


<b>Administrative Policy and Procedures Regarding Sponsored Programs Administration</b>	
<b>Sponsored Programs SOP #1 Version 1.0 – XX, 2019</b>	

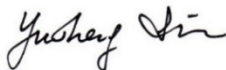
**1. ADMINISTRATIVE POLICY AND PROCEDURES REGARDING SPONSORED PROGRAMS ADMINISTRATION**

**1.1. Purpose.** The Sponsored Programs Office, which includes Pre and Post award services, ("Sponsored Programs") resides in the Office of Research Services (ORS) and is responsible for stewardship of external funds received for Sponsored Projects. Sponsored Programs oversees submission of proposals to external sponsors, negotiation/acceptance of grant and contract awards, and other Sponsored Programs-related matters. Sponsored Programs shall assist faculty and staff with:

- Retrieval of funding source information;
- Preparation of proposal applications to include budgeting guidance;
- Authorization and submission of proposals to federal/state/local/private sponsors;
- Negotiation/acceptance of grant/contract award agreements to include review of terms/conditions;
- Plans for spending awarded funds;
- Financial reporting and invoicing;
- Award modifications to include changes in scope of work or key personnel, re-budgeting, and/or no-cost extension requests; and
- Additionally, in cases of proposed or awarded projects, Sponsored Programs shall guide faculty and staff in interpretation of University/federal/state/other sponsor policies relative to cost principles; external sponsor-required University cost sharing; effort certification; and University use/maintenance/sharing of equipment.

**1.2. Scope.** A "Sponsored project" is defined as any externally funded research or scholarly activity that has a defined scope of work or set of objectives, which provides a basis for sponsor expectations. This more specifically involves research, demonstration, professional development, instruction, training, curriculum development, community and public services, or other scholarly activity involving funds, materials, or other forms of compensation, or exchanges of in-kind efforts under awards or agreements.

- 1.2.1.** A project is consider a "Sponsored project" if any one of the following conditions apply:
- The project is awarded based on a proposal request;
  - The University commits to a statement of work for a specified project;
  - The project involves a set of objectives which provides the basis for sponsor expectations;


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- The proposal includes a detailed budget;
- There is a written agreement for a commitment of resources between a sponsor and the University, there is a specified period of performance, requires deliverables (such as reports, financial accounting, or intellectual property ownership);
- The award provides for the disposition of tangible or intangible property that may result from the project (such as equipment, records, formal activity reports, rights in data, software, copyrights, invention or research-related materials);
- The sponsor is involved in making decision regarding project performance; or
- The project involves the use of human subjects, laboratory animals, radioactive or hazardous materials, recombinant DNA, carcinogens, pathogens or proprietary materials.

**1.3. General principles.**


- 1.3.1.** To generate proposals for external funding to the University, Sponsored Programs will disseminate information on funding opportunities.
- 1.3.2.** Proposals must be consistent with the mission of the University and must be suitable to the unit in which the project is to be conducted. A proposal is a formal offer by the University to conduct a program under the direction of the principal investigator/project director who does so utilizing personnel and facilities of the University. Therefore, projects must comply both with University policies and external sponsor regulations. Authority for proposal submission resides in Sponsored Programs where the authorized organizational representative (AOR) or his/her designee is the legal signatory on submissions.
- 1.3.3.** A grant or contract award is an award to the Curators of the University of Missouri on behalf of the University of Missouri – Kansas City (UMKC) and, as such, must be accepted by the University. Authority for acceptance resides in Sponsored Programs where the AOR or his/her designee serves as the legal signatory on grant or contract agreement documents.
- 1.3.4.** It is the responsibility of the principal investigators/project directors to maintain academic and research integrity in the conduct of his/her Sponsored project. A project may be carried out under the direction of one or more principal investigators/project directors within a single department, school, institute, center, or college or under the direction of such individuals from various cooperating units. In extenuating circumstances, an individual who is not a full-time employee may serve as principal investigator/project


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director; such cases must be sanctioned by the chair of the department/institute or center director, or regional campus dean from which the proposal is submitted.


