



University of Colorado Denver

Fiscal Policy

Title:	Roles and Responsibilities for Sponsored Project Management, 4-13
Source:	Office of Grants and Contracts
Prepared by:	Director of the Office of Grants and Contracts, Anschutz Medical Campus
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Applies:	Fitzsimons and 9 th & Colorado

A. Introduction

The purpose of this policy is to establish guidelines for the roles and responsibilities of Principal Investigators (PI), their academic unit, and the PreAward and PostAward staff of Grants and Contracts (G&C) in the administration and management of sponsored projects. An understanding of the roles and responsibilities related to sponsored projects will result in more effective and efficient management including meeting project deadlines, reducing duplicate efforts, complying with regulations and grant/contract terms, achieving budget expectations, and establishing accountability.

The University of Colorado Denver (UCD) PI and administrative unit are responsible for complying with and enforcing the policies and procedures outlined herein. Any penalties, disallowances, 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 PIs, personnel that have been designated PI roles and responsibilities (hereinafter referred to as "designee"), relevant administrative unit(s), and the PreAward and PostAward staff of G&C.

B. Table of Contents

- A. Introduction
- B. Table of Contents
- C. References
- D. Definitions
- E. Policy Statement

C. References

1. Office of Management and Budget Circular A-21, *Cost Principles for Educational Institutions*

2. University of Colorado Sponsored Research Audit Report, July 16, 1999

D. Definitions

1. Administrative unit is the part of a school, college, department, division, center, institution section or large program at UCD.
2. 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 throughout this policy.
3. Facilities and Administrative Costs (“F&A”, formerly referred to as “indirect 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 UCD activity.

Facilities costs are defined 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 UCD treats particular types of costs as F&A costs for sponsored agreements, all costs incurred for the same purpose in like circumstances must be treated as F&A costs.

4. Personnel Effort Reporting (PER) System is a system of semester, after-the-fact confirmation reports that document the percentage distribution of effort for the period reported and substantiates salary charges to Federal grants, contracts, and agreements.
5. PostAward 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.
6. PreAward 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.
7. Principal Investigator is typically a faculty member who submits or submitted an application or proposal that was accepted and funded by a sponsoring agency. The Principal Investigator has primary responsibility for technical compliance, completion of programmatic work, and fiscal stewardship of sponsor funds.
8. Proposal is a document in which the prospective project director describes his/her plan for a research, training, or other project and requests financial support. The words “proposal” and “application” are used interchangeably throughout this policy.
9. Sponsored Projects are research, instructional, or public service activities related to the mission of UCD and sponsored by external agencies or entities. F&A cost recovery is

not a factor in determining whether funding is a sponsored project. Application/award issues that require administration by G&C include any one of the following:

- a. the award is a grant or contract from a governmental entity;
- b. sponsor support is directed to satisfy specific, programmatic objectives that are to be accomplished within a specific time and budget framework;
- c. the sponsor is entitled to receive some deliverable, such as a detailed technical report of research results or a report of expenditures;
- d. there is a provision for audits by or on behalf of the sponsor;
- e. the funding is for a project with compliance issues including but not limited to human subjects, animal use, biohazards, and biosafety;
- f. publication restrictions, patent, or licensing rights or rights to the use of research data are a condition of the award.

E. Policy Statement

1. General

G&C is the coordinating office for externally funded activities at the UCHDSC and serves faculty and staff by assisting in the preparation, review and execution of applications and proposals, negotiation and execution of mutually binding agreements, and the administration of UCD's funded projects. The following is provided to clarify the responsibilities of G&C, PIs, and their academic unit in both PreAward and PostAward activities.

2. PreAward Responsibilities

Sponsored projects are funded by a wide array of sponsors including Federal, state and local governments, federally-funded laboratories, non-profit associations and organizations, associations and foundations, and for-profit corporate entities. The application process varies depending on the sponsor, and each one will have unique requirements. The PreAward process requires G&C, the PI, and the academic unit that is pursuing sponsored project funding to be responsible for various activities in the process.

a. G&C

- i. Provide pre-submission assistance and review of proposals.
- ii. Review proposal documents to ensure that all institutional proposal requirements and sponsoring agency rules and regulations are observed.
- iii. Provide institutional approval of submittal(s).

