

## **Solicitation, Clearance, Acceptance and Ongoing Management of Sponsored Programs**

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**Policy Type** [University](#)

**Contact Office**

[Sponsored Programs \(Office of\)](#)

**Oversight Executive**

[Vice President for Research](#)

**Applies To**

Academic Division The College at Wise

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### **Reason for Policy**

In accepting a sponsored program, the University assumes the responsibility for fulfilling the institutional, sponsoring agency, Federal, and State requirements. These requirements may be specifically contained in the agreement or they may be incorporated by reference to guidelines issued by the sponsor in special publications or directives. The University has established policies and procedures to provide reasonable assurance that internal controls are in place to manage sponsored awards in compliance with Federal, State, and other non-federal sponsor requirements, statutes, and terms and conditions of the award.

### **Definition of Terms**

#### **Authorized Signatory**

An individual authorized pursuant to the Board of Visitor's Signatory Authority policy to sign contracts with external parties on behalf of the Rector and Visitors of the University of Virginia.

#### **Facilities and Administrative (F&A) Rate**

The rate the University is authorized to charge Federal sponsors to cover F&A costs for sponsored programs. The rates are set based on location (On-Grounds/On-Campus or Off-Grounds/Off-Campus) and the type of activity (organized research, instruction, or other sponsored program). For federally funded sponsored programs, rates are applied as a percentage of the Modified Total Direct Costs supporting the sponsored program. The Federal agency that sets the University's F&A rates is the Department of Health and Human Services.

## **Federal Award**

A grant, contract, or cooperative agreement received directly from a Federal agency as well as federally funded sub-awards received by the University from other organizations.

## **Contract**

Any agreement between the University and one or more parties for performing, or refraining from performing, some specified act(s) in exchange for a valuable benefit known legally as "consideration."

## **Sponsored Program**

Any externally funded research, public service, or scholarly activity (including hosting or attending conferences) at the University that has a defined scope of work often including a set of specific programmatic objectives and/or deliverables, and line-item-based budget, providing the basis for sponsor expectations and awardee accountability (i.e., a reciprocal transfer of something of value). Sponsored programs are funded through agreements that usually include terms and conditions for the disposition of tangible properties and outcomes (e.g., equipment, records, specified technical reports, theses, or dissertations) or intangible properties and outcomes (e.g., rights in data, copyrights, and inventions). **Note:** The terms sponsored program, sponsored project, and/or sponsored activity are often used interchangeably.

## **Policy Statement**

Although sponsored programs are awarded based on the special competence of the proposing faculty and assembled research team, all solicitations (e.g., proposals or offers) for sponsored programs must be made by and, if selected for funding, issued to the University under its legal name: The Rector and Visitors of the University of Virginia. (For information about who is eligible to submit proposals and oversee the technical, fiscal, and administrative performance of sponsored programs, see University policy [RES-011: Investigator Eligibility Requirements and Responsibilities Related to Sponsored Programs.](#))

### **1. Administrative Authority:**

The Office of Sponsored Programs (OSP) has primary administrative authority for the solicitation, clearance, negotiation, acceptance, and ongoing management of sponsored programs. Ongoing management includes, but is not limited to, financial management (e.g., application of appropriate facilities and administrative rates, sponsor invoicing/draws, financial reporting, and audit support) and contract management throughout the sponsored program lifecycle. OSP has the authority to establish institutional systems, processes/procedures, and controls to support these activities and to confirm compliance with applicable requirements (e.g., sponsor, institutional, state, and federal). In implementing its authorities, OSP shares information and works collaboratively with other units in the Office of the Vice President for Research; school officials and faculty; and the University research administration community as well as other units across the institution that engage in, enable, or support sponsored program activities.

(For current information about sponsored program administrative systems, processes/procedures, and controls, see the [OSP website](#).)

**2. Sponsored Program Documents:**

Sponsored program documents [e.g., proposals including budgets, research awards (i.e., grants, contracts, and cooperative agreements), modification requests, representation and certification documents, and other sponsored program contracts] must be submitted for review and approval via the University's electronic research administration system. The requirement for prior review and approval does not apply to interim or final technical/progress reports which are typically submitted to the sponsor by a member of the research team; however, these reports are expected to be uploaded to the University's electronic research administration system following submission to the research sponsor. Financial management documents (e.g., invoices, financial reports, and supporting documents) submitted directly to the sponsor are not required to be routed via or stored in the University's electronic research administration system.

