Sponsored Project Handbook

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Contents

Preface

The University of Colorado Denver | Anschutz Medical Campus (University) Sponsored Project Handbook (Handbook) identifies the requirements for proposal development, proposal submission, award acceptance, and award administration for all externally sponsored projects—both federal and non-federal—made to the University.

The Handbook complements University policies governing sponsored projects. University employees administering sponsored projects, including Principal Investigators (PI) and research administrators, are required to comply with all University policies, as well as the procedures and requirements outlined in this Handbook.

The information in this Handbook is intended to provide general guidance on federal requirements; it is not, and cannot be, a comprehensive listing of every award requirement. This Handbook is designed to be a "first stop," not a "one-stop," for guidance. It is always the responsibility of the PI and other University employees to comply with the award terms and conditions for each sponsored project, even if specific requirements are not addressed in this Handbook. When sponsor requirements conflict with University policies or procedures, the more restrictive requirement—typically the University policy—must be followed.

University of Colorado Fiscal Policies and Procedures are available on the Fiscal Compliance website. Additional campus-specific policies for CU Denver and CU Anschutz Medical Campus can be found on the Policies and Guidelines website. Other relevant policies and procedures are referenced throughout this Handbook via direct URLs to various University websites.

Throughout this Handbook:
- "The University of Colorado" refers to the University system.
- "The University" refers specifically to the University of Colorado Denver | Anschutz Medical Campus.
- The term "award" refers to an agreement received by the University, including grants, contracts, cooperative agreements, and other externally funded agreements.
- The term "subagreement" refers to an agreement issued by the University to another entity.

This Handbook follows the language conventions of 2 CFR 200 regarding "should" and "must":
- "Should" indicates a best practice—not a requirement—and is not subject to audit findings.
- "Must" indicates a mandatory requirement.

Since January 2025, the federal government has implemented significant changes to award terms and conditions, often with immediate effect. Information regarding these updates can be found on the following websites:
- University of Colorado Federal Transition Updates
- CU Anschutz Federal Updates
- CU Denver Campus Communications

Due to the frequency of changes at the federal level, the Handbook may not always reflect the most recent agency guidance or judicial rulings. It is the responsibility of all University employees to remain informed of evolving federal requirements and ensure compliance with all applicable policies.

This Handbook becomes effective for all University employees on July 1, 2025.

Chapter 1: General Information

1.1 What Are Sponsored Projects?

Sponsored projects are research, instructional, or public service activities that align with the mission of the University and funded by external entities. Sponsors may include federal government agencies, pass-through entities, nonprofit organizations, foundations, and for-profit businesses. The award terms and conditions of a sponsored project are legally binding, and the University is obligated to comply with all sponsor requirements. Although awards are made to the University, the Principal Investigator (PI) named in the award is responsible for the successful execution of the project and for managing all funds in accordance with sponsor guidelines.

1.2 Structure of the University of Colorado

The Constitution of the State of Colorado establishes the University of Colorado. The University of Colorado is governed by an elected Board of Regents, which is responsible for the supervision of the university system. The Regents also appoint the President of the University, who oversees the central administrative office.

The University of Colorado comprises four campuses:
- CU Anschutz Medical Campus
- CU Boulder
- CU Colorado Springs
- CU Denver

CU Anschutz Medical Campus and CU Denver operate as a consolidated campus, with specific central administrative offices serving both locations.

1.3 Policy Framework at the University of Colorado

When managing and administering sponsored projects, employees must comply with all University policies and procedures, sponsor requirements, and applicable federal and state laws.

The policy framework at the University of Colorado includes:
- Administrative Policy Statements (APS) applicable to all campuses and employees within the University system
- PSC Travel Statement and Procurement Rules
- Campus Policies and Guidelines applicable to CU Anschutz Medical Campus and CU Denver
- Administrative Unit policies and procedures applicable to employees within a specific administrative unit

1.4 Sponsor Requirements

The award terms and conditions for a sponsored project outline both general sponsor requirements and specific award provisions. It is the responsibility of the PI and all employees working on a sponsored project to ensure compliance with all applicable sponsor requirements.

For federal awards—whether made directly by a federal agency or indirectly through a pass-through entity—sponsor requirements typically include:
- Award terms and conditions, which incorporate the proposal and the funding opportunity announcement
- Sponsor guidelines and regulations

Most federal grant awards are governed by [2 CFR 200 (Uniform Guidance)](#), or by an agency-specific implementation of 2 CFR 200, as indicated in the award's terms and conditions. Some agencies have adopted additional guidance that supersedes 2 CFR 200 or the implementation by their parent department.

Example of agency-specific guidance documents include:
- NIH awards must comply with the [NIH Grants Policy Statement (NIH GPS)](#) and all [Notice of NIH Policy Changes](#)
- NSF award must comply with the [NSF Proposal & Award Policies & Procedures Guide (PAPPG)](#).
- The [Department of Defense (DOD) Research and Development (R&D) General Terms and Conditions](#) apply to most DOD awards

These agency-specific documents may, in turn, be superseded by program-specific or award-specific terms and conditions. It is always the responsibility of the PI and their administrative unit to ensure full compliance with all award terms and sponsor requirements.

For non-federal awards, applicable requirements are outlined in the award terms and conditions and in any guidance documents provided by the sponsor. As with federal awards, it is the responsibility of the PI and their administrative unit to comply with all sponsor policies and requirements.

1.5 Roles and Responsibilities

The management and administration of sponsored projects at the University are shared responsibilities between the Office of Grants and Contracts (OGC) and the PI and their respective administrative units. Additional University offices also support the fiscal and regulatory compliance of sponsored projects and provide services to facilitate project activities.

All University employees must comply with the University of Colorado's [Fiscal Roles and Responsibilities](#) policy. This policy defines the fiscal duties of University employees and applies to all University funds, including those associated with sponsored projects.

1.5.1 Principal Investigators (PI)

The lead University employee on each sponsored project is known as the Principal Investigator (PI) or Program Director, as designated in the award notice. The PI and their respective administrative unit (i.e., a school, department, division, center, institutional section, or large program) are responsible for the day-to-day management of sponsored projects. The PI holds ultimate responsibility for the oversight of all programmatic and financial aspects of the sponsored projects under their name. PI designees and administrative staff assist with managing the work and project funds, but the PI retains accountability.

PIs are responsible for:
1. Developing and submitting proposals in accordance with sponsor requirements, University policies, and the Sponsored Project Handbook;
2. Ensuring compliance with award terms and conditions, applicable federal laws and regulations, University policies, and the Sponsored Project Handbook;

3. Verifying that the award has been correctly set up in the financial system;
4. Managing the financial aspects of the award and complying with all applicable sponsor requirements, University financial policies, and the Sponsored Project Handbook;
5. Monitoring subrecipients and documenting monitoring activities in accordance with sponsor requirements, University policies, and the Sponsored Project Handbook; and
6. Successfully completing all programmatic tasks identified in the sponsored project's scope of work.

PI Eligibility

Each school or college within the University is responsible for establishing its own requirements for PI eligibility. Information regarding proposal development for prospective University employees is available on the OGC website.

Proposal Development

PIs, their designees, and administrative units are responsible for preparing applications and proposals to sponsors and obtaining all necessary assurances and internal approvals for University submission in accordance with the Sponsored Project Handbook.

Administrative, Programmatic, and Financial Management of a Sponsored Project

PIs, their designees, and administrative units are responsible for ensuring compliance with all administrative, programmatic, and financial requirements for each sponsored project, in accordance with sponsor requirements, University policies, and the Sponsored Project Handbook. This includes, but is not limited to:

- Financial Management, including:
  - Cost Share and matching requirements
  - Effort allocation
  - Program Income
  - Charging costs to the award
  - Accounting and financial reconciliation
  - Cash management
  - Rebudgeting
  - Cost Transfers
- Completing all programmatic aspects of the project, including adherence to the scope of work and compliance with sponsor requirements for revising the scope of work
- Property Management
- Procurement of goods and services
- Meeting all reporting requirements
- Subrecipient monitoring and management
- Record Retention
- Award closeout and post-closeout responsibilities

Enforcement

PIs who consistently fail to meet the responsibilities outlined in University policy or the Sponsored Project Handbook—as determined by the Office of Grants and Contracts—may be subject to University sanctions. These may include, but are not limited to, loss of privileges to apply for external funding, as outlined in the Handbook.

1.5.2 Role of the Research Administrator

Administrative units employ research administrators to assist PIs throughout the award lifecycle. Research administrators provide support and guidance to reduce the administrative burden on PIs. While research administrators play a key support role, ultimate responsibility for all aspects of a sponsored project rests with the PI.

The specific duties of research administrators may vary among administrative units. In general, research administrators assist PIs with:

- Developing and submitting proposals
- Responding to sponsor inquiries
- Verifying that sponsored projects are correctly set up in the financial system
- Managing administrative and reporting requirements for sponsored projects
- Effort reporting and the use of the electronic Personnel Effort Reporting (ePER) system
- Supporting financial management activities
- Assisting with compliance across all aspects of the project

1.5.3 Office of Grants and Contracts (OGC)

OGC is responsible for the following functions related to the administration of sponsored projects:

- Reviewing applications and proposals and providing institutional approval
- Reviewing award documents
- Negotiating award terms and conditions with sponsors
- Executing award agreements with sponsors on behalf of the University
- Serving as the primary administrative contact for all sponsors
- Acting as the University's Authorized Organization Representative (AOR)
- Assisting with the transfer of PI awards from other institutions
- Maintaining administrative and costing information necessary for the proper preparation of applications and proposals for external funding
- Establishing sponsored projects in the financial system
- Drafting and negotiating subagreements
- Coordinating all audit matters related to sponsored projects
- Preparing and submitting financial reports to sponsors
- Managing billing and collection activities (unless designated to administrative units)
- Ensuring administrative unit compliance with sponsor award terms and conditions, as well as University policies and procedures
- Providing assistance to PIs and administrative units in accordance with University policy and the Sponsored Project Handbook.

The following table identifies some of the commonly used OGC email accounts:

Subject	Email
Award Setup	OGC.4status@ucdenver.edu
Billing	OGC.billing@ucdenver.edu
Auxiliary Fund/Fee for Service Contracts	OGC.revenue@ucdenver.edu
Sponsored Project Contracts (includes subagreements for incoming funding)	OGC.contracts@ucdenver.edu

ePERs	ePERs@ucdenver.edu
Fiscal Roles	OGC.fiscalroles@ucdenver.edu
Notification for final proposal submission	eapp.xenia@ucdenver.edu
Payments (Accounts Receivable)	OGC.4payments@ucdenver.edu
Pre-Award	xenia@ucdenver.edu
Post Award	OGC.Postaward@ucdenver.edu
Subagreements for outgoing funding	OGC.subcontracts@ucdenver.edu

1.5.4 OGC Resources

The OGC website offers a wide range of resources for University employees managing sponsored projects. These resources include:

- Award Lifecycle – Offers links and guidance documents for specific actions throughout the grant lifecycle
- A to Z Resources – Provides an alphabetical listing of guidance documents and forms
- Forms Library – Provides links to required forms for completing specific sponsored project actions
- Frequently Asked Questions (FAQs) – Provides answers to common questions about sponsored projects
- Grants and Contracts Updates Mailing List – Allows users to register for the monthly OGC newsletter
- New and Team Talks – Contains an archive of past OGC newsletters and Team Talk presentations

1.5.5 Other University Offices

Additional University offices are responsible for fiscal and regulatory compliance of sponsored projects and for providing support services for sponsored projects and other University activities. These offices include:

- Advancement offices - Accept gifts and ensure compliance with gift requirements
  - Office of Advancement for CU Anschutz Medical Campus
  - Office of Advancement for CU Denver
- Clinical Research Administration Office (CRAO) – Responsible for reviewing agreements related to human subject research, including industry clinical trial agreements, non-disclosure agreements and confidentiality agreements, material transfer agreements, and data use agreements
- CU Foundation – Responsible for receiving gift funds
- Finance Office – Manages equipment disposal for exempt property associated with sponsored projects
- Fiscal Compliance – Responsible for:
  - Assisting with the interpretation of policies and regulations
  - Providing sponsored project training
  - Approving gift card use
  - Serving as an audit liaison
  - Managing leasing agreements
  - Monitoring high-risk financial areas
- Legal Counsel – Protects and defends the University's legal interests; may assist PIs with due process for award terminations and provide guidance on FOIA requests
- Office of Laboratory Animal Resources (OLAR) – Manages and ensures the care of animal research subjects
- Office of Regulatory Compliance – Oversees:
  - Environmental health and safety
  - Human subject research
  - Colorado Multiple Institutional Review Board (COMIRB)
  - Conflict of interest reporting
  - Export control compliance

- HIPAA compliance
- Research integrity
- [Offices of Research Committee Support](#) – Provides administrative support for:
  - Institutional Biosafety Committee (IBC)
  - Institutional Animal Care and Use Committee (IACUC)
  - Radioactive Drug Research Committee (RDRC)
  - Committee on Ionizing Radiation (CIR)
  - Committee on Ionizing Radiation for Human Use (HUCIR)
- [Office of Research Development and Strategy (ORDS)](#) – Assists CU Anschutz Medical Campus faculty in finding funding opportunities and building collaborations. ORDS is also responsible for overseeing limited submission opportunities and managing internal funding programs for both campuses.
- [Office of Research Services](#) – Supports faculty development and CU Denver's research efforts, including training programs for PIs through the Faculty Grants Academy
- [Office of University Controller](#) – Establishes financial practices and policies for the University
- [Procurement Services Center](#) – Develops and administers the University's procurement and travel policies
- [Research Informatic Office](#) – Supports data-related needs, including ORCID integration and data management plans
- Technology Transfer Offices –Assists PIs in commercializing technology, developing ventures, and building business partnerships.
  - [CU Innovations](#) supports the CU Anschutz Medical Campus and provides support for medical device innovations for the CU Denver
  - [Venture Partners at CU Boulder](#) supports the CU Denver campus for non-medical device innovations
- [University of Colorado Internal Audit](#) - Conducts audits of University programs and activities
- [University of Colorado Office of Policy and Efficiency](#) – Oversees University-wide policies that apply to all campuses
- University Libraries
  - [Auraria Library](#)
  - [Strauss Health Sciences Library](#) located on CU Anschutz Medical Campus

Additional information about each office is provided throughout the Handbook.

1.6 Award Lifecycle

The award lifecycle of a sponsored project has two major phases: pre-award and post award. The duration of an award varies depending on the sponsor and the nature of the project.

The pre-award phase includes:
- Locating funding opportunities
- Proposal development
- Internal routing and approvals
- Proposal submission
- Responding to sponsor inquiries
- Just-in-time requests
- Award negotiation
- Award acceptance

The post award phase includes:
- Award set-up
- Pre-award spending
- Award Administration
- Project closeout
- Post-closeout activities

The requirements for each aspect of the award lifecycle are discussed throughout the Handbook.

1.7 Institutional Information and Data Elements

Throughout the award lifecycle, the University is often required to provide institutional information to sponsors. Commonly requested data elements and other institutional details are available on the University's FDP Clearinghouse profile and the OGC Admin Info website.

1.8 Types of Sponsored Projects

Sponsors use a variety of award instruments, with grants and contracts being the two most common types.

1.8.1 Grants

Grants are a form of financial assistance awarded to the University to conduct projects that fulfill a public purpose. Grants typically have the following characteristics:
- No substantial involvement is anticipated between the sponsor and the University during project performance
- The award includes terms, conditions, and other contractual requirements that must be met
- Budgetary restrictions apply and must be followed
- Financial and progress reports are typically required
- Expenditures must be documented
- The project has a defined start and end date

Fixed amount, or fixed price, are a type of grant in which payment is based on achieving specific milestones identified in the scope of work. Federal fixed amount subagreements are governed by 2 CFR 200.201. While the University may receive fixed amount awards or subagreements, University policy prohibits the issuing of fixed amount subagreements to subrecipients.

Cooperative Agreements are a type of grant characterized by substantial sponsor involvement in the project, as defined in the award terms and conditions. Substantial involvement may include:
- Participating in the project design, data collection, or data analysis
- Co-authoring papers
- Assisting in selecting contractors or hiring project staff
- Review of proposed publications or presentations

1.8.2 Contracts

Contracts are award instruments in which the University provides goods or services to the sponsor. Contracts specify clear obligations for both the sponsor and the University, with an expectation that specific deliverables will be provided within a defined timeframe. Compared to grants, contracts generally allow less flexibility to modify the project during the post-award phase. Federal contracts are governed by the Federal Acquisition Regulation (FAR) rather than 2 CFR 200.

There are two primary types of federal contracts:
- Cost Reimbursable Contracts
- Fixed Price Contracts

Cost reimbursable contracts are the University's preferred contract type. These contracts provide payment for actual incurred costs and carry less financial risk for the University.

Fixed price contracts provide a total or lump-sum payment upon completion of specific tasks or deliverables within an agreed timeframe. This contract type involves more risk, as any cost overruns become the responsibility of the Principal Investigator (PI) and their respective administrative unit.

1.8.3 Clinical Trials

A clinical trial is defined as controlled clinical testing in human subjects of investigational new drugs, devices, treatments, or diagnostics—or comparisons of approved drugs, devices, treatments, or diagnostics—to assess their safety, efficacy, benefits, costs, adverse reactions, and/or outcomes. Such studies may be conducted under either an industry-developed protocol or an investigator-developed protocol.

Clinical trial agreements are reviewed and approved following the same procedures as other sponsored projects. Principal Investigators (PIs) and University employees must comply with the terms of the sponsor's clinical trial agreement.

1.8.4 Other Award Instruments

Sponsors may award the University agreement types other than grants and contracts. These other award instruments include:
- Material Transfer Agreement (MTA) – An agreement to transfer tangible research materials (e.g., cells, animals, or other scientific materials) from one institution to another.
- Revenue/Fee-for-Service – Agreements related to revenue-generating activities such as consulting, professional services, lab or facility use, or revenue agreements for on-campus service centers.
- Equipment Loan Agreements – Agreements that involve the temporary loan of equipment from one institution to another.
- Confidential Disclosure Agreement (CDA) and Non-Disclosure Agreements (NDA) – Agreements that prevent the unauthorized use or disclosure of protected or proprietary information.
- License Agreements – Agreements between the University and a commercial entity granting rights to develop, produce, or sell products based on the University's intellectual property.
- Data Use Agreement (DUA)/Business Associate Agreement (BAA) – Agreements related to the transfer, use, or protection of data,
- Member Practice Consulting Agreement – Agreements related to consulting services provided through CU Medicine.
- Other Transactional Agreements (OTAs) – Federal award instruments that are not subject to the standard requirements of grants or contracts and offer more flexibility in structure and negotiation.

Additional information regarding the processing and requirements for these agreements can be found on the [University Contracting Menu guidance](#).

1.8.5 NIH Activity Codes

NIH uses three-character activity codes to distinguish between the wide variety of research-related programs it funds. Award requirements and cost allowability vary by activity code. A full description of each NIH activity code can be found on the NIH Activity Codes website.

1.8.6 SBIR and STTR Awards

Several federal agencies provide grant funding to for-profit small businesses through Small Business Innovation Research (SBIR) or Small Business Technology Transfer (STTR) awards. SBIR awards encourage subagreements with research institutions, while STTR awards require such subagreements. University resources may only be used for activities conducted under an SBIR or STTR subagreement awarded to the University.

Federal law imposes strict requirements on time and effort reporting for Principal Investigators (PIs) involved in SBIR or STTR projects. Additionally, each award type presents potential conflicts of interest that must be addressed. A University employee may not serve as both the PI of the overall SBIR or STTR award and the PI of the University's subagreement. For more details, refer to the University's Faculty Entrepreneurial Activity & SBIR/STTR Collaboration Policy.

1.8.7 Gift Agreements

A gift is any item of value given by a donor who does not expect anything of significant value in return, other than recognition and the use of the gift in accordance with the donor's stated intent. While a gift may include restrictions on its use, it does not impose contractual obligations.

Gifts are not considered sponsored projects and are not subject to the same terms or requirements. Gifts are irrevocable and do not have a specified period of performance. In most cases, gift agreements are made to the CU Foundation rather than directly to the campus.

1.9 Reporting Waste, Fraud, and Abuse on Sponsored Projects

Sponsored projects are awarded to the University, and the PI named in the award notice is responsible for managing the project in accordance with sponsor terms and conditions. Award funds may only be used in compliance with sponsor requirements and University policies.

University employees have a fiduciary responsibility to report any suspected fraud, waste, or abuse on sponsored projects. Concerns may be reported to a manager or administrative unit leadership, through CU EthicsLine, or to Internal Audit.

Under 2 CFR 200.113 Mandatory Disclosures, the University is required to promptly disclose to the federal sponsor and any pass-through entity when credible evidence exists of a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations. When this requirement is triggered, PIs and their administrative units must notify Fiscal Compliance, which will coordinate submission of the necessary disclosure to the sponsor or pass-through entity following review by Legal Counsel.

Federal law provides whistleblower protections to employees and prohibits the University from retaliating against any employee who reports waste, fraud, or abuse on federal awards or subagreements. Additional information on these protections is found in 2 CFR 200.217. This section of the Handbook also fulfills the University's obligation to inform employees of their rights and protections under 41 U.S.C. 4712, as required by 2 CFR 200.

1.10 University Management Systems

The University utilizes a variety of applications and systems to manage sponsored projects. Each employee is responsible for completing any required training before gaining access to these systems and for using them in accordance with University policies and procedures.

Key University management systems include:
- InfoEd eRA (InfoEd) - Used during the pre-award phase to develop and route proposals, initiate contracts for negotiation, manage conflict of interest (COI) disclosures, track human subjects reporting, and store award-related documents.
- CU Data – the University's financial reporting system portal, which contains m-Fin and other grant reports
- CU Marketplace - the University's eProcurement system
- Concur Travel and Expense - The University's system for managing travel arrangements and commercial card transactions.
- Human Capital Management (HCM) - The University's human resource management system, that contains job codes, employee classifications, benefits information, and compensation/payroll data.
- OnCore - The University's clinical trial management system.
- PeopleSoft Finance and Grants Administration Module – Provides access to the University's financial system and includes journal entries, invoicing, grants administration, and financial reports for sponsored projects.

1.11 Authorized Organizational Representative (AOR) and Signature Authority

An Authorized Organizational Representative (AOR) is a University employee who has been granted legal authority by the Board of Regents to sign legal documents on behalf of the University. All AORs are employees of OGC. PIs and administrative units are not permitted to perform any function that requires AOR approval, submission, or signature.

Actions that require AOR approval may include:
- Proposal submission
- Submitting a Just-in-Time request
- Requesting prior approval
- Submission of financial reports
- Accepting or signing an award document
- Executing an award agreement

A list of OGC signing officials is available on the [OGC Admin Info](#) website.

