



## 3.1.030

# Sponsored Projects Policy

Date of last board of trustees review: August 16, 2023

The originator of this policy is the executive director of Sponsored Projects. Questions regarding this policy may be directed to the originator by calling 801-957-4209.

### 1. Policy

Salt Lake Community College supports the pursuit, development, and management of resources from external sources that provide strategic benefit to the college and further its mission. These resources facilitate scholarship and innovation, enhance the programs, services, and capacity of the college, and support research. Administration of these resources is necessary to ensure transparency and inclusion, identify college obligations and applicable regulations, and coordinate oversight and stewardship. The college encourages diverse and equitable participation in sponsored projects and welcomes involvement by all members of the college community.

This policy establishes the Office of Sponsored Projects to administer sponsored projects in conjunction with the Controller's Office. For policies regarding philanthropic and private gifts, see the "[Gift Solicitation, Receipt, and Acceptance policy](#)."

### 2. References

Uniform administrative requirements, cost principles, and audit requirements for federal awards, 2 C.F.R. § 200–200.520; <http://www.ecfr.gov/>, select title 2, 200-299.

System for award management, <http://www.sam.gov/>

Grants.gov; federal grant opportunity locator and submission site; <http://www.grants.gov/>

## 3.1.030

# Sponsored Projects Procedure

Date of last executive cabinet review: May 23, 2023

The originator of this procedure is the executive director of Sponsored Projects. Questions regarding this procedure may be directed to the originator by calling 801-957-4209.

### 3. Definitions

- A. Award Acceptance: the college process wherein awards are authorized by OSP and, as needed, college leadership, for acceptance.
- B. Award: a sponsored project that has been approved or issued by the sponsor but has not yet been accepted by the college.
- C. Designation: a type of sponsored project that provides special classification for the awardee; sponsored project designations often allow awardees to seek funding or support that would not otherwise be available
- D. Direct costs: allocable, allowable, reasonable costs that are identified with a particular final cost objective or funded activity or are directly assigned to a funded activity.
- E. Financial Activities: post-award activities that, in concert with the sponsor approved budget, support the fiscal administration of the project, such as all revenues and expenditures, matching funds, asset tracking, financial reporting, and expense monitoring.
- F. Formula-funding: long-standing funding or support that is received each year from a reliable sponsor and is used for a similar purpose year after year. See Department Rules section B.3.c which is linked in section 4.D entitled "Pre-Award Requirements".
- G. Indirect costs: costs that benefit more than the cost objective(s) assigned. Also referred to as Facilities and Administrative costs.
- H. Internal approval process: the college process wherein PIs, PI supervisors, and appropriate Vice President authorize proposals for submission to the sponsor.
- I. Matching: the portion of resources provided by an entity other than the sponsor. Also referred to as cost sharing.
- J. Pass-through entity: a non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program.

- K. Post-award: activities occurring from award notification. Includes award negotiation, award acceptance, award management, reporting, award modification, close out and record retention.
- L. Pre-award: activities prior to award notification. Includes funding opportunity identification, proposal development, proposal submission, and sponsor revisions to proposals.
- M. Principal Investigator ("PI"): Internally approved and qualified college employee responsible to develop and oversee a sponsored project.
- N. Programmatic activities: post-award activities that support the technical, scholarly, or scientific aspects of the project generally completed by persons with discipline specific expertise.
- O. Proposal: a sponsored project not yet submitted to the sponsor.
- P. Private grant: non-gift external resources managed by the Development Office.
- Q. Sponsor: an entity providing funding or support.
- R. Sponsored Project: project supported by a governmental entity or an organization using public resources in support of research, instruction, capacity development, training, or other strategic, developmental, or scholarly activity. A sponsored project's test is in section 4.B.
- S. Subaward: an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity consider a contract.
- T. Subrecipient: a non-federal entity that receive a subaward from a pass-through entity to carry out part of a federal program but does not include an individual that is a beneficiary of such a program. A subrecipient may also be a recipient of other federal awards directly from a federal award agency.
- U. Waiver: a type of sponsored project that exempts awardees from certain regulations.