- 1.3.5.** The principal investigator/co-investigator/project director/co-director must accept responsibility for the proposal's content while also certifying compliance with the sponsoring agency and institutional requirements. Also prior to submission to an external sponsor, the proposal must be approved by the appropriate chair(s), director(s), dean(s), or other University officer(s), as relevant, indicating to Sponsored Programs that the proposed project, its budget, and the level of effort committed by University personnel have the necessary University endorsements.
- 1.3.6.** In reviewing the proposed project, the chair/director, or dean must ascertain that the proposed project is consistent with the goals of the department, college, or school, that the faculty level of effort dedicated to the project is compatible with the unit's needs, and that any cost-sharing commitment is both possible and suitable. The dean shall review the proposed project to ascertain to what degree the project commits the college to long-term support of project personnel or program support beyond the award period.
- 1.3.7.** The proposed project's budget shall include allowable direct costs, facilities and administrative costs, and, as needed, the appropriate, sponsor required University cost share whose source and amount has been approved by responsible chair, director, dean, or institutional official agreeing to such cost share.
- 1.3.8.** Cost sharing shall become part of a proposed project's budget when required by the external sponsor and only when authorized by the appropriate University official representing the unit providing the cost share. Cost sharing on one project precludes its use on another project. Sponsored Programs shall ascertain that costs requested from an external sponsor as well as University cost sharing meet the cost principles (Uniform Guidance) of allowability, allocability, reasonableness, and consistency (with University financial practices). The University assumes the position that voluntary (not required by the external sponsor) cost sharing shall not ordinarily be offered, and that the University's negotiated facilities and administrative rate, an essential Sponsored project cost, shall not be waived. When UMKC project costs include subrecipient costs, in order to incorporate such costs into the UMKC proposed budget, Sponsored Programs must receive Justifying documentation from the subrecipient prior to proposal submission.
- 1.3.9.** Research projects involving use of human subjects must be reviewed by the University's Institutional Review Board (IRB). A project's human subjects must be protected in


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accordance with federal regulations. A project that does not comply may not be conducted.

- 1.3.10.** Research projects involving use of live vertebrate animals must be reviewed by the University's Institutional Animal Care and Use Committee (IACUC). No project involving animals may begin without approval by the IACUC.
- 1.3.11.** The University shall maintain its publication rights in all Sponsored Projects. The University shall not accept awards or enter into agreements for the support of research that permits another party the power to prohibit publication of or dissemination in any form of results of the Sponsored research activities. The University shall permit short delays (thirty to sixty days) of publication or dissemination of results in order for sponsor review, not sponsor approval, in order for sponsors to remove inadvertently included, sponsor-provided proprietary information or for sponsors to seek patent applications; in such cases, these delay conditions will be specified in the initial grant/contract award.
- 1.3.12.** At times, a government agency or an industry has need to contract with the University for a research project under conditions that do not permit free inquiry and disclosure of results. Such research is "classified research." Contracts for classified research may be considered on a case-by-case basis. The general purpose and method of such research shall be disclosed to pertinent faculty and administrators so that they can judge the appropriateness of the research and its contribution to human knowledge and well-being.
- 1.3.13.** A proposal to an external sponsor is subject to approval of the department in which the Sponsored project will reside. The proposal may be submitted only if the proposed project does not unduly disrupt the established research and teaching programs of the University and department, that is, if teaching obligations can be met or rearranged as needed; if appropriate space, equipment, and facilities can be made available to the project; and, if the University can provide for continuation of support for a project's new positions if required
- 1.4. Implementation:** proposal preparation and submission.
  - 1.4.1.** Individual faculty/staff members prepare proposals in accord with external sponsor guidelines.
  - 1.4.2.** Sponsored Programs' staff shall review the proposal and provide project proposal support including but not limited to the following services:
    - 1.4.2.1.** Sponsored Programs staff shall review the proposal for adherence to University policy and sponsor regulations.

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**1.4.2.2.** Sponsored Programs’ staff shall guidance with the development of the budget, assisting in identifying its adequacy for the proposed work, allowability (meets cost principles as delineated in Uniform Guidance and external sponsor cost requirements), and consistency with University financial procedures; and shall ascertain that the University is not cost sharing unnecessarily or unduly.

