Office of Grants and Contracts in the administration and management of sponsored projects. An understanding of the roles and responsibilities for sponsored projects will result in more effective and efficient management including meeting of project deadlines, reducing duplicate efforts, complying with regulations and grant/contract terms, achieving budget expectations, and establishing accountability.

The University of Colorado Denver | Anschutz Medical Campus Principal Investigator (PI) and the university administrative unit (i.e., part of a school, department, division, center, institution section or large program) are jointly responsible for complying with and enforcing the following policies and procedures. Any penalties, disallowance, or losses of funding caused by non-compliance with this policy will be the responsibility of the administrative unit in violation of the policy.

This policy applies to all PI's, personnel delegated responsibility to handle PI roles and

responsibilities (hereinafter referred to as “designee”), appropriate administrative unit(s), and OGC staff.

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C. DEFINITIONS

1. Application is the form(s) or document(s) required by external agencies or entities when applying for funding for a sponsored project. The words “application” and “proposal” are used interchangeably in this policy.
2. Facilities and Administrative Costs, for sponsored project costing purposes, are those that are incurred for common or joint objectives (research, instruction, public service, or patient care) and, therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other University of Colorado activity.

Federal guidelines refer to these costs as “Facility and Administrative” (F&A) costs.

Office of Management and Budget (OMB) Circular A-21 defines facility costs as “...depreciation and use allowances; interest on debt associated with certain buildings, equipment and capital improvements, operation and maintenance expenses and library expenses”. Administrative costs are defined as “...general administration and general expenses, departmental administration, sponsored projects administration, student administration and services, and all other types of expenditures not listed specifically under one of the subcategories of Facilities.”

If the university treats a particular type of cost as an F&A cost for sponsored projects, then all costs incurred for the same purpose, and in like circumstances, must be treated as F&A for all activities at the university.

3. Electronic Personnel Effort Reporting (ePER) System is University of Colorado system, web-based method used to document and certify the level of effort that has been devoted by an individual to a sponsored project(s) during a specific period of time. ePERs are reported on a semester, after-the-fact basis (i.e., fall, spring and summer).
4. Post-award is the period from actual receipt of an award document or fully executed agreement through final project technical and financial reporting, closeout from the accounting system, and audit resolution.

5. Pre-award is the period of time during which a proposal is developed, reviewed, submitted to a funding agency, and, if necessary, negotiated prior to actual receipt of an award document or fully executed agreement.
6. PI is typically a faculty member who submits or submitted an application or proposal that was accepted and funded by a sponsoring agency. The PI has primary responsibility for technical compliance, completion of programmatic work, and fiscal stewardship of sponsor funds.
7. Proposal is a document in which the prospective PI describes a plan for a research, training, or other project and requests financial support. The words “proposal” and “application” are used interchangeably in this policy.
8. Sponsored Projects are research, instructional, or public service activities that are related to the mission of the university and sponsored by external agencies or entities.

If an award meets at least one of the following criteria, it is likely a Sponsored Project. However, the existence of any one of the criteria may not be determinative.

- a. The award is a grant or contract from a governmental entity, unless exempted under OMB Circular A-21.
- b. The proposal responds to a Request for Application (RFA), Request for Proposal (RFP), or other formal solicitation, and the project is initiated by notice of award. Certain RFPs issued by private charitable foundations may not qualify as a Sponsored Project.
- c. The award includes terms that bind the university to a list of scholarly or scientific inquiry.
- d. The Statement of Work specifies programmatic objectives mutually agreed upon by the university and the sponsor, which are to be accomplished within a specific period of time or within a detailed budget framework.
- e. The sponsor is entitled to receive the following types of deliverables: a detailed technical report of research results, milestone reports, or a required report of allowable expenditures. Certain reporting requirements of private charitable foundations that are stewardship- or accountability-oriented may not qualify as Sponsored Projects.
- f. The award requires separate accounting procedures and detailed financial reports.
- g. The sponsor requires the return of unexpended funds or only reimburses for incurred costs (expenditure-driven)
- h. The award provides for compliance audits by or on behalf of the sponsor, which may or may not include a financial audit.
- i. The award is for a project requiring compliance oversight including, but not limited to: human subjects, animal use, biohazards, or bio-safety.
- j. The award terms include publication or data restrictions or monitoring.
- k. The sponsor requests intellectual property rights or controls the disposition of capital equipment.
- l. The award is by a sponsor who has licensing rights to inventions from the

- same lab/researcher benefiting from the award.
- m. The sponsor designates a sponsor employee (agent) as project technical monitor (as opposed to designating a contact person to improve communications).
- n. The award is for a sub-award project under a federal award.
- o. The award requires a matching or cost sharing commitment on the part of the university.
- p. The award generates program income to a federal award
- q. The award from the sponsor is for membership fees to centers and affiliate programs. The university may receive membership fees for its centers and affiliate programs, as characterized by any one of the following examples:
 - 1) The member agreement imparts “Center Member” status to the sponsor.
 - 2) The member receives the right to exert any type of control over the operation of the institute, center, or program.
 - 3) The member receives special or discounted access to laboratories or other university facilities for its use.
 - 4) The member receives patent, licensing rights, or other intellectual property rights provisions benefiting the sponsor.

