

# **EAST CENTRAL UNIVERSITY SPONSORED PROGRAMS POST-AWARD POLICY**

## **A. General Statement**

The purpose of this policy is to inform the Program Director/Principal Investigator (PD/PI) of the policies and procedures that are involved following receipt of a grant award or contract. One of the primary goals of the Office of Sponsored Programs and Research (OSPR) is to provide the PD/PI with contractual, financial and administrative support. The OSPR will also assist the PD/PI to effectively manage the project and project funds to facilitate a smooth closeout and to prevent any cause for audit investigation.

Note: The President of East Central University (ECU), unless otherwise appointed by the president, is the only person legally allowed to enter into an agreement with other entities.

## **B. Supplementary Document(s) Prior to Award**

Any additional information requested by the sponsor prior to the award shall be routed through the OSPR for review and approval. Once the document(s) has been approved and signed, it will be submitted to the sponsor by the OSPR.

## **C. Compliance Requirements**

All compliance requirement(s) must be met before the OSPR releases the award documents to the controller's office to establish the accounting procedure.

### 1. Institutional Review Board (IRB) Approval

Human subjects research conducted at ECU is governed by the Code of Federal Regulation Title 45 Part 46. The PD/PI must obtain approval from the Institutional Review Board (IRB) prior to any human research activities. All ECU investigators, research staff, and key personnel involved in human subjects research must complete the web-training course offered by the National Institutes of Health (NIH). The Protection of Human Subject Research educational lesson can be accessed at <http://phrp.nihtraining.com/users/login.php>. Refer to **ECU IRB** and the **Office for Human Research Protection (OHRP)** websites for more information regarding human subjects research.

### 2. Financial Conflict of Interest

All grant-funded personnel shall comply with 42 CFR Part 50, Subpart F, and the university Financial Conflict of Interest (FCOI) policy. Investigators, faculty and staff shall disclose any potential or existing conflict of interest to the OSPR as required by Federal law and University policy. For further information regarding the FCOI policy, refer to the **Code of Federal Regulation 42 Part 50, Subpart F**, and **FCOI** guidelines.

### 3. PD/PI Assurance Form

The University Compliance Officer shall meet with the PD/PI after the receipt of the accounting procedure. The PD/PI shall certify that all information on the grant application is true and accurate, he/she will be responsible for the conduct of the project

and will provide the required reports, and there is no knowledge of any financial conflict of interest.

#### **D. Grant Award Notification or Receipt of Contractual Document**

The PD/PI, the OSPR, the controller or the president's office will receive an official award letter once the grant proposal or contract is selected for funding. This legal document notifies the grantee institution and the PD/PI that the grant has been awarded and funds are available for the PD/PI to perform the necessary duties required to achieve the goals described in the proposal. By accepting the award or agreement, the PD/PI accepts the terms and conditions, including legal obligation, set forth by the sponsor agreement. The PD/PI is held responsible for the day-to-day operations and management of the sponsored programs and research.

The PD/PI, the controller and the president's office shall forward all official award documents to the OSPR. The PD/PI shall forward a copy of the approved budget, if not already done so, and the invoicing and reporting requirements to the OSPR. The OSPR will stamp and forward these documents to the controller's office for processing. The controller will forward the accounting procedure to the OSPR indicating that the budget has been established, and an account has been set up for the operation of the grant. The Compliance Officer will meet with the PD/PI to review the grant or program policies and procedures. The PD/PI is responsible for the implementation of the project in accordance with the proposal and any other conditions of the award and for ensuring the programmatic and fiscal compliance of the project. He/she shall notify the other key personnel of the award.

#### **E. Grant Award Containing Subcontract(s)**

The OSPR shall review and recommend approval to the President on all sub-agreements prior to any subcontract related work with other entities.

##### **1. ECU as Prime Institute**

The PD/PI shall notify the OSPR of any award involving a sub-award(s) with other entities. The recipient entity shall enter into a sub-agreement with ECU to perform the necessary work as stated in the proposal or contract. The OSPR shall prepare and forward a sub-contract agreement to the recipient entity in a timely manner. A copy of the fully executed agreement will be forwarded to the PD/PI for his/her records and the controller for account set up. The sub-recipient's invoices must be reviewed, approved and signed by the PD/PI before forwarding them to the purchasing office for further processing.