1.12 University Finance System

The University uses PeopleSoft Finance System to manage institutional financial information. Within this system, Funds are used to identify the source of money.

For sponsored projects, the University uses the following Funds:
- Fund 30 – Sponsored projects from federal and non-federal entities
- Fund 31 – Sponsored projects from the State of Colorado or local government within Colorado

For cost share obligations, the University may use the following funds:

- Fund 22 – Cost Share Auxiliary Enterprises, used when cost share is provided from administrative unit funds
- Fund 32 – Cost Share Sponsored Projects, used when cost share is met using a gift or Academic Enrichment Funds (AEF)
- Fund 72 – Renewal and replacement funds, used for construction grants

Each sponsored project is assigned a project number, which will have at least one associated speedtype. A speedtype is an internal term referring to a chartfield within the finance system. It is a unique 8-digit identifier that indicates the campus and the corresponding fund.

Employees may use either the project number or speedtype in the finance system to generate an m-Fin report, which provides detailed financial information. Budgeted and expended funds are tracked using account codes. To assist with financial management and reconciliation, the University provides an Account Quick Reference Card.

> **Project Numbers and Speedtypes**
> Dr. Smith receives a two-year NIH grant without carryover authority. OGC Award Setup will establish the award in the financial system with a project number and a speedtype for each budget period.
>
> For example:
> - Project Number – 26M5379
>   - Speedtype (Budget Year 1) – 63031779
>   - Speedtype (Budget Year 2) – 63038451
>
> By running the project number in the financial system, an employee will be able to review the finances of all the project's speedtypes.

1.13 CU Denver Campus Considerations

Faculty at the CU Denver campus may be hired on a 9-month contract for the academic year. As a result, academic-year and summer-month compensation must be budgeted separately, since the summer period is not covered by the standard academic contract. A separate 3-month contract must be negotiated for each calendar year to cover summer effort.

The monthly summer salary may not exceed 1/9th of the faculty member's 9-month academic salary, excluding administrative stipends or awards. Faculty may budget up to three full summer months of compensation per calendar year, but this must account for any administrative stipends paid during that period. Per CU Denver policy 1006, summer compensation must reflect actual effort provided during the summer and may not be used to compensate for effort during the academic year.

With permission from their dean, and in accordance with school/college and department policies, faculty may reduce their University-paid academic-year salary in exchange for an equivalent amount of compensation from research grants and contracts, consistent with the level of effort provided.

Faculty may also budget effort during the academic year toward a course buy-out, which relieves them of teaching responsibilities and allows more time for research. The required level of effort needed to cover a course buy-out varies by college, school, and department.

1.14 Sponsored Project Trainings

Two online courses are available through Skillsoft Percipio to assist PIs and other University employees in managing sponsored projects:

- [CU: Direct Charging to Sponsored Projects](#) (u00059)
- [CU: ePER – electronic Personnel Effort Reporting System](#) (u00055)

While the University does not require these courses, individual administrative units may mandate them for their employees, including PIs.

In addition, Fiscal Compliance offers a variety of training courses related to sponsored project management. These courses are available to all University employees. Additional information about available training opportunities can be found on the [Fiscal Compliance](#) website.

1.15 English Language and U.S. Dollars

All documents submitted to federal sponsors must be in English and provide financial information in U.S. dollars. The only exception to this requirement is when the federal funding opportunity announcement or the award terms and conditions provide otherwise. Regardless of federal requirements, all documents submitted to OGC must be in English and use U.S. dollars.

It is the responsibility of the PI and their administrative units to translate documents into English and convert financial information into U.S. dollars before submission to OGC or to a federal sponsor. All currency conversions must be computed using the conversion rate on the day the costs are incurred. The [Office of International Affairs](#) may assist administrative units in locating translation services.

1.16 Colorado Open Records Act (CORA)

The University of Colorado is a state institution, and documents associated with sponsored projects, including electronic communications such as e-mail, are subject to the Colorado Open Records Act (CORA).

Additional information about CORA is found on the University of Colorado's [Open Records Requests](#) website.

1.17 Suspension and Debarment

[2 CFR 180](#) prohibits federal funds from being provided to any individual or entity that has been suspended or debarred from federal activities. The PSC is responsible for ensuring compliance with procurement agreements and OGC Subcontracts is responsible for ensuring compliance with subagreements.

1.18 Prohibition on Certain Telecommunications and Video Surveillance Equipment

Federal law prohibits recipients and subrecipients of federal awards from obligating or expending federal loan or grant funds to procure certain telecommunication products. The PSC is responsible for ensuring the University of Colorado is in compliance for procurement agreements. PIs and their respective administrative units are responsible for ensuring subrecipient compliance.

Additional information is found at 2 CFR 200.216.

1.19 Working with Children's Hospital Colorado

The University is a close partner and affiliate of Children's Hospital Colorado (CHCO). The affiliation agreement between the two entities states that, in general:
* The University is the direct recipient of any non-industry (federal, state, non-profit) funding for research that takes place at CHCO, and the University is the only party to the contract with the sponsor.
* CHCO is the direct recipient of the funding for any industry-sponsored clinical trials where the site is CHCO, and both entities will enter into a tri-party agreement with the sponsor.
* The University is the direct recipient for industry-funded investigator-initiated trials, and both entities will enter into a tri-party agreement with the sponsor.

There are some rare exceptions to this rule, so please work closely with the OGC if you have any questions about which entity should be the recipient of funding for a particular project.

1.20 Interpersonal Agreements (IPAs) and Joint Personnel Agreements (JPAs)

An Interpersonal Agreement (IPA) is used when a University employee is temporarily assigned to a federal government entity, such as a Veterans Affairs hospital or a federal research laboratory. A Joint Personnel Agreement (JPA) is used when a University employee is temporarily assigned to a non-government entity, such as the Denver Research Institute.

Information regarding IPAs and JPAs is found on the OGC website.

1.21 Veterans Affairs Dual Appointments

University employees with a dual appointment with the Department of Veterans Affairs must maintain a valid and current memorandum of understanding (MOU) identifying the relationship with both entities.

Information regarding VA Dual Appointments is found on the OGC website.

1.22 Publication Rights for Researchers

Regent Law recognizes and supports the principles of academic freedom, and the University will not accept restrictions on research involvement or publications absent compelling reasons. The University's Restricted, Proprietary, and Classified Research policy identifies and clarifies situations in which the University may accept such restrictions. This policy specifically applies to CU Anschutz Medical Campus.

In the absence of a campus-specific policy for CU Denver, this policy is inherently applied to CU Denver until further notice. The Chancellor for CU Denver may approve exceptions to the policy.

1.23 Federal Updates to Existing Policies

Since January 2025, the federal government has made significant changes to award terms and conditions. These changes are often imposed with immediate effect. Information regarding federal updates can be found on the following websites:

- University of Colorado Federal Transition Updates
- CU Anschutz Federal Updates
- CU Denver Campus Communications

Due to ongoing changes at the federal level, the Handbook may not always reflect the most recent updates from federal agencies or judicial rulings. It is the responsibility of all University employees to remain informed of evolving government requirements and to ensure compliance with federal policies affecting federal awards.

1.24 Research Security Training Requirements for PIs and Senior/Key Personnel

Effective Fiscal Year 2026, the CHIPS and Science Act of 2022 (Section 10634) mandates that Principal Investigators (PIs) and senior/key personnel on federal research grants complete annual research security training as a condition for receiving new federal awards. Implementation of this requirement varies by federal agency.

For the National Science Foundation (NSF), National Institutes of Health (NIH), Department of Energy (DOE), and Department of Defense (DoD), this requirement may be fulfilled by completing the NSF's SECURE Center consolidated training module. The module takes approximately one hour to complete. Upon completion, individuals must download or print the certificate of completion and be prepared to provide it to the Office of Grants and Contracts (OGC) and/or the relevant federal awarding agency.

It is the responsibility of PIs and other personnel to ensure compliance with all applicable agency-specific requirements prior to proposal submission. OGC Pre-Award will be unable to submit any application to a federal agency or pass-through entity unless all required training has been completed. For questions regarding agency-specific requirements, please contact OGC Pre-Award.

1.24.1 National Institutes of Health (NIH)

As of October 1, 2025, NIH has not finalized final research training requirements and stated future guidance will be announced "in the coming months." (NOT-OD-25-161Update: Recission Notice re: Implementation of NIH Research Security Policies).

Additional information and University-specific resources are available on the Office of Regulatory Compliance's NIH Training Requirements website.

1.24.2 National Science Foundation (NSF)

In July 2025, NSF issued Important Notice No. 149: Updates to NSF Research Security Policies, outlining its training and certification requirements.

Under this policy, PIs, co-investigators, and other senior/key personnel must complete research security training within 12 months prior to the submission of a grant application. These individuals are also required to certify completion of the training on their Current & Pending (Other) Support documentation.

Chapter 2: Pre-Award

2.1 Roles and Responsibilities During the Pre-Award Phase

Developing an application or proposal is a shared responsibility between PIs and research administrators. The University employs a decentralized model for administering sponsored awards, so pre-award responsibilities may vary across administrative units. The following outlines common responsibilities,

Typically, a PI is responsible for:
- Identifying funding opportunities
- Developing the technical or scientific section of the proposal
- Securing necessary internal approvals, such as cost share
- Selecting subrecipients (if applicable) and ensuring their statements of work, budgets, and budget justifications are submitted on time

A research administrator typically handles the following tasks:
- Managing the proposal development and submission process
- Collaborating with the PI to prepare the project budget
- Ensuring the proposal complies with sponsor requirements
- Assembling the proposal in InfoED or sponsor-specific system
- Responding to sponsor inquiries and post-submission requests
- Routing the proposal.

OGC Pre-Award is responsible for:
- Reviewing and approving the proposal during the routing phase
- Verifying PIs have a financial conflict of interest disclosure on file
- Submitting proposals to most sponsors
- Submitting Just-in-Time requests to NIH
- Maintaining relevant sponsor system credentials and logins.

OGC Pre-Award assigns a Pre-Award Analyst to each administrative unit. Specific questions regarding a proposal should be directed to the assigned Pre-Award Analyst. General inquiries regarding the pre-award process can be emailed to xenia@ucdenver.edu.

2.2 Principal Investigator Eligibility

Each college and school within the University sets its own eligibility criteria for a faculty member to serve as a PI on a sponsored project. PI eligibility requirements are found on the [Principal Investigator Eligibility](#) website.

2.3 Finding Funding Opportunities

PIs are responsible for finding funding opportunities to support their research activities. The University offers two offices dedicated to assisting PIs in locating funding opportunities:
- [Office of Research Services](#) – Assists CU Denver faculty
- [Office of Research Development and Strategy](#) – Assists CU Anschutz Medical Campus faculty

Additional resources to help PIs find funding opportunities include:
- RP-Pivot - A database available to both campuses, RP-Pivot contains funding opportunities from the federal government, associations, foundations, and international organizations.
- SPIN - A database accessible through InfoED, SPIN includes funding opportunities from the federal government, non-federal sponsors (such as associations and foundations), and international organizations.
- Grants.gov – The federal repository for all competitive federal grant opportunities.
- SAM.gov Contract Opportunities is the federal repository for federal contract request for proposals.
- Federal agency websites, such as NIH, NSF, NASA, and DOE.
- Proposal Central – A resource for non-federal opportunities..

Limited Submissions
Some funding opportunities limit the number of proposals that the University may submit. For these limited submissions, PIs must first complete an internal competition at the University and be selected before developing and submitting a proposal to the sponsor. The University's Limited Submission Funding Opportunities website lists these restricted opportunities and provides instructions for completing the internal selection process.

2.4 Reviewing a Funding Opportunity Announcement

The funding opportunity should be thoroughly reviewed before deciding to submit a proposal. The announcement will provide important details, including instructions on how to apply, submission deadlines, funding restrictions, application requirements, selection criteria, and post-award requirements.

Key sponsor information to note includes:
- Formatting requirements (e.g., font type and size, paper margins, page length)
- Deadlines and other key dates
- Purpose of the funding opportunity and the sponsor's funding priorities
- Funding availability and restrictions on specific items of cost
- Budget limitations, including any restrictions on indirect cost rates
- Start date and duration of the award
- Application instructions
- Eligibility criteria, including whether subrecipients are allowed
- Cost share requirements
- Application and submission guidelines
- Review criteria
- Post-award requirements
- Program-specific terms and conditions

2.5 Responsibility for Submitting a Proposal

OGC Pre-Award is responsible for submitting all proposals that require Authorized Organizational Representative (AOR) submission, which includes nearly all federal awards. If AOR submission is not required, the PI or their respective administrative unit will submit the proposal to the sponsor according to the internal procedures of the administrative unit.

Internal deadlines for routing may vary depending on who is responsible for submission. PIs and their respective administrative units are accountable for meeting all University and sponsor routing and submission deadlines and assume full responsibility for any late proposal submissions.

2.6 Proposal Development Portals and Applications

When reviewing a funding opportunity announcement, it is important to identify the sponsor's requirements for how the proposal should be developed and submitted. For federal awards, the funding opportunity should be reviewed to determine if Grants.gov or a System-to-System (S2S) application can be used. When S2S can be used, the proposal must be developed and submitted through InfoED. For all other proposal development and submission requirements, the proposal will need to be created in the sponsor-specified portal and routed internally using the manual routing procedures for InfoED.

Examples of sponsor-specific portals include, but are not limited to:
* ProposalCentral
* Research.gov
* NIH Assist

Administrative units must complete the manual routing requirements for InfoED when a proposal is developed in a sponsor-specific portal.

2.7 NIH eRA Commons

PIs applying for an NIH account are required to have an NIH eRA Commons account. The Commons account must be associated with the University. To establish or update an eRA Commons account, PIs must complete the eRA Commons Access Request Form and submit the form to OGC Pre-Award at xenia@ucdenver.edu.

2.8 ORCiD

ORCiD (Open Researcher and Contributor Identification) is a unique identifier used to distinguish individual authors and contributors. Many federal research agencies require PIs and other senior or key personnel to provide their ORCiD in proposals and other required documents.

Additional information about ORCiD, including how to create an account, is available on the University's ORCiD website.

2.9 Common Proposal Elements

The format and contents of a proposal depend upon the sponsor's requirements. The following list identifies and explains common proposal elements.
* Cover page or proposal form: Most proposals include a form requiring institutional information and relevant project data. Federal agencies often require the use of the SF-424 for non-research awards or SF-424 (R&R) for research awards. Commonly requested information for the proposal form includes:
    o Institutional information
    o Identification of the sponsor's program, such as funding opportunity announcement and, for federal awards, the Assistance Listing (CFDA) number
    o Project title
    o Project start and end dates
    o PI information

- o   Amount of requested project funding
- o   Authorized Organization Representative (AOR) contact information and signature.
- Abstract or proposal summary. The abstract summarizes the major aspects of the proposed project, including the proposed project's hypothesis, specific aims, objectives, significance, and expected results. Most sponsors limit the length of the abstract.
- Project Narrative. The project description outlines the project, its purpose, relevance, and implementation. Each sponsor has specific guidelines for this portion of the proposal, including page limitations and formatting requirements. Common sections in the project narrative include:
  - o   Introduction
  - o   Specific aims or objectives
  - o   Background
  - o   Research strategy and description
  - o   Plan of work
  - o   Timeline
- Bibliography or references cited. This section lists all references cited in the proposal, including the PI's own publications. The required format may vary by sponsor.
- Biographical Sketch (BioSketch). Many sponsors require biographical sketches for all senior and key personnel, including PIs, co-investigators, and other significant contributors. Sponsors may have different format, naming conventions, and content requirements, but they typically request education background, appointments, research experience, and publications for each key individual.Budget and budget justification. Sponsors typically request a detailed budget that identifies cost categories and an accompanying justification for each cost.
- Budget and budget justification. Sponsors typically request a detailed budget identifying cost categories, along with a justification for each cost.
- Facilities and other resources. This section provides information on the available facilities and other resources for the project, such as lab or office space, library resources, equipment, or unpaid personnel. Sponsors use this information to assess the university's resources for carrying out the proposed project.
- Data Management. This section details how the PI will share their research data, including primary data, samples, physical collections, and other supporting materials created or gathered. Additional information, resources, and templates can be found on the [Research Informatics Projects](#) website.
- Current and pending support. PIs may need to identify all current funding and submitted proposals. This section ensures the sponsor that the researcher is not overcommitted and helps identify potential overlaps with other projects. Failing to disclose duplicative proposals on federal awards may lead to administrative, civil, or criminal sanctions.
- Compliance documents. Depending on the sponsor and the type of proposed project, the PI may need to submit various compliance documents. Sponsors may require this information at the time of the proposal or as a condition of funding. Compliance documents may include:
  - o   Institutional Review Board (IRB) approval for human subject research
  - o   Verification of Human Subjects Training
  - o   Institutional Animal Care and Use Committee (IACUC) approval
  - o   Institutional Biosafety Committee approval for recombinant DNA research
  - o   Conflict of Interest documentation
  - o   Compliance with federal disability laws
  - o   Sponsor and program-specific requirements
- Attachments and appendices. Some sponsors may allow appendices to be included with the proposal. PIs may add figures, charts, protocols, representations, certifications, letters of support, or other

supplemental materials. However, appendices cannot be used to bypass page limitations in the project description. Sponsors may limit what can be included in the appendices.

Institutional information and other commonly requested data elements can be found on the University's [FDP Clearinghouse profile](#).

2.10 Cost Sharing in Proposals

Cost share refers to the portion of a project's costs not covered by the funding agency, but instead paid by the University or other sources. This may include both cash contributions and in-kind contributions, such as donated services. Cost share obligations cannot be met through a salary differential with the PHS Salary Cap and usually cannot be met by using sponsored funds from another project.

There are two types of cost sharing in the pre-award phase:
- Mandatory Cost Sharing: Required by the sponsor as a condition for receiving the award.
- Voluntary Committed Cost Sharing: Offered by the University, even though it is not required by the sponsor.

Cost sharing is generally not appropriate on projects sponsored by for-profit entities. For federal research awards, [2 CFR 200.306](#) prohibits the use of voluntary committed cost sharing as a factor during the merit review process, unless otherwise required in the funding opportunity announcement.

Cost sharing may be funded by:
- Unrestricted General Fund programs,
- Auxiliary and Self-Funded Activity Fund programs, and
- Gift Fund programs.

The University discourages the use of voluntary committed cost sharing, as it strains University resources and imposes additional administrative burdens

The [Cost Share Request Form](#) must be included in the routing when cost share is included in a proposal.

Additional information on post award cost sharing requirements can be found on the [OGC Cost Sharing](#) website and in Chapter 4 of this Handbook.

2.11 Proposal Budget

A budget reflects the costs necessary for the successful completion of the project. Failure to include all relevant costs in a proposal budget during the pre-award phase can lead to delays, cost overruns, and other significant issues during the post-award phase.

Any cost included in a proposal must comply with sponsor requirements, the funding opportunity announcement, and University policies and procedures.

The total costs of sponsored research include both direct costs and indirect costs, also known as facilities and administration costs. Both types of costs are essential for a project's success.
- Direct Costs: Costs directly associated with a project and necessary to meet the project's objectives.
- Indirect Costs: Costs that benefit research in general but cannot be directly attributed to a specific project, such as utility and infrastructure costs, administrative salaries, and office supplies.

Direct costs are included in a proposal budget as estimates and are charged to the sponsor based on actual costs incurred during the post-award phase. Sponsors reimburse the University for indirect costs through an agreed-upon rate. For federal awards, the University negotiates an indirect cost rate agreement with the federal government every five years. This agreement, known as the Negotiated Indirect Cost Rate Agreement (NICRA), is published on the OGC website.

Additional information regarding the University's indirect cost rates is found in 2.13 Indirect Costs.

2.12 Faculty Compensation

The University has two policies governing faculty compensation:
- Faculty Compensation – Anschutz Medical Campus
- Faculty Compensation – University of Colorado Denver

2.13 Direct Costs

2.13.1 Salaries and Wages

Each employee who will directly work on a project must be included in the proposal. All personnel should be listed, and the amount of effort for each employee needs to be identified. Effort should be shown as a percentage of effort or in person-months based on their current university appointment or formatted based on sponsor requirements. For person-month requirements:
- Employees on an annual contract must have their effort reflected in calendar months.
- Employees on a 9-month contract must have their effort reflected in academic months and summer months.

The salary request is based on an employee's institutional base salary (IBS) as reflected in HCM.

Some sponsors impose a salary cap, which limits the amount of funding provided for salaries and wages. There is a Congressional imposed salary cap for awards made by Public Health Service agencies, including NIH. Current PHS and NIH salary cap requirements are found on the NIH Salary Cap, Stipends, and Training Funds website.

Time and effort commitments in proposals need to be carefully scrutinized. Reductions in time and effort commitments during the post-award phase generally require prior sponsor approval. No employee may be committed to more than 100% effort, which encompasses all University activities. It is typically expected that a PI will commit at least 1% of effort to a sponsored project. In total, PIs should commit no more than 90-95% effort to all sponsored project activities to meet other University responsibilities. This specific requirement may vary across administrative units.

Employees on a sponsored project generally need to be classified as either Senior/Key Personnel or Other Personnel. Special consideration should be given when classifying an employee as senior/key personnel, as prior approval may be required to replace those employees during the post-award phase.

Some sponsors will allow for salary escalation to be included in the proposal. If permitted by the sponsor and administrative unit, salary escalation should generally be budgeted at 3% for each budget year. Any salary escalation of 5% or more will require documented approval from the appropriate dean, supervisor, or appointing authority at the time of routing.

2.13.2 Fringe Benefits

Fringe benefits are the cost of benefits paid to personnel working on the grant and are based on the employee's job code and work location, as listed in HCM. The University requires proposals to include an estimated fringe benefit rate and to charge each employee's actual fringe benefit during the post-award phase.

The University's Budget Office releases the fringe benefit estimates annually, which are found on the Fringe Benefit page.

The University's Employee Fringe Benefit Pools policy provides the guidelines used by the Budget Office in developing fringe benefit rates and the costs included in the rates.

2.13.3 Consultants

A consultant, also known as an independent contractor, is an individual or organization capable of providing a service not readily available at the University. Consultants are typically engaged for short periods to provide services within the project's scope of work. A consultant is usually paid an hourly rate that incorporates all costs. The consultant's hourly rate must be reasonable, and sponsors may impose limits on a consultant's pay.
Any University of Colorado employee, regardless of campus, must be listed as an employee on a proposal and not as a consultant. Consultants do not have intellectual property rights under a sponsored project. Additionally, a consultant may not have any conflict of interest with the PI. For example, a PI should not hire their spouse to be a consultant on a project.

Additional information regarding consultants can be found on the University of Colorado website.

