

# SPON-002 Sponsored Grants and Contracts, Award Management

	<p>Policy identification number: SPON-002</p> <p>File: Other Operational Policies &gt; Sponsored Research &amp; Federal Relations</p> <p><b>Sponsored Grants and Contracts, Award Management</b></p> <p>Policy Summary</p> <p><i>This policy establishes the required fiscal management, financial reporting, and procedures for sponsored programs and contracts.</i></p>
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Policy Owner	Approval Date	Effective Date
<b>President</b>	<b>May 1, 2020</b>	<b>May 1, 2020</b>

Search Terms	Scheduled for Review
<b>sponsored, grants, contracts, award management, s, pres</b>	<b>Spring 2025</b>

## I. Policy Statement

Sponsored programs are established through contracts and grants negotiated by the College with outside agencies.

1. Under normal circumstances, expenditure commitments may not be made against a specific sponsored program before:
  1. A contract, grant document, or other authorizing document has been received by the College and signed by a person with authority to sign on behalf of the College (refer to Signature Authority section below).
  2. The grant has been entered and approved in Cayuse.
  3. A Project Data Sheet has been approved and filed with the Sponsored Research Office (SRO) and an appropriate organization number has been assigned.
2. The Principal Investigator (PI) shall have the primary responsibility of grant compliance for expenditures of program funds. The PI is responsible for keeping supporting documentation for all purchases made with grant funds, and for providing that supporting

documentation to the Sponsored Research Office, Controller's Office, and granting agency when requested. The PI is required to follow all College procurement rules and follow all Uniform Guidance requirements on federal grants.

3. If the PI requests to use award funds for purposes different from that approved in the original grant proposal and budget approved by the granting agency, it is the PI's responsibility to contact SRO who will determine if a request for a change in the scope of work is appropriate or if a budget revision is appropriate. The SRO will make the determination if it is appropriate for the PI or the SRO to contact the sponsor agency to make the request in accordance with Sponsored Grants and Contracts procedures re: Budgets, Budget Revisions, and Expenditure Monitoring.
4. Granting agencies will provide documentation to awardees showing the authorized funding amount on a project. Grants must have authorized funding for the PI to begin or continue making expenditures on a grant. For multi-year grants, authorized funding is typically granted on an annual basis. PIs must obtain approval from granting agencies to make expenditures on a grant in excess of authorized funding amounts or outside of the grant's approved performance period. If the granting agency allows advance spending on a grant award and can provide the College documentation approving advance spending, the College will allow the PI to make expenditures on the grant in advance of the grant's performance period.
5. Equipment purchased with grant funds will be transferred, sold, or disposed of in accordance with the granting agency's rules. Equipment purchased with grant funds becomes property of the College. If a PI or other outside party wants to purchase equipment obtained with grant funds from the College, the request will only be considered if the equipment does not have any benefit or use for the College or students.
6. The PI is not authorized to waive indirect costs in the grant budget or to use indirect costs towards matching requirements. Indirect costs should be included in the grant budget using the sponsor's rate, if specified, or the College's federally negotiated indirect cost rate if the sponsor does not specify a rate.
7. Signature Authority on Grant Awards and Contracts:
  1. For a grant or contract to have validity and enforceability, it must be signed by a person with specific authority to sign on behalf of the College. Therefore, if a Sponsored Program award is NOT signed by an authorized official, the research contract, grant, agreement, proposal or application may be void, voidable, and/or unenforceable. In some cases, the authorized official review and signature is provided through the College's award proposal management system.
  2. Most grants and all research-related contracts and subcontracts issued to the College require signatures from both the sponsor and the College. In some cases, the College signature will have been provided when the proposal was submitted. The proposal then becomes a part of the grant document either directly or by reference
  3. Signature Authority Regarding Grant Awards and Contracts Resulting from Grant Proposals:
    1. The Vice President of Finance and Administration has delegated signing authority for sponsored program grant proposals, awards, contracts, and award amendments to the Provost; however, the Vice -President of Finance and Administration should be notified of, and provide approval

