#### **Sponsored Research Policy Restructure**

#### **Background**

Currently, there are over 30 campus-wide that directly or tangentially affect sponsored projects. Many campus policies have not been updated to reflect 2 CFR 200 (Uniform Guidance), which became effective on December 26, 2014. The existing campus policies do not provide uniform definitions, contain typographical errors, and pose difficulty for PIs and research administrators to ensure compliance. Additionally, existing University policy creates administrative burden to update or modify existing policy in a timely manner.

#### **Objectives of the Policy Restructure**

- Consolidation of policies and guidance
- Allows for timely updates to reflect changing federal, institutional, and other regulatory requirements
- Reduce administrative burden for PIs and research administrators
- Adopt best practices of other research institutions
- Create a policy framework that enables continuous process improvement

## **New Policy Structure**

- Two overarching campus policies related to sponsored projects
  - Roles and Responsibilities for Sponsored Projects
  - Financial Administration of Sponsored Projects
- University Sponsored Projects Policies and Procedures Handbook (Handbook)
  - Consolidates existing campus sponsored project policies and serves as a complement to the University's policies governing sponsored projects provides guidance on general federal requirements
  - o Employees must comply with requirements in the Handbook
  - The Handbook is designed to build a bridge between University policies and procedures and sponsor requirements
    - The Handbook is a "first-stop" not a "one-stop" for guidance
    - The Handbook will be updated to incorporate tools and other resources this will be a living document
  - o The Handbook is not, and cannot be, a listing of every award-specific requirement
  - References additional federal, state, sponsor, and University policies and requirements for managing sponsored projects – PIs are still responsible for following all requirements for their awards

#### **Impact to PIs and Research Administrators**

The Handbook does not change any campus policy or procedure at this time.

#### **Timeline**

- Policy Review: 2023-2024
- Handbook Development: August 2024-December 2024
- Handbook Review: January 2025-June 2025
  - Office of Grants and Contracts
  - o CU Denver and CU Anschutz Medical Campus administrative units
  - o Office of Administration and Finance Executive Team
  - Campus Policy offices
  - o CU Denver and CU Anschutz Leadership
- Effective Date for new policies and the Handbook: July 1, 2025

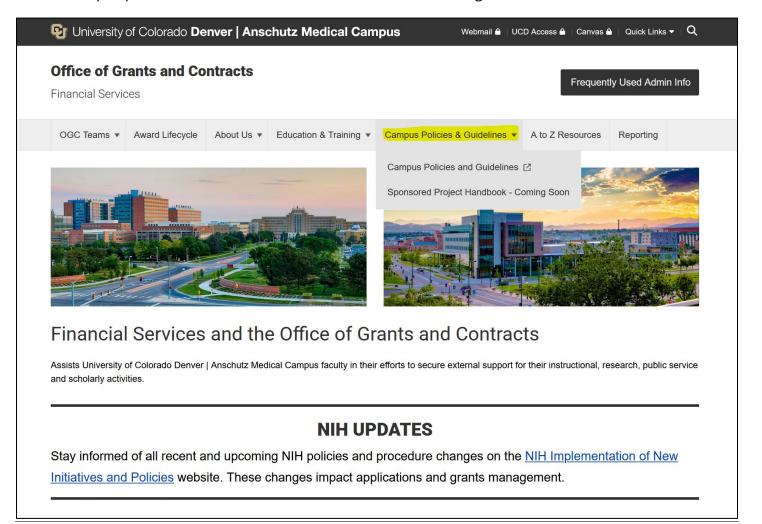
#### Structure of the Handbook and Overview

The Handbook is composed of 10 chapters covering the entire award lifecycle. Each chapter identifies and explains relevant federal, sponsor, and University policies, requirements, and procedures. Each chapter also provides the user with resources and guidance.

- Chapter 1 General Information
- Chapter 2 Pre-Award
- Chapter 3 Award Phase
- Chapter 4 Post Award Financial Administration
- Chapter 5 Post Award Administrative Requirements
- Chapter 6 Subagreements
- Chapter 7 Award Transfers
- Chapter 8 Closeout
- Chapter 9 Regulatory Compliance
- Chapter 10 Additional Requirements for Sponsored Projects
- Appendices

## **Location of Policies and Handbook**

Campus policies and the Handbook will be accessible through the OGC website.