2.13.4 Equipment and Supplies

Equipment and supplies included in a proposal must be itemized and adequately justified. For federal proposals, equipment is defined as tangible property with a per-unit acquisition cost of $5,000 or more and a useful life of at least one year. Any property that does not meet this definition of equipment must be classified as a supply for federal proposals. The costs of equipment and supplies should be based on catalog prices, quotes, or bids. All associated costs, such as shipping and installation, should also be included.

Computing devices, such as laptops and desktops, included in a proposal must be essential for the project and sufficiently justified. Failure to include the costs of essential computing devices in the proposal can make it difficult to justify charging these costs during the post-award phase.

Costs that are typically classified as indirect costs may be included in a proposal as a direct cost only when adequately justified and when the cost exceeds what the University or administrative unit would typically provide. For example, postal costs should generally not be included in a proposal as a direct cost, but they could be allowed when the project requires the mass mailing of project-related surveys.

2.13.5 Travel

All travel costs included in a proposal must be directly tied to that proposal's objectives. Travel costs must comply with the University's travel policy, found at PSC Procedural Statement: Travel and the sponsor's policies. Funds can be requested for travel to scientific meetings, to conduct fieldwork, to collaborating laboratories, and for consultation with the funding agency or with colleagues concerning project research. Travel must be classified as either "domestic travel" or "foreign travel" in accordance with sponsor definitions.

Travel costs include expenses for transportation, lodging, subsistence, and related items incurred by employees in travel status on official business related to a sponsored project. Such costs may be charged on an actual basis or on a per diem or mileage basis in lieu of actual costs. If per diem is used for budgeting purposes, the first and last day of travel can only be charged at 75% of the allowable per diem rate.

2.13.6 Subagreements

Subagreements are agreements by which some scientific or programmatic aspects of a grant made to the University are contracted out to another organization or institution under the direction of a non-University investigator. Before including a subagreement in a proposal, the PI must fully understand and accept all responsibilities and administrative burdens associated with subrecipient monitoring, as well as the potential audit risks related to subagreements.

The proposal submitted to the sponsor must include evidence of commitment from the subrecipient, a scope of work, a proposed subrecipient budget, and any other forms required by the sponsor. Most sponsors do not allow adding a subrecipient during the post-award phase without prior approval.

For federal awards, the University must accept a subrecipient's negotiated indirect cost rate unless the funding opportunity announcement specifies a different indirect cost rate. Additionally, the proposal budget must include the first $25,000 of each subagreement's total budget as part of the indirect cost rate pool. This requirement does not apply to subagreements made from the University to other University of Colorado campuses, as outlined in the AB Nexus agreement.

The University prohibits the use of fixed-amount subagreements for all federal awards. All subagreements included in a federal proposal must be cost-reimbursable subagreements.

2.13.7 Research Patient Care Costs

Research patient care costs may only be included in a budget when allowed by the funding opportunity announcement. Research patient care costs include the costs of routine and ancillary services provided by hospitals to individuals participating in research programs.
Research patient care costs do not include:
- The otherwise allowable items of personal expense reimbursement, such as patient travel or subsistence, consulting physician fees, or any other direct payments related to all classes of individuals, including inpatients, outpatients, subjects, volunteers, and donors.
- Costs of ancillary tests performed in facilities outside the hospital on a fee-for-service basis (e.g., in an independent, privately owned laboratory) or laboratory tests performed at a medical school/university not associated with a hospital routine or ancillary service.
- Recruitment or retention fees.
- Data management or statistical analysis of clinical research results.

2.13.8 Participant Support Costs

Participant support costs are direct costs that support participants and their involvement in a sponsored project. Participants are individuals who engage in or attend program activities under a sponsored project, such as training or conferences, but who are not responsible for implementing the project. Individuals, including University employees, committing effort to the development or delivery of program activities under a sponsored project are not considered participants. Participants may include U.S. citizens, permanent residents, or foreign nationals. A participant must have a social security number (SSN) or an individual taxpayer identification number (ITIN).

Participant support costs may include the following:
- Event registration fees
- Stipend for housing and subsistence allowance
- Travel costs when the sole purpose of the trip is to participate in the project activity
- Event support costs for lodging and food expenses paid directly to the event facility, only if the payment is made on behalf of, or reimbursed directly to, the participant
- Meals and incidentals when on travel status
- Per diem paid directly to or on behalf of participants
- Training materials

Study subject payments are not considered participant support costs.

Careful consideration must be given when including participant support costs in a proposal. Most federal sponsors require prior approval before rebudgeting participant support costs during the post-award phase.

Inclusion of participant support costs in a proposal must adhere to sponsor requirements and the notice of funding opportunity. Some sponsors, such as NIH, have specific definitions for "participant support costs." The sponsor's definition will govern their awards.

2.13.9 Trainee Costs and Student Tuition

Costs associated with trainees and fellows must adhere to the sponsor requirements. Tuition costs for student workers may be included in the budget when allowed by the sponsor.

Additional information about the allowability for graduate student costs for CU Anschutz Medical Campus can be found in the University's Graduate Student Assistantships and Tuition Remission Policy.

CU Denver permits student tuition to be included in sponsored budgets in accordance with 2 CFR 200.430, 2 CFR 200.466, and sponsor policy. Tuition is considered a fringe benefit and should not be paid in lieu of salary. The inclusion of tuition in sponsored projects varies by school/college. In general, student tuition may be included in sponsored budgets when the student's activity for the sponsored project is tied to their degree program. This typically limits tuition coverage to graduate students conducting thesis-related research. Undergraduate tuition may be budgeted when the sponsor permits and when the student's activity for the sponsored project and their degree program align with the sponsored project. Tuition rates also vary by school/college and can be found at the CU Denver Tuition & Fees website.

2.13.10 Internal Service Centers and Core Laboratories

Costs related to internal service centers and core laboratories must be based on a fixed rate established by the center or laboratory through a cost study.

The University's Internal Service Centers and Core Laboratories Policy provides guidelines for establishing, budgeting, costing, administering, and accounting for internal service centers and core laboratories.

2.13.11 Study Subject Payments

Study subjects may be compensated for their involvement in a clinical trial, protocol, or survey. The University's Study Subject Payments Policy establishes the procedures and methods of payments to study subjects. These procedures and methods of payment will also need to be detailed in the IRB approved consent forms.

2.13.12 Other Direct Costs

Other direct costs necessary for a project can include, but are not limited to: publication costs, animal costs, equipment maintenance, and rental fees. All other direct costs must conform to sponsor requirements and be classified according to sponsor and University requirements.

2.14 Indirect Costs

Indirect costs are facility and administrative (F&A) costs that support research and are necessary for University operations but are not readily identifiable with a specific project. Indircanect costs include, but are not limited to:

- Building bond costs
- Utility costs
- Equipment depreciation
- Operations and maintenance, such as custodial and police services
- Departmental administration
- Sponsored project administration

Proposal budgets must apply the appropriate indirect cost rate, as identified on the University's Facilities and Administrative Cost Grid, which is reproduced below.

Primary Fund Source	Project Type	On-Campus	Off-Campus	Cost Base Type
Sponsors including but not limited to Federal, Federal Flow-Through, State, State Flowthrough	Organized Research	56%	26%	MTDC
	Instruction	42%	26%	MTDC
	Other Sponsored Projects	30%	26%	MTDC
	Clinical Trials	56%	26%	MTDC
Private Industry	Organized Research	56%	26%	MTDC
	Instruction	42%	26%	MTDC
	Other Sponsored Projects	30%	26%	MTDC
	Clinical Trials	28%	28%	TDC
Proof of Concept Awards (POCg)	All Types	8%	8%	MTDC
Non-profit Associations and Foundations (Sponsor Policy or 10% if no Policy)	All Types	10%	10%	TDC

Complete the following process to determine the correct indirect cost rate to use on sponsored projects:

- **Step 1** – Identify the sponsor
    - When the university is the recipient of a subagreement, use the indirect rate for the <u>prime</u> sponsor type.
    - Proof of Concept awards are used in the commercialization of an invention. The use of this rate is specific to certain CU Innovations/state partnership programs such as Colorado Office of Economic Development and International Trade (OEDIT) Advanced Industries Proof-of-Concept program.
    - Other non-federal and non-profit sponsored projects must have a published, consistently applied policy that establishes a specific indirect cost rate for the project for that rate to be honored by the university. For sponsors that do not have an established policy, the proposal must initially use an indirect cost rate of 10% TDC.
- **Step 2** – Identify the project type
    - The federal definitions of organized research, instruction, and other sponsored projects are found in [Appendix III of 2 CFR 200](#).
- **Step 3** – Identify if the project will be conducted on or off campus
    - This determination is based on where the majority of the work will be conducted
    - Verify if any CU buildings physically located on the campus use the [off-campus rate](#) or the [on-campus rate](#).
- **Step 4** – Apply the indirect rate against the appropriate cost base.

Applying the correct indirect (F&A) rate to the appropriate cost base is essential. The two cost bases are:
- **Total Direct Costs (TDC).** TDC is the sum of all direct costs charged to a sponsored project.
- **Modified Total Direct Costs (MTDC).**
    - The following costs are included in the MTDC cost base:
        - Salaries and wages
        - Fringe benefits
        - Materials and supplies
        - Animal resource center costs
        - Services
        - Travel
        - Subagreements and subcontracts up to the first $25,000 of each subagreement or contract
        - Genomic Arrays subject to NIH Policy (NOT-OD-10-097) effective 5/13/2010
    - The following costs are excluded from the MTDC cost base:
        - Equipment
        - Capital Expenditures
        - Patient Care Costs (when provided by external entities)
        - Tuition Remission
        - Rental Costs (Building Rental Costs)
        - Scholarships
        - Fellowships
        - IRB Fees
        - Portion of subagreements and contracts in excess of the first $25,000

The University's indirect cost rate must be applied unless a sponsor requires the use of a lower indirect cost rate, as indicated in the funding opportunity notice or other guidance. For example, NIH only allows an 8% indirect cost rate for Training (T) awards and does not allow for indirect costs for conference grants or fellowships.

A PI may submit a waiver to request the use of a lower indirect cost rate. The waiver request must be submitted during proposal development. Please note the following regarding the use of a lower rate:

- A PI may not negotiate an indirect cost rate with the sponsor.
- A waiver should only be requested in rare, exceptional circumstances
- The University **HIGHLY DISCOURAGES** the use of a lower indirect cost rate
- A private sponsor should be charged the same rate as federal government
- The PI must submit a request through the F&A Waiver Process
- The University must approve the request before a lower rate can be used in the proposal
- The University will reject all waivers that are associated with a for-profit entity
- For federal research awards, the use of a lower rate in a proposal cannot be used in the decision-making of the federal sponsor

Additional information about the waiver process is found on the [OGC website.](#)

The University's [Fiscal Policy for Facilities and Administrative Costs](#) details the distribution of indirect cost recovery to administrative units.

2.15 NIH Modular Budgets

For certain NIH activity codes, a modular budget may be submitted instead of a detailed budget. While the use of a modular budget does not require the submission of a detailed budget to NIH, a detailed budget and budget justification must be included in the routing to OGC.

Additional information about NIH modular budgets is found on the [NIH Develop Your Budget](#) website.

2.16 Other Support Reporting Requirements and Process

Federal research proposals generally require PIs and senior/key personnel to report other active and pending support to ensure there is no scientific, budgetary, or commitment overlap. "Other Support" is sometimes referred to as "current and pending support" or "active and pending support."

Other Support includes all resources made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at the University. This includes but is not limited to:

- Grants, Cooperative Agreements, and Contracts from the following sponsor types:
  - Federal (e.g., NIH, Department of Defense)
  - State (e.g., Colorado state agencies, other state funding entities)
  - Non-federal (e.g., professional societies, disease foundations)
  - Foundations (e.g., American Heart Association, Susan G. Komen Foundation)
- Sponsored Research Agreements (SRAs) from industry sponsors
- Clinical Trial Agreements (CTAs)
- Internal Awards made through competitive institutional processes (e.g., CU Anschutz or CU Denver pilot grant awards)
- Any funding or resources provided with expectations of time, services, or deliverables in return.
  - *Note:* NIH does not require reporting of "gifts," which are defined as resources provided with no expectation of return. Similarly, training awards, prizes, and gifts are not required to be reported.

- Support for Non-Employee Scientists (NES) or Visiting Scholars working in a PI's laboratory when funded by an external source (domestic or foreign, including self-funding).
- Resource support from external organizations, including in-kind contributions (e.g., laboratory space, equipment, supplies, personnel).
  - For foreign resources, NIH requires supporting documentation (contracts, grants, agreements, or appointment/employment documents). If these documents are not in English, the PI and their respective administrative unit are responsible for providing accurate translations.
- High-value in-kind resources not freely available (e.g., unique animal models, cell lines).
- Consulting arrangements involving research activities.

Responsibilities of PIs and senior/key personnel include:
- Disclosing new sources of Other Support as soon as they become aware of them
- Working with their respective administrative unit, OGC, and/or the Office of Regulatory Compliance to determine when disclosures to sponsors are required
- Participating in the preparation of Other Support documentation and providing their signature attesting to its accuracy
- Complying with all applicable sponsor requirements

2.16.1 NIH Requirements

Effective October 1, 2025, NIH requires recipient institutions to provide training and to implement a written and enforced policy for PIs and senior/key personnel on the requirements on the disclosure of Other Support.

In addition to the responsibilities described in section 2.16, for NIH proposals and awards, PIs and senior/key personnel are also required to:
- Complete required training on Other Support
- Submit accurate Other Support documentation to NIH:
  - At Just-in-Time, when requested by NIH
  - With the annual RPPR
  - As necessary, when new support arises during the project period of active NIH awards

Failure to comply with University and NIH requirements may result in proposal rejection, delays in project set-up, disallowed costs, or suspension or termination of the award.

Compliance will be effective for applications submitted on or after January 25, 2026.

Additional information and University-specific resources are available on the Office of Regulatory Compliance's NIH Training Requirements website.

2.16.2 NSF Requirements

Information for NSF reporting requirements for Current and Pending (Other Support) are found on the NSF Documents Requirements for Senior/Key Personnel website.

2.16.3 Department of Defense (DoD)

Disclosure requirements for DOD proposals vary by agency. PIs and their respective administrative units should carefully review and follow disclosure guidance in the specific DoD proposal solicitation.

2.17 Routing and Proposal Submission

All extramural requests for program funding and sponsorship, including grant applications, contract proposals, or other proposals for research, training, or service support, must obtain institutional authorization prior to being submitted to the sponsor or pass-through entity. Routing is completed via InfoED. It is the PI and administrative unit's responsibility to meet all routing deadlines and requirements. Routing deadlines are dependent upon who is responsible for submitting a proposal.

The following table identifies routing deadlines.

Responsible for Submitting Proposal	Requirement
OGC is submitting the proposal to the sponsor	• For the initial review, OGC must receive the proposal by the end of the 12th business day prior to the submission deadline • The final electronic version must be in InfoEd by 4:00pm on the 4th business day prior to the submission deadline. Notification must be sent to eapp.xenia@ucdenver.edu when the application is ready for submission. • If the application is submitted by a method other than InfoEd, such as through a sponsor-specific portal, the email notification must include the application file or the application must be ready in the applicable sponsor portal. Additionally, research administrators must ensure OGC has access to the application in the sponsor portal.
The Department is submitting the proposal to the sponsors	• OGC must receive the routing package 5 full business days prior to the submission deadline

The following documents must be routed:
- Routing form (i.e., Approval of Application for Grant or Contract) electronically signed by PI, Department Chairperson, and applicable Dean or Administrator via InfoEd eRA.
- Clinical Trials Supplemental Budget and Certification (CU Denver Fiscal Policy 4-01) industry-sponsored contracts only
- Sponsor's instructions (for non-NIH sponsors only)
- All forms required by the sponsor. The information should be complete, and all signatures (except institutional endorsement supplied by Grants and Contracts) should be obtained, prior to routing.
- Budget pages. Regardless of the sponsor's budget requirements, routings for competing grants should include detailed budget pages or spreadsheet for the entire project period. Routings for non-competing years of a project should include budget information on the Routing form, but additional detailed budget information is not necessary unless the sponsor requires it.
- Salary increase verification. If the PI's salary in the proposal is above UCD allowable proposal inflationary increases (5%), documentation of the approved salary increase from the appropriate dean, supervisor or appointing authority must be included as an internal document with the routing.
- VA MOU. For any person who is listed in the proposal budget who has a dual appointment with the VA, their current fully executed VA MOU must be included with the proposal routing as a required internal document. All other documents (e.g., biographical sketches, other support pages, letters of support) to be submitted to the sponsor.

- If any of the funds will be contracted to other organizations, please include the following from the subrecipient organizations:
    - All forms the sponsor requires for subrecipients. The information should be complete and must bear institutional endorsement from the subrecipient organization.
    - Budget pages. Budget figures should always be supplied by the subrecipient in order to insure the proposed subrecipient budget is in line with the subrecipient's institutional policies.
    - Budget justification
    - Scope of work
    - Any and all other documents that will be submitted on behalf of the subrecipient (e.g., biographical sketches, other support pages)
    -

All applications and proposals route to OGC must be in a complete and final format upon receipt and include the Routing Form, other required internal forms, approval signatures, a print-out of all parts of the grant application, including attachments, and a print-out of instruction materials (non-NIH Sponsors only).

Additional information about routing requirements is found on the [OGC website](#).

2.18 Post-Submission Requests and NIH Just-in-Time Requests

Many sponsors will request additional information regarding a proposal after the initial sponsor review. These requests are frequently time-sensitive, and failure to provide the requested information by the sponsor's deadline will generally result in proposal rejection. OGC must submit all required documents when AOR submission or signature is required by the sponsor.

NIH uses Just-in-Time (JIT) procedures to request certain proposal documents that were not due at submission. A JIT could request Other Support, certification of IRB approval, or verification of IACUC approval, among other documentation.

PIs may receive JIT requests from NIH after it has completed its initial review of the proposal. A JIT does not constitute funding. All requested materials must be uploaded into eRA Commons, and OGC is required to submit the requested documents to NIH.

Additional information about JITs is found on the [OGC website](#).

Chapter 3: Award Phase

3.1 Receiving a New Award

Upon receiving a notice of award, PIs and research administrators are responsible for carefully reviewing the award's terms and conditions. Particular attention should be paid to the following elements:
- The Contact Email
- Project Period and Budget Period start and end dates
- Reporting requirements and deliverable schedule
- Billing and payment terms
- Award terms and conditions, such as:
  - SNAP Authority for NIH awards
  - Prior approval requirements
  - Allowable costs
  - Carryover authority
  - Pre-award spending authority
  - No-Cost Extension authority
  - Specific award terms and conditions
  - Billing frequency
  - Closeout requirements
  - Rebudgeting authority
- Budget amount: PIs and research administrators should:
  - Compare the proposal budget to the award budget and identify any differences
  - Verify the correct indirect (F&A) rate has been applied to the award
  - Verify any cost-sharing requirements

Any errors or undesired terms and conditions must be addressed with the sponsor before the University executes the award. All award terms and conditions become legally binding once the University executes the award or draws down funds from the federal payment systems.

After reviewing the award, the PI or administrative unit should route the award. The following table outlines the routing requirements for award notifications:

Scenario	Required Action
Project has never been routed through InfoEd	Complete the University's routing process in InfoEd and upload the award document
Proposal was routed through InfoEd and the award notice requires an AOR signature	Email the award document to OGC.Contracts@cudenver.edu and include the proposal number from InfoEd
Proposal was routed through InfoEd and the award notice does not require a signature (most federal awards)	Email the award document to Ogc.Awardsintake@ucdenver.edu
The award document is an amendment to an existing award	Complete the Contract Amendment form

3.2 Project Period and Budget Period Terminology

Sponsors generally provide two sets of dates on the award notice that reflect the project period and the budget period.

- A project period (or period of performance) indicates the duration of the award, typically ranging from one to five years.
- A budget period refers to the timeframe in which the current amount of funding is valid, typically lasting one calendar year.

3.3 Reviewing the Award Budget

The award notice should provide a summary of the award budget and funded budget categories. The following example is from one federal agency. While the format of the budget will vary for each sponsor, the general information provided will typically be the same.

```
              Summary Federal Award Financial Information
19. Budget Period Start Date 06/01/2024 – End Date 04/30/2025
20. Total Amount of Federal Funds Obligated by this Action        $524,462
        20 a.  Direct Cost Amount                                 $342,631
        20 b.  Indirect Cost Amount                               $181,831
21. Authorized Carryover
22. Offset
23. Total Amount of Federal Funds Obligated this budget period    $524,462
24. Total Approved Cost Sharing or Matching, where applicable           $0
25. Total Federal and Non-Federal Approved this Budget Period     $524,462
        -------------------------------------------------------------------
26. Project Period Start Date 06/01/2024 – End Date 04/30/2029
27. Total Amount of the Federal Award including Approved Cost      $524,462
        Sharing or Matching this Project Period
```

The following table explains each data element found in the award financial information summary.

Data Element	Explanation
Line 19	Identifies the dates for the budget period. *Note:* if carryforward authority is not provided for the award, the funds will expire at the end of the budget period.
Line 20	Identifies the total amount of direct costs and indirect costs available for the budget period
Line 21	Identifies how much funding is being carried over from the previous budget period
Line 22	Identifies how much funding is offset from the previous budget period
Line 23	Identifies the total amount of federal funding available for the budget period – it is the sum of Lines 20-22
Line 24	Identifies the cost share obligations for the budget period, which is the amount of University funds required for the award. *Note:* some sponsors require the cost share obligations to be met during the budget period, while other sponsors require the cost share obligations to be met during the period of performance.
Line 25	The total amount of federal and University funds for the budget period - it is the sum of Lines 23 and 24.
Line 26	Identifies the dates for the project period, also known as the period of performance
Line 27	Identifies the amount of funding provided to the project to date – this is not an indication of the total amount of the award

In addition to the award financial information summary, the award notice may also provide funding levels for each budget category. Each sponsor establishes specific requirements and allowability for rebudgeting and prior approval of cost categories that are not funded. The following example identifies funded budget categories.

Salaries and Wages	$155,198
Fringe Benefits	$29,008
Personnel Costs (Subtotal)	$184,206
Materials & Supplies	$72,216
Travel	$6,318
Other	$52,958
Publication Costs	$4,500
ADP/Computer Services	$4,500
Tuition Remission	$17,933
Federal Direct Costs	$342,631
Federal F&A Costs	$181,831
Approved Budget	$524,462
Total Amount of Federal Funds Authorized (Federal Share)	$524,462
TOTAL FEDERAL AWARD AMOUNT	$524,462
AMOUNT OF THIS ACTION (FEDERAL SHARE)	$524,462

The award notice may also provide a summary of expected funding for each budget category throughout the period of performance. This summary helps with funding projections and budget management; however, future funding levels are not guaranteed. Sponsors may adjust funding levels based on factors such as available funding, the PI's satisfactory programmatic performance, and compliance with award terms and conditions.