**3. Sponsored Program Contracts:**

Sponsored program contracts must be executed by an authorized signatory in OSP (see University policy [FIN-036: Signatory Authority for Executing University Contracts](#)). Sponsored program contracts include, but are not limited to, certain research awards (i.e., contracts and collaborative research and development agreements), collaboration agreements, memoranda of agreement or understanding, nondisclosure agreements, and agreements related to the transfer and use of materials and/or data when associated with the conduct of research.

**4. Financial Transactions:**

All financial transactions must be processed through the University's financial system(s) of record (see University policy [FIN-048: Safeguarding and Stewardship of University Financial Records](#)). Reconciliation of accounting records are performed by the units (see University policy [FIN-023: Reconciling Unit Accounting Records](#)). Costs must be treated consistently to conform to sponsor policies, contract or grant special provisions, institutional requirements (see University policy [FIN-017: Consistent Treatment of Sponsored Program Costs](#)), and in accordance with Federal cost principles:

- Costs claimed must be necessary (i.e., essential for the performance of the Federal award).
- Reasonable (i.e., not exceeding an amount that a prudent person would incur).
- Allocable (the charges specifically benefited that particular Federal award or cost objective).
- Allowable (i.e., per institutional, sponsor, Federal, and State cost principles).

Unallowable or unallocable costs must be moved off the sponsored program to another fund source that can accept such charges (e.g., gift, endowment, or residual balance account) as soon as they are identified.

**5. Compliance with Policy:**

Failure to comply with the requirements of this policy may result in disciplinary action up to and including termination or expulsion in accordance with relevant University policies.

Questions about this policy should be directed to the [Office of Sponsored Programs](#).

**Procedures**

[OSP Procedures](#) (complete listing), specifically:

[OSP-Budgeting Direct Costs on Sponsored Programs](#)

## OSP-Cost Transfers on Sponsored Awards

### Monthly Grants Accounting (GA) Reconciliation Procedure

#### **Related Information**

##### **Policies and Guidance on Research Data Security:**

[IRM-003: Data Protection of University Information](#) *Note:* This policy covers unpublished research data. Consistent with this policy and the [University Data Protection Standards](#), when a discrepancy exists between a University data protection standard and an applicable external data protection standard the more stringent will apply. [Research Data Security](#) content on the Vice President for Research's website provides information on sponsor requirements/expectations and links to UVA resources available to support research.

[OSP Policies](#), specifically:

[FIN-017: Consistent Treatment of Sponsored Program Costs](#)

[FIN-027: Time and Effort Certification](#)

[FIN-051: Proposing and Managing Cost Sharing on Sponsored Programs](#)

[FIN-023: Reconciling Unit Accounting Records](#)

[FIN-036: Signatory Authority for Execution of University Contracts](#)

[RES-005: Financial Conflicts of Interest for Research Investigators](#)

[RES-011: Investigator Eligibility Requirements and Responsibilities Related to Sponsored Programs](#)/p>

[ResearchUVA](#) (Netbadge authentication required) is the University's electronic research administration system. The [Using ResearchUVA](#) section of OSP's public website contains general information and instructions for access and using the system.

[2 CFR 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards](#)

**Major Category** [Research Administration](#)

**Next Scheduled Review** Saturday, September 7, 2024

##### **Revision History**

Revised 9/7/21; Added Compliance section 7/21/21; Confirmed 3/19/21; Updated Related Information 2/23/21.

##### **Applies To Text**

Academic Division and the College at Wise.

##### **Category Cross Reference**

[Finance and Business Operations](#)

##### **Supersedes Policy Text**

Elements of VIII.A.1, VIII.A.2, VIII.A.3, VIII.A.4; RES-009: Compliance with Sponsor Requirements: VIII.C.1: Compliance with Sponsor Requirements.

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**Approved By** Policy Review Committee

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