- for grant proposals that involve equipment, Information Technology needs or space modification/construction.
2. The Vice President of Finance and Administration has delegated limited signing authority to the Director of Sponsored Programs and Research. The Director of Sponsored Programs Research has signing authority for grant proposals, modifications or amendments to existing grants, audit certifications and other financial forms related to post-award grant or contract management. Limited signing authority has been delegated to the Controller or their designee(s), for financial reporting related to post-award grant and contract management.
  3. The Vice President of Finance and Administration has delegated signing authority to the Provost for any new grant agreements or contracts that involve cash matching and/or faculty release time. New grant proposals or contracts amounting to \$500,000 or greater must be signed by the Provost. Amendments or revisions to existing grants and contracts \$500,000 or greater may be signed by the Director of Sponsored Research.
  4. Principal Investigators (PI), Project Directors (PDs), Department Chairs (DC), or other faculty or staff employees of the College are not authorized to sign sponsored program proposals, research contracts or grants on behalf of the College. This policy does not preclude PIs, PDs, DCs, and/or other individuals from signing internal processing documents, the proposal, or the award if called for by the funding agency.

## **II. Reason for Policy**

All monies solicited from external funding sources by FLC faculty and staff are required to follow a set of procedures to ensure compliance with College fiscal rules as well as federal and state requirements for monitoring and tracking of external funds solicited on behalf of the College.

## **III. Responsibilities**

**For following the policy:** Principal Investigator, Project Director

**For enforcement of the policy:** Director of Sponsored Programs and Research

**For oversight of the policy:** President

**For notification of policy:** Policy Librarian

**For procedures implementing the policy:** Principal Investigator, Project Director, Office of Sponsored Programs and Research, Controller's Office

## **IV. Definitions**

**Sponsor/Granting Agency:** *The source of the external funds to support a sponsored project (grant or contract). The sponsor/granting agency can be a federal, state or local government entity, corporation, foundation or trust.*

**Principal Investigator (PI)/Project Director (PD):** *The primary individual responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service project, contract, or other Sponsored Project in compliance with applicable laws and regulations and institutional policy governing the conduct of sponsored research.*

**Project Data Sheet (PDS):** *The form the PI must complete to receive a budget code to access the grant funds once they have been awarded. The PDS informs the Controller's Office on which budget categories and time period to use in setting up the grant budget. The PDS form can be found on the Sponsored Research website: <https://www.fortlewis.edu/sponsoredresearch/> under "Forms and Resources."*

**Uniform Guidance (UG):** *Federal grants are maintained in compliance with the Office of Management and Budget's (OMB) 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, commonly called Uniform Guidance. The Uniform Guidance is a government wide framework for grants management and provides an authoritative set of rules and requirements for Federal awards.*

**Signature Authority:** *Authority granted by the Board of Trustees to fund the College in grants or contracts. Signature Authority is not the same as budget authority.*

## **V. Cross-Referenced Policies**

[SPON-001 Grant Application Process](#)

[SPON-003 Grants Incentive \(Indirect Cost Distribution\)](#)

[SPON-004 Gift or Grant Determination](#)

[SPON-005 Cost Sharing Requirement \(Cash or In-Kind Matching\)](#)

[SPON-007 Promoting Objectivity in Research—Financial Conflicts of interest in Research for Public Health services \(PHS\) Investigators](#)

## **VI. Consequences of Non-Compliance**

Grant awards that do not comply with the policy outlined above risk termination of the grant award by the College or granting agency. Faculty and staff members may incur personal and financial liability for lack of compliance with grant rules and requirements.

## **VII. Revision History**

Effective May 1, 2020 this policy replaces SPON-002 Sponsored Grants and Contracts, Budgeting, Accounting and Reporting