SPREADSHEET SUMMARY
AWARD NUMBER: ▮▮▮▮▮▮▮▮

INSTITUTION: UNIVERSITY OF COLORADO DENVER

Budget	Year 1	Year 2	Year 3	Year 4	Year 5
Salaries and Wages	$155,198	$172,442	$172,442	$172,442	$172,442
Fringe Benefits	$29,008	$32,231	$32,231	$32,231	$32,231
Personnel Costs (Subtotal)	$184,206	$204,673	$204,673	$204,673	$204,673
Materials & Supplies	$72,216	$80,240	$80,240	$80,240	$80,240
Travel	$6,318	$7,020	$7,020	$7,020	$7,020
Other	$52,958	$58,842	$58,842	$58,842	$58,842
Publication Costs	$4,500	$5,000	$5,000	$5,000	$5,000
ADP/Computer Services	$4,500	$5,000	$5,000	$5,000	$5,000
Tuition Remission	$17,933	$19,925	$19,925	$19,925	$19,925
TOTAL FEDERAL DC	$342,631	$380,700	$380,700	$380,700	$380,700
TOTAL FEDERAL F&A	$181,831	$202,034	$202,034	$202,034	$202,034
TOTAL COST	$524,462	$582,734	$582,734	$582,734	$582,734

3.4 NIH SNAP Authority

NIH awards may be subject to Streamlined Noncompeting Award Procedures (SNAP), which are designed to reduce administrative burden. SNAP authority:
- Changes the due dates for NIH RPPRs to the 15th of the month preceding the month in which the budget period ends. For example, if the budget period ends on 11/30, the due date for the RPPR is 10/15.
- Modifies the RPPR format by removing the budget module.
- Requires the submission of one financial report at the end of the period of performance, rather than an annual financial report.

3.5 Contract Review, Negotiations, and Acceptance

OGC Contracts reviews all agreements and amendments involving sponsored projects (Fund 30/31) and fee-for-service revenue-generating activities (Fund 20/28/29). OGC Contracts has five business days to complete an initial review of an agreement, though most reviews are completed within a few days. After the review, OGC Contracts will work with the PI or administrative unit to negotiate the award's terms and conditions with the sponsor.

The time required to negotiate the agreement depends on the complexity of the agreement, the responsiveness of the sponsor, and the type of award anticipated. Award negotiations with private industry generally take longer than those with federal awards.

PIs and their administrative units cannot sign an award or give the impression they are negotiating on behalf of the University. A PI who fails to obtain the necessary University approval for an award may be held personally liable for all aspects of the award and its contractual terms.

3.6 Creating a Revised Budget

The budget in a proposal represents a request for funding. Frequently, sponsors do not fully fund the proposed budget in the award. Before OGC can set up the award in the financial system, PIs and their administrative units must develop an internal detailed budget that reflects the awarded amount, if the award does not already contain a detailed budget. The revised budget should be sent as soon as possible to ogc.4status@ucdenver.edu.

3.7 Reviewing the Routing Form

OGC Award Set-up uses the information provided in the routing form to establish the project in the financial system and create the associated speedtype(s) for the project. Errors or incomplete information on the routing form will delay the set-up process. The following information should be reviewed on the routing form:
- Verify employee ID numbers are correct
- Ensure the employees listed as "Fiscal Staff" on the routing form are correct
- Verify the correct org code has been used
- Confirm the location of the project on the routing form is correct and appropriately classified as either "on campus" or "off campus"

3.8 Award Setup

After the PI and administrative unit have completed revising the internal budget, OGC Award Set-up will establish the project in the University's financial system and create the associated speedtypes for the project. This process typically takes between 5 and 10 business days.

Upon receiving a speedtype from OGC, the PI and administrative unit must review the project's information in CU-Data to verify that the award has been correctly created. The following data elements should be verified:

- Fund number
- Org Code
- Project Principal
- Project Fiscal Manager
- Project Type
- Project Sponsor
- Project Award Type
- Project Contract Type
- Project Bill Type
- Project Start and End dates
- Project F&A Rate
- Account Codes
- Budget

Any errors should be corrected as soon as possible by contacting ogc.4status@ucdenver.edu. To correct or update an Org Code, the research administrator must complete the OGC Org Change Request form.

3.9 Pre-Award Spending

Federal research awards generally provide the authority for a recipient to incur costs up to 90 days before the beginning of the period of performance. Pre-award costs must conform to the award's terms and conditions, be allowable by the sponsor, and be necessary for the project.

A request for a pre-award speedtype must be submitted using the Award Pre-Activation Speedtype Request form – OGC will not automatically establish a pre-award speedtype.

PIs and administrative units should exercise caution when incurring pre-award costs. All pre-award spending is at the risk of the PI and administrative unit if the award is not executed or is terminated by the sponsor. Any pre-award costs that cannot be charged to an award are the responsibility of the PI and the administrative unit that incurred the costs.

Chapter 4: Post Award – Financial Administration

4.1 Roles and Responsibilities for Financial Administration

PIs are fully responsible for all aspects of a sponsored project, including both project management and financial administration. Administrative unit research administrators assist the PI and are responsible for performing administrative tasks. OGC provides oversight functions for administrative units, offering guidance, processing invoices, and submitting financial reports.

All employees must comply with the following University of Colorado policies when managing University and sponsor funds and charging costs.
- Fiscal Roles and Responsibilities
- Propriety of Expenses

4.2 Cost Principles

The term "cost principles" refers to which costs can be charged to a project and how those costs should be classified, either as direct costs or indirect costs. Properly applying the cost principles is necessary throughout the award lifecycle. During the pre-award phase, the proposal budget must only include costs that are allowable by the sponsor and necessary for the project. During the post-award phase, costs that conform to the cost principles and University policy may be charged to the award.

Any cost disallowance, fines, or penalties assessed against a project for non-compliance with sponsor requirements or University policy is the responsibility of the PI and their respective administrative unit.

Subpart E of 2 CFR 200 (Uniform Guidance) provides general guidance for the cost principles for federal awards. The following table summarizes the significant provisions in Subpart E.

Title	Sections	Summary
General Provisions	§200.400-401	• Identifies the applicability of the cost principles for federal awards • States the grant recipients may not make profit on an award and may not retain a residual balance, unless authorized by the award terms and conditions
Basic Considerations	§200.402-411	• Provides for the tests to determine if a cost can be charged to a federal award
Direct and Indirect Costs	§200.412-415	• Defines direct costs and indirect costs
Special Considerations for States, Local Governments, and Indian Tribes	§200.416-419	• Provides special treatment for select entity types - not applicable to PIs or administrative units
General Provisions for Selected Items of Cost	§200.420-476	• Identifies common costs for federal awards and explains if those costs may be charged to a federal award and how to classify those costs

NIH awards follow the cost principles in Chapter 7 of the NIH GPS, with the selected items of cost for NIH awards is found in Chapter 7.9 of the NIH GPS. For certain NIH Activity Codes, such as T and F awards, additional cost considerations are provided in Chapters 9-19 of the NIH GPS.

Each non-federal sponsor will establish its own policies for cost considerations. 2 CFR 200 is not applicable to non-federal awards.

4.3 Cost Considerations

To charge a cost to a sponsor, the cost must meet **all** of the following criteria:
- Allowable
- Necessary and reasonable
- Allocable
- Consistently treated as either a direct cost or indirect cost

4.3.1 Allowability

A cost must be allowable by the terms and conditions of the award. To determine allowability, PIs and research administrators should carefully review the award terms and conditions, sponsor requirements, and the selected items of cost. A cost is generally allowable if it was included in the proposal and accepted by the sponsor, though some sponsors may still require prior approval before those costs are incurred on an award. If a cost meets all the criteria under 2 CFR 200.403, then that cost generally is considered allowable.

4.3.2 Necessary and Reasonable

A cost must be necessary for the successful completion of the project, and the price must be reasonable. If a cost meets all the criteria under under 2 CFR 200.404, it is generally considered necessary and reasonable.

It is important to note that the federal cost principles require computing equipment to be "essential" for a sponsored project. The "essential" threshold is more rigorous than the "necessary" threshold.

4.3.3 Allocability

A cost can only be charged to an award in proportion to the benefit that award receives from the cost. Items of cost that benefit multiple activities, such as sponsored projects and University-supported activities, must be charged to each activity.
Common costs that must be allocated include:
- Equipment used on multiple activities
- Large supply purchases that benefit multiple activities
- Travel costs that benefit multiple activities

The allocation method for each cost must be documented and retained for audit purposes. The allocation method must be revised as necessary. Criteria for allocability is provided under 2 CFR 200.405.

4.3.4 Consistency

The University must generally treat costs consistently as either a direct cost or an indirect cost. To charge a typical indirect cost directly to an award, the cost must either have been included in the proposal and accepted by the sponsor or be approved by OGC.

4.4 Direct Charges to Sponsored Projects

The University prohibits the following actions related to direct charges on a sponsored project:

- Rotating charges among sponsored projects by month without establishing that the rotation schedule credibly reflects the relative benefit to each grant
- Assigning charges to the sponsored project with the largest remaining balance or using other bases outside of the benefit to the project
- Charging the budgeted amount instead of charging an amount based on actual usage
- Assigning charges to sponsored projects in advance of the time the cost is incurred
- Assigning charges to sponsored projects for costs incurred outside of the project period, including a pre-award period, if applicable
- Identifying a cost as something other than what it actually is
- Charging expenses exclusively to sponsored projects when the expense also supports non-sponsored project activities
- Assigning charges that are part of the normal administrative support for contracts and grants (e.g., proposal preparation, accounting, payroll)
- Charging to sponsored projects that are ending to expend funds without regard to the appropriateness of the costs
- Shifting costs to other sponsored projects due to cost overruns, avoidance of restrictions imposed by law, or for convenience. Convenience would include charging a direct cost to a project on a temporary basis, pending the set-up of a new project account number
- Charging administrative costs directly to sponsored projects because the administrative unit requires the PIs to fund these costs (e.g., telephone, office supplies)

Additionally, special consideration should be given when using sponsored funds for equipment or large supply purchases in the last few months of an award. Sponsors and auditors are likely to scrutinize these purchases, as they may indicate an attempt to spend down remaining funds without regard to the cost principles. PIs and their administrative units should discuss equipment and large supply purchases in the final months of an award with OGC before proceeding with the purchase order.

4.5 Charging Indirect Costs Directly to an Award

The University should consistently treat costs as either direct or indirect costs. In certain circumstances, indirect costs may be directly charged to an award when those costs have been included in the proposal and accepted by the sponsor, or with OGC approval.

PIs and their administrative units are required to complete the Sensitive Cost Checklist and submit the form to OGC for approval to charge an indirect cost as a direct cost to an award. OGC must approve the request before a PI or administrative unit directly charges a typical indirect cost.

4.6 Salaries and Fringe Benefits

Salary charges must reflect the time and effort each employee has worked on a project. Faculty and exempt professional staff are not required by the University to track hours on a daily or weekly basis, but should maintain a reasonable estimate of their average effort each semester to provide an accurate breakdown of effort.

Salary charges are based on each employee's institutional base salary (IBS), which is the annual compensation paid by the University for research, instruction, patient care, administration, or other activities. The IBS excludes bonus payments, extra compensation, and any income earned outside of University employment. IBS information can be accessed through HCM. Employees on the Anschutz Medical Campus are typically on a 12-month

appointment, while employees on the Denver Campus may be on either a 12-month or a 9-month appointment, with the option for three months of summer salary.

Some sponsors may impose a salary limitation, or salary cap, on their awards. All Public Health Service (PHS) agencies must comply with the PHS Salary Cap, which is tied to the Executive Level II of the Federal Executive Pay Scale. The NIH Salary Cap Summarywebsite provides current and historical data. If an employee's IBS exceeds the salary cap, the administrative unit is responsible for covering the salary costs that exceed the sponsor's cap. Additional information on salary caps can be found on the OGC website.

For institutional training grants (T32, T90, TL1) and individual fellowships (F32), the stipend level for the first year of support is determined by the number of full years of relevant postdoctoral experience when the award is issued. Relevant experience may include research, teaching assistantships, internships, residencies, clinical duties, or other time spent in a health-related field beyond the qualifying doctoral degree. Once the stipend level is determined, the trainee or fellow must be paid at that level for the entire grant year. The stipend for each additional year of Kirschstein-NRSA support is the next level in the stipend structure and does not change mid-year. Additional information about training stipends can be found on the NIH website.

Fringe benefits are charged to sponsors based on the actual fringe benefit costs for each employee.

Information and resources regarding postdoctoral scholars can be found on the University's Postdoctoral Office website.

4.7 ePERs – Time and Effort Reporting

The University uses electronic Personnel Effort Reports (ePERs) to certify time and effort on federally sponsored projects in compliance with 2 CFR 200.430. The ePER documents the amount of time and effort an individual has contributed to a federal award, compared to the proposed time and effort. The University also uses ePERs to document any effort that is part of cost sharing on a sponsored project. Employees are responsible for submitting timely and accurate ePERs; failure to comply is a violation of federal regulations and University policy.

Every employee who is paid from or has committed cost-sharing effort to a sponsored project must certify an ePER. Hourly employees do not complete an ePER, but they must certify their project effort on their timesheet by going to the CU Resources tab in the employee portal, selecting "Business Applications," and clicking on the ePER link.

University employees are required to certify their ePER each semester:
- Fall (September-December)
- Spring (January-May)
- Summer (June-August)

The Office of University Controller sends email notifications when ePERs are ready for certification. Departmental research administrators do not complete an ePER unless a portion of their salary is paid directly from a federal award.

The term "time and effort" encompasses the entirety of an employee's work at the University. It is not based on a 40-hour work week. Effort is reported as a percentage of total work, and total effort cannot exceed 100%.

Effort includes all work performed as a university employee, including:

- Research
- Teaching
- Service
- Chair duties
- Proposal writing
- Clinical work
- Administrative duties

Any effort that is not paid by the University is not considered part of the university's effort and cannot be included in the University's ePERs. For example, employees working at the VA Hospital or in private industry would not include those hours and would certify their ePER for the 100% effort that is provided at the University, regardless of the number of hours worked outside the University.

ePERs must be certified within 120 calendar days from ePER creation. Research administrators can run the "Uncertified ePERs by Org(s) or Campus" report in CU-Data to identify which employees have not certified their ePERs and remind them of their responsibilities. PIs, or their designee, are responsible for certifying ePERs for employees who no longer work at the University.

Errors on the ePER must be corrected before certification, and the ePER must be uncertified if there are any mistakes. To correct payroll issues, a PET may be required to reflect the actual effort, and the funding distributions for employees may need to be updated. Research administrators should work with their HR Administrators for assistance in updating funding distributions.

PIs should be aware of award terms and conditions relating to time and effort. Most federal awards require prior approval when there is a 25% reduction in time devoted to the project, per 2 CFR 200.308. The 25% reduction is cumulative over the period of performance.

Cost-sharing obligations on federal awards may be met by the University paying for a portion of salaries and fringe benefits on a sponsored project. Employees must meet all mandatory or voluntary committed cost-share effort in addition to the effort paid by the sponsored project. An ePER must reflect when an employee has contributed 5% or more of voluntary uncommitted cost share.

Under 2 CFR 200.430, the University must ensure that all salaries and associated fringe benefits are accurately charged to federal awards and that the charges reflect the actual effort expended on the sponsored project. Failure to certify a timely and accurate ePER can result in disallowed costs for associated salary and fringe benefits and other penalties, as provided for by 2 CFR 200.

The Office of the University Controller provides a ePERs and Resources website, and additional information regarding ePERs is found on the OGC website. Questions and requests for assistance may be emailed to OGC at epers@ucdenver.edu.

4.8 Sensitive Items

Some costs are classified as "sensitive expenses" due to the potential for non-compliance, audits, and sponsor reviews. Such costs include:
- Alcohol
- Computing equipment
- Meals

- Moving expenses
- Recognition expenses
- Travel
- Tips
- Visas

All costs charged to a sponsored project must conform to University policies and sponsor requirements. Additional information can be found in the University's [Finance Procedural Statement: Sensitive Expenses](#). Moving and relocation costs must adhere to the University's [Moving and Relocation Expense Reimbursement Policy](#).

4.9 Cost Sharing

Cost sharing refers to the portion of a sponsored project that is not supported by the sponsor and is instead funded by the University or a third party.
There are three types of cost sharing:
- Mandatory Committed Cost Sharing: The cost-share funds required by a sponsor, as identified in the notice of award.
- Voluntary Committed Cost Sharing: The cost-share funds provided in the proposal, in excess of the mandatory committed cost share requirements. If approved by the sponsor, this voluntary committed cost share becomes an obligation for the PI to meet.
- Voluntary Uncommitted Cost Sharing: The cost-share funds provided in the post-award phase, in excess of the committed cost share. The University **highly discourages** the use of uncommitted cost share, as the respective administrative unit is responsible for paying these costs.

Cost sharing is typically not appropriate for projects sponsored by for-profit entities. For federal research awards, voluntary committed cost sharing cannot be considered during the merit review process unless otherwise required in the funding opportunity announcement. Cost-share obligations cannot be met through a salary differential with the PHS Salary Cap and generally cannot be met by using sponsored funds from another project. Cost sharing may be funded by Unrestricted General Fund programs, Auxiliary and Self-Funded Activity Fund programs, and Gift Fund programs.

A PI must work with their respective administrative unit to obtain the necessary approval to include cost share in a proposal. Departmental approval is required because cost sharing represents a redirection of departmental resources to support sponsored projects. The effectiveness and expected benefits of each cost-sharing agreement should be evaluated against the administrative requirements and responsibilities inherent to the PI, the department, and central administration. Departments approve proposed cost share by providing signature approval on the [Cost Share Request](#) form, which must be included in the routing to OGC before submission to the sponsor.

The PI and their respective administrative units are responsible for identifying, tracking, documenting, and meeting all cost-share obligations and requirements. Committed cost share, whether mandatory or voluntary, is legally binding. PIs and their administrative units are responsible for any disallowance or loss of funding due to failure to meet any cost-share obligations.

Committed cost sharing is indicated on an ePER. Employees should be notified of their committed cost share before the start of the award and should be made aware of the importance of meeting those obligations. ePERs must reflect any voluntary committed cost share of 5% or more of an employee's time and effort.

The University requires cost sharing expenditures to be:
- Verifiable by the University
- Used as cost sharing for only one sponsored project
- Allowable under the award terms and conditions
- Properly allocated
- Necessary and directly related to the project's objectives
- Provided for in the approved budget when required by the sponsor
- Not paid by the federal government under another award, except where authorized by statute to be used for cost sharing
- Incurred during the applicable period of performance of the award
- Recorded in a separate project if there is a specific mandatory dollar amount of cost sharing or nonpayroll voluntary committed cost sharing
- Recorded in a separate project if there is a cost overrun of $50,000 or more of non-faculty/professional salary/benefit expense, or cost overrun of non-personnel expense

The University allows the following expenditures to be used for cost sharing:
- Faculty, staff, or student salaries and fringe benefits (in most cases)
- Laboratory supplies
- Travel
- Waivers of indirect costs: With appropriate approvals, waivers or reductions of the indirect cost rate may be used as cost sharing. The sponsor must approve the use of a lower indirect cost rate and allow the difference to be used to meet cost-share obligations. Additionally, the University must provide approval to use a lower indirect cost rate in the proposal. These requests are granted in **limited** circumstances and only with adequate justification.

The University prohibits the following expenditures as cost share:
- Expenditures that are normally charged as indirect costs, such as administrative salaries or office supplies
- Any cost unallowable under the award terms and conditions
- Equipment, unless required by the sponsor
- Service Center expenses

4.10 Program Income

Program income refers to gross income directly generated by a sponsored project or as a result of a sponsored project. Program income includes, but is not limited to:
- Income from fees for services performed (e.g., laboratory tests)
- Charges for the use or rental of real property, equipment, or supplies acquired under a sponsored project
- The sale of commodities or items fabricated under an award
- Charges for research resources
- Registration fees for grant-supported conferences

Unless otherwise specified in the award terms and conditions, program income must be used for the award that generated the funds. The University, PI, or administrative unit may not retain program income received during the period of performance. Sponsors generally allow institutions to retain program income generated after the period of performance.

The PI and their administrative unit should review the proposal to identify sources of actual or potential income from the project. The proposal should disclose anticipated or potential program income, provide an estimate of

expected income, and describe how the funds will be used on the project. It should also identify any potential program income from subrecipients. The funding opportunity announcement will outline program income requirements. The routing form should reflect anticipated program income and the establishment of a speed type to track the program income will be necessary.

During the post-award phase, the PI and their respective administrative unit must track program income in a speed type and ensure compliance with sponsor requirements. Research administrators should work with OGC Post Award administration if unexpected program income is generated. Program income must be reported on federal financial reports.

Program income must be used in accordance with the award terms and conditions. It may be used in one or more of the following ways when allowed by the sponsor:
- Additive Method: Program income is added to the award and may be used to further eligible project objectives.
- Deductive Method: The sponsor's share of the project is reduced by the amount of program income.
- Combination Method: The sponsor treats the first $25,000 under the additive method and any additional amount under the deductive method.
- Cost Sharing or Matching Method: Program income may be used to meet the cost-sharing requirements of the award, if approved by both the University and sponsor. The total amount of the award remains the same.

Unless required by the award terms and conditions, program income earned from license fees and royalties for copyrighted materials, patents, patent applications, trademarks, and inventions made under a federal award subject to the Bayh-Dole Act are not reported to the federal government. PIs are encouraged to work with the appropriate technology transfer office to determine the applicability of reporting requirements for license fees and royalties.

Considerations for Program Income:
- Award terms and conditions may allow nominal fees to cover shipping costs for samples or materials developed under the award. Income from these fees is generally treated as program income.
- Under federal research awards, proceeds from the sale of equipment or supplies are generally not considered program income.
- Fees resulting from clinical practice, professional consultation, or other comparable activities performed by a trainee generally cannot be retained by the trainee and are typically treated as program income.
- Generally, sales proceeds from materials developed under an award are considered program income.
- PIs and their administrative units are responsible for monitoring program income generated by subrecipients and ensuring compliance with award terms and conditions.

Additional information is available on the OGC website.

4.11 Applicable Credits

Applicable credits are rebates or refunds provided by a supplier or vendor from a purchase. Applicable credits are not considered program income. Under 2 CFR 200.406, applicable credits must be credited to the federal award as either a cost reduction or cash refund. PIs and their administrative units should notify OGC when applicable credits occur to ensure compliance with federal regulations.