D. POLICY STATEMENT

1. General

Grants and Contracts is the coordinating office for externally funded activities at the university. Grants and Contracts assists the university faculty and staff in the review and execution of applications and proposals, negotiation and execution of mutually binding agreements, and the administration of the university funded projects. The following is provided to clarify the responsibilities of OGC, PIs and the PI’s administrative units performing Pre-award and Post-award activities on behalf of the PI/PI’s sponsored project.

2. Pre-award and Contracting Responsibilities

Sponsored projects are funded by a variety of sponsors including Federal, state and local governments; non-profit associations, foundations and organizations; and for-profit corporate entities. The application process varies depending on the sponsor, and each sponsor may have unique requirements. The Pre-award process requires OGC, the PI, and the academic unit pursuing the sponsored project funding to be responsible for various activities in the process.

- a. Grants and Contracts
 - 1) Provide pre-submission assistance and review of applications/proposals.
 - 2) Review application/proposal documents to ensure that institutional concerns and sponsoring agency rules and regulations are observed.
 - 3) Provide institutional approval of proposals.
 - 4) Review award documents for completeness, appropriate language and compliance with guidelines and requirements set by the sponsoring agencies, the university, and the State of Colorado.

- 5) Negotiate terms and conditions and budgets for all the university sponsored program awards.
 - 6) Execute sponsored program agreements on behalf of the university.
 - 7) Act as primary administrative contact point for all sponsoring agencies.
 - 8) Interpret and disseminate major sponsor policies and forms within the university.
 - 9) Provide assistance with the transfer of PI awards from other grantee organizations to the university as needed.
 - 10) Maintain administrative and costing information necessary for the proper preparation of an application/proposal for extramural funding.
 - 11) Prepare routine and ad-hoc reports.
 - 12) Facilitate submission of timely information requested by sponsoring agencies.
- b. Principal Investigator(s), Designee(s) and Administrative Unit
- 1) Contact Dean's Office or OGC to inquire about funding opportunities.
 - 2) Contact sponsor for appropriate application forms.
 - 3) Prepare application/proposal to sponsoring agency, including the budget and technical portions of application/ proposal and all appropriate assurances for university approval and submission to sponsoring agency.
 - 4) Prepare institutional forms and coordinate process for internal approval ("routing") of application/proposal. Include all sponsor specific application/proposal guidelines to facilitate the review process.
 - 5) Communicate with OGC if there is a question regarding the appropriate Facilities and Administrative cost rate (e.g., on- or off- campus rate).
 - 6) Obtain all required approvals on the Approval of Application for Grant or Contract (Routing Form). Include in routing materials any additional forms and any special approvals for human subjects, lab animals, hazardous materials, bio-safety agents, or cost share (refer to Fiscal Policy 4-5, Application and Proposal Approval Process for Sponsored Projects). At the time of submission, the proposal should be complete administratively for the final review and signature.
 - 7) Answer project-specific questions of the sponsoring agency.
 - 8) Prepare, obtain OGC institutional approval, and submit or assist OGC with the timely submission of information requested by sponsoring agency (e.g., Just-In-Time requests by NIH).
 - 9) Communicate to OGC deadlines which impact submission of materials requested by sponsoring agency.

3. Award Responsibilities

Post-award administration is a joint effort on the part of the PI, PI's designee, departmental administration, and OGC. Each area has specific responsibilities to ensure that the university complies with Federal, state and sponsor guidelines. Failure to comply with the required guidelines or regulations may jeopardize the

university's ability to qualify for future funding.

Sponsored project grants and contracts are legally and mutually binding agreements between the sponsoring agency and the Regents of the University of Colorado.