## **Support and Resources**

## **Project Specific Resources:**

- Introductory page on OGC website
- Website Banner Announcements
- May 2025 OGC Newsletter Article
- Go Live Announcement 6/30 or 7/1
- Dedicated Office Hours on 7/1, 7/2 and 7/3

## Ongoing Support:

- Fiscal Compliance Office Hours (held on the first and third Monday of every month)
- Direct inquiries to fs-compliance@ucdenver.edu
- FAQs Continuous Development related to navigation and driven by campus conversations/incoming questions post-launch.

## **Project Contacts:**

- Shane Jernigan <a href="mailto:shane.jernigan@cuanschutz.edu">shane.jernigan@cuanschutz.edu</a>
- Caroline Quane Caroline.quane@cuanchutz.edu

# **Campus Policy Crosswalk**

CAMPUS POLICY	NOTES
1005 - Faculty Compensation - Anschutz Medical Campus	Policy is retained and referenced
1006 - Faculty Compensation - Denver	Policy is retained and referenced
2001 - Internal Service Centers and Core Laboratories	Policy is retained and referenced
2002 - Cost Sharing	Rescinded and incorporated into the Financial Administration Policy and handbook
2008 - Accounts Receivable	Policy is retained and referenced
2009 - Clinical Trials	Policy is retained and referenced
2010 - Study Subjects Payments	Policy is retained and referenced
2011 - Closeout of Sponsored Projects	Rescinded and incorporated into the Financial Administration Policy and handbook
2012 - Moving and Relocation Expense Reimbursement	Policy is retained and referenced
2013 - Direct Charges to Federally Sponsored Projects	Rescinded and incorporated into the Financial Administration Policy and handbook
2014 - Roles and Responsibilities for Sponsored Project Administration	Updated for technical edits, to incorporate other policies, and to streamline the policy
2015 - Application and Proposal Approval Process for Sponsored Projects	Rescinded and incorporated into handbook
2018 - Cost Transfers on Sponsored Projects	Rescinded and incorporated into the Financial Administration Policy and handbook
2020 - Establishing a Sponsored Project Without an Award Document	Rescinded and incorporated into handbook
2021 - Program Income	Rescinded and incorporated into the Financial Administration Policy and handbook
2023 - Capital Equipment and Government Property	Policy is retained and referenced
2024 - Inventories	Policy is retained and referenced
2026 - Transfer of Assets To or From Other Organizations	Rescinded and incorporated into handbook
2027 - Fiscal Policy for Facilities and Administrative Costs	Policy is retained and referenced
2030 - Retaining Residual Income from Federal Fixed Price Contracts	Rescinded and incorporated into the Financial Administration Policy and handbook
2031 - Time and Effort Reporting on Sponsored Projects	Rescinded and incorporated into the Financial Administration Policy and handbook
2032 - Transfer of Sponsored Project Financial Commitments Not Involving Assets to Other Organizations	Rescinded and incorporated into handbook
2035 - Signature Authority	Rescinded and incorporated into handbook
2036A - [Sub] Recipient Monitoring	Rescinded and incorporated into handbook
2038A - Cost Allocations	Policy is retained and referenced
2040A - Intellectual Property Policy on Discoveries and Patents for their Protection and Commercialization - CU Anschutz	Policy is retained and referenced
2041A - Expenditure Contracts and/or Subagreements under Sponsored Awards	Policy is retained and referenced
7008 - Graduate Student Assistantships and Tuition Remission	Policy is retained and referenced
APS 4014 - Fiscal Roles and Responsibilities	Policy is retained and referenced
APS 4015 - Propriety of Expenses	Policy is retained and referenced

OTHER POLICIES	NOTES
RESEARCH POLICIES	Policies are retained and referenced
HUMAN RESOURCES POLICIES	Policies are retained and referenced