4.12 Financial Reconciliation

Administrative units should complete a monthly reconciliation for all sponsored projects. During reconciliation, each cost should be scrutinized to ensure it is allowable, charged to the correct speedtype, properly allocated, and classified with the correct account codes. Any incorrect charges must be corrected with a cost transfer as soon as possible. Monthly expenditures should also be compared against the approved budget to identify potential overspending and determine if rebudgeting is necessary. A financial reconciliation must also be completed before an invoice or financial report is submitted to a sponsor.

While research administrators are generally tasked with completing financial reconciliation, PIs are responsible for being fully aware of all financial aspects of each project.

The University's "Quick Reference for Sponsored Projects Expenditures on Federal Awards" is a resource to determine if an account code can be charged to a sponsored project.

4.13 Cost Transfers

A cost transfer is a request to move a cost from one speedtype to another due to an error resulting in a direct expense being charged to an incorrect project or to properly allocate costs across multiple projects. The University uses two types of cost transfers:
- Payroll Expense Transfer (PET) for salaries and associated fringe benefits
- Journal Entry (JE) for all non-personnel costs

Administrative units are responsible for completing the cost transfer and submitting the request to OGC. OGC will review the cost transfer request and approve or reject it. The employee submitting the cost transfer must certify that all expenses are:
- True and correct
- Reasonable, allowable, and allocable
- In accordance with the award terms and conditions

Cost transfers cannot be used to transfer costs:
- Solely based on funding availability
- To relieve an over-expenditure on another program or project
- To address a non-compliance situation on another program or project
- In anticipation of an award

Cost transfers must adhere to the following requirements:
- The cost transfer must be submitted within 90 days of discovery of the error. If errors are not discovered within 90 days of the expense transaction date, additional explanation is required to justify the delay and describe how future delays will be avoided.
- The cost transfer request must be supported by documentation that explains how the error occurred and the actions taken to prevent it from happening again. A mere explanation stating the request is to "correct an error" or "transfer to the correct project" is not sufficient.
- All inappropriate expenditures must be removed from sponsored project accounts once the error is identified, regardless of when the error occurred.
- Departmental review of financial reports should be completed regularly to identify and correct all errors. While the University recommends monthly reconciliation of all accounts, departmental policies may vary.
- Extra documentation is required for the following situations:

- A program/project is in deficit status
    - o Unexpended funds exist at the end of a program/project
    - o The cost transfer is requested more than 90 days after the transaction date
- All JE and PET requests, along with supporting documentation and employee certification, are retained in the PeopleSoft Finance system in accordance with the University's record retention policy and award terms and conditions.
- The OGC PET Checklist or JE Checklist must be completed and submitted with the cost transfer request.

Additional information and resources regarding cost transfers are available on the OGC website.

4.14 Rebudgeting

Rebudgeting is often necessary on sponsored projects to address cost increases or to purchase unexpected, but necessary, resources. The flexibility for rebudgeting authority varies among sponsors, types of awards, and categories of cost. It is the responsibility of the PI and their administrative units to understand and comply with the award terms and conditions.

Federal research awards generally provide the ability to rebudget up to 25% of the current budget period. Federal non-research awards typically provide rebudgeting authority up to 10% of the current budget period. All federal awards require prior approval before rebudgeting participant support costs. Prior approval is also required when rebudgeting will result in a scope change. The requirements for non-federal awards will vary by sponsor.

NIH requires prior approval for significant rebudgeting, which occurs when expenditures in a single direct cost budget category deviate (increase or decrease) from the categorical commitment level established for the budget period by 25% or more of the total costs awarded. The base used for determining significant rebudgeting excludes the effects of prior-year carryover balances but includes competing and non-competing supplements. Significant rebudgeting does not apply to modular grants.

Rebudgeting requirements for non-federal awards will vary.

Administrative units must submit rebudgeting request to OGC by completing the Re-budget Request Form. Additional information is available on the OGC website.

4.15 Carryover Authority

Carryover authority, also called carry forward authority, allows for funds from one budget period to be used in the subsequent budget period. Without carryover authority, any unobligated funds at the end of a budget year are returned to the sponsor.

Federal research grants generally provide carryover authority, while federally sponsored non-research grants typically do not provide this authority. Requirements for non-federal awards may vary. Prior approval is required when an award does not provide for carryover authority.

Additional information about carryover is available on the OGC website.

4.15 Financial Reports

OGC is responsible for submitting financial reports to sponsors. Before OGC can submit a financial report, administrative units are responsible for completing an accurate and timely financial reconciliation. Failure to

complete an accurate financial reconciliation can result in the submission of inaccurate or delinquent financial reports, which may cause delayed funding or penalties for noncompliance

Additional information about financial reporting is available on the OGC website.

4.16 Cost Overruns

A cost overrun occurs when the actual costs of a project exceed the award budget. PIs are responsible for continuously monitoring project finances and expenditures to prevent cost overruns and for resolving any overruns in a timely manner. However, it is recognized that, in carrying out sponsored projects, it may sometimes be necessary to incur cost overruns temporarily while alternate resources are identified, to ensure the work performed under the sponsored project is not adversely affected by the delay.

Cost overruns may only be charged to another sponsored project if the costs conform to the cost principles and award terms and conditions. If cost overruns cannot be charged to a sponsored project, they must be charged to a departmental speedtype.

4.17 Payment on Sponsored Projects

OGC is responsible for managing billing activities and follow-up for past-due invoices for most sponsored projects at the University. OGC is also responsible for drawing down funds from the federal government payment management systems and applying the funds to the appropriate speedtype. Administrative units are responsible for billing and invoicing for non-federal clinical trials.

The University's financial system identifies four contract types:
- CR – Cost reimbursable: The University is reimbursed for the actual incurred costs of the project.
- LC – Letter of Credit: Federal drawdowns are treated as a cost-reimbursable award.
- IB – Installment Based: Payment is made on a predetermined schedule.
- FR – Fixed Rate: Used for clinical trials, and payment is based on invoicing rather than expenses.
- HY – Hybrid Agreements: Awards with both a CR and FR component.

OGC invoices the sponsor based on the award terms and conditions. If the invoice is for a fixed price, OGC invoices the fixed-price amounts and time frames. If invoices are based on expenses, expenses are pulled from the General Ledger on either a monthly or quarterly basis. PIs and research administrators may review a project's financial statements to determine the expenses included on the invoice.

Submitting timely and accurate final invoices is critical in the closeout process. The award terms and conditions will identify when final invoices must be submitted. Generally, sponsors provide either 30, 45, or 60 days to submit the final invoice after the budget or project end date. Depending on the award terms and conditions, sponsors may have no obligation to pay a late invoice.

Before OGC can submit the final invoice, PIs and their administrative units must complete a final reconciliation of the project's finances and verify all allowable expenses have been posted. All unallowable expenses must be removed one month prior to the final invoice due date.

Additional information is available on the OGC website.

4.18 Accounts Receivable

OGC is responsible for depositing funds from sponsors and applying those funds to the appropriate speedtype. Sponsors making payments via check should make the check payable to "The University of Colorado Denver" and mail it to:

University of Colorado Denver
Office of Grants and Contracts - F428
PO Box 209436
Dallas, TX 75320-9436
United States

For electronic payments, the administrative unit must contact the Accounts Receivable team at OGC.4payments@ucdenver.edu for payment information.

All checks for fund 30, 31, and 35 should be deposited by the Office of Grants and Contracts. The checks can be left at the Bursar Office Drop Box located in Education 2 North, 3rd floor – Room 3120A. The check should be accompanied by a cash receipt form with the speedtype and account code.

Employees can review and verify sponsor payments by using the Balance Sheet transactions reports in PeopleSoft. Cognos also provides a Payments Received report.

PIs and administrative units may contact OGC.4payments@ucdenver.edu for questions regarding payments. When contacting OGC, please include:
- Check number
- Amount
- Date of Check
- Project or Speedtype
- Any other relevant information

The University's Account Receivable Policy establishes guidelines for departments when selling goods and services on credit to external customers with a future payment or collection date. This policy applies to both sponsored and non-sponsored projects.

Additional information is available on the OGC website.

Chapter 5: Post Award – Administrative Requirements

5.1 Sponsor Prior Approval

During the period of performance of an award, it may become necessary to deviate from the accepted budget or project plan. Many changes require sponsor prior approval before they can be initiated, while other changes may be made without sponsor approval. Requirements for prior approval vary among sponsors, and PIs and their administrative units are responsible for complying with all sponsor requirements. Non-compliance with prior approval requirements can result in disallowed costs, and sponsors may impose additional penalties, such as award termination, depending on the severity of the non-compliant action.

For federal awards, all prior approval requests must be submitted to the sponsor by OGC. PIs and administrative units are responsible for developing the prior approval request, and OGC Post Award will formally submit the request. For non-federal awards, the requirements for submitting prior approval requests will vary.

The award terms and conditions generally identify prior approval requirements or provide references to where these requirements can be found. The following summarizes where to find prior approval requirements outside of the award document:
- Federal awards – 2 CFR 200.308(f) identifies general prior approval requirements for most federal awards and 2 CFR 200.407 provides a list of administrative actions and selected items of cost that may require prior approval
- NIH – Prior approval requirements are found in Section 8.1.2 of the NIH Grants Policy Statement (NIH GPS)
- NSF – Prior approval requirements are found in Chapter VII of the NSF PAPPG
- Non-federal awards – The award term and conditions, sponsor guidelines, or sponsor website should provide prior approval requirements

5.1.1 Prior Approval Requirements Common to Most Federal Awards

2 CFR 200.308(f) identifies prior approval requirements applicable to most federal awards, which includes:
- Change in scope or the objective of the project
- Change in key personnel, including employees and contractors, that are identified by name or position in the notice of award
- The disengagement from a project for more than 3 months, or a 25 percent reduction in time and effort devoted to the award over the course of the period of performance by the PI
- The addition of certain items of cost or cost categories that were not included in the approved budget
- The transfer of funds budgeted for participant support costs to other budget categories
- The addition of a subagreement not included in the notice of award (For NIH awards, prior approval is not required to add a domestic cost-reimbursable subagreement)
- Changes to the approved cost-sharing amount
- Request for additional federal funds
- Transferring funds between construction and non-construction cost categories
- A no-cost extension, which is a request to extend the period of performance other than any one-time extension provided for by the award terms and conditions (Please note, the University refers to a "one-time extension" as a 1st no-cost extension)

Change in Scope

In general, PIs may make changes in the methodology, approach, or other aspects of a project's objectives. However, changing the scope of a project almost always requires sponsor prior approval. A change in scope refers to a change in the direction, aims, objectives, purpose, or type of research training.

Potential indicators of a change in scope include, but are not limited to:
- Change in the specific aims approved at the time of award
- Substitution of one animal model for another
- Changes from the approved involvement of human subjects that would result in an increased risk
- Shift of the research emphasis from one disease area to another
- A clinical hold by the FDA under a study involving an investigational new drug or device (IND/IDE)
- Application of a new technology, such as changing assays from those approved to a different type of assay
- For NIH, purchasing a unit of equipment exceeding $25,000 that was not included in the award notice
- For NIH, significant rebudgeting when expenditures in a single direct cost budget category deviate (increase or decrease) from the categorical commitment level established for the budget period by 25 percent or more of the total costs awarded

Reduction in PI Effort

Federal regulations require prior approval when there is a reduction in PI effort in the following situations:
- When the PI is disengaged from the project for three months, or
- When there is a 25% reduction in time and effort by a PI

A PI who does not contribute effort on a project for three consecutive months must obtain prior approval from the federal sponsor to continue the project. PIs should discuss prolonged leaves of absence with the sponsor before taking a sabbatical, family or medical leave, a prolonged vacation, or other pre-planned leave that requires them to be absent for more than three months, to ensure their project will remain active upon their return. If a PI has a medical or family emergency requiring them to be absent for more than three months, the sponsor should be notified as soon as possible. One option is to name a temporary PI for the project during the original PI's extended absence. Prior approval is required to name a temporary PI.

Prior approval is also required when there is a 25% reduction in the PI's time and effort. The 25% reduction refers to the percentage change from the proposed time and effort. For example, if a PI proposed 20% time and effort on an award (2.4 Calendar Months), they must provide at least 15% of time and effort (1.8 Calendar Months) to retain the award without obtaining prior approval.

Unless otherwise notified in the notice of award, sponsors expect PIs to provide the level of effort outlined in the proposal, even when the amount funded is less than requested or the initial budget period is shortened.

5.1.2 Prior Approval Requirements for Non-Federal Awards

The prior approval requirements for non-federal awards vary. It is the responsibility of the PI and their administrative units to determine and comply with all sponsor requirements.

5.2 Expanded Authorities

Federal research awards typically provide Expanded Authorities, which are flexibilities designed to reduce administrative burden. Under Expanded Authorities, federal agencies may waive certain prior approval requirements for research awards. Common Expanded Authorities for federal research awards include:
- **Pre-Award Spending**: Allows costs to be incurred, at the recipient's risk, up to 90 days before the period of performance.

- **Carry Forward / Carryover**: Allows funding from one budget period to be used in the subsequent budget period.
- **First No-Cost Extension**: Allows the period of performance to be extended for up to 12 months. (Note: 2 CFR 200 and some federal sponsors identify a first no-cost extension as a "one-time" extension. All federal sponsors require prior approval for a second extension to an award.)

Information about University procedures for each expanded authority can be found through the hyperlinks provided in the previous list.

It is important to note that Expanded Authorities are only provided to federal research grants, not to federal contracts. Additionally, not all federal agencies provide Expanded Authorities for their awards, and prior approval may be required for any or all of the actions identified above.

Since January 2025, some federal agencies have rescinded certain expanded authorities. It is the responsibility of the PI and their administrative units to follow all current requirements for their awards.

5.3 National Policy Requirements

National policy requirements, sometimes referred to as public policy requirements, are broad categories of federal laws and regulations applicable to federal awards. Examples of national policy requirements include:
- Animal welfare and protection
- Human subject protection
- Environmental safety and conservation
- Civil rights and non-discrimination
- Employee health and safety
- National security
- Domestic economic protection
- Labor standards

Applicable national policy requirements depend on the nature of the award, monetary thresholds, and the type of recipient. PIs and their administrative units are responsible for complying with all applicable national policy requirements.

5.4 PHS Legislative Mandates (Appropriation Mandates)

Public Health Service (PHS) agencies, including NIH, are subject to annual legislative mandates included in the appropriation act that funds the Department of Health and Human Services. These legislative mandates may change annually, depending on the priorities of Congress. Compliance with the legislative mandates is mandatory for all PHS awards.

The NIH Fiscal Policies website provides a list of current and historical legislative mandates. While this is an NIH website, the legislative mandates apply to all PHS agencies.

5.5 The Acknowledgement Statement

The Acknowledgement Statement is a requirement for many federally funded research awards. When issuing statements, press releases, requests for proposals, bid invitations, and other documents (including conference

slides and publications) that describe federally funded projects, recipients must acknowledge the federal government.

Recipients are required to state:
- The percentage and dollar amount of the total program or project costs financed with federal funds
- The dollar amount of federal funds provided to the project
- The percentage and dollar amount of the total costs of the project financed by non-governmental sources

The exact language required for each federal agency may vary, and it is the responsibility of the PI to ensure compliance with the acknowledgement statement requirements for each award. Failure to use the acknowledgement statement may result in a cost disallowance for all costs associated with the publication or document.

5.6 Procurement of Goods and Services and Travel

Sponsored projects typically require the procurement of goods and services necessary to complete the project's objectives. Examples of procurement include obtaining supplies, services, equipment, subagreements, travel, and consultants.

All procurement using University funds, sponsored funds, or a combination of both University and sponsored funds must comply with:
- The University of Colorado Procurement Rules
- The Procurement Code of Ethics
- PSC policies and procedures

The PSC provides information on how to purchase specific goods and services on the Commodity Listing website.

All travel-related costs must comply with the PSC Procedural Statement: Travel and follow PSC policies and procedures.

The University's procurement rules are more restrictive than federal government requirements found in 2 CFR 200. Therefore, all procurement actions must adhere to the University's procurement rules.

5.7 Property Management

Sponsored funds may be used to obtain equipment and supplies necessary for the successful completion of the project, provided they are allowable under the award terms and conditions. The following graphic identifies the property classifications under 2 CFR 200 and University policy:
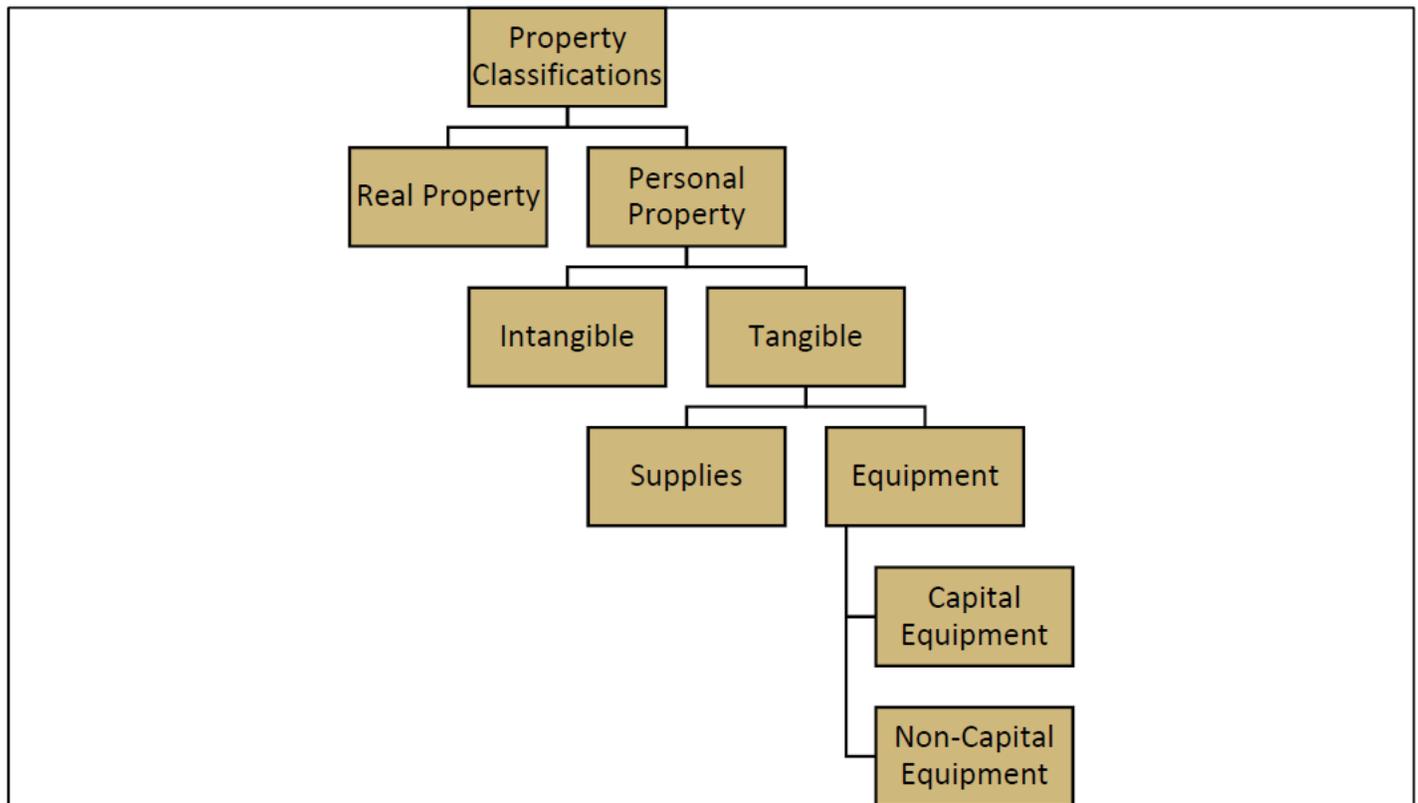
The following list defines the types of property:
- Real property: Defined as buildings or land
- Personal property: Property not classified as real property, including:
  - Intangible property: Property having no physical existence, such as intellectual property (trademarks, copyrights, and patents), data and data licenses, and websites
  - Tangible property, which includes:
    - Equipment: Property with a per-unit acquisition cost of $5,000 or more and at least one year of useful life
    - Supplies: Property that does not meet the equipment threshold

Please note that the equipment threshold of $5,000 is based on University policy and must be applied to all federal awards, even though 2 CFR 200 establishes a higher threshold for equipment.

For internal University purposes, tangible property is classified as follows:
- Capital equipment: Property with a per-unit acquisition cost of $5,000 or more and at least one year of useful life
- Non-capital equipment: Property that does not meet the capitalization threshold but is not a consumable item (e.g., a $2,000 laptop)
- Supplies: Consumable items that are disposed of after use

For most federal research awards, tangible personal property (equipment and supplies) acquired with federal funds is classified as exempt property, which provides title of the property to the University and relieves the University of any further obligations to the federal government. For exempt equipment, PIs and administrative units must obtain disposition instructions from the Finance Office. If property is not classified as exempt property, the University only obtains conditional title to the property and must follow all government requirements for use, disposition, and reimbursement as outlined in 2 CFR 200.313 for equipment and 2 CFR 200.314 for supplies.

The University may also obtain and use federal government property under federal awards and subagreements. Government property is property owned by the federal government in the possession of the University for exclusive use on a federal award. Government property may not be used for any other purpose without the sponsor's prior approval.

PIs and administrative units are required to complete physical inventories of capital equipment and government property acquired with sponsored funds. The frequency of these inventories varies depending on the type of property. The Finance Office will provide administrative units with inventory and property reports to facilitate the physical inventory.

All property obtained through University funds, sponsored funds, or a combination of University and sponsor funds belongs to the University. PIs and administrative units may not use property for non-work-related purposes. All University property must be returned upon employee termination or when the property is no longer required for official business. An administrative unit has the right to retain all property obtained under a sponsored project when the PI transfers institutions.

All University employees must comply with the University's University's Capital Equipment and Government Property policy and the University's Inventories Policy.

5.8 Progress Reports

Most sponsors require progress reports that detail the project's accomplishments and identify corrective actions to address any problems, delays, or adverse conditions in meeting the project's objectives. The award terms and conditions will specify the reporting requirements. PIs and their administrative units are responsible for writing and developing progress reports and ensuring that all sponsor deadlines are met. Inadequate or late progress reports may result in delays in future funding and possible award suspension or termination.

Federal research awards generally require the submission of the Research Performance Progress Report (RPPR). The specific requirements for the RPPR vary among federal sponsors. The RPPR is used as a non-competing continuation application, which releases funds for the next budget period within the period of performance. For NIH awards, the RPPR is completed and submitted through eRA Commons. As the NIH RPPR requires AOR submission, only OGC may submit the NIH RPPR. Additional information regarding University requirements for NIH RPPRs is available on the OGC website.

The submission requirements for other sponsors will vary. PIs and their administrative units must ensure that OGC Pre-Award provides any required AOR signature or submits any progress report requiring AOR submission.