#### 4. Procedures

##### A. General

1. All sponsored project proposals must be developed, submitted and managed under the direction of the Office of Sponsored Projects ("OSP"). Employees pursuing a sponsored project shall inform OSP as soon as possible.
2. OSP will authorize submission of the proposal to the sponsor.
3. OSP shall review, negotiate and accept or reject all awards on the college's behalf.
4. For sponsored project assistance or information on sponsored project procedures,

contact the Office of Sponsored Projects.

B. Test for Determining Whether a Project Constitutes a Sponsored Project

1. A contract, agreement, grant, designation or waiver supported by a government or public entity where at least two of the conditions below apply:
  - a. the project requires adherence to government grant regulations and imposes terms of legal accountability, i.e., indemnification;
  - b. the project requires formal institutional endorsement;
  - c. the project obligates the PI or institution to a line of developmental or scholarly inquiry that follows a plan or seeks to meet stated goals;
  - d. the project establishes an understanding of how the funds will be used or includes a line-item budget that identifies expenses by activity or period;
  - e. the project requires fiscal accountability as evidenced by the submission of financial reports to the sponsor or the return of unexpended funds at the end of the project period;
  - f. the project requires the PI to report project results or convey rights to tangible or intangible properties resulting from the project; or
  - g. the project recovers indirect costs.
2. Employees should consult with the Office of Sponsored Projects in evaluating whether a project constitutes a sponsored project.

C. Roles and Responsibilities

1. Office of Sponsored Projects

Oversees all sponsored projects in pre-award and in post-award phases. OSP's responsibilities are to:

- a. develop vision and strategy for sponsored projects at the college;
- b. review and approve submission of all sponsored project proposals; OSP shall be responsible for submitting the proposal unless the sponsor requires otherwise.
- c. review, negotiate and accept/reject all sponsored project awards and related legal obligations;
- d. develop policy and procedures for sponsored projects;
- e. serve as the Authorized Official Representative and represent the college in all official sponsored project transactions;
- f. support and collaborate with PIs and project personnel on all aspects of sponsored projects throughout the lifespan of the project except financial compliance and fiscal management of awards;

- g. collaborate with PIs to prepare programmatic reports for internal distribution, college leadership, and Executive Cabinet;
  - h. oversee electronic grant administration systems, excluding college financial systems;
  - i. oversee project compliance to all applicable government regulations and guidelines related to the identification, development, submission, and programmatic governance;
  - j. manage sponsored project resources including trainings, handbooks, templates, and reports;
  - k. support the acquisition and allocation of indirect costs to support the development of sponsored project infrastructure;
  - l. identify governmental funding opportunities and disseminate these opportunities to the college community; and
  - m. serve as the records custodian for proposal and award documents
2. Controller

Oversees financial activities of post-award sponsored projects. The Controller's Office responsibilities are to:

- a. establish and maintain financial systems and records that ensure compliance with:
  - (1) generally accepted accounting principles;
  - (2) government accounting standards board; and
  - (3) Office of Management and Budgets ("OMB") 2 CFR 200 uniform administrative requirements, cost principles, and audit requirements for federal awards;
  - (4) award requirements
  - (5) prepare, review, approve and submit all required financial reports with the PI's knowledge and consent.
- b. develop policy and procedures regarding financial award management over sponsored projects;
- c. prepare, negotiate, and submit the college's indirect cost proposal to the college's cognizant federal agency;
- d. charge and allocate indirect costs at least quarterly to all applicable sponsored projects;
- e. complete and submit waivers of federal regulations to federal entities, in cooperation with principal investigators and programs;

- f. serve as the main contact and responsible party for all financial and federal compliance audits; and
  - g. ensure revenues are received for all sponsored projects.
  - h. serve as the records custodian for all financial documents.
3. Principal Investigator ("PI")

Responsible to lead the project with the support of their supervisor and all departments involved in the administration of sponsored projects. PIs responsibilities are to:

a. Pre-Award

- (1) complete all proposal components including but not limited to the project narrative, budget, budget justification, and resumes; PIs are not required to complete components that require institutional certification or assurance,
- (2) submit all final proposal components to OSP for review and submission;
- (3) obtain approval from their supervisor to work on a sponsored project; and
- (4) work with OSP to complete the internal approval process.