**1.4.2.3.** Sponsored Programs’ staff shall ensure that the principal investigator/project director follows University-required procedures (involving, as necessary, the Research Compliance Office, Environmental Health & Safety, University legal counsel, etc.) when human subjects, animals, export controlled data, hazardous chemicals, recombinant DNA, bio hazardous materials, radioactive materials, select agents/toxins, or new use of space (obtaining approval from the relevant University official) are involved in the project's conduct.

**1.4.3. Sub-recipient institution**

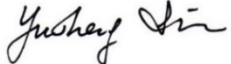
**1.4.3.1.** When a sub-recipient institution serves as a partner in the University's proposed project, Sponsored Programs staff shall coordinate the proposal submission with the subrecipient. Sponsored Programs staff shall obtain, prior to submission of the proposal, the necessary subrecipient documents. This documentation shall be in the form of a letter of commitment to the project, budget for subrecipient costs and cost sharing if applicable, the sub-recipient's statement of work substantiating what that institution will do for its proposed costs, and verification of the sub-recipient's facilities and administrative rate.


**1.4.4. AOR authorization**

**1.4.4.1.** Every proposal must be authorized by the AOR for submission and submitted by Sponsored Programs staff to the external sponsor.

**1.4.5. Endorsement**

**1.4.5.1.** Prior to its submission to an external sponsor, the proposal must be approved by the appropriate chair/director and/or dean. In reviewing the proposed project, the chair/director, or dean must ascertain that the proposed project is consistent with the goals of the department, college, or school, that the faculty level of effort dedicated to the project is compatible with the unit's needs, and that any cost sharing commitment is both possible and suitable. The college dean shall review the proposed project to ascertain to what degree the project commits the college to

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long-term support of project personnel or program support beyond the award period.

**1.4.6. Conflict of interest**

**1.4.6.1.** Prior to its submission to an external sponsor, all potential conflicts of interest must be disclosed (see UM system CRR 330.015 Policy on Conflict of Interest) by the project's key personnel (those who have a role in the design, conduct, or reporting of the project). Each investigator must complete/update the "Conflict of Interest/Conflict of Commitment Disclosure Form" in [eCompliance](#).

**1.4.7. Time for submission**

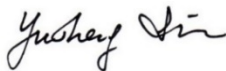
**1.4.7.1.** Sufficient time shall be allowed for Sponsored Programs to process the proposed project. University principal investigators/project directors submitting proposals must follow the established timelines to ensure efficiency, expediency, and quality of the proposal process. While we will work to get every proposal submitted by the sponsor's deadline, Sponsored Programs cannot be held responsible for submitting a proposal to the sponsor on time if a proposal does not meet the internal deadlines. In addition to risking a missed sponsor deadline, proposals that miss the internal Sponsored Programs deadline interrupt the submission of proposals that have arrived on time. Late submissions threaten not only the proposal itself but also the proposals of colleagues. For this reason, Sponsored Programs staff will give priority to those proposals that have been submitted on time and will not let late-arriving proposals affect the review and submission of on-time proposals.

**1.4.7.2.** See Policy #3, Proposal Submission Policy for specific timelines/expectations

**1.4.7.3.** If narrative proposal documents will be revised after submission for internal approval, all files must be finalized in PeopleSoft **no later than two working days before the due date of the proposal to the external agency or source.**


**1.5. Procedures: Grant/contract acceptance, initiation, and administration**


**1.5.1.** The grant or contract award to UMKC is issued as a document that must be reviewed by Sponsored Programs' staff, often in concert with University legal counsel; prior to acceptance, unacceptable clauses are modified or struck from the agreement. Acceptance is evidenced by the AOR's signature on the award agreement document. The University does not make funds available to the principal investigator/project director until he/she has met all compliance requirements (e.g., financial conflict of interest, IRB, IACUC).