The PD/PI must provide the following information to the OSPR:

- The Sub-recipient's Budget (Based on Awarded Amount)
- The Sub-recipient's Period of Performance
- The Sub-recipient's PD/PI
- The Sub-recipient's Entity Name and Address
- The Sub-recipient's Entity Person of Contact, if available
- The Sub-recipient's Statement of Work
- A List of Reports and Due Dates

The OSPR will contact the PD/PI for further information if necessary.

## 2. ECU as Sub-Contracting Recipient

The OSPR shall be notified of any sub-agreement award(s). A copy of the sub-award must be forwarded to the OSPR for review and approval. The PD/PI must not perform any work related to the sub-award before ECU enters into an agreement with the prime institution or entity. The PD/PI must comply with the terms and conditions set forth by ECU, the prime institution or entity and the primary sponsor agency once the agreement is accepted by both institutions or entities. The PD/PI, if not received directly by OSPR, shall forward the fully executed contract to the OSPR for further processing. The PD/PI may review, approve and initial the billing statements before the controller's office forwards it to the prime institution or entity for payment.

The PD/PI must provide the following information to the OSPR prior to sub-agreement negotiation:

- The Sub-Contract Agreement
- CFDA Number, if available
- The Budget
- The Period of Performance
- The Invoicing Requirement
- Statement of Work

## **F. Service Agreement**

The PD/PI shall notify the OSPR for approval of any potential service agreements with independent entities. Services may range from data analysis to advisory consultation. The independent recipient must enter into a service agreement with ECU to provide the necessary services/duties needed to accomplish the project goal(s). The independent recipient will not be compensated unless the agreement has been finalized. The purchasing office will be forwarded a copy of the service agreement for further processing.

If ECU is the recipient of the service agreement, the PD/PI shall forward the agreement to the OSPR for review and approval. The services/duties shall not be performed by the PD/PI until the agreement is fully executed, and the accounting procedure has been set up. The controller and PD/PI will be notified once negotiation is complete. A copy of the service agreement will be forwarded to each.

In either case, the PD/PI must provide the following information to the OSPR:

- The PD/PI or Servicing PD/PI
- The Period of Performance
- The Cost per Services/Duties
- The Entity's Name and Address
- The Entity's Person of Contact
- Type of Services/Duties
- The Invoicing Requirement

## **G. Funded Sponsored Programs/Projects of Less Than \$2,500**

The Office of Sponsored Programs and Research will coordinate the fiscal and programmatic management of projects that are funded at less than \$2,500. Once the accounting procedure is established through the controller's office, the PI/PD may work through the OSPR Compliance Office to complete fiscal transactions and reporting requirements as well as to coordinate programmatic activities. All expenditures, activities and reports shall be approved through the OSPR Compliance Office for projects that are funded at less than \$2,500.

Note: The PD/PI is responsible for the fiscal and programmatic management of funded projects totaling \$2,501 or more.

## **H. Matching or Cost Sharing**

Some granting institutions require matching of funds for research and/or development. It must be specifically dedicated to the awarded project. Examples of matching funds are equipment, personnel salary and fringe benefits, and supplies. Matching funds of less than ten thousand dollars (\$10,000.00) shall be approved by the OSPR and the appropriate Vice President. Matching funds in the amount of ten thousand dollars (\$10,000.00) or more shall be approved by the OSPR, the appropriate Vice President and the Vice President of Administration and Finance.

The matching or cost sharing contributions shall be reported monthly or periodically to the OSPR. The forms are available on-line at

[http://www.ecok.edu/centers\\_programs/ospr/forms\\_templates.htm](http://www.ecok.edu/centers_programs/ospr/forms_templates.htm).

The PD/PI is highly encouraged to contact the OSPR regarding his/her matching and/or cost sharing report prior to submission to the sponsoring agency. It is the responsibility of the PD/PI to ensure that the report is accurate, complete, and consistent with the OSPR records.

## **I. Procurement Procedures**

Sponsored Programs and Research must follow the procurement policies and procedures established by the University. The PD/PI is charged with ensuring that all expenditures are in compliance with the Sponsor, ECU, and Federal OMB Circular A-21 Costs Policies. The acquisition of goods and services necessary to carry out the proposed activities shall be competitive, fair and acquired in a timely manner.

