



**UCCS CAMPUS POLICY**

**Policy Title: Roles and Responsibilities for Sponsored Programs Administration**

**Policy Number: 900-001**

**Policy Functional Area: RESEARCH**

Effective: June 27, 2017  
Approved by: Venkat Reddy, Chancellor  
Responsible Vice Chancellor: Executive Vice Chancellor of Academic Affairs (EVCAA)  
Office of Primary Responsibility: EVCAA  
Policy Primary Contact: AVC Research, 719-255-3779  
Supersedes: April 6, 2006  
Last Reviewed/Updated: April 6, 2006  
Applies to: Faculty, Staff & Administration

Reason for Policy: 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 Colorado Springs.

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## I. INTRODUCTION

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 and Research Integrity (OSPRI), the Sponsored Projects Accounting (SPA) and other administrative units.

## II. POLICY STATEMENT

### A. Purpose

To align with APS 1012, this policy defines the roles and responsibilities of principal investigators, their departmental administrators, department chairs, directors and deans, the Office of Sponsored Programs and Research Integrity (OSPRI), and Sponsored Projects Accounting (SPA) for the administration of sponsored programs.

### B. Responsibilities

#### 1. Principal Investigator

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

- a. 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.
- b. Process proposals and resulting awards through the Office of Sponsored Programs and Research Integrity and other administrative units, including home department(s) and units(s) in accordance with unit requirements.
- c. Obtain appropriate approvals required for the conduct of the sponsored project, such as use of human subjects, animals, biohazardous materials and/or recombinant DNA, and export controls.
- d. Comply with specific terms and conditions of each sponsored agreement, including submission of programmatic reports, invention reports and inventory and equipment reports.
- e. Complete required training as requested by OSPRI.
- f. Ensure that project personnel are appropriately trained and understand project's scope of work, funding agency rules and compliance requirements.
- g. Ensure that any sub recipients comply with specific terms and conditions.
- h. Maintain budgets showing anticipated revenues and/or expenditures to assess financial performance.
- i. Ensure all expenditures incurred or transfer of funds:
  - i. are only for allowable costs under the terms of the sponsored agreement or applicable law;
  - ii. are authorized in accordance with University policies, State and Federal laws and regulations, and specific sponsor requirements or restrictions;
  - iii. are made within the available funding for the project, or supported by an appropriate alternate non-sponsored project 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
  - iv. are, in the case of unallowable costs, transferred to an alternate non-sponsored project funding source.
- j. Review monthly detailed financial reports to:
  - i. detect financial transaction errors or discrepancies;
  - ii. monitor actual expenditures as compared to budgets;
  - iii. confirm that procurement system documents are correct and accurate for all transactions.
- k. Take immediate action to resolve discrepancies or significant errors noted during the monthly report review.
- l. Follow up to ensure that such discrepancies or errors are corrected.
- m. Ensure that all costs charged to a sponsored program are accurate and specifically benefit the program being charged.
- n. Ensure salaries charged are accurate and specifically benefit the project.

- o. Complete required electronic effort reports.
  - p. Ensure that all financial transactions are properly recorded in a timely manner so that expenditure reports may be prepared and submitted by SPA.
  - q. Copies of supporting financial documentation are stored electronically within CUs procurement system. Maintain copies of original supporting documentation that may not be in the procurement system for all financial transactions for the period required by the campus retention policy (APS 2006) unless a longer time period is required by the sponsor as specified in the sponsored project agreement.
  - r. Work with the assigned departmental administrator to fulfill financial management.
  - s. Timely reply to requests from OSPRI, SPA, Departmental Administrator, Sponsor, and others.
  - t. Ensure compliance with Technology Control Plans, if applicable.
2. Department Chairs, Directors and Other Unit Heads Responsible for Administering Sponsored Programs

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

- a. Review proposals developed by faculty.
- b. Ensure the proposed project is consistent with the objectives of their unit.
- c. Determine the eligibility of the individual designated as Principal Investigator (PI) or Co-Principal Investigator (Co-PI) in accordance with UCCS Policy 900-006 *Principal Investigator Eligibility on Sponsored Programs*.
- d. Ensure the PI/Co-PI job description permits pursuing external funding and has appropriate time to devote to funded projects.
- e. Ensure the appropriateness of the effort committed to the project by UCCS faculty, staff and students.
- f. As appropriate, ensure departmental administrators attend sponsored projects administration trainings.
- g. Ensure that appropriate space has been identified and is available for the project, if applicable.
- h. Confirm that support will be provided for the administration of the project.
- i. Determine that cost sharing and/or matching fund commitments set forth in the proposal can be met.
- j. Identify appropriate unrestricted fund sources at the departmental or program level to cover cost-sharing commitments

