RES-009

# Proposal, Acceptance, and Management of Sponsored Programs

**Effective Date** Friday, February 15, 2019

**Status** Final

**Last Revised** Wednesday, November 5, 2025

**Policy Type** University

**Contact Office** Sponsored Programs (Office of)

**Oversight Executive**
Vice President for Research

**Applies To** Academic Division and the College at Wise.

**Table of Contents**


Policy Statement
1. Administrative Authority
2. Sponsored Program Documents
3. Sponsored Program Contracts
4. Financial Transactions
5. Compliance with Policy

Procedures


## 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 requirements issued by the sponsor. The University has policies, procedures, and internal controls to manage sponsored awards in compliance with applicable laws and the terms and conditions of the award.

## Definition of Terms

### Authorized Signatory

**Description**

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.

### Federal Award

**Description**

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

## Sponsored Program

**Description**

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 grants, agreements, and contracts that 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*, s*ponsored award*, and/or *sponsored activity* are often used interchangeably.

## Contract

**Description**

Any agreement between the University and one or more external parties for performing, or refraining from performing, some specified act(s) in exchange for a valuable benefit known legally as "consideration." Agreements meeting this definition may be referred to by other terms (e.g., memoranda of understanding, statements of work, non-disclosure agreements, academic program agreements).

## Electronic Research Administration System

**Description**

The software solution (RUVA also known as Research UVA) used for pre-award grants management including, but not limited to, proposal development and submission, contract management, and award documentation. Regardless, the University's electronic research administration system is the system currently in use for the purpose as described.

**Policy Statement**

Although sponsored programs are awarded based on the expertise of the proposing faculty and assembled research team, 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 proposal, acceptance, and management of sponsored programs. Management includes, but is not limited to, financial management (e.g., use of approved rates in proposal budgets and financial system setups, 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 University central and school units and faculty and staff engaged in the research mission. (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.

   Direct questions about this policy 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

**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 Office of 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: Payroll Allocation Confirmation on Sponsored Programs
- FIN-051: Proposing and Managing Cost Sharing on Sponsored Programs

FIN-023: Reconciling Unit Accounting Records
FIN-036: Signatory Authority for Executing University Contracts
RES-005: Financial Conflicts of Interest for Research Investigators
RES-011: Investigator Eligibility Requirements and Responsibilities Related to Sponsored Programs

RUVA (also known as ResearchUVA) is the University's electronic research administration system. RUVA-Grants is used for pre-award grants management including, but not limited to, proposal development, submission, and award documentation while RUVA – Agreements is used for contract submission and management. Other RUVA modules/solutions support compliance functions; for example, research related disclosures are made in RUVA-COI and payroll allocation confirmations are completed in RUVA-PAC.

Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards

**Major Category** Research Administration

**Next Scheduled Review** Sunday, November 5, 2028

**Revision History**

Updated title, terms, clarified Policy Statement 11/5/25; Revised 9/7/21; Added Compliance section 7/21/21; Confirmed 3/19/21; Updated Related Information 2/23/21.

**Category Cross Reference**
Finance and Business Operations

**Supercedes 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.

**Approved By** Policy Review Committee

**Approved Date** Friday, February 15, 2019