The Program Director/Principal Investigator must ensure that:

- Proper purchasing procedures are followed (i.e., purchase orders prior to purchasing) as described in the institutional purchasing policy;
- The costs are actual, allowable, reasonable and necessary for the performance and administration of the project;
- The costs conform to limitations or exclusions set forth in the OMB circulars, Federal laws, State laws, University guidelines, sponsoring agency requirements and in the sponsoring agency agreement;
- The costs are documented as established in the OMB circulars, Federal and State laws, University guidelines, and in the sponsoring agency agreement;
- The costs are incurred within the budget period;
- All fiscal activity is completed within 30 days after the end date of the budget period (i.e., open purchase orders and invoices must be closed out within 30 days of the end date of the budget period) or as required in the sponsor agreement, whichever comes first;

- The project's expenditures are continuously monitored by the PD/PI;
- Prior approval shall be obtained from the OSPR for purchases of \$2,500 or more;
- Prior approval shall be obtained from the OSPR for the purchase of any single piece of equipment costing \$500 or more; and
- The shared cost of acquired goods and services between grant-related projects shall be documented and charged accordingly.

For further information, refer to the sponsor guidelines, [ECU's Purchasing Policy](#) or [OMB Circular A-21](#).

## **J. Equipment Maintenance and Inventory**

If equipment purchases shall be necessary to accomplish the goals described in the grant proposal, the item(s) must not be for general usage but mainly for grant-related purposes. The acquisition of equipment follows the same standard as the procurement of goods and services as stated above. Prior approval is required from the OSPR for equipment purchases of \$500 or more.

The PD/PI is responsible for keeping the equipment well maintained and operable. He/she is charged with keeping an inventory list of all newly acquired equipment of \$2500 or more and computers of \$500 or more. The PD/PI shall update the comprehensive equipment list annually as requested by the purchasing department.

The inventory list shall include the following:

- Equipment's Serial Number or Identifier
- Equipment's Acquisition Cost
- Equipment's Current Value
- Equipment's Location
- Equipment's Acquisition Date
- Equipment's Condition
- Equipment's Purchased Account

For more information regarding equipment purchases, maintenance, disposal, or title transfer refer to the sponsor guidelines and ECU's equipment policy.

## **K. Travel**

When ECU personnel or external consultants are in travel status, the travel shall be intended for grant related purposes or professional development only. The expenses shall be charged to the project grant. ECU holds the PD/PI responsible for ensuring that all travel purposes comply with the sponsor, ECU, State and Federal (OMB A-21) travel policies.

## **L. Personnel Appointment**

The PD/PI is charged with ensuring that all personnel appointments, evaluations and terminations are in compliance with ECU policy. For more information, refer to the University's Personnel Appointment policy and procedures.

## **M. Rate of Expenditures**

All purchases shall be made on an “as needed” basis, or as required by the sponsor, and necessary to carry out the funded project in an efficient and timely manner. Refer to the sponsor’s guidelines for additional information.

## **N. Leave**

Employees appointed to externally funded accounts shall accrue annual leave and sick leave at a rate consistent with similar non-externally funded positions at the University. Employees appointed to externally funded accounts are expected to use all accrued annual leave and sick leave during the specified period of appointment. Except as noted below, there shall be no payment for any accrued annual leave or sick leave for employees appointed to external funded accounts. All unused annual leave and sick leave shall be forfeited at the point of employment termination. Accrued sick leave may be documented for credit with the Oklahoma Teachers’ Retirement System.

Employees appointed to externally funded accounts that terminate their appointment under satisfactory conditions, and who have been employed by the University more than one (1) year in a benefits-eligible position, may be compensated for accrued annual leave if the externally funded project contains a separate account with sufficient funds to pay for accumulated leave and if approved by the immediate supervisor, appropriate Vice President and the OSPR. Total compensation shall not exceed ten (10) days of accrued annual leave. If an employee appointed to an externally funded account transfers or is appointed to a nonexternally funded account, the University may allow the employee to transfer all accrued annual leave and/or sick leave. Request to transfer annual leave and/or sick leave must be approved by the supervisor and the appropriate Vice President of the position to which the employee is transferring.

## **O. Unemployment Insurance**

Concerning unemployment benefits, the University pays full unemployment costs of eligible employees instead of paying monthly insurance premiums. Therefore, grants shall make budgetary preparations to pay full unemployment benefits for employees eligible for unemployment.

