


<p><b>CAMPUS POLICY</b></p>  <p><b>UNIVERSITY OF COLORADO at COLORADO SPRINGS</b></p>	<p><b>POLICY NUMBER:</b> 900-001</p>	<p><b>PAGE NUMBER:</b> 1 of 7</p>
	<p><b>CHAPTER:</b> Academic</p>	
	<p><b>SUBJECT:</b> Roles and Responsibilities for Sponsored Programs Administration</p>	
	<p><b>EFFECTIVE DATE:</b> April 6, 2006</p>	
	<p><b>SUPERSESION:</b> May 15, 2005</p>	
<p>OPR: VCAA</p> <p>VC: Academic Affairs</p>	<p>Approved by Pamela Shockley-Zalabak, Chancellor, on April 6, 2006</p>	

I. POLICY

Managing sponsored programs is a shared responsibility among the principal investigators, their departmental administrator, their department chair and college dean, the Office of Sponsored Programs, the Office of Contracts and Grants Accounting and other administrative units. Individual responsibilities are as follows:

***Responsibilities:***

Principal Investigator

It is reasonable and appropriate for the principal investigator (PI) to rely on administrative staff (departmental administrator) for assistance under a sponsored program. However, the PI is expected to:

1. Be knowledgeable about sponsoring agency and UCCS policies and procedures related to proposal preparation and processing, conducting research, instruction, and training under a sponsored program.
2. Process proposals and resulting awards through the Office of Sponsored Programs and other appropriate administrative units.
3. Obtain appropriate approvals required for the conduct of the sponsored program, such as use of human subjects, animals, biohazardous materials and/or recombinant DNA.
4. Comply with specific terms and conditions of each sponsored program, including submission of programmatic reports, invention reports and inventory and equipment reports.
5. Ensure that any sub recipients comply with specific terms and conditions.

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6. Maintain budgets showing anticipated revenues and/or expenditures to assess financial performance.
7. Ensure all expenditures incurred or transfer of funds:
  - are only for allowable costs under the terms of the sponsored agreement or applicable law;
  - are authorized in accordance with University policies, State and Federal laws and regulations, and specific sponsor or donor requirements or restrictions,
  - are made within the available funding for the account, or supported by an appropriate alternate non-sponsored program fund with sufficient funding for the disbursement. When it is anticipated that expenditures will exceed available funding, initiate plan for correction before exhaustion of funds; and
  - are, in the case of unallowable costs, transferred to an alternate non-sponsored funding source.
8. Review monthly detailed financial reports to:
  - Detect financial transaction errors or discrepancies, and
  - monitor actual expenditures as compared to budgets.
9. Take immediate action to resolve discrepancies or significant errors noted during the monthly report review.
10. Follow up to ensure that such discrepancies or errors are corrected.
11. Certify that all costs charged to a sponsored program are accurate and specifically benefit the program being charged.
12. Certify salaries charged are accurate and specifically benefit the program by using the Personnel Effort Reporting system forms.
13. Ensure that all financial transactions are properly recorded in a timely manner so that expenditure reports may be prepared and submitted by Contracts and Grants accounting.
14. Maintain copies of original supporting documentation for all financial transactions for at least the minimum time periods specified in the funding agreement.
15. Ensure the Departmental Administrator is adequately trained and fully understands his/her financial recording responsibilities.

Department Chairs, Directors and Other Unit Heads Responsible for Administering a Sponsored Program:

Responsibilities of Department Chairs, Directors and Other Unit Heads include:

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1. Review proposals developed by faculty.
2. Ensure the proposed project is consistent with the objectives of their unit.
3. Determine the eligibility of the individual designated as Principal Investigator (PI) or Co-Principal Investigator in accordance with UCCS Policy, Principal Investigator Eligibility on Sponsored Programs.
4. Ensure the appropriateness of the effort committed to the project by UCCS faculty, staff and students.
5. Ensure that appropriate space has been identified and is available for the project, if applicable.
6. Confirm that support will be provided for the administration of the project.
7. Determine that cost sharing and/or matching fund commitments set forth in the proposal can be met.
8. Identify appropriate unrestricted fund sources at the departmental or program level to cover cost-sharing commitments
9. Provide documentation that cost sharing and/or matching fund commitments were provided as set forth in the proposal.
10. Identify appropriate unrestricted fund sources at the departmental or program level to cover overdrafts and/or disallowances that PIs are not able to cover with funds under their jurisdiction
11. Ensure that equipment purchased or acquired under sponsored programs awards are accounted for and/or disposed of in accordance with sponsor and University requirements.