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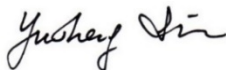
- 1.5.2.** When an award to the University includes subrecipient collaboration, the University shall issue the subaward agreement that includes the external sponsor's award terms and conditions. The subaward agreement will require the Subrecipient's certification of compliance with federal regulations and/or other external sponsor requirements. The agreement is then executed between UMKC and the Subrecipient. Ongoing monitoring of Subrecipient technical performance is documented by the principal investigator/project director and of administrative requirements by Sponsored Programs and grants accounting.
- 1.5.3.** In the administration of grant or contract awards, Sponsored Programs shall abide by:
- The award instrument issued by the particular funding agency;
  - [Uniform Guidance](#); in particular [Subpart F](#)
  - Other federal regulations; and
  - University policies.
- 1.5.4.** When an external sponsor selects a proposal for an award, the sponsor commonly requests additional budgetary or technical information. Such budgetary information may be provided only with Sponsored Programs' staff approval.
- 1.5.5.** Any award negotiation that takes place between UMKC and an external sponsor must be conducted by Sponsored Programs. If an external sponsor contacts a principal investigator/project director directly, he/she shall advise Sponsored Programs. Prior to finalizing negotiations, Sponsored Programs' staff shall work with the principal investigator/project director to ensure that his/her needs are met and that the University is protected. Sponsored Projects are subject to facilities and administrative costs (F&A) at the University's current federally-approved F&A cost rate agreement applicable to the type of project being conducted. If the sponsor has a published policy, uniformly applied, prohibiting or restricting the payment of F&A costs, the University may accept the reduced or waived F&A rate in accordance with the sponsor's policy. This does not apply to for-profit sponsors that are expected to provide full F&A recovery.
- 1.5.6.** The principal investigator/project director shall operate within University policy and external sponsor requirements and shall be responsible for day-to-day direction and financial and administrative management of his/her awarded project. Sponsored Programs' staff shall guide the principal investigator/project director in the interpretation of University policy and external sponsor requirements. University policy and external sponsor terms and conditions shall be followed for all sponsored program activities

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including but not limited to travel, equipment acquisition, employment and committed effort of personnel, participation of human participants, and/or use of animals. The principal investigator/project director shall fulfill the requirement for review and certification of salaries, assuring that salaries charged to Sponsored Projects correspond to effort expended on those projects.

- 1.5.7.** Equipment as defined by the University that is purchased with grant/contract funds shall be subject to University equipment inventory control procedures regardless of whether title vests in the University or the funding agency. The principal investigator/project director shall be responsible for such equipment, shall purchase the equipment in due time (well before an award end date), and shall account for all items periodically as well as at the project's end. Retention and disposal of equipment at project termination falls into three categories: (a) equipment purchased by the University with University funds (deemed to be cost share) remains in the department or school of the principal investigator/project director and cannot be removed from the University by a resigning principal investigator/project director; (b) special purpose equipment purchased by the University with grant or contract funds with title vested in the University by a sponsor remains in the principal investigator/project director's department or school and may be transferred with the approval of the appropriate chair/director/dean to a principal investigator/project director's new institution upon his/her resignation, only if the department/school has no use for the equipment (final approval for transfer rests with the provost or designee; and (c) equipment purchased with grant/contract funds that remains vested with the external sponsor shall be tagged appropriately to identify the sponsor and grant/contract number and shall be disposed of in accordance with external sponsor instructions and as coordinated between the controller's office and Sponsored Programs.
- 1.5.8.** UMKC considers that cost sharing included in proposal budgets and accepted by the sponsoring agency is an award condition and University obligation. Cost sharing is subject to audit; the external sponsor will require repayment of a portion of grant funds if the proposed cost sharing is not obtained/documentated and could terminate an active award. Cost sharing obligations, including both mandatory and voluntary-committed investigator effort, are appropriately recorded by project in the University's accounting records and substantiated by documentation (e.g., effort certification, vendor letters stating equipment value). Cost sharing is monitored for timeliness and adequacy as well as for allowability, allocability, reasonableness, and consistency with other University charging

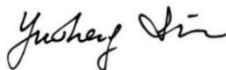
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procedures. Cost sharing expenditures like expenditures subsidized by the grant/contract award must comply with federal cost principles and sponsor award terms and conditions. Where cost sharing is a requirement of a University-issued subaward, the cost sharing commitment that the University requires from the subrecipient is included in the University-issued subaward document. The subrecipient's compliance with the required cost sharing commitment is then monitored by both the principal investigator/project director and grants accounting and appropriately reported to the external sponsor.

