

Sponsored Project Department Rules Pertaining to Supporting Roles and Responsibilities and Award Contract Review Requirements

A. Supporting Roles and Responsibilities

The department rule referenced in Sponsored Projects policy section 4.C.5.a is as follows:

1. Project staff are personnel that have dedicated effort to the project but are not the PI or co-investigator. The effort may be funded by the sponsor or other sources. These personnel may or may not be employed by the college. Project Staff's responsibilities are to:
 - a. Work on a sponsored project consistent with the proposed work plan; their work is subject to review by the PI; and
 - b. adhere to all regulations associated with the sponsored project.
2. Academic Affairs or Student Services may have dedicated sponsored project administration support, such as grant coordinators or managers to assist PIs with project programmatic and financial compliance. These personnel shall coordinate with OSP and the Controller's Office on a regular basis to ensure institution-wide compliance with sponsored project regulations.
3. College leaders include PI supervisors, deans, associate vice presidents, vice presidents and the president. They will:
 - a. approve/rejects sponsored project proposals and oversee awarded or cost-share resources including personnel;
 - b. secure replacement leadership for the project if the PI leaves;
 - c. cover costs resulting from project budget mismanagement such as project expenses over the project budget and expenses not allowable as a direct cost; and
 - d. ensure the project meets stated outcomes or provide timely notification and explanation to the area vice president in the event there is evidence a project may fall short of stated goals or objectives.
4. Vice President Responsibilities
 - a. facilitate collaboration among multi-disciplinary projects;
 - b. provide matching funds or other support, as committed during the internal approval process; and
 - c. support the development of overall infrastructure needed to complete the project or sponsored project activity.
5. PI Supervisor Responsibilities
 - a. confirm that matching funds or other college resources committed to the project are available and can be used for the sponsored project; and
 - b. support the PI by providing direction or training as needed, including training on college processes or development of new processes to ensure project success.

6. Other college offices support and coordinate with OSP and the Controller's Office to effectively accomplish sponsored projects. All roles involved may not be included in this policy. Other college offices are responsible as follows:
 - a. Budget office will review proposal budgets for compliance with college policy, Utah state regulations, and mathematical accuracy. They will provide benefit information for the electronic grant administration system.
 - b. Community relations will represent sponsored project opportunities to potential partners as appropriate and inform OSP of sponsored project partnership opportunities.
 - c. Data science and analytics will upon request:
 - i. provide data evaluation development and implementation support; and
 - ii. oversee the institutional review board at the college or provide an alternative process for college projects needing an institutional review board.
 - d. Human resources will review proposals for compliance with college personnel hiring and management requirements, assist principal investigators and others to hire and manage grant personnel, and develop processes to support the compensation of sponsored project personnel.
 - e. Facilities will review proposals that involve space needs, such as remodeling, new space requests, etc. They will develop processes to accommodate the special needs of sponsored projects, such as rapid bid development, communicating construction plan changes to sponsors, etc.
 - f. Financial Aid will collaborate on the development, submission and management of sponsored projects, including waivers, involving financial aid or financial aid regulations and support the administration of scholarships, and other financial aid provided by a sponsored project.
 - g. Legal will review the terms and conditions of award contracts and work with OSP to determine efficient processes for this review.
 - h. Institutional marketing will develop and submit press releases for sponsored projects and support the marketing needs of sponsored projects, as appropriate.
 - i. Office of information Technology will review proposals that involve specific information technology needs such as new software, significant new hardware, or the transmission of sensitive data. They will support the development or integration of information technology as outlined in the proposal, including hiring additional resources or outsourcing work as needed.
 - j. Risk Management will review award contracts and work with OSP to determine efficient processes for this review.

B. Pre-Award Requirements

1. Proposals must include the college's full federally negotiated indirect cost rate or

the sponsor's maximum rate. Proposals that do not include the college's full rate may be rejected during the internal approval process.

2. Proposals must cover all costs for the project using sponsor's funds and designate a viable, approved source for the college's matching obligation, if matching is required by the sponsor.
 - a. If unexpected post-award expenses arise and sponsored project funds are insufficient to complete the project, the principal investigator, in collaboration with college stakeholders, shall develop and implement a detailed and compliant plan to complete the project.
 - i. This amended budget plan must be approved by the PIs supervisor.
 - ii. The Controller and Budget Offices must be consulted on the amended plan before it is approved.
 - iii. OSP must review this amended plan to ensure it is compliant with applicable project regulations before it is approved.
 - b. Pre-award spending is not allowed unless approved by the sponsor and OSP in writing.

3. Proposal Internal Approval and Submission Requirements

- a. Proposals of \$100,000 or more in direct costs
 - i. must be internally approved by the principal and co-investigators:
 - a. department head (associate dean, department chairperson or director);
 - b. dean or assistant/associate vice president;
 - c. vice president; and
 - d. college president after consultation with the executive cabinet.
 - ii. must be routed for internal approval at least ten business days before the sponsor's submission deadline;
 - iii. must be submitted to the Office for Sponsored Projects for final review at least three business days before the sponsor's submission deadline.
- b. Proposal of less than \$100,000 in direct costs
 - i. must be approved by the principal investigators and co-investigators:
 - a. department head (associate dean, department chairperson or director);
 - b. dean or assistant vice-president; and
 - c. vice president;
 - ii. must be routed for internal approval at least five business days before the sponsor's submission deadline;
 - iii. must be submitted to the Office for Sponsored Projects for final review at least three business days before the sponsor's submission deadline.

- c. Proposals that involve the transmission of sensitive data or the purchase of IT software or significant hardware must be reviewed by the Office of Information Technology.
- d. Proposals that involve 1) remodeling, 2) new or unique space needs, or 3) the purchase of vehicles must be reviewed by Facilities.
- e. Proposals that are formula-funded, have previously received internal approval, and have no significant changes are not required to receive internal approval.
- f. Draft or incomplete proposals will not be submitted to the sponsor for consideration.
- g. If a proposal is not routed or submitted to OSP per the requirements in this section, the OSP Executive Director will confer with the vice president for Governmental and Community Relations and other appropriate vice presidents regarding the appropriateness of OSP declining to review and submit the proposal to the sponsor. The Executive Director will make the final determination whether the proposal will be reviewed and submitted to the sponsor. Exceptions for untimely proposals will only be made for rare, unplanned circumstances.

C. Guidelines for Legal Review of Award Contracts

The Department Rule referenced in Sponsored Projects policy section 4.E.1.c(1) is as follows:

- 1. OSP is required to seek legal review of award contracts under the following circumstances:
 - a. Any award contract with provisions which, in the judgment of OSP Personnel, present potential significant risk to the college.
 - b. All award contracts with legal terms and conditions that have not previously been reviewed by Legal Affairs.
- 2. No legal review is required for:
 - a. Sponsored project agreements; or
 - b. Sponsored project contracts in which the legal terms and conditions or a college template is used which has been approved by Legal Affairs within the past three years.