5.9 Award Amendments

Sponsors provide award amendments to the original award to allocate funding for subsequent budget periods, provide supplemental funds, or update the terms and conditions of a project. PIs and their administrative units must take the following steps when receiving an award amendment:
- If the amendment needs to be signed, complete the Contract Amendment Form, or
- If the amendment does not need to be signed, email the amendment and Master Proposal/PeopleSoft Contact Number to OGC.AwardsIntake@ucdenver.edu.
  - Note: State Option Letters do not require signature but should be routed using the Contract Amendment Form

5.10 Sponsor Monitoring

Sponsors may monitor awards through a variety of activities, including:
- Reviewing and approving progress reports
- Financial inquiries
- Financial reporting
- Requesting invoice documentation for submitted expenses
- Certifications and representations
- Desk reviews
- Site visits
- Audits

PIs and their administrative units are responsible for complying with all sponsor requests in a timely manner. Fiscal Compliance is the coordinating office for all site visits and sponsor audits. PIs and their administrative units should immediately notify Fiscal Compliance when a sponsor indicates they are planning a site visit or audit of a sponsored project.

5.11 Record Retention

The University's Record Retention Matrix governs the record retention requirements for all University-related paperwork, documents, and files, including those for sponsored projects. The Record Retention Matrix is based on the University of Colorado's APS Retention of University Records policy. For federal sponsored projects, the University's record retention requirements are more restrictive than 2 CFR 200. Therefore, PIs and administrative units must follow the University's policy instead of the federal requirements. Failure to comply with the University's record retention policies may result in audit findings and questioned costs.

Chapter 6: Subagreements

6.1 The University as a Pass-Through Entity (PTE)

The University may receive funding directly from a sponsor and then award a portion of that funding to another entity to carry out part of the project. The agreement between the sponsor and the University is known as the prime award or prime contract, and the agreement between the University and another entity is called a subagreement. A subagreement may be either a subaward (when the prime agreement is an award) or a subcontract (when the prime award is a contract).

The University is considered a pass-through entity (PTE) when it makes a subagreement, and the entity receiving the subagreement is known as a subrecipient. As a PTE, the University assumes the role and responsibilities of both a recipient and a sponsor. The University must administer and manage the award in adherence to the terms and conditions of the prime award while ensuring the subrecipient complies with the subagreement. The University is responsible for monitoring both the financial and programmatic performance of subrecipients to ensure compliance.

Federal Offices of Inspectors General (OIG) have frequently identified subrecipient monitoring as a weakness in grants management. In recent years, federal auditors and awarding agencies have increased their reviews and scrutiny of subrecipient monitoring policies and procedures. As a result, the University has seen an increase in sponsor desk reviews and audits focused on subrecipient monitoring.

The University is at risk of noncompliance when PIs and administrative units fail to adequately monitor subrecipients and document monitoring activities. A PI must demonstrate to an auditor that they have "reasonable assurance" that their subrecipients comply with award terms and conditions. Noncompliance with subrecipient monitoring requirements can result in sanctions against the University, including the disallowance of the entire cost of a subagreement. All cost disallowances, fines, and penalties assessed against an award for noncompliance are the responsibility of the PI and administrative unit.

6.2 Responsibilities of PTEs

2 CFR 200.331-333 identifies the responsibilities for pass-through entities (PTEs) in federal awards. For each federal subagreement, the Uniform Guidance requires the University to:
- Identify the Award and Applicable Requirements: The University must include specific data elements in the subagreement.
- Evaluate Risk: The University must complete a risk assessment for each subrecipient.
- Monitor: The University must monitor each subrecipient for compliance with the subagreement's terms and conditions. The University must document the following activities:
  - Regular communication with the subrecipient
  - Review of financial and programmatic reports
  - Review of each subrecipient's annual Single Audit
  - Remedies for audit findings associated with a University subagreement
- Ensure Accountability of For-Profit Subrecipients: The University must take specific actions to ensure a for-profit subrecipient is in compliance with award terms and conditions.

The OMB Compliance Supplement identifies the suggested auditor procedures to verify PTE compliance with subrecipient monitoring requirements. Auditors may:
- Review the PTE's subrecipient monitoring policies and procedures

- Review subagreement documents
- Review the PTE's documentation of monitoring the subagreement and evaluate if the monitoring provided reasonable assurance that the subrecipient is in compliance with award terms and conditions
- Ascertain if the PTE verified that subrecipients have complied with audit requirements under 2 CFR 200

For non-federal subagreements, the University and the PI must comply with prime award terms and conditions regarding subrecipient monitoring.

6.3 Roles and Responsibilities for Subagreements

The responsibilities for subrecipient monitoring and award management are shared between OGC, Fiscal Compliance, and PIs and their respective administrative units.
- PIs and Administrative Units: The PI is responsible for ensuring that each subrecipient is making adequate progress on the subagreement and complies with the financial and administrative requirements. The PI must maintain regular communication with the subrecipient and ensure an informal progress update at least quarterly. This update can be in the form of an email, phone call, video conference, or other meeting. Monitoring activities must be documented. Administrative units assist PIs in requesting subagreements, reviewing and approving invoices, ensuring deliverables are received on time, providing guidance on addressing subrecipient non-compliance, and documenting monitoring activities.
- Multiple OGC Units Involved in Subagreements:
    - OGC Subcontracts: The primary office within OGC responsible for subagreements. OGC Subcontracts handles the initial compliance review, drafts and negotiates subagreements, executes subagreements, and amends any subrecipient agreements.
    - OGC Pre-Award: Reviews proposals during the routing process to ensure the subrecipient budget conforms to sponsor requirements.
    - OGC Post-Award: Submits financial reports to sponsors containing financial information from the University's subrecipients and reviews and approves Marketplace submissions related to subagreements.
- Fiscal Compliance: Reviews the University's subrecipients' single audits and issues management decisions for audit findings.

The following table identifies the requirements for federal subagreements under 2 CFR 200.331-200.333 and the roles and responsibilities for each requirement.

Requirement	Responsible Office(s)
Subrecipient and Contractor Determination	- PIs and administrative units will use the Subrecipient Determination Checklist to identify the appropriate award instrument as either a subrecipient or vendor agreement - PIs and administrative units may use the subrecipient determination checklist during the pre-award phase to assist in the proposal development process.
Verify the subrecipient is not excluded or disqualified in accordance with 2 CFR 180	OGC Subcontracts is responsible for compliance with 2 CFR 180 and for

	documenting suspension and debarment verification from SAM.gov. • OGC Subcontracts will complete a review through Visual Compliance for foreign entities and will document the review.
Identify the Award and Applicable Requirements	• OGC Subcontracts is responsible for ensuring all required elements are contained in the award document. • PIs and administrative units should review the award document to verify all required elements are identified in the subagreement and correct and the appropriate indirect cost rate has been applied for the subagreement.
Complete Subrecipient Risk Assessment	• OGC Subcontracts is responsible for conducting a risk assessment for each subagreement and providing the risk assessment to the PI and administrative unit. Subrecipients that receive a score of "30" or higher on the risk assessment will be designated as a "high-risk subrecipient." • PIs and administrative units should review the completed risk assessment and ensure subrecipient monitoring mitigates any identified risk.
Apply Specific Conditions on a Subrecipient	• OGC Subcontracts is responsible for imposing specific conditions onto a subrecipient after conducting the risk assessment or by amending the subagreement during the period of performance. • PIs and administrative units must request OGC Subcontracts impose a specific condition on a subrecipient under 2 CFR 200.208(c)(2,3, and 6). PIs and administrative units have unilateral ability to require additional project monitoring under 2 CFR 200.208(c)(4).
Monitoring the activities of a subrecipient	• Fiscal Compliance is responsible for reviewing the single audit of each federal subrecipient entity and working with the respective PI and their respective administrative units for audit resolution • PIs and administrative units are responsible for monitoring each subagreement, reviewing financial and progress reports, and documenting monitoring activities. PIs and their

	administrative units are responsible for taking corrective action on all significant developments that negatively affect the subagreement and documenting monitoring activities.
Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records	• OGC Subcontracts and Fiscal Compliance may update internal records as necessary to reflect audit findings and changes in a subrecipient's risk assessment. OGC Subcontracts may also amend a subagreement when necessary. • PIs and administrative units should document subrecipient monitoring activities and retain related communications and other documents.
Consider taking enforcement action against non-compliant subrecipients	• PIs and administrative units should notify OGC Subcontracts when a subrecipient is noncompliant with a subagreement. • OGC Subcontracts must be involved to temporarily withhold payments until the subrecipient takes corrective action (2 CFR 200.339(a)) and to suspend or terminate the subagreement (2 CFR 200.339)(c)). • PIs and administrative units may disallow a cost without OGC Subcontract involvement (2 CFR 200.339(b)).

6.4 Requesting a Subagreement

OGC Subcontracts is responsible for drafting, reviewing, negotiating, and executing subagreements for both federal and non-federal awards. PIs and their administrative units are prohibited from executing subagreements.

One key consideration when requesting a subagreement is determining the period of performance for the subrecipient. Whenever possible, it is advisable to set the subrecipient's period of performance to end one or two months before the end of the period of performance for the prime award. This practice helps mitigate potential issues during the closeout process.

Additional information for requesting a subagreement is available on the OGC website.

6.5 Subrecipient Scope of Work

PIs and administrative units should carefully review a subrecipient's statement of work. Once the subagreement is executed, the statement of work becomes legally binding on both parties. Acceptance of an inadequate statement

of work places the University at risk for paying for unexpected costs, unsatisfactory performance, or incomplete work. An adequate statement of work should be specific and detailed by:

- Clearly identifying the scope of work of the subrecipient, including specific activities and their frequency, if applicable
- Identifying the subrecipient PI's roles and responsibilities
- If applicable, providing a deliverable schedule for project milestones, including a description of each deliverable or task, identifying applicable dates and conditions for project tasks to begin and end, and due dates for deliverables
- Explaining requirements for all reports, data, and other deliverables. The PI should ensure this section meets all reporting and programmatic needs. For reports, the statement of work should explicitly describe what information will be reported, specific data formats, what data the subrecipient will collect, how the data will be shared with the University, and the frequency of reporting.

6.6 Prime Award Terms and Conditions and Prior Approval Requirements

For federal subagreements, the University must comply with 2 CFR 200.101(b)(1), which states in part: "The terms and conditions of Federal awards flow down to subagreements to subrecipients unless a particular section of this part of the terms and conditions of the Federal award specifically indicate otherwise." A PI and administrative units must comply with 2 CFR 200.208 in order to remove an award term and condition from flowing down to a subrecipient and subagreement.

The PI and administrative unit are responsible for ensuring that each subrecipient has obtained the necessary prior approval as required by the award terms and conditions. For most sponsors, the pass-through entity (PTE) has the authority to grant prior approval to subrecipients. However, for NIH awards, only NIH may provide prior approval to subrecipients, per Section 15.2.4 of the NIH GPS.

6.7 Subrecipient Monitoring Plans and Monitoring Records

PIs and administrative units should develop and comply with a subrecipient monitoring plan for each subagreement. For most low-risk subrecipients, a standard monitoring plan may be adopted. For high-risk subrecipients, a tailored monitoring plan should specifically address identified risks from the risk assessment. Once a monitoring plan has been adopted for a subagreement, PIs and administrative units must follow the plan, document monitoring activities, and revise the plan as necessary. Auditors may request a subrecipient monitoring plan and verify University compliance with the monitoring plan.

PIs must maintain regular communication with the subrecipient PI. At least quarterly, the PI must have a status meeting or email with each subrecipient. The PI needs to determine if the subrecipient is making adequate programmatic progress and is adhering to the statement of work. Any problems or deficiencies must be identified, and a resolution must be developed for each issue.

Monitoring activities must be documented. PIs and administrative units may use the OGC Subcontract Monitoring Record or another form to document monitoring activities. OGC, Fiscal Compliance, and auditors may request to review a subrecipient monitoring record at any time. PIs and administrative units that fail to comply with subrecipient monitoring requirements may lose the ability to request subagreements.

In certain circumstances, a PI may need to complete a site visit of a subrecipient. PIs and their administrative units must notify Fiscal Compliance before initiating a site visit to ensure the visit is adequately conducted.

6.8 Specific Conditions and Remedies for Noncompliance

2 CFR 200.208 Specific Conditions and 2 CFR 200.339 Remedies for Noncompliance identify actions a pass-through entity may take to rectify noncompliant subrecipients on federal grants and cooperative agreements. Specific conditions may be imposed on a subrecipient during the pre-award or post-award phase, and remedies for noncompliance may be imposed during the post-award phase. PIs and their administrative units must work with OGC Subcontracts to impose a specific condition or remedy for noncompliance when the nature of the agreement changes. Failure to obtain OGC Subcontracts approval will have no legal impact on the subrecipient.

The following table identifies the actions available under 2 CFR 200.

Citation	Action	Responsible Party to Impose Action	Notes
2 CFR 200.208	Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance	OGC Subcontracts through a formal amendment	May be used for high-risk subrecipients or to ensure the subrecipient is making adequate progress
2 CFR 200.208	Requiring additional or more detailed financial reports	OGC Subcontracts through a formal amendment	May be used to request detailed invoices from subrecipients
2 CFR 200.208	Requiring additional project monitoring	PI and administrative units	May be used to increase the frequency or nature of monitoring activities to ensure the subrecipient is making adequate progress
2 CFR 200.208	Establishing additional prior approvals	OGC Subcontracts through a formal amendment	May be used for high-risk subrecipients or to ensure the subrecipient is making adequate progress
2 CFR 200.339	Temporarily withhold payments until the subrecipient takes corrective action	OGC Subcontracts	May be used to temporarily stop payment when a subrecipient is in noncompliance with award terms and conditions
2 CFR 200.339	Disallow costs for all or part of the activity associated with the noncompliance of the subrecipient	PI and administrative units	PIs and administrative units may disallow a cost on an invoice when the cost does not conform with the award terms and conditions
2 CFR 200.339	Suspend or terminate the subagreement	OGC Subcontracts through a formal amendment	May be used when a subrecipient is in noncompliance with the subagreement terms and conditions. The University must comply with 2 CFR 200.340 when suspending or terminating a subagreement.

The guidance provided in this section for federal awards is generally applicable to non-federal awards.

6.9 Subrecipient Invoices

PIs and administrative units are responsible for reviewing and approving all subrecipient invoices. All charges made to a subagreement must comply with the cost principles and the award terms and conditions. Under PSC procedures, a partial invoice may not be processed. Therefore, any subrecipient invoice containing unallowable costs must be rejected, and the subrecipient must provide a new invoice.

It is the general practice of the University to only require a detailed invoice from high-risk subrecipients. For low-risk subrecipients, PIs and administrative units should randomly request a detailed invoice from each subrecipient once per year to demonstrate reasonable assurance that the subrecipient complies with award terms and conditions.

All costs charged by a subrecipient to the subagreement must comply with the subrecipient's internal policies and procedures. Due to audit risk, the PI and administrative unit should specifically ensure that charges for equipment and travel costs comply with the subrecipient's procurement and travel policies before approving an invoice. Additionally, PIs and their administrative units must ensure that no federal funds are provided to subrecipients to procure certain telecommunication equipment, as outlined by 2 CFR 200.216.

PIs and administrative units should use the OGC Subrecipient Invoice Checklist when reviewing and approving subrecipient invoices.

6.10 Subrecipient Progress Reports

The PI and administrative units must ensure that subrecipient progress reports are received on time, as indicated in the subagreement terms and conditions. The PI, or their designee, is responsible for reviewing and approving subrecipient progress reports. Inadequate progress reports should be rejected.

6.11 Third Tier Subagreements

A third-tier subagreement exists when a subrecipient makes a subagreement under the University's subagreement. When a third-tier subagreement exists, PIs and administrative units are responsible for ensuring the University's subrecipient complies with subrecipient monitoring requirements for third-tier subagreements.

6.12 Subagreement Closeout

PIs and administrative units are responsible for ensuring that subagreements are closed in compliance with award terms and conditions. For most awards, the University will provide subrecipients 60 days after the end of the subagreement period of performance to complete closeout requirements by submitting all required deliverables, including a final invoice, within the allotted time period.

The University retains the right to unilaterally close out a subagreement when the subrecipient's noncompliance with the subagreement terms and conditions may result in the University's noncompliance with its closeout requirements. Unilateral closeout of a subagreement may occur 90 days after the subagreement period of performance. During unilateral closeout, the University may reject an invoice submitted more than 90 calendar days after the end of the subagreement period of performance. PIs and their administrative units must inform OGC Subcontracts if a subrecipient has failed to comply with the subagreement terms and conditions. OGC

Subcontracts reserves the right to deny a future subagreement to a subrecipient PI or institution for failure to comply with closeout responsibilities.

PIs and administrative units should scrutinize all final subrecipient invoices to ensure that all costs conform to the cost principles. Additionally, PIs and administrative units are responsible for ensuring the subrecipient has met all applicable cost-sharing requirements.

Any subrecipient closeout costs charged to the University must adhere to the subrecipient institution's written policies and procedures and be allowable under the award terms and conditions.

6.13 Post Closeout Requirements for Subagreements

All University subrecipients are required to comply with their own institutional record retention requirements. Costs associated with subrecipient record retention may not be directly charged to federal awards, as these costs are part of the institution's indirect costs.

Fiscal Compliance will review the single audit for each subrecipient for three years after the subagreement period of performance, as per 2 CFR 200.

6.14 Fixed Amount Federal Subagreements

As of October 1, 2024, the University will not issue new fixed amount, or fixed price, subagreements under a federal grant. Fixed amount federal subagreements made before October 1, 2024, may continue until the end of the subagreement's period of performance.

Under NIH policy, a clinical trial is not considered a fixed amount subaward.

6.15 Subagreement Payment

The University requires the use of cost-reimbursable payment methods for most subagreements, except for clinical trials, where a fixed-rate payment method is used. A working capital advance may only be used with OGC Subcontracts approval and in compliance with 2 CFR 200.305(b)(4).

6.16 Special Consideration for Foreign Subrecipients

PIs and administrative units must give special consideration to foreign subrecipients, as foreign subagreements require heightened monitoring to protect against potential fraud, waste, and abuse of federal funds. Not all federal laws and regulations apply to foreign subrecipients, and PIs and administrative units are responsible for ensuring foreign subrecipients comply with applicable award terms and conditions.

Please note that since January 2025, some agencies, such as NIH, have been restricting or terminating foreign components. It is the responsibility of the PI and their administrative unit to comply with all sponsor requirements.

6.17 Required Certifications from Subrecipients

Subrecipients under federal awards must provide certification to the University whenever submitting a proposal, requesting payment, or submitting financial reports and invoices, certifying that all information is complete and accurate. The following language must be used in all certifications, as required by 2 CFR 200.415:

"I certify to the best of my knowledge and belief that the information provided herein is true, complete, and accurate. I am aware that the provision of false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative consequences including, but not limited to violations of U.S. Code Title 18, Sections 2, 1001, 1343 and Title 31, Sections 3729-3730 and 3801-3812."

The University cannot accept or approve documents from subrecipients that fail to provide the certification statement or use the exact language required under 2 CFR 200.

Chapter 7: Award Transfers

7.1 Award Transfer Requirements

Awards are made to institutions, not individual PIs. This applies to both federal and non-federal awards. An award does not automatically transfer when a PI changes institutions. The institution that originally received the award has the discretion to retain, transfer, or terminate the award when the PI leaves.

Even if the institution relinquishes the award to the PI's new institution, the sponsor must approve the transfer. The sponsor approval process requires paperwork from both the prior and new institutions. The entire process can take anywhere from six to nine months.

The University's Transfer of Assets to or From Other Organizations Policy establishes the procedures for transferring assets to and from other organizations.

7.2 PI and Award Transfers to CU Denver | Anschutz Medical Campus

The transfer process may begin before the PI's official appointment date at CU Denver | Anschutz Medical Campus. A PI transferring an award to the University must complete the following actions:
- Review and approve financial reports before submitting the transfer request
- Determine if cost-share requirements have been met and whether any unmet requirements will be transferred
- Obtain Institution and Sponsor Prior Approval. A letter from the PI informing the sponsor of the planned move of the project to the University, co-signed by the former institution's business office. This letter needs to be sent to the sponsor officials indicated on the notice of award. The request should include a statement that the balance of the award be transferred to the University for PI use. The PI should obtain prior approval as soon as possible. For NIH awards, a Type 7 Application must be submitted to transfer the award.
- Obtain a Relinquishing Statement. The former institution needs to provide an official relinquishing statement as soon as possible.
- Obtain a Final Inventions Statement from the current institution, if applicable.
- Obtain IRB and IACUC approvals through the University, if applicable.
- Obtain contact information for the University.
- Initiate a Material Transfer Agreement, if applicable.
- Determine the role of the Co-PI or other senior/key personnel that will remain at the previous institution and if a subrecipient agreement will be required.
- If subrecipients are included in the award, each subrecipient institution must provide the following documents to OGC:
  - A face page signed by the subrecipient's business official
  - A detailed budget for the initial year reflecting the dollars that have yet to be expended
  - A budget page detailing the remaining years of the award
  - Biosketch and other support pages
  - A checklist page specific to the subrecipient institution
  - A letter indicating the subrecipient's willingness to enter into a subrecipient agreement with CU Denver should the transfer be approved by the sponsor
- A new proposal routing must be submitted to OGC. The budget reflected on the routing form should be the balance of the initial year's direct cost dollars that are to be transferred, plus the University's indirect cost rate.

When there is a delay in obtaining a transferred award, it may be necessary to establish a subagreement from the PI's former institution to CU Denver. The subagreement period of performance should be until the sponsor approves the transfer of the award. To execute the subagreement, the former institution will need to name a PI, which generally requires sponsor prior approval.

Additional information about transferring an NIH award to the University is available on the OGC website.

7.3 PI and Awards Transfers from CU Denver | Anschutz Medical Campus to Another Institution

A PI leaving the University must request their department and school's approval to transfer the award to a new institution. Approval will only be approved under the following conditions:

- The PI is leaving the University to go to an affiliated organization/institution, another institution of higher education, or another nonprofit or government training institution
- The PI's administrative unit and school does not wish to request that the sponsor approve another faculty member who is qualified to serve as PI on the award
- The request is made in a timely manner prior to the project's expiration. A late request will be considered but is subject to sponsor restrictions
- The PI completes all documents necessary to facilitate the transfer and submits those documents to OGC along with the "Request for Approval to Transfer Sponsored Project Award" form approved by both the PI's department and school
- The financial obligations for non-cancelable obligations are covered out of award funds or are resolved at the administrative unit and school level prior to the transfer of any remaining award commitments. Expenses charged to a sponsored project must be allowable under the award terms and conditions
- The new institution accepts the award
- The sponsor grants approval

PIs may request the transfer of equipment and supplies of the award from their administrative unit, which has no obligation to approve the transfer. The administrative unit must notify the Finance Office if approval is granted to transfer equipment. PIs should work with the appropriate intellectual property office (CU Innovations or Venture Partners at CU Boulder) for the transfer of intellectual property.