## **P. Prior Approvals**

Below is a list of activities and/or expenditures that may require prior consent by the OSPR and/or the sponsoring agency. Approval requirements may vary among sponsors. For further information consult the sponsor guidelines or contact the OSPR.

- Budget Revision
- Change in Scope of Project
- Changes in PD/PI Status or Percent of Effort
- Change in Grantee Institution
- Carryover of Unexpended Balances
- No-Cost Extension
- Equipment Purchases
- Research Involving Human Subjects

- Research Involving Vertebrate Animals

1. Budget Revision

Some sponsors give the University certain flexibility in re-budgeting, while others require prior approval if the cost(s) was not initially requested. The PD/PI shall submit in writing a request for any budgetary revision to the OSPR. The requested amount must be allowable, reasonable and necessary for the performance of the sponsored programs or research.

The request should include the budget item(s), the revised amount, the entire account number and the justification for the revision. The PD/PI is strongly encouraged to review the budget and expenditure needs prior to the request to minimize the number of revision requests. The OSPR will contact the PD/PI for further information if needed.

2. Change in Scope of Work

The PD/PI must notify the OSPR and the sponsor of any changes in the specific aims or the methodology that may significantly affect the objectives of the approved project. The sponsor's prior approval may be required before integrating any modifications into the project's activities. Refer to the sponsor guidelines for further instructions.

3. Changes in Program Director/Principal Investigator Status

The PD/PI shall inform the OSPR in writing of a change in status as soon as he/she is aware of it to prevent any delay in the progression of the funded project. The newly named PD/PI must have the capabilities and expertise to accomplish the goals set forth on the project proposed in an efficient and productive manner. Hence, he/she shall assume responsibilities for the operation and management of the project. Reduction or increase in the PD/PI's committed effort to the project will require prior approval from the OSPR and may require prior approval from the sponsor. Refer to the sponsor guidelines for instructions and requirements on these matters. The OSPR will assist the PD/PI with the request. The request will be forwarded to the sponsoring agency for approval.

4. Change in Grantee Institution

The transfer of sponsor supported programs and research requires prior approval from the OSPR and the sponsoring agency. Transfer of the legal and administrative responsibility from one institution to another must be agreed upon by the sponsor and both institutions involved. The original University may proceed with the transfer or terminate and close out the grant completely. The PD/PI shall inform the OSPR in writing regarding his/her organizational reassignment as soon as he/she is aware of it. If the transfer is agreed upon by both institutions, the OSPR will formally notify the sponsor of the impending transfer. The University shall relinquish all its responsibilities for the project once the transfer is submitted and approved. The PD/PI shall discontinue all purchases and cancel all orders immediately after the change in grantee institution is granted.

The PD/PI should consult the sponsor guidelines regarding the requirements for the transfer. The required documents shall be submitted to the OSPR for review and approval. The OSPR will then forward the approved documents to the sponsor. The sponsor's decision will be communicated to the PD/PI and controller for further processing. The change in grantee institution may take up to a few months to complete.

Note: The close-out process is usually required before the transfer is finalized. See below for ECU's closeout requirement.

Equipment transfer will be determined by the PD/PI and the OSPR based on the University and sponsor guidelines.

## 5. Unexpended Balances

Unexpended balance is the amount that has not been incurred on any item of costs or services as of the last day of the project period. Any unexpended balances may be carried over, if allowed and approved, or will be returned to the sponsoring agency.

### i. Unobligated Balances

Some agencies, like the National Institutes of Health (NIH), allow unobligated balances to be carried over automatically to the next budget year for specific multi-year grants, if the unobligated amount is within 25% of the awarded amount. The allowable carryover amount may differ between sponsors. The PD/PI shall notify the OSPR and the VP for Administration and Finance of his/her intent to carry forward unobligated funds thirty (30) days prior to the end of the budget period. A new line item budget will be necessary to process the revision. The PD/PI must ensure that the balance is available and allowable for carryover before the OSPR begins processing the request.

### ii. Obligated Balances

Any obligated balance shall be returned to the sponsoring agency, cleared from the account, or otherwise specified by the sponsor within ninety (90) days following the end of each budget period.