b. Post-Award

- (1) ensure proper administration of the project with the assistance of OSP, the Controller's Office and Project Staff. Depending upon the project, responsibilities may include:
  - (a) monitor budgets to ensure timely completion of sponsored project objectives;
  - (b) monitor performance outcomes;
  - (c) review and approve expenditures, payroll transactions, invoices etc., to ensure allowable use of project funds;
  - (d) maintain records of and track capital assets in accordance with college policy;
  - (e) work with OSP to ensure the PI and project staff receive required project training and comply with applicable regulations;
  - (f) serve as the budget center manager (BCM) of the project index upon completion of training as needed from the Controller's Office, including monitoring the budget and reviewing and approving financial transactions;
  - (g) ensure that programmatic activities are completed in accordance with the terms of the sponsored project;

- (h) ensure all reports are submitted to the sponsor timely and in accordance with terms of the award with assistance from OSP and the Controller's Office;
- (i) review awards for feasibility before award acceptance and work with OSP on any changes to the award after award acceptance;
- (j) under the direction of the Controller's Office, review and approve submission of financial reports and complete project fiscal responsibilities; and
- (k) notify OSP and the Controller's Office if their employment terminates, they intend to withdraw from the project entirely, or if they plan to leave the college for more than 30 consecutive days.

#### 4. Co-Investigator

The co-investigator assumes leadership for a portion of the project and assists the principal investigator in meeting project goals. Co-investigators must have received approval to serve and have the requisite qualifications to effectively conduct their part. They are not required to be an employee of the college.

#### 5. Other Supporting Roles and Responsibilities

The roles and responsibilities for project staff, college leaders, PI supervisors and other college offices are set forth in the [Department Rules](#).

#### D. Pre-Award Requirements (See [Department Rules](#))

#### E. Post-Award Requirements

1. OSP shall be solely responsible to review, negotiate and execute all sponsor awards.
  - a. Principal Investigators who receive Notice of Award documents shall immediately forward them to OSP.
  - b. Principal Investigators shall not sign any award document.
  - c. OSP shall be responsible to negotiate with the sponsor any agreement, contract, award letter, amendment or other documents creating legal obligations to the college.
    - (1) OSP will seek review of award contracts by the college legal department, in accordance with its department rules established by the vice-president for Government and Community Relations. Review of other award types by the college legal department is not required.
  - d. OSP shall make proposal and award documents available to the PI and Controller's Office in a timely manner.
2. Project Account Funds Use Limitations

- a. Funds must be used in the following manner:
    - (1) allowable cost and activities;
    - (2) expended within the period of performance;
    - (3) as authorized in the approved project budget.
  - b. All expenditures must have adequate supporting documentation and comply with college policies.
3. Compliance with Obligations, Deadline and Reporting Requirements
- a. The Principal Investigator, OSP and the Controller's Office shall work together to comply with all college obligations, deadlines and reporting requirements. The failure to comply with these requirements have detrimental consequences to the college.
  - b. All official communication with the sponsor shall be communicated to OSP and the Controller's office, such as an audit or site visit notification, change in award amount, etc. OSP shall conduct all communication with the sponsor, on behalf of the PI and college, that affect the college's legal agreement with the sponsor.
  - c. The Controller's Office must review all financial reports before submission to the sponsor.
  - d. Controller's Office Responsibilities
    - (1) ensure sponsored projects account expenditures are compliant with procedures section D.3.
    - (2) work with the PI or other authorized staff to ensure compliance with sponsor requirements, college policy, uniform guidance, or internal revenue service regulations as well as acceptable accounting practices for:
      - (a) payroll documentation;
      - (b) personnel changes,
      - (c) payroll certifications; and
      - (d) reallocation
    - (3) administratively establish stipends and compensation forms for sponsored project work.
    - (4) allocate indirect costs in accordance with the college's indirect cost allocation schedule approved by Executive Cabinet.
      - (a) Indirect costs will be calculated according to a sponsor's requirements.
      - (b) Allocations should occur no less than quarterly.
      - (c) prepare, negotiate, and submit the college's indirect cost proposal to the



college's federal cognizant agency;