Upon notification a PI is leaving the University, the administrative unit should:

- Provide the PI with the Request for Approval to Transfer Sponsored Project Award
- Obtain a list of the PI's projects and determine the future status of each award
- Identify all personnel working on the PI's projects and determine the future status of each employee
- Work with HR to revise funding distributions
- Stop recurring charges for transferring awards
- Complete a final reconciliation of the financial report for all the transferring projects and submit necessary PETs and JEs as soon as possible
- Obtain prior approval for a PI change for any award not transferred
- Determine the disposition of any pending proposals
- Coordinate effort certification
- Verify the PI has completed all required reports for each award
- Determine the status of data
- Provide for the disposition of any transferring equipment
- Ensure IACUC and IRB protocols are closed

- Complete any department-specific procedures, such as laboratory closing

For NIH transfer awards, the University must indicate if the transfer request is related to concerns about safety and/or work environment, including issues related to sexual harassment or bullying.

Chapter 8: Closeout

8.1 Closeout Roles and Responsibilities

Closeout is a critical and mandatory process for sponsored projects. All obligations to sponsors must be fulfilled within the time frame specified in the award terms and conditions. Closeout requirements can vary depending on the sponsor and the type of award. Failing to meet these requirements can result in audit findings, financial penalties, administrative consequences, and impact the University's ability to secure future awards. Closeout responsibilities are shared between OGC, PIs, and their administrative units. To ensure timely closeout, activities should begin no later than 90 days before the end of the award's period of performance.

PIs and administrative units who do not comply with closeout requirements will be held accountable for any resulting fines, penalties, or cost disallowances.

8.1.1 OGC Responsibilities

OGC's responsibilities for closeout include:
- Assisting PIs and their administrative units throughout the closeout process
- Providing Closeout Timeline Reports (90-60-30 Day Report and 30-60-90 Day Report) to administrative units
- Completing and submitting final financial reports to sponsors
- Submitting other required deliverables to sponsors when AOR submission is necessary
- Submitting and processing final invoices and/or drawdowns
- Liquidating unobligated balances
- Closing speedtypes for sponsored projects

OGC is responsible for providing the Closeout Timeline Reports to administrative units at least 90 days before a project ends. The Closeout Timeline Reports include a checklist outlining activities and actions that the PI and their respective administrative units must complete to ensure timely closeout.

8.1.2 PI and Respective Administrative Units Responsibilities

PIs and their respective administrative units are responsible for completing all applicable requirements on the Closeout Timeline Reports, which include, but are not limited to:
- Completing a financial reconciliation for the project
- Completing and submitting all required reports and deliverables
- Ensuring and documenting subrecipient compliance with closeout activities, as applicable
- Submitting applicable cost transfers for any unallowable or improperly allocated costs
- Resolving overspending
- Updating employee funding distributions
- Submitting the Request to Close Contract or Agreement form for clinical trials to OGC

To ensure the University meets closeout responsibilities, PIs and their respective administrative units should complete all required closeout actions 30 days before the closeout period ends. PIs or their administrative units must immediately notify OGC if delays or issues arise that may prevent the University from closing the award within the prescribed timeframe.

Administrative units are responsible for meeting all closeout responsibilities, including in cases where the PI is incapacitated, no longer employed by the University, or in the event of the PI's death.

8.2 Federal Award Closeout Requirements

The general requirements for federal award closeout are outlined in [2 CFR 200.344](#); however, each federal award may have differing closeout requirements as stipulated by the award terms and conditions, which take precedence over 2 CFR 200. It is the responsibility of PIs and their administrative units to adhere to the specific requirements of each award.

In general, closeout for federal awards requires:
- Submission of financial, performance, and other reports no later than 120 calendar days after the end date of the period of performance
- Receipt of all subrecipient reports and deliverables no later than 90 calendar days after the end of the subagreement period of performance, or another date as provided for in the subagreement (please note, the University generally requires subrecipients to provide final invoices within 60 days of the end of the subagreement's period of performance)
- Final payment to subrecipients within 45 days of receipt of the final invoice
- Financial reconciliation and liquidation of all financial obligations no later than 120 calendar days after the end date of the period of performance
- Meeting all cost share obligations
- Complying with all post-closeout responsibilities

Please note, while the general government requirements provide for 120 calendar days after the end date of the period of performance to meet closeout responsibilities, some federal agencies may only provide 90 days.

In recent years, the federal government has increased monitoring and oversight of award closeout. To enforce compliance with closeout responsibilities, a federal agency may:
- Prevent drawdowns or reimbursements 120 calendar days after the end date of the period of performance
- Unilaterally closeout the award one year after the end date of the period of performance
- Report the University to SAM.gov for material failure to comply with closeout requirements

Under 2 CFR 200, failure to timely and accurately comply with closeout requirements may affect future funding to the University and/or awards involving the same PI

8.3 Non-Federal Award Closeout Requirements

The closeout requirements for non-federal awards vary by sponsor. It is the responsibility of the PI and their respective administrative units to comply with all requirements outlined in the award terms and conditions.

8.4 Subagreement Closeout Considerations

When the University has entered into a subagreement with another institution, the PI and their administrative units are responsible for ensuring the subrecipient complies with the subagreement terms and conditions. The University may unilaterally close a subagreement if the subrecipient fails to comply with these terms, particularly when noncompliance hinders the University's ability to meet its closeout obligations. Unilateral closeout may include rejecting invoices submitted more than 90 calendar days after the end of the subagreement's period of performance. PIs and their administrative units must notify OGC Subcontracts if a subrecipient fails to comply. OGC Subcontracts reserves the right to deny future subagreements with a subrecipient PI or institution for noncompliance with closeout requirements.

When the University is a subrecipient, the PI and their administrative units must ensure compliance with the pass-through entity's requirements. The PI and administrative units are responsible for any cost disallowances or penalties imposed by the pass-through entity.

8.5 Final Financial Reconciliation

PIs and their respective administrative units are responsible for completing a final financial reconciliation during closeout. It is considered best practice to conduct monthly reconciliations to minimize the administrative burden during closeout. The final financial reconciliation must review all costs incurred throughout the project period and should be completed once all outstanding encumbrances have been settled. This reconciliation must occur before OGC can submit the final financial report to the sponsor and should be completed no less than 30 days before the closeout period ends.

During the final financial reconciliation, PIs and their respective administrative units must:
- Ensure that all charges to the sponsor have been properly allocated and documented when costs have been charged to multiple projects or activities.
- Ensure that all ePERs have been certified.
- Remove all unallowable costs from the speedtype using a cost transfer.
- Verify that all recurring costs, such as monthly supply orders, have been canceled.
- Ensure that multi-year costs, such as warranties or service agreements, have been prorated so that charges to the sponsor do not extend past the award's period of performance.
- Confirm that cost share obligations have been met.
- Ensure indirect costs have been applied correctly.
- Verify that program income and applicable credits (such as rebates and refunds) have been appropriately applied to the sponsor.
- Address any overspending on the project.

The University must comply with all sponsor closeout requirements. OGC reserves the right to charge any unresolved expenses directly to the PI's administrative unit if the PI or their administrative unit fails to complete a timely final financial reconciliation, potentially causing the University to miss sponsor closeout deadlines.

8.6 Overspent Projects

PIs and their respective administrative units are responsible for all overspent projects. Cost overruns must be applied to an administrative unit speedtype, in accordance with the administrative unit's policies and procedures. A cost transfer may be required to move costs from a sponsored project speedtype to an administrative unit speedtype.

8.7 Reporting Requirements

Final reporting requirements will be identified either explicitly or by reference in the award terms and conditions. Common reporting requirements include:
- Final Financial Report – OGC is responsible for submitting the final financial report.
- Final Progress or Technical Report – PIs and their respective administrative unit are responsible for writing the final progress or technical report and for determining who submits the final report. If AOR submission is required, the PI and their respective administrative unit must route the final progress report to OGC at least five business days before the deadline.

- Invention Statement – Most sponsors require the University to report any inventions, discoveries, or other novel commercial developments that were a result of an award. This is typically a requirement regardless if an invention disclosure has already been filed. PIs and their respective administrative unit are responsible for completing the invention statement and following sponsor submission requirements.
- Property Reports – Some sponsors may require final property reports to be submitted during closeout and these responsibilities may continue until the University has disposed of the property. PIs and their administrative units are responsible for submission of property reports.
- Dissemination of Clinical Trial Results – PIs and their administrative units are responsible for ensuring compliance with sponsor requirements regarding the dissemination of clinical trial results.

8.8 First No-Cost Extension (One-Time Extension)

Under expanded authorities, federal sponsors may grant authority to unilaterally extend the project period of an award up to 12 months without prior approval. One-time extensions may not be used solely to spend any remaining funds. Under 2 CFR 200, this expanded authority is known as a "one-time extension"; however, the University and many sponsors refer to this authority as a "first no-cost extension."

Any additional request to extend the period of performance requires sponsor prior approval. Under 2 CFR 200, this additional request is called a "no-cost extension," while the University and many sponsors refer to it as a "second no-cost extension."

Since January 2025, some federal sponsors, such as NIH, have removed this authority. It is the responsibility of PIs and their respective administrative units to comply with applicable sponsor requirements and deadlines to elect the one-time extension.

Additional information, including recent federal updates regarding no-cost extensions, is available on the OGC website.

8.9 Costs Incurred Before and During Closeout

Equipment purchases and large supply purchases near the end of the period of performance of an award may indicate an attempt to spend remaining funds, rather than incurring necessary costs for project completion. These costs may be seen as a misuse of sponsor funds.

For costs to be allowable near the end of the award, they must be incurred before the end of the period of performance and allocated in proportion to the benefit the award receives from the cost.

Equipment and supplies that have been charged to an award before the end of the period of performance but are received after the period ends are unallowable costs. Additionally, travel costs incurred after the period of performance cannot be charged to the sponsor and are considered unallowable.

The only allowable cost during the closeout period that may be charged to federal awards is for publication and printing costs, if incurred during the closeout timeframe and if award terms and conditions do not prohibit such costs. Further information on publication and printing costs is available in 2 CFR 200.461.

For non-federal awards, PIs and administrative units must comply with the award terms and conditions for allowable costs.

Although 2 CFR 200.472 allows for administrative costs related to closeout to be charged to federal awards, the University prohibits these costs unless prior approval is granted by OGC.

8.10 Property Disposition

Federal sponsors typically classify property as either "exempt" or "non-exempt." Exempt property means that the University has title to the property purchased under a sponsored award and has no further obligations to the sponsor. Non-exempt property means the University has conditional title to the property purchased under a sponsored award and has continuing responsibilities to the sponsor.

For exempt property, PIs and their respective administrative units must request disposition requirements for capital equipment from the Finance Office. PIs and their respective administrative units may dispose of non-capital equipment and supplies in accordance with the policies and procedures of the administrative unit. For non-exempt property, PIs and their respective administrative units must comply with all sponsor requirements, including property reports and disposition requirements. General federal government requirements for non-exempt equipment are found at 2 CFR 200.313.

Federal awards generally vest title of supplies to the University upon acquisition of the property. If there is a residual supply inventory exceeding $10,000 in aggregate fair market value at the end of the period of performance, the University may either retain the supplies for use on other federally sponsored projects or sell the supplies. The federal sponsor, or pass-through entity, must be compensated for the current market value or proceeds from the sale. Additional information regarding supplies is found at 2 CFR 200.314.

Property disposition requirements for non-federal awards vary by sponsor, and PIs and their administrative units must comply with all sponsor requirements.

8.11 Award Termination

When terminating an award, the sponsor must provide, in writing, the reason for the termination and the effective date for termination. No new costs may be charged to an award on or after the termination date, and PIs are responsible for complying with all closeout requirements on a terminated award. All costs incurred prior to the award termination date must comply with the cost principles, award terms and conditions, and University policies. Attempts to exhaust remaining funds are unallowable.

All subawards under a terminated award must also be terminated, and PIs and their respective administrative units must work with OGC Subcontracts to properly terminate subawards. The date of termination for subawards will be the same date as the prime award's termination. Subrecipients must also complete all closeout activities and may not incur costs to the award on or after the date of the prime award's termination.

Since January 2025, federal agencies have terminated awards for "failure to comply with current administration policies." PIs who have received a termination letter, stop work order, rescission, or any other grant status update must submit this information to the campus federal transition team via this form. The PI should indicate if they would like to explore appealing the decision. OGC will work with PIs during the appeals process.

8.12 Residual Balance

Unless allowed by the award terms and conditions, a residual balance on a sponsored project is returned to a sponsor. Any residual funds are University funds and must be expended on allowable University activities – these funds are not personal funds of the PI.

The following table identifies the required actions PIs and their administrative units need to complete when a residual balance exists at the end of an award and the sponsor allows the University to retain the residual balance.

Scenario	Required Action
Residual balance is under 5% for a federal award and under 50% for a non-federal award.	Complete the University's closeout process and sign the closeout certification form indicating the Fund 26 speedtype the residual balance will be distributed.
Residual balance is 5% or greater for a federal award and 50% or greater for a non-federal award.	Complete the High Cash Balance form. OGC and/or the Office of Vice Chancellor of Research will review the situation.

8.13 Post-Closeout Responsibilities

Most sponsors impose additional responsibilities after closeout. General federal requirements for post-closeout responsibilities are identified at 2 CFR 200.345. Specific sponsor requirements may also be included in the award terms and conditions.

Common post-closeout responsibilities include:

- Record Retention – All University employees are required to comply with the University's Record Retention Matrix. Information Information for sponsored project records begins on page 22 of the Matrix. Please note, since the University's policy is more restrictive than federal requirements, the University's Record Retention Matrix supersedes requirements under 2 CFR 200.
- Repayment of Costs – Any cost disallowance or financial adjustments requiring repayment to a sponsor is the responsibility of PIs and their respective administrative unit.
- Subrecipient Audit Verification and Resolution – For federal subagreements, 2 CFR 200 requires the University to verify each subrecipient complies with audit requirements under 2 CFR 200, Subpart F, and for audit resolution for audit findings for three years after subagreement closeout. Fiscal Compliance is responsible for reviewing the Federal Audit Clearinghouse to verify federal subrecipients are in compliance and working with PIs and their administrative units during audit resolution.

Chapter 9: Regulatory Compliance

9.1 Regulatory Compliance Requirements

There are numerous federal laws and regulations that apply to research to ensure research subjects and employees are protected from harm, ethical standards are upheld, the use of taxpayer funds is transparent, and U.S. national security and economic interests are safeguarded. The exact requirements applicable to each sponsored project vary depending on the purpose of the research and the specific research activities. PIs are fully responsible for complying with all applicable laws and regulations for each sponsored project.

A list of all University policies governing regulatory compliance requirements for research activities is available on the University's [Research Policies website](#).

9.2 Animal Subjects

The use of animal subjects in research is highly regulated and is subject to extensive oversight to protect animal subjects from unnecessary harm.

Resources:
- [Institutional Animal Care and Use Committee (IACUC)](#) - Responsible for reviewing and approving research on animal subjects and ensuring compliance with applicable laws and regulations governing the use of animals in research projects.
- [Office of Laboratory Animal Resources (OLAR)](#) - Serves as the University's vivarium and provides animal care resources and veterinary services for animal subjects.
- [Animal Research Lifecycle](#) – This University website provides information and resources to support animal research throughout the award lifecycle.

9.3 Human Subjects

The use of human subjects in research activities is heavily regulated to protect the safety and welfare of study participants.

Resources:
- [Colorado Multiple Institutional Review Board (COMIRB)](#) - Serves as the University's institutional review board (IRB) for human subject research.
- [Clinical Research Administration](#) – Supports PIs and researchers with human subject research at the University.
- [University Guidance and Policies for Human Subject Research](#) – This University website provides resources and guidance on the use of human subjects at the University.
- [Human Research Lifecycle](#) – This University website provides information and resources to support human subject research throughout the award lifecycle.

9.4 Environmental Health and Safety

Federal and state laws and regulations govern the procurement, use, storage, and disposal of biological, chemical, and radioactive materials in research activities to protect the health and wellbeing of employees, the community, and the environment.

Resources:
- [Environmental Health and Safety (EHS)](#) – The University office responsible for overseeing biological safety, hazardous materials, occupational health, radiation safety, and research safety and industrial hygiene.
- [General Guidance for Researchers](#) – This University website provides guidance on environmental health and safety policies and procedures.
- [Office of Research Committee Support (ORCS](#)) – This University website provides links to University review boards.

9.5 Conflict of Interest

Federal regulations and University policies governing conflict of interest are designed to promote transparency, prevent undue influences from impacting research activities, and protect the University's integrity and reputation.

Resources:
- [Conflict of Interest](#) – This University website provides information and resources to assist University employees in complying with conflict of interest requirements.
- [OGC Conflict of Interest](#) – This OGC website provides information regarding conflict of interest requirements on sponsored projects.

9.6 Fly America Act

The Fly America Act regulates air travel funded by the federal government. With limited exceptions, federal funds must be used to purchase tickets from a U.S. flag carrier.

Resources:
- [PSC International Travel](#) – The PSC provides resources and guidance for international travel and compliance with the Fly America Act.
- [General Services Administration Fly America Act](#) – This website provides additional guidance for the Fly America Act.

9.7 Export Control

Export Control laws and regulations restrict the release of certain items, information, and software to foreign nationals within the United States and in international locations. Penalties for non-compliance with export control laws are severe and can lead to civil actions and criminal prosecution for the PI.

Resources:
- [Export Control](#) – this University website provides resources and information regarding export control laws and regulations.
- [PI Responsibilities](#) – this University website identifies responsibilities for PIs to ensure compliance with export control laws and regulations.
- [Policies and Procedures](#) – this University website identifies University policies and procedures relating to export control laws and regulations.

9.8 Research Integrity

Ethical conduct is a foundation for research, and the University strives to maintain a culture of integrity. Allegations of research misconduct are treated seriously and are fully investigated. It is the responsibility of University employees to report research misconduct, which includes:
- Fabrication

- Falsification
- Plagiarism

Resources:
- [Research Integrity](#) – this University website identifies and explains the University's policies and procedures relating to research integrity and misconduct.
- [Office of Research Integrity](#) (ORI) – the U.S. Department of Health and Human Services' Office of Research Integrity provides resources and information regarding federal regulations and training materials.
- [Scientific Integrity at NSF](#) – this website explains the NSF scientific integrity policy.

9.9 Responsible Conduct of Research (RCR) Training

Federal law requires certain employees working on research grants to complete mandated Responsible Conduct of Research (RCR) training. The training requirements differ by sponsor and grant program.

NIH requires all trainees, fellows, participants, and scholars receiving support through any NIH training (T), career development (K), research education grant, and dissertation research grant to receive instruction in responsible conduct of research. Please note, CITI online courses do not meet NIH requirements.

NSF requires institutions to have a plan to provide appropriate training and oversight in the responsible and ethical conduct of research for undergraduate students, graduate students, postdoctoral scholars, faculty, and other senior personnel who will be supported by NSF to conduct research. The training must include mentor training and mentorship.

Resources:
- [Institutional RCR Plan Information for Proposals](#) – resources to include for proposals regarding the University's RCR Plan.
- [Responsible Conduct of Research (RCR) Training](#)– University website discussing RCR requirements and training information.

9.10 Intellectual Property

Intellectual property (IP) encompasses patents, copyrights, trademarks, and related proprietary matters. When intellectual property is created under federal awards, the University must adhere to the Bayh-Dole Act, which outlines specific reporting requirements for inventions arising from federal funds. The Bayh-Dole Act allows the University to retain ownership of inventions made under federally funded research and contracts, while also granting the government a license to these inventions.

Resources:
- [APS Intellectual Property Policy on Discoveries and Patents for Their Protection and Commercialization](#) – The Administrative Policy Statement for the University of Colorado, outlining intellectual property procedures.
- [CU Anschutz Campus Policy Intellectual Property Policy on Discoveries and Patents for their Protection and Commercialization](#) – The CU Anschutz campus policy detailing intellectual property management.
- [Protecting Your Intellectual Property](#) – Information on patents, copyrights, and trademarks for CU Anschutz personnel.
- [CU Innovations](#) – A resource for CU Anschutz personnel to manage and commercialize innovations.
- [Venture Partners at CU Boulder](#) – Resources for CU Boulder and CU Denver personnel regarding IP protection and commercialization.

9.11 Health Insurance Portability and Accountability Act (HIPAA)

The Health Insurance Portability and Accountability Act (HIPAA) establishes privacy standards to protect patients' medical records and other health information. The University is classified as a hybrid covered entity under HIPAA, meaning that its compliance applies to patient records, human subjects research records, and marketing demographics that contain health-related information. The Office of Regulatory Compliance (ORC) is responsible for coordinating HIPAA compliance within the University.

Resources:
- [University HIPAA Policy](#) – The University's official policy regarding HIPAA compliance.
- [HIPAA for Researchers](#) – Guidelines and information for researchers
- [ORC HIPAA](#) – The Office of Regulatory Compliance's resources and support for HIPAA compliance.

9.12 Freedom of Information Act (FOIA)

The Freedom of Information Act (FOIA) grants individuals the right to access federal government records, including those related to federally funded sponsored projects. By accepting a federal award, PIs agree to comply with FOIA requirements and requests. If a federal agency receives a FOIA request regarding a project, they will notify the PI and provide a list of documents that must be submitted. PIs may propose redactions to protect confidential, proprietary, or personally identifiable information. It is strongly recommended that PIs consult with University Counsel prior to submitting any documents subject to FOIA to a federal agency.

Chapter 10: Additional Requirements for Sponsored Projects

10.1 Human Resources

Human Resources (HR) establishes numerous policies and procedures relating to the workplace, including:
- Search and Hiring Process
- Onboarding
- Compensation and Payroll
- Performance Management
- Separation and Retirement
- Leave
- Learning and Development
- Workplace Policies and Labor Standards
- Benefits

Employees must comply with HR policies in all aspects of their position at the University.

Resources:
- [University of Colorado Employee Services](#)
- [University of Colorado Denver Human Resources](#)
- [University of Colorado Anschutz Medical Campus Human Resources](#)
- [CU Denver | Anschutz Medical Campus Human Resources Policies](#)

10.2 Information Technology

The Office of Information Technology (OIT) provides IT resources for students, faculty, staff, and researchers and establishes policies for the use of IT for business-related purposes.

Resources:
- [OIT Denver Campus](#)
- [OIT Anschutz Medical Campus](#)
- [CU Denver | Anschutz Medical Campus Information Technology Policies](#)

The [Information Security and IT compliance unit](#) is involved with risk assessment of technology and with federal or sponsor requirements related to cybersecurity involving grant activity.