- iv. Review award documents for comprehensiveness, appropriate use of language and compliance with guidelines and requirements set by sponsoring agencies, UCD and the State.
 - v. Negotiate terms and conditions and budgets for all UCD extramural awards.
 - vi. Execute agreements on behalf of UCD.
 - vii. Act as primary administrative contact point for all Federal and non-federal sponsoring agencies.
 - viii. Interpret and disseminate major sponsor policies and forms within UCD.
 - ix. Facilitate the transfer of a PI's proposals or awards from other grantee organizations.
 - x. Maintain administrative and costing information necessary for the proper preparation of a proposal for extramural funding.
 - xi. Obtain information from sponsor regarding continuation proposal due dates, notify PIs of non-competing and competing grant applications and provide the necessary application materials.
 - xii. Prepare routine and ad-hoc reports.
 - xiii. Facilitate submission of timely information requested by sponsoring agencies.
- b. Principal Investigators, Designees and Academic Unit
- i. Contact Dean's Office or G&C to inquire about funding opportunities.
 - ii. Contact sponsor for appropriate application forms if not available in G&C.
 - iii. Prepare application for sponsoring agency, including the budget and technical portions of the application and all appropriate assurances for UCD approval and submission to sponsoring agency.
 - iv. Prepare institutional forms and coordinate process for internal approval ("routing") of application. Include all sponsor specific application guidelines to facilitate the review process.
 - v. Communicate with G&C if there is a question regarding the appropriate F&A cost rate, e.g., on- or off-campus rate.
 - vi. Obtain all appropriate approvals, e.g., all signatures required 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, biosafety agents, or cost share ([refer to Fiscal Policy 4-05, Application/Proposal Approval Process on Sponsored Projects](#)). At the time of submission, the proposal should be complete administratively and scientifically for the final review and signature.

- vii. Answer project-specific questions of the sponsoring agency.
- viii. Prepare, obtain G&C institutional approval, and submit timely information requested by sponsoring agency (e.g. Just-In-Time requests by NIH).
- ix. Communicate with G&C deadlines which impact submission of materials requested by sponsoring agency.

3. PostAward Responsibilities

PostAward administration is a joint effort on the part of the PI, designee, departmental administration, and G&C. Each area has specific responsibilities to ensure that UCD complies with Federal, state and sponsor guidelines. Failure to comply with the required guidelines or regulations may jeopardize UCD'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 has primary responsibility for achieving the technical success of the project, while also complying 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 the sponsored project work and funds remains with the PI. Inherent in this responsibility is 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. G&C

- i. Review the award notice for special terms and conditions, including prior approval requirements, matching funds, and cost sharing.
- ii. Set up project in the financial system and establish the appropriate budget for the project, in accordance with the sponsor's award notice.
- iii. Monitor selected expenditures in the financial system, within established parameters, as to allowability, allocability, and appropriateness.
- iv. Work with PI or designee to obtain approvals for equipment purchase, travel, no-cost extensions, or other items that may require sponsor approval.
- v. Research, analyze, and clarify for faculty and staff various University, State, and sponsor policies, procedures, and regulations.
- vi. Review and negotiate subrecipient agreements(s), prepare subrecipient 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 subrecipient agreements, and serve as a liaison between funding agencies, academic unit and PIs.

- vii. 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.
 - viii. Prepare interim and final financial reports.
 - ix. Work with PIs and/or UCD State/Federal Reporting/Property Accounting as necessary to complete invention and/or property reports when specifically requested by sponsors.
 - x. Administer the Personnel Effort Reporting (PER) system.
 - xi. Coordinate all financial audit matters relative to sponsored projects.
 - xii. Prepare routine and ad-hoc reports.
- b. Principal Investigator(s), Designee(s) and Academic Unit
- i. Execute the technical aspects of the project as presented in the proposal and as awarded.
 - ii. Adhere to UCD requirements, such as human subjects, animal care, hazardous materials, and bio-safety.
 - iii. 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.
 - iv. Adhere to required hiring practices and personnel policies, initiate employment and payroll actions, and supervise project personnel.
 - v. Review and approve, as appropriate, all subrecipient invoices related to the project ensuring compliance with Sponsor cost principles.
 - vi. Identify, ensure receipt of, and approve, as appropriate, all subrecipient reports or other subrecipient deliverables related to the project.
 - vii. 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.
 - viii. 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).
 - ix. Maintain fiscal stewardship over the sponsored project, ensuring the reasonable and prudent use of the sponsor's funds.
 - x. 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; follow up on accounts receivable.

- xi. Authorize only those requisitions, PeopleSoft human resources authorizations, and other spending actions necessary for the conduct of the sponsored project.
- xii. Review the monthly accounting statements to determine that all charges and credits are appropriate.
- xiii. Assure that any errors involving the allocation of expenses are corrected in a timely manner.
- xiv. Work with G&C to obtain approvals for equipment purchase, travel, no-cost extensions, or other items that may require sponsor approval.
- xv. Prepare and submit all technical reports, project reports, and deliverables required by the sponsor. Work with G&C to prepare unique and/or detailed financial reporting requirements.
- xvi. Maintain all technical documents and reports related to the project.
- xvii. Advise G&C of any proposed sponsor audits, financial reviews, or any other financial or administrative inquiry from sponsors.
- xviii. Work with G&C, UCD State/Federal Reporting/Property Accounting, and the Technology Transfer Office as necessary to complete financial, invention, and/or property reports when specifically requested by sponsors.
- xix. Disclose to the 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.