- k. Provide documentation that cost sharing and/or matching fund commitments were provided as set forth in the proposal.
  - l. 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
  - m. Ensure that equipment purchased or acquired under sponsored programs awards are accounted for and/or disposed of in accordance with sponsor and University requirements.
  - n. Ensure compliance with Technology Control Plans, if applicable.
3. Deans and Non-Academic Vice Chancellors

Responsibilities of Deans and Non-Academic Vice Chancellors include:

- a. Review all proposals to ensure that the proposed project is consistent with the objectives of their unit.
  - b. Review and approve requests for exceptions to the Policy on Principal Investigator Eligibility on Sponsored Programs.
  - c. Approve cost-sharing or matching commitments.
  - d. 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.
  - e. Ensure that a qualified departmental administrator is assigned to each funded project.
  - f. Ensure departmental administrators attend sponsored projects administration trainings.
  - g. Ensure compliance with Technology Control Plans, if applicable
4. Office of Sponsored Programs and Research Integrity (OSPRI)

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

Responsibilities of OSPRI include:

- a. Assist in locating funding opportunities.
- b. Assist in proposal generation:
  - i. Obtain guidelines/applications.
  - ii. Interpret guidelines.
  - iii. Provide budget guidance.

- iv. Review and approve final budget to ensure allowability of proposed costs, appropriate rates and calculations for salaries, benefits, facility and administrative costs and other budget items.
  - v. Review/complete required representations & certification.
  - vi. Review final proposal for compliance with solicitation, as applicable.
  - vii. Process for institutional approval and signature.
  - viii. Submit to Sponsor.
- c. Confirm approvals from the appropriate department chair, director or other unit head and the appropriate dean or non-academic vice chancellor are received.
  - d. Coordinate review and approval of PI and Co-PI eligibility requests per policy 900-006 *Principal Investigator Eligibility on Sponsored Programs*.
  - e. Coordinate review and approval for F&A rate reductions and waivers per policy 900-002 *Facilities and Administrative Rate Reduction and Waivers*.
  - f. Coordinate review of intellectual property and non-disclosure provisions with the Technology Transfer Office, as needed.
  - g. Coordinate review and approval of requests for restricted, proprietary, and classified research per APS 1023.
  - h. Serve as the institutional designated official to negotiate and approve all sponsored project agreements, non-auxiliary unit fee-for-service agreements, non-disclosure agreements, and other academic agreements, as appropriate.
  - i. Prepare speedtype request paperwork for SPA.
  - j. Serve as liaison with funding organization throughout project period.
  - k. Process requests for budget modifications, extensions, and other prior approval requests.
  - l. Track proposal/award data.
  - m. Coordinate and manage sponsored program and compliance committees:
    - i. Institutional Review Board for the Protection of Human Subjects
    - ii. Institutional Animal Care and Use Committee
    - iii. Biosafety Research Committee
    - iv. Misconduct in Research, Scholarship, and Creative Activities
    - v. Classified Research Committee
    - vi. Sponsored Programs Administrator Network
    - vii. Committee on Research and Creative Works for scholarship seed grants.
    - viii. Coordinate and comply with audits by CU System and funding agencies.
  - n. Certify that projects receive approval of the appropriate Compliance Committee(s).
  - o. Maintain required Federal Wide Assurances (FWA) for human subjects' research.

- p. Conduct workshops on various sponsored programs and research integrity topics.
  - q. Serve as the institutional Export Control Officer and Empowered Official.
  - r. Review projects for export control implications and prepare, if needed, technology control plans and apply for applicable licenses.
  - s. Create policies, procedures, training, etc. to ensure compliance with sponsored programs and other research integrity rules and regulations.
  - t. Complete final inventions reports, if required.
  - u. Assist SPA with project close out as needed.
5. Sponsored Projects Accounting

Sponsored Projects Accounting (SPA) is responsible for all post-award financial administration, focusing on documenting expenditures/compliance rather than processing expenditures. SPA is responsible for reporting expenditures from sponsored projects to the System and external organizations.

