



INSTITUTIONAL POLICY: R-08

Category:	Research
Subject:	Sponsored Program Administration
Effective Date:	March 13, 2019
Last Updated:	August 24, 2022

R 08-1. Authority

W. Va. Code § 18B-1-6

R 08-2. Purpose

- 2.1 The purpose of this policy is to establish the administrative authority of the Office of Research and Sponsored Programs (ORSP), together with grants accounting in the Office of Business Affairs (OBA), to ensure responsible stewardship of external funds received for sponsored projects. The ORSP encourages and supports employees in their pursuit of external funding to conduct research, scholarly activity, or other programs, with an emphasis on administrative functions that advance a culture of compliance with applicable regulations. For Federal grants, WVSOM complies with the applicable regulations (e.g. 2 CFR 200, 45 CFR 75) and any specific Agency requirements. For non-Federal grants, WVSOM complies with the unique terms described by each sponsor. In all cases, the state of West Virginia requirements are followed.
- 2.2 The ORSP oversees submission of proposals to external sponsors, negotiation and acceptance of grant and contract awards, and other Sponsored programs-related matters. The ORSP manages, in conjunction with OBA, budget review and institutional signature for all external proposal submissions, manages electronic application submission processes, and manages negotiation on awards offered from external sources for sponsored program activities on behalf of the institution. ORSP also assists in non-financial post-award administration matters and monitors related program reporting.

R 08-3. Applicability and Scope

All employees and students of WVSOM are subject to this policy. WVSOM requires all individuals who apply for Sponsored Project Awards (employees or students) to do so through the ORSP and, if the award is received, to comply with institutional procedures and sponsoring agency regulations regarding the terms of the awards.

R 08-4. Definitions

- 4.1 “Contract” means a binding agreement between two parties, in which the principle purpose is for one party to acquire, through purchase or lease, services or property from the other party. This is in contrast to a (more flexible) grant agreement, in which the principle purpose

is to transfer item(s) of value to the recipient (grantee) in order to carry out an activity on behalf of the grantor.

- 4.2 “Cost share” means any project cost that is not reimbursed by the sponsor to support the scope of work defined by the federal or non-federal sponsored award. Cost sharing is also known as matching, is funded by WVSOM or a third-party, which is generally a non-federal resource.
- 4.3 “Cost transfer” means an entry that transfers an expense onto a federally-funded sponsored award that was previously recorded elsewhere on WVSOM’s ledger.
- 4.4 “Principal Investigator (PI)/Project Director (PD)” means the primary individual responsible for the preparation, conduct, and administration of a grant, cooperative agreement, training or public service project, contract, or other Sponsored Project Award in compliance with applicable laws and regulations and institutional policies and procedures governing the conduct of sponsored projects.
- 4.5 “Sponsored project (or program) or Grant” means any externally funded research, scholarly activity, or programmatic 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.
- 4.6 “Subaward” means an award of financial assistance in the form of money, or property in lieu of money, made under an award by a recipient to an eligible subrecipient or by a subrecipient to a lower tier subrecipient.
- 4.7 “Subrecipient” means a non-Federal entity that receives 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 program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding.

R 08-5. Sponsored Programs Administration Structure and Responsibilities

Sponsored programs are administered through several departmental units at WVSOM, each with distinct responsibilities.

- 5.1 Office of Research and Sponsored Programs
 - 5.1.1 Serves as the Institution’s administrative agent and liaison with external funding agencies regarding all sponsored programs.
 - 5.1.2 Manages administrative review of and submits (if approved) all sponsored program proposals, unless otherwise specified by the sponsor.
 - a. Signatory authority is delegated by the Institution to the Assistant Vice President of Research and Sponsored Programs (AVPRSP) for submitting sponsored award applications in support of research, educational, and other sponsored projects.