Although the agreement is with the institution, the PI maintains primary responsibility for achieving the technical success of the project, and for compliance with the financial and administrative policies and regulations associated with the award. Although PIs may have administrative staff designated to assist them with the management of work and project funds, the ultimate responsibility for the management of all technical and financial aspects of the sponsored project resides with the PI. With this responsibility comes the obligation to adhere to all terms and conditions of the award and to adequately document all expenditures and budget modifications in accordance with sponsor regulations.

a. Grants and Contracts

- 1) Review the award notice for special terms and conditions, including but not limited to prior approval requirements, matching funds, and cost sharing.
- 2) Set up project in the financial system and establish the appropriate budget for the project, in accordance with the sponsor's award notice.
- 3) Review, at time of closeout and within established parameters, the allowability, allocability, and appropriateness of selected expenditures in the financial system.
- 4) Work with PI or designee as needed to obtain approvals for equipment purchase(s), travel, no-cost extensions, or other items that may require sponsor approval.
- 5) Research, analyze, and clarify for CU Denver | CU Anschutz faculty and staff various University, State, Federal, and sponsor policies, procedures, and regulations.
- 6) Review and negotiate subaward agreements(s), prepare subaward agreement(s) when subrecipient is documented in the award or when requested by the PI or designee, verify budgets, assure compliance with policies and guidelines as they relate to subaward agreements, and serve as a liaison between funding agencies, academic unit and PIs.
- 7) Manage billing and cash collection activities (except on non-federal clinical trials and awards with a periodic payment schedule as a condition of the award) and perform appropriate follow-up when payments are past due.
- 8) Prepare interim and final financial reports.
- 9) Work with PIs and/or university State/Federal Reporting/Property Accounting as necessary to complete invention and/or property reports when specifically requested by sponsors.
- 10) Follow up on outstanding effort reports.
- 11) Coordinate all audit matters relative to sponsored projects.
- 12) Prepare routine and ad-hoc reports.

- b. Principal Investigator(s), Designee(s) and Administrative Unit
- 1) Execute the technical aspects of the project as presented in the proposal and award.
 - 2) Adhere to university requirements, including but not limited to human subjects, animal care, hazardous materials, and bio-safety.
 - 3) Carry out the project's financial plan as presented in the proposal and as awarded or make changes to the plan following sponsor policies and procedures.
 - 4) Adhere to required hiring practices and personnel policies, initiate employment, and payroll actions, and supervise project personnel.
 - 5) Review and approve, as appropriate, all subrecipient invoices related to the project ensuring compliance with Sponsor cost principles.
 - 6) Identify, ensure receipt of, and approve, as appropriate, all subrecipient reports or other subrecipient deliverables related to the project.
 - 7) Monitor Subrecipient's performance to ensure that Subrecipient's invoices for services provided and/or deliverables submitted are in agreement with Subrecipient's request for payment.
 - 8) Certify to personnel effort on the project as required and ensure effort is in agreement with sponsor terms (e.g., effort of any individual does not exceed 100%, effort does not significantly deviate from that which was reflected in the proposal/award).
 - 9) Maintain fiscal stewardship over the sponsored project to ensure the reasonable and prudent use of the sponsor's funds.
 - 10) Invoice sponsor on non-federal clinical trials and review the monthly accounting statements to ensure that sponsor payments have been received and reflected in the accounting system, i.e., follow up on accounts receivable.
 - 11) Limit the authorization of requisitions, PeopleSoft human resources authorizations, and other spending actions to what is necessary for the conduct of the sponsored project.
 - 12) Review the monthly accounting statements to determine that all charges and credits are appropriate.
 - 13) Assure that any errors involving the allocation of expenses are corrected in a timely manner.
 - 14) Work with OGC to obtain approvals for equipment purchase, travel, no-cost extensions, or other items that may require sponsor approval.
 - 15) Prepare and submit all technical reports, project reports, and deliverables required by the sponsor. Work with OGC to prepare unique and/or detailed financial reporting requirements.
 - 16) Maintain all technical documents and reports related to the project.
 - 17) Advise OGC of any proposed sponsor audits, financial reviews, or any other financial or administrative inquiry from sponsors.
 - 18) Work with OGC, the university State/Federal Reporting/Property Accounting and /or University of Colorado Technology Transfer Office as needed to complete financial, invention, and/or property reports when

- specifically requested by sponsors.
- 19) Disclose to the University of Colorado Technology Transfer Office any invention or intellectual property as required under the Regents policy on Patents and Inventions and assist in making necessary disclosures to sponsor.

Notes

1. Dates of official enactment and amendments:
May 1, 2009: Adopted by Vice Chancellor for Research
May 1, 2011: Revised
February 11, 2019: Modified
2. History:
February 11, 2019: Modified to reflect a Campus-wide effort to recast and revitalize Campus policy sites into a standardized and more coherent set of chaptered policy statements organized around the several operational divisions of the university. Article links, University branding, and formatting updated by the Provost's office.
3. Initial Policy Effective Date: May 1, 2011
4. Cross References/Appendix: N/A