Responsibilities of SPA include:

- a. Setting up projects in the financial accounting system in accordance with award notice. This includes entering the budget accounts and creating the speedtype.
- b. Prepare and process invoicing as specified by the sponsored project agreement.
- c. Processing sponsored project agreement amendments in the financial accounting system, as directed by OSPRI.
- d. Monitor post-award activities to include monitoring budgets, expenses, and recovered overhead to insure adherence to sponsor guidelines and all reporting requirements are met.
- e. Examine expenses for allowability, allocatability, and appropriateness in accordance with applicable federal and sponsor regulations.
- f. Create speedtype and enter budget accounts for voluntary and mandatory departmental cost sharing.
- g. Monitor departmental cost sharing expenses entered by departmental administrators.
- h. Oversee the compliance of the electronic Personnel Effort Reporting (ePER); advise and instruct PI's, employees and administrators on personnel effort reporting requirements and procedures.
- i. Accumulate data for preparing variety of financial reports.. This includes preparation of specialized financial status reports submitted to federal, state, local agencies, private sponsors, university management, the university Budget Office and Regents of the University of Colorado.

This also includes preparing budgets, budget and research fund reconciliations, forecasting, analysis and ad-hoc reports for administrators, PIs, and others.

- j. Audit sponsored projects for compliance against applicable federal regulations, university policy, and the sponsored project agreement.
- k. Provide online and in-person training on various sponsored projects topics.
- l. Coordinate project close-out:
  - i. Analyze financial data to ensure the project has conformed to the terms and conditions of the award. Work with PI and administrator on any necessary corrections.
  - ii. Ensure that all electronic Personnel Effort Reporting (ePERS) have been certified.
  - iii. Ensure that cost share commitments have been fulfilled.
    - i. Prepare final financial reports.
    - ii. Request technical reports from the PIs.
    - iii. Report final expenditures, equipment and property reports to the sponsor.

### III. KEY WORDS

Disallowances, F&A, ICR, Overdrafts, Principal Investigator (PI), Proposal, Pre-award, Post-award, Sponsored Programs, Sponsored Projects, Speed type, Sub-award, Subrecipient

### IV. RELATED POLICIES, PROCEDURES, FORMS, GUIDELINES, AND OTHER RESOURCES

#### A. Administrative Policy Statements (APS) and Other Policies

APS 1012 Sponsored Research Projects, November 2013 <http://www.cu.edu/ope/aps/1012>

APS 1005 Sponsored Project Revenues <http://www.cu.edu/ope/aps/1005>

APS 1007 Misconduct in Research, Scholarship, and Creative Activities <http://www.cu.edu/ope/aps/1007>

APS 1013 Intellectual Property Policy on Discoveries and Patents for their Protection and Commercialization <http://www.cu.edu/ope/aps/1013>

APS 1023 Restricted, Proprietary and Classified Research <http://www.cu.edu/ope/aps/1023>

APS 2006 Retention of University Records: <http://www.cu.edu/ope/aps/2006>

APS 4014 Fiscal Roles and Responsibilities <http://www.cu.edu/ope/aps/4014>

UCCS Policy 900-002 Facilities and Administrative Rate Reduction and Waivers  
<http://www.uccs.edu/vcaf/policies/uccs/policies.html>

UCCS Policy 900-006 Principal Investigator Eligibility on Sponsored Programs  
<http://www.uccs.edu/vcaf/policies/uccs/policies.html>

## B. Procedures

Policy and Procedures links: [www.uccs.edu/osp/resources/policies-and-procedures.html](http://www.uccs.edu/osp/resources/policies-and-procedures.html)

Principal Investigator Handbook: [www.uccs.edu/osp/resources/policies-and-procedures.html](http://www.uccs.edu/osp/resources/policies-and-procedures.html)

Sponsored Projects Accounting procedures:

[www.uccs.edu/rmd/uccs-controllers-office/sponsored-projects-accounting.html](http://www.uccs.edu/rmd/uccs-controllers-office/sponsored-projects-accounting.html)

## C. Forms

Sponsored programs and research compliance: [www.uccs.edu/osp/resources/forms.html](http://www.uccs.edu/osp/resources/forms.html)

## D. Guidelines

Uniform Guidance Information:

[www.uccs.edu/osp/resources/uniform-guidance-information.html](http://www.uccs.edu/osp/resources/uniform-guidance-information.html)

Research Compliance guidelines: [www.uccs.edu/osp/research-compliance.html](http://www.uccs.edu/osp/research-compliance.html)

## E. Other Resources (i.e. training, secondary contact information)

Finding funding resources: [www.uccs.edu/osp/finding-funding.html](http://www.uccs.edu/osp/finding-funding.html)

Training Requirements: [www.uccs.edu/osp/resources/trainings.html](http://www.uccs.edu/osp/resources/trainings.html)

2010 Effort Reporting Audit Report Available on request from the UCCS Controller's Office

2005 Sponsored Projects Audit Report Available on request from the UCCS Controller's Office

## F. Frequently Asked Questions (FAQs)

## V. HISTORY

Initial policy approval	May 15, 2005
Revised	April 6, 2006