10.3 Audits

The Single Audit Act and 2 CFR 200 require all entities expending more than $1 million in federal funds in their fiscal year to be audited by an external auditor. The Single Audit, sometimes referred to as the Uniform Guidance Audit or 2 CFR 200 Audit, examines an institution's financial statements, policies and procedures, and compliance with federal regulations. Fiscal Compliance coordinates the University's Single Audit each year.

As a state institution, the University's audit is incorporated into the Colorado Statewide Single Audit. Sponsors frequently request a copy of the Statewide Single Audit for routine monitoring purposes and during the pre-award phase.

The University's [FDP profile page](#) provides a copy of the University's most recent single audits and a management letter.

10.4 Hostile Work Environment and Sexual Harassment

The University prohibits all forms of abusive workplace behavior, including conduct that is threatening, humiliating or intimidating, work sabotage, and any related retaliation. PIs are responsible for fostering a safe and inclusive work environment in their labs and for treating all employees respectfully. HR is responsible for investigating and disciplining employees that violate University policy regarding safe working environments.

Most federal agencies maintain a zero-tolerance policy for harassment and discrimination. The University is required to report to most federal agencies anytime a PI or other senior/key personnel on a federally sponsored project is removed from their position or otherwise disciplined by the University due to concerns about harassment, bullying, retaliation, or hostile work conditions.

Resources:
- [Office of Equity Reporting](#) – all University employees may report instances of bullying, hostile work environments, harassment, and retaliation to the Office of Equity
- [NIH Safe and Respectful Workplace](#) – NIH resources and policies regarding safe and respectful workplace
- [NSF Stopping Harassment and Assault](#) – NSF resources and policies regarding sexual assault and harassment

Appendix A – Summary of Significant Changes

A.1 March 26, 2026

- Section 2.13.1
  - Language changed from "Effort should be shown as a percentage of full-time effort or in person-months, depending on sponsor requirements" to "Effort should be shown as a percentage of effort or in person-months based on their current university appointment or formatted based on sponsor requirements."

A.2 February 9, 2026

- Section 4.17 Payment on Sponsored Projects
  - Information added about hybrid payment methods

A.3 October 1, 2025

- Section 1.24 Research Security Training Requirements for PIs and Senior/Key Personnel
  - Section added to the Handbook to identify training requirements for PIs and senior/key personnel
- Section 2.16 Other Support Reporting Requirements and Process
  - Section added to the Handbook to incorporate policy statement required by NIH NOT-OD-25-133
- Section 2.17 Routing and Proposal Submission
  - Section renumbered from 2.16
- Section 2.18 Post-Submission Requests and NIH Just-in-Time Requests
  - Section renumbered from 2.17
- Section 4.18 Accounts Receivable
  - Section updated to reflect new OGC banking address for sponsor payments
- Section 8.12 Residual Balance
  - Section updated to provide additional clarification.

Appendix B – Glossary

TERM	DEFINITION
2 CFR 200 (Uniform Guidance)	2 CFR 200 is the governmentwide guidance that establishes the administrative requirements, cost principles, and audit requirements for most federal grants and cooperative agreements. Federal agencies may have implementing regulations or guidance documents that supersede 2 CFR 200.
Acknowlekdgement Statement	Federal research awards generally require an acknowledgment statement when issuing statements, press releases, and other public documents.
Administrative Policy Statement (APS)	Policies that apply to all University of Colorado campuses and employees.
Administrative Unit	Part of a school, department, division, center, or institutional section of a large program.
Applicable Credits	Transactions that offset or reduce direct or indirect costs allocable to a Federal award. Examples of such transactions are purchase discounts, rebates or allowances, recoveries or indemnities on losses, insurance refunds or rebates, and adjustments of overpayments or erroneous charges
Assistance Listing	A unique number assigned to the federal government for each federal financial assistance program.
Authorized Organization Representative (AOR)	A University employee who has legal signature authority to bind the University.
Award Terms and Conditions	The legally binding provisions between two parties, the sponsor and the university, governing a sponsored projects.
Award Transfers	The process of transferring an award from one institution to another.
Budget Period	The time interval from the start date of a funded portion of an award to the end date of that funded portion
Carryover Authority	The request, or expanded authority, to move unobligated funds from one budget period to the next.
Clinical Trial	A research study in which one or more human subjects are prospectively assigned to one or more interventions (which may include placebo or other control) to evaluate the effects of those interventions on health-related biomedical or behavioral outcomes.
Closeout	The process by which the federal awarding agency or pass-through entity determines that all required administrative actions and project work are complete, in accordance with 2 CFR §200.344.
Co-Investigator (Co-I)	An individual who collaborates with the Principal Investigator (PI) in the scientific development or execution of a project.
Colorado Open Records Act (CORA)	Colorado's state freedom of information law which requires most public records be available to the public. A "public record" includes most documents made, maintained, or kept by a state entity.
Cost Sharing	The portion of project costs paid by the University rather than the sponsor.
Cost Transfer	The re-allocation of an expense from one speedtype to another.
Direct Cost	Costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.
Disallowed Cost	Charges to a federal award that the sponsor determines to be unallowable, in accordance with the applicable federal statutes, regulations, or the terms and conditions of the federal award. All disallowed costs are the responsibility of the PI and their respective administrative unit.
Electronic Personnel Effort Reports (ePERs)	The University's official time and effort reporting system for federal awards.

Equipment	Tangible personal property with a per-unit acquisition cost of $5,000 or more and a useful life of more than one year.
eRA Commons	The NIH's electronic grant administration interface.
Exempt Property	Property acquired under a federal award where the federal agency vests title to the recipient or subrecipient without further responsibility to the federal government.
Expanded Authorities	Administrative flexibilities provided to certain federal grant recipients, allowing changes to a project without prior agency approval.
Federal Awards	Financial assistance or resources received by the University either directly from a federal agency or indirectly via a pass-through entity.
Federal Financial Report (FFR)	The standard form used to summarize the financial state of a federal award for a specific time period.
Financial Conflict of Interest Disclosure	A federal requirement for PIs and certain employees to disclose significant financial interests related to their institutional responsibilities and research.
Freedom of Information Act (FOIA)	A federal law granting public access to records from federal agencies, including those related to grant awards.
Gift	Anything of value given to the University by a donor who expects nothing of significant value in return.
Government Property	Property titled to the federal government and provided by the federal government for the exclusive use on a federal award.
Indirect Cost (Facilities and Administration Costs)	Expenses necessary for conducting research that are not easily attributable to a specific project. Also known as Facilities and Administrative (F&A) or overhead costs.
InfoED eRA	The University's electronic research administration system.
Institutional Base Salary (IBS)	The annual compensation paid by the University to an employee for University-related work.
Limited Submission	A funding opportunity that limits the number of applications the University may submit.
NIH Grants Policy Statement (NIH GPS)	The NIH's official guidance and requirements for grants management and administration.
NIH Just-in-Time Requests	A request from NIH for additional proposal information following the initial review of the proposal.
No-Cost Extension (NCE)	An extension of time to a project period and/or budget period to complete the work of the grant under that period, without additional Federal funds or competition. Prior approval may be required depending on sponsor policies.
Non-Federal Awards	Financial assistance received from sponsors other than federal agencies and that does not include federal funding.
NSF Proposal & Award Policies & Procedures Guide (NSF PAPPG)	NSF's guidance and requirements for grants management and administration.
Office of Grants and Contracts (OGC)	The administrative office supporting both CU Anschutz Medical Campus and CU Denver in managing sponsored projects.
One-Time Extension (First No Cost Extension)	A no-cost extension for the first time under a federal award to extend the project period. As defined in 2 CFR 200, this term is used in lieu of "first no-cost extension."
ORCiD	A unique identifier used to distinguish and authenticate individual authors and researchers in scholarly communication.
Participant Support Costs	Direct costs that support participants and their involvement on a sponsored project. Participants may include community members participating in a community outreach program, students, and conference attendees. These costs do not include study subject payments.

Pass-through Entity (PTE)	A non-federal entity that provides sponsored funding another entity to carry out a portion of a sponsored project via a subaward agreement.
Pre-Award Spending	The costs incurred prior to the start of a sponsored project. Pre-award spending may require sponsor prior approval.
Principal Investigator (PI)	The individual primarily responsible for the preparation, conduct, and administration of a sponsored project.
Prior Approval	Sponsor-required written approval before making certain changes to an award.
Program Income	The gross income directly generated by a sponsored project.
Project Period (Period of Performance)	The approved length of a sponroed project, which includes one or more budget periods.
Proposal	A detailed request for funding prepared in accordance with sponsor guidelines.
Record Retention	The mandated period during which University records must be retained following the completion of an action.
Research Administrator	A University employee who supports the management and administration of sponsored projects.
Routing	The University's internal review process for proposals by administrative units and the OGC Pre-Award team.
Salary cap	The maximum salary amount that a sponsor will reimburse.
Sponsored Project	Research, instruction, or public service activities supported by external funding sources.
Subagreements	Agreements between the university and external entities to carry out portions of a sponsored project.
Supplies	Tangible personal property that does not meet the criteria to be classified as equipment.
University Sponsored Project Handbook	A guide for policies and procedures governing sponsored projects at CU Anschutz Medical Campus and CU Denver. Compliance is mandatory for all University employees working on sponsored projects.

Appendix C – Quick Reference for Sponsored Projects Expenditures on Federal Awards

Sponsored projects are to be charged directly for the types of direct costs that are (1) allowable under the terms and conditions of the sponsored agreement, (2) consistently treated as direct costs under like circumstances, and (3) reasonable and necessary for the performance of the sponsored agreement.

The following list provides guidance on whether a particular type of cost, **if reasonable and necessary for the performance of the agreement**, is treated as a direct cost of sponsored projects and under what circumstances it may be treated differently. The list is not intended to be all-inclusive and **does not** preclude the need to look at the terms of specific sponsored agreements.

Non-federal projects may allow charging of expenditures that cannot be direct charged to federal sponsored projects. This is considered to be an "unlike circumstance" and expenditures will be approved for these **non-federal** sponsored projects if appropriate to the award and not specifically disallowed by the sponsor.

Cost	Account code(s)	Are costs usually charged directly to Sponsored Projects?	Explanation of unlike circumstances that allow treatment as direct cost on Federally sponsored projects or other notes
Advertising - recruitment, procurement, disposition of surplus goods	507600	YES	The only advertising costs allowable are those which are solely for: 1. The recruitment of personnel required for the performance by the institution of obligations arising under the sponsored agreement; 2. The procurement of goods and services for the performance of the sponsored agreement; 3. After approval by the University of Colorado Denver (UCD) Space and Asset Management, the disposal of scrap or surplus equipment/materials acquired in the performance of the approved agreement; and 4. Other specific purposes necessary to meet the requirements of the sponsored agreement. These allowable costs should be a direct charge.
Advertising – other	508700	NO	Unless specifically necessary to meet the requirements of the sponsored agreement
Alcoholic beverages		NO	
Alterations and renovations (Physical Plant Maintenance and Repair)	515108 – 515113	YES	Specific prior approval is required by some sponsors.
Alumni Activities		NO	
Bad debts	552900	NO	
Building rental	502600	NO	Sponsored projects that are charged the off-campus indirect cost rate are directly charged for the cost of space and building rental if identified in the budget narrative and approved by the sponsor. In addition rent may be directly charged when it is in lieu of hotel (travel costs) for long term fieldwork.
Commencement and convocation costs		NO	

Cost	Account code(s)	Are costs usually charged directly to Sponsored Projects?	Explanation of unlike circumstances that allow treatment as direct cost on Federally sponsored projects or other notes
Communication costs		See long distance toll charges and/ or telephone equipment.	
Conference and convention registration fees	553000	YES	
Contingency reserve		NO	
Contractual services, consultants	492601 552605 552606	YES	Specific prior approval is often required by some sponsors. See terms of sponsored agreement.
Custodial	517600 517601	NO	Federal sponsored projects may be charged directly if they are located off-campus, and use the off-campus indirect cost rate.
Data processing (excluding areas identified as campus wide administrative systems). Examples include costs of local area networks, central file servers, etc.	500000 – 502499	YES	Federal projects may be charged directly for data processing costs that can be directly identified and allocated to the project. The costs of local area networks, central file servers, engineering workstations, and other shared facilities are charged directly to federal projects **if allocated to all users based on their relative benefit and usage of those facilities.** For example, if a computer is used for multiple projects, the cost of the network connections and central file server maintenance must be allocated based on the benefit to the projects. For more information see the UCD Fiscal Policy on Service Centers.
Defense and prosecution of criminal and civil proceedings, claims, and patent infringement	553600	NO	
Donations and contributions	547600	NO	Includes donations that are requested as part of a membership due in a technical or professional organization.
Dues and memberships - civic or community organization, social or dining club	510200	NO	
Dues and memberships - business, technical, professional organizations	510100	NO	Examples of exceptional circumstances in which membership fees can be directly charged to federally sponsored awards include – 1. Membership fees required in order to attend a conference, where the conference is directly related to the sponsored project. For example, a project requires the PI to present results at a conference and the conference requires participants to be members of the technical/professional organization sponsoring the event. Expense would be coded as conference registration fee if membersship is part of registration fee. 2. Membership fee required in order to subscribe to a journal, where the subscription is necessary for the agreement. Code the expense as subscriptions if membership is part of subscription price.
Employee morale, health, and welfare costs		NO-except as defined as fringe benefits	
Entertainment – costs incurred for amusement, social activities, entertainment, and any items relating thereto, such as meals, lodging, rentals, transportation, and gratuities are unallowable.		NO	

Cost	Account code(s)	Are costs usually charged directly to Sponsored Projects?	Explanation of unlike circumstances that allow treatment as direct cost on Federally sponsored projects or other notes
Equipment-capital	810100 810200 810400 810500	YES	When the University acquires equipment using federal funds, it must assure that all purchases or leases are necessary, beneficial, and non-duplicative. Approval criterion for the purchase or lease of capital assets varies between the different awarding agencies; prior approval by the department will be obtained if required by award terms based on awarding agency and university requirements. For further information, contact Grants and Contracts.
Equipment (non-capital, general office purpose) – this includes equipment that is used for general office purposes, such as calculators, typewriters, etc.	501800 537600 537601 537602 537603	NO	Non-capital equipment used by an employee that is fully funded by an off-campus or major project (or proportionately funded in relation to the cost allocated) for work done on the same major or off-campus project, subject to Sponsor Terms.
Equipment (non-capital, technical) – this includes equipment purchased for direct use in research, such as computers, lab equipment, etc.	501800 537600 537601 537602 537603	YES	
Equipment maintenance and repair	552600	YES	
Equipment rental	497603 552603	YES	
Express mail	485108	YES	New or competing proposal submittal costs should not be a direct cost to a project – see proposal preparation costs.
Fees and licenses	552600	YES	Exception – medical license fees are not allowable.
Fines and penalties – costs resulting from violations of, or failure to comply with, federal, state, and local laws and regulations (including University regulations) are unallowable.	553500	NO	Exceptions are allowed when incurred as a result of compliance with specific provisions of the sponsored agreement, or instructions in writing from the contract officer or equivalent.
Food and food service	522600 522700	NO	Food is allowed in exceptional circumstances including – 1. Conference grants 2. Educational grants 3. Symposia
Freight, moving and storage	540100 540102 540109	YES	When related to goods purchased or related to recruitment of individual to work on specific sponsored agreement
Fringe Benefits	400700 400800 405700 405800 418XXX 419XXX 420000 – 439999	YES	Allowable in proportion to the amount of time or effort employees devote to project and paid in accordance with UCD policies.
Honoraria	495100	NO	An honorarium that constitutes a payment for services rendered, such as a speaker's fee, under a conference grant is allowable. Do not use this account code, 495100, to pay study subjects or consultants. For study subject payments use account code 495102, Honoraria Study Subjects, for consultants use Other Operating Consultants, 552606.
Hospitalization Costs	520000 –	NO	Patient care is an allowable restricted category on a project receiving

Cost	Account code(s)	Are costs usually charged directly to Sponsored Projects?	Explanation of unlike circumstances that allow treatment as direct cost on Federally sponsored projects or other notes
	522499		federal grant support providing: 1. the recipient has obtained prior approval from the sponsor agency to treat patients and incur patient care costs, and 2. the hospital affiliated with the grant awarded patient care must have a Patient Care Rate Agreement for Hospitals from the sponsor agency.
Housing and personal living expenses		NO	May be appropriate on projects requiring team members to work at remote locations, including international locations. Some sponsors require approval of international travel.
Instructional supplies	527500 – 529999	NO	Instructional supplies may be charged on instructional grants, including training grants.
Insurance	545100	NO	Federal grants are charged directly for the cost of insurance required or approved, and maintained pursuant to the sponsored agreement.
Interest expense	542500 – 544999	NO	
Laboratory and technical shop supplies	530100 530108	YES	
Laundry expense	517600 517601	YES	
Lobbying costs		NO	
Long distance toll charges	482607	YES	
Losses on other sponsored agreements (cash deficits)		NO	
Medical supplies	535000 – 537499	YES	
Microfilming, photography and graphics supplies and services	490000 – 492499	YES	
Motor vehicle maintenance and supplies	497500 – 499999	NO	Federal projects are charged directly for maintenance and supplies for vehicles located and used in remote locations pursuant to project if identified in the budget narrative and accepted by the sponsor.
Office supplies	480000 – 484999	NO	Office supplies are normally treated as F&A costs. Federally sponsored projects may be charged directly for these costs if -- a. The project has a special need for the item or service that is beyond the level of services normally provided by the administrative unit personnel because it is considered a "major" project by OMB A-21 standards. See examples in UCD Fiscal Policy 4-7, Exhibit C. Use account code, 480101, for these office supplies. **or** b. The cost can be specifically identified to the technical scope of work conducted under the project and is appropriately documented. The project does not need to be major for those costs to qualify as technical costs and to be charged directly. They must, however, meet the other conditions in UCD Fiscal Policy 4-7 in order to be directly charged. Use account code, 480118, for office supplies used for technical purposes.
Official functions-meetings and conferences	550200	NO	See FOOD for explanation of when food would be allowed on a federally sponsored project.
Official functions-receptions and events	550100	NO	
Goods for Personal Use		NO	
Services for Personal Use		NO	
Political Activities – include, but are not limited to, lobbying,		NO	

Cost	Account code(s)	Are costs usually charged directly to Sponsored Projects?	Explanation of unlike circumstances that allow treatment as direct cost on Federally sponsored projects or other notes
publications, or other materials intended for influencing legislation.			
Postage costs	485107	NO	Postage is normally treated as F&A costs. Federally sponsored projects may be charged directly for these costs if -- a. The project has a special need for the item or service that is beyond the level of services normally provided by the administrative unit personnel because it is considered a "major" project by OMB A-21 standards. See examples in UCD Fiscal Policy 4-7, Exhibit C. **or** b. The cost can be specifically identified to the technical scope of work conducted under the project and is appropriately documented. The project does not need to be major for those costs to qualify as technical costs and to be charged directly. They must, however, meet the other conditions in UCD Fiscal Policy 4-7 in order to be directly charged.
Preagreement costs		NO	Except as allowed by sponsoring agency's regulations or specific approval. NIH generally allows preaward costs 90 days prior to effective date of new or competing continuation award.
Prepaid expense		NO	
Printing, binding, publication, and reproduction	487500 – 487599	YES	Some restrictions apply, see sponsor regulations.
Proposal /application preparation		NO	Costs associated with preparing proposals are not allowable direct costs to a federal project.
Public relations		NO	Costs specifically required or necessary to communicate to the public about a federal sponsored agreement are allowed.
Recruitment costs	507600 552600 702000 702100 702200	YES	
Remodeling		NO	Remodeling and alteration costs incurred for a specific sponsored project work area are allowable as a direct charge when such work has been approved in advance by the sponsoring agency.
Salaries and wages of Administrative and Clerical staff	400000 – 419999	NO	Salaries and wages of administrative and clerical staff are normally treated as F&A costs. Federally sponsored projects may be charged directly for these costs if -- a. The project has a special need for the item or service that is beyond the level of services normally provided by the administrative unit personnel because it is considered a "major" project by OMB A-21 standards. See examples in UCD Fiscal Policy 4-7, Exhibit C. **or** b. The cost can be specifically identified to the technical scope of work conducted under the project and is appropriately documented. The project does not need to be major for those costs to qualify as technical costs and to be charged directly. They must, however, meet the other conditions in UCD Fiscal Policy 4-7 in order to be directly charged. Because of the way the UCD effort reporting system is structured, administrative or clerical salary charges of less than 5% are not

Cost	Account code(s)	Are costs usually charged directly to Sponsored Projects?	Explanation of unlike circumstances that allow treatment as direct cost on Federally sponsored projects or other notes
			expected to be made to Federally sponsored projects. Thus, charges of less than 5% or that impact a calendar year quarter by less than 5% would not be appropriate (an exampled of calendar year quarter is July through September).
Salaries and Wages of Faculty, Graduate Research Assistants, and Technical Support Staff	400000 – 419999	YES	
Severance pay		YES	Only to the extent required by UCD policy.
Stipends and student aid	770000 – 772499	NO	Stipends, fees and tuition payments are allowable for students in federally funded training and/or fellowship projects.
Subscriptions, books, periodicals, scores, and monographs	512500 – 514999	NO	General medical resource materials are not allowable as a direct cost to federal projects. When resource materials are specifically needed in order to adequately research the area identified by the statement of work for the project and are not readily available through the UCD library, they may be charged to the federal project.
Student Activities		NO	Costs incurred for intramural activities, student publications, student clubs, and other student activities, are unallowable, unless specifically provided for in the federally sponsored agreements.
Study Subject Payments	495102	YES	Requires COMIRB protocol approval and sponsor approval.
Telephone equipment, maintenance, pagers, and cellular telephones.	482600 482604 482608	NO	LOCAL TELEPHONE COSTS (local services) are normally treated as F&A costs. Under exceptional circumstances, local telephone expenses may be directly charged to sponsored projects. Exceptions apply when a project has a special or unique need for telephone communication. Phone usage must be significantly greater than routine level required by administrative unit usage. CELLULAR PHONES AND PAGERS - Cellular telephones and pagers are charged directly when needed to coordinate field work. In such cases the need for charging such equipment and services must be justified in the narrative portion of the budget and approved by the sponsor.
Trash collection	515114	YES	Federal sponsored projects may be charged directly for these costs if they are located off-campus and use the off-campus indirect cost rate.
Travel	700000 – 709999	YES	Specific prior approval of international travel is required by some sponsors for some types of agreements. Travel must be by U.S. Carrier (exceptions defined on Travel Policy Summary and cost is not one of the exceptions).
Utilities	750000 – 752499	NO	Federal sponsored projects may be charged directly for these costs if they are located off-campus and use the off-campus indirect cost rate.