- b. The AVPRSP may delegate his/her authority for submission of a sponsored project.
 - 5.1.3 Provides assistance with funding information, reviewing and procuring approval of all proposals to external sponsors.
 - 5.1.4 Oversees and tracks administrative aspects related to award terms and compliance for all active projects, including:
 - a. Conflict of interest, including compliance with 2 CFR 200.112 and 200.318 when applicable (see WVSOM policy R-05);
 - b. Determination of subrecipient vs. contractor (per 2 CFR 200.330 when applicable) status (jointly with OBA)
 - c. Subrecipient risk assessment and monitoring, including compliance with 2 CFR 200.331 when applicable,
 - d. Time and effort reporting, including compliance with 2 CFR 200.430 when applicable (see WVSOM policy R-06),
 - e. Cost share commitments, including compliance with 2 CFR 200.306 when applicable,
 - f. Allowable costs, including compliance with Subpart E and 200.403, 200.302(b)(7) when applicable, and
 - g. Reports, outcomes, communications and non-compliance.
 - 5.1.5 Manages post-award actions that require institutional or sponsor approval.
 - 5.1.6 Provides training for employees and students on sponsored programs management.
- 5.2 Office of Business Affairs
 - 5.2.1 Negotiates and accepts all sponsored awards, and initiates contracts and agreements related to sponsored programs.
 - a. The Vice-President for Finance and Facilities or President is the authoritative agent authorized to execute agreements from sponsoring agencies providing the award or contract.
 - b. The Vice-President for Finance and Facilities or President is the authoritative agent authorized to execute agreements to subrecipients or contractors on awards provided by WVSOM.
 - 5.2.2 Conducts the post-award financial accounting and reporting of contracts and grants.
 - 5.2.3 Generates sponsored program financial reports, prepares sponsor required financial reports, collects funds from sponsors, and handles of all final close-out documents.
 - 5.2.4 Serves as the point of contact for audit issues related to sponsored programs.
 - 5.2.5 Manages and documents cost transfers.

- 5.2.6 Oversees procurement compliance, including compliance with 2 CFR 200 regarding micropurchases, small purchases, sealed bids, competitive proposals, and sole source when applicable.
- 5.2.7 Oversees cash management, including advance payments and reimbursements, compliance with 2 CFR 200.305 and 302(b)(6) when applicable.
- 5.3 Departmental Units
 - 5.3.1 All sponsored program activities must be carried out within a department or other administrative unit, or under the direction of an employee who has been delegated Principal Investigator or Project Director.
 - 5.3.2 Ensures the PI/PD has the appropriate time and resources to undertake the sponsored project.
 - 5.3.3 Determines departmental administrative support (if any) to PIs/PDs, in terms of grant management (e.g. ordering, reconciliation, budget tracking).
 - 5.3.4 Ensures that any deficits in compliance on the part of the PI/PD, which are reported to the supervisor by the AVPRSP, are addressed.
- 5.4 PI/PD Responsibilities
 - 5.4.1 Submits all sponsored project proposals to the ORSP in a timely manner for approval.
 - 5.4.2 Submits all post-award action requests that require Institutional or sponsor approval to the ORSP for approval in advance of the change. These include, but are not limited to, changes in PI/PD, Key personnel, budget category, or time and effort.
 - 5.4.3 Ensures compliance with the terms of the award for themselves and any personnel working on the project.
 - 5.4.4 Oversees and manages the sponsored project/research, including oversight and monitoring of the budget, personnel, and project activities.
 - 5.4.5 Ensures compliance with all WVSOM research and/or sponsored program policies and procedures, including:
 - a. Not being delinquent in any federal debt;
 - b. Not being debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from current federal transactions;
 - c. Submitting reports on time to the ORSP and sponsor;
 - d. Requesting extensions or changes in advance and in a timely manner to the ORSP and Sponsor;
 - e. Monitoring the budget to prevent expenditure overages or disallowed costs, and that costs incurred are related to and in accordance with the award;
 - f. Ensuring match commitments by all project personnel are met during the course of the award; and
 - g. Ensuring availability and ongoing communication with the ORSP and OBA regarding the award.

R 08-6. Procedures

WVSOM's ORSP shall maintain a manual of Sponsored Programs Procedures to implement this policy. These procedures must be approved following the requirements set forth in WVSOM's Procedure for the Adoption, Amendment, or Repeal of Institutional Operating Procedures.

R 08-7. Implementation of Policy

This policy will be implemented using applicable WVSOM policies and procedures, including the Sponsored Programs Procedures Manual.

R 08-8. References

- 8.1 OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. 200.
- 8.2 WVSOM Sponsored Programs Procedures Manual.