#### Deans and Non-Academic Vice Chancellors

Responsibilities of Deans and Non-Academic Vice Chancellors include:

1. Review all proposals to ensure that the proposed project is consistent with the objectives of their unit.
2. Review and approve requests for exceptions to the Policy on Principal Investigator Eligibility on Sponsored Programs.
3. Approve cost-sharing or matching commitments.

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4. Identify appropriate unrestricted fund sources to cover overdrafts and/or disallowances the department chair or director within their unit have not been able to cover.
5. Ensure that a qualified departmental administrator is assigned to each funded project.

#### Office of Sponsored Programs

The OSP is responsible for all pre-award and non-financial post-award administration. The OSP provides the initial interpretation of all aspects of extramural funding. Should different interpretations arise between OSP and OCGA, the matter will be reviewed by the Associate Vice Chancellor for Research and the Controller, who may involve individuals from other campuses.

Responsibilities of OSP include:

1. Assist in locating funding opportunities.
2. Assist in proposal generation
  - Obtain guidelines/applications.
  - Interpret guidelines
  - Provide budget guidance
  - Review/completion of required representations & certifications
  - Process for institutional approval and signature
  - Copy & mail to Sponsor
3. Review and approve budgets to ensure appropriate charges for salaries, benefits, facility and administrative costs and other budget items.
4. Ensure that no proposals are submitted without full approval from the appropriate department chair, director of other unit head and the appropriate dean or non-academic vice chancellor.
5. Route files to Technology Transfer Office as needed.
6. Review, negotiate and approve all contractual agreements for sponsored programs.
7. Coordinate with Office of Contracts and Grants Accounting for account set-up.
8. Continue liaison with funding organization throughout project period.
9. Process requests for budget modifications, extensions, and other prior approval requests.

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10. Track proposal/award data.

11. Coordinate Compliance committees:

- Institutional Review Board for the Protection of Human Subjects
- Institutional Animal Care and Use Committee
- Biosafety Research Committee
- Research Misconduct Committee
- Classified Research Committee

12. Ensure that no project is authorized to begin work without approval of the appropriate Compliance Committee.

13. Coordinate with OCGA on external reporting of sponsored-programs expenditures.

14. Conduct workshops on various sponsored programs topics.

#### Office of Contracts and Grants Accounting

The Office of Contracts and Grants Accounting focus is on documenting expenditures/compliance rather than projecting or processing expenditures. The OCGA, in conjunction with the OSP, is responsible for reporting expenditures from sponsored programs to the System and to external organizations.

Responsibilities of the Office of Contracts and Grants Accounting include:

1. Set-up project account in accordance with award notice.
2. Monitor expenditures as to allowability, allocatability, and appropriateness:
  - Must hold up to Federal and State Audit
3. Manage billing and receivable activities.
4. Prepare financial reports, as required.
5. Administer the personnel effort report system.
6. Coordinate project close-out:
  - final financial reports
  - final property reports
  - final invention statements

## II. AUTHORITY FOR CAMPUS POLICIES

1999 System Audit Report

University of Colorado System Administrative Policy Statements (APS), "Sponsored Research Policies," May 14, 2001

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### III. PURPOSE

The purpose of this policy is to provide a description of the shared responsibility for the administration of sponsored programs at the University of Colorado at Colorado Springs. This policy defines the roles and responsibilities of principal investigators, their departmental administrators, department chairs, directors and deans, the Office of Sponsored Programs (OSP), and the Office of Contracts and Grants Accounting (OCGA).

### IV. DEFINITIONS

“Proposal” is the document required by external funding agencies to apply for funding that describes the plan for a research, instruction, training, or other program and requests financial support.

“Pre-award” is the period of time during which a proposal is developed, reviewed, submitted to a funding organization, and, if necessary, negotiated prior to actual receipt of an award document or fully executed agreement.

“Post-award” is the period of time from actual receipt of an award document or fully executed agreement through final project technical and financial reporting, closeout from the accounting system, and audit resolution.

“Sponsored Programs” are research, instruction and training, and other activities (i.e., public service) sponsored by external organizations, including activities classified as “fee for service” programs by the campus. Facilities and administrative cost recovery is not a factor in determining whether funding is a sponsored project. Funding may be from federal, state, city, county, or private organizations. Application/award issues that require administration by the Office of Sponsored Programs include any one of the following:

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

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**“Sub-award”** (also referred to as a subcontract or subgrant) is an agreement that transfers to another organization a portion of the substantive work being conducted under a sponsored program.

**“Principal Investigator (PI)”**: A UCCS employee who has been identified by UCCS and the sponsoring organization as the individual having primary responsibility for the intellectual and technical conduct and fiscal management of a sponsored program.

V. PROCEDURES

VI. RESPONSIBILITY

VII. HISTORY

None

VIII. ATTACHMENTS:

None