- 1.5.9.** Throughout an externally funded project's course, the principal investigator/project director shall inform his/her chair/director or dean as well as Sponsored Programs staff if there is or will be (a) any deviation from the project's sponsor-approved scope of work, budget, and/or level of personnel effort; or (b) any other change necessitating external sponsor approval. Sponsored Programs staff should be informed about any such proposed deviations prior to discussions that might occur between the principal investigator/project director and the external sponsor. The principal investigator/project director shall not communicate directly with the external sponsor about such deviations without approval from Sponsored Programs.
- 1.5.10.** All expenditures must occur during the period of the grant/contract award. Principal investigators/project directors shall be responsible for reviewing project expenditures (as documented in the University system-generated reports) on a timely\* basis, correcting any errors, and staying within the Sponsor approved budget.
- \*Expenditures for sponsored projects must be reviewed by a knowledgeable individual, i.e., the PI or designee (typically the financial or research administrator) so that required corrections can be made in a timely manner, and rates of expenditures can be monitored to ensure availability of funds. To be considered timely, expenditures should be reviewed at least quarterly, preferably monthly.
- 1.5.11.** Costs allocable to a particular sponsored agreement may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, or to avoid restrictions imposed by law, by terms of the sponsored agreement, or for other reasons of convenience. Costs allocable to activities sponsored by industry, foreign governments or other sponsors may not be shifted to federally sponsored agreements. If a cost transfer is made due to discovery of an error, the transfer must be supported by documentation that fully explains how the error occurred and a certification of the correctness of the new charge.

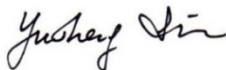
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**1.5.12.** External sponsors and UMKC expect principal investigators/project directors to manage the funded grant/contract project both within the sponsor-approved budget and project period. Unanticipated developments can, however, necessitate modification of the budget, scope of work, personnel effort, project period, or, in some cases, all of these. Principal investigators/project directors who need a modification must submit the request to Sponsored Programs for approval.


**1.5.13.** As recipients of external funds, principal investigators/project directors must exercise appropriate responsibility in reporting performance on the funded project to the sponsor. Technical progress (e.g., quarterly, annual) and final reports shall be submitted by the principal investigator/project director to the external sponsor as required and in timely fashion. The principal investigator/project director shall provide a copy of any submitted report (to include electronic reports) to Sponsored Programs. At the project period's end, the project work ceases; after the termination date, no additional expenditures may be charged to the grant/contract index. A period of thirty to ninety days is usually allowed to pay previously committed financial obligations prior to grant accounting's preparation of the final financial report based on expenditures recorded. The Principal Investigator/Project Director must certify that all expenditures are accurate. Upon receipt of expenditure certification, grants accounting shall certify the accuracy of the final fiscal report to the external sponsor. Final technical reports, invention disclosure reports, subrecipient reports (property, patent, technical, and fiscal) if applicable, and other reports as required by the external sponsor shall be submitted by Sponsored Programs to the external sponsor (the principal investigator/project director may have submitted the final technical report as required). The University shall not pay the subrecipient's final invoice until the reports and deliverables required from the subrecipient have been received and accepted. The principal investigator/project director shall certify that the subrecipient has adequately completed the technical aspects of the work. Upon acceptance of these closeout reports, grants accounting shall close the award.

**1.5.14.** Considered an integral part of a department/center/institute, or school, grant/contracts/other sponsored agreements must be monitored not only by the principal investigator/project director but also by the chair, director, and dean. Project over-expenditures and audit disallowances are, ultimately the responsibility and burden of the home department/center/institute, or school.

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**1.5.15.** Records of sponsored project activities (financial and programmatic records, supporting documents, statistical records, lab books, records for real property and equipment) shall be retained according to the [UM System Records Retention Authorizations](#).

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