A special request may be submitted to the sponsor if the PD/PI wishes to carryover the unexpended obligated funds. A new budget and a budget justification may be necessary for the request. It is the responsibility of the PD/PI to ensure that the balance is available before the OSPR begins processing the request.

### iii. Cash Balances

Cash balances are balances that remain in the account after all grant funding, reporting and expenditure requirements have been met. The controller's office shall notify the PD/PI of the unexpended balance from the account thirty (30) days prior to the project's ending date. The PD/PI must place

his/her orders with the purchasing department in a timely manner. The purchases must be related to the funded project. Any cash balances remaining after ninety (90) days following the expiration date shall be transferred to the 430 ID account.

#### 6. No-cost Extension (if applicable)

The PD/PI of externally funded projects may request a one-time no-cost extension to the extent allowed by the funding agency for the purpose of completing the programmatic commitment of the project goals with the existing funds. No additional amount will be awarded. Rationale, activities and length of time for the no-cost extension shall be in accordance with those allowed by the funding agency.

The extension cannot be requested or granted for the sole purpose of spending the unexpended balance. The extension shall be denied if a remaining budget is zero (0). Prior to submission, the PD/PI shall prepare a justification and budget for the no-cost extension period at least ninety (90) days prior to the expiration date of the project. The documents shall be forwarded to the immediate supervisor, appropriate Vice President and the OSPR for approval. After approval, the PD/PI or OSPR may then forward the request to the funding agency. The sponsor's decision will be communicated to the OSPR, if not directly conveyed to the OSPR, for further processing. The OSPR will forward the extension notification and a new budget, if required, to the controller's office for processing. The terms and conditions set forth in the original sponsor agreement will continue to be applied throughout the extended period. Refer to the sponsor guidelines for further information.

#### 7. Equipment Purchases

Most sponsoring agencies require prior approvals for all equipment purchases over \$5000 or more. However, East Central University requires approval by the OSPR for equipment purchases of \$500 or more. American made items should be the first choice of purchase. For more information regarding equipment purchases, refer to ECU purchasing guidelines at <http://www.ecok.edu/offices/purchasing/index.htm>.

#### 8. Human Subjects Research

Research involving human subjects is regulated by the Department of Human Health and Services. The use of human subjects in any research related activities requires approval by both ECU Institutional Review Board and the funding agency. The approval is a just-in-time process that is required after the project is selected for funding but prior to the award. Refer to the OSPR website at [http://www.ecok.edu/centers\\_programs/ospr/INS\\_reviewboard.htm](http://www.ecok.edu/centers_programs/ospr/INS_reviewboard.htm) for further information.

#### 9. Vertebrate Animal Research

East Central University is not equipped with an animal facility to house vertebrate animals. Therefore, faculty shall not be involved in and the university shall not approve research involving vertebrate animals that are regulated by the Office of Laboratory

Animal Welfare. For further information, refer to the following website:  
<http://grants.nih.gov/grants/olaw/olaw.htm>.

## **Q. Internal In-Kind Matching Reporting Requirements**

The following reports must be submitted to the OSPR by the tenth (10<sup>th</sup>) day of each month for all prior month's activities by the PD/PI:

- Summary Report
- Detailed Salary Report, if applicable
- Detailed Fringe Benefits Report, if applicable
- Detailed Items Report, if applicable

These items may include facility costs, supplies, internet services, phone services, indirect costs, etc. The forms are available on the following OSPR website:

[http://www.ecok.edu/centers\\_programs/ospr/forms\\_templates.htm](http://www.ecok.edu/centers_programs/ospr/forms_templates.htm)

## **R. Time and Effort Reporting**

All grant-funded personnel and student(s) are responsible for tracking the amount of time they commit to each sponsored project. The OSPR will distribute the time and effort certification form twice a year to all PDs/PIs to certify his/her effort and that of his/her personnel and student(s) for the period covered by the report. Any changes to the effort shall be corrected on the form. It shall be certified and returned to the OSPR in a timely manner. For more information regarding this policy, refer to ECU time and effort reporting policy.

## **S. Records and Records Retention**

The PD/PI is responsible for the maintenance of all official programmatic records. The records shall be retained for five (5) years, or more as required by the sponsoring agency, beyond the expiration of the budget period. The official financial records will be maintained by the controller's office for five (5) years or more beyond the expiration of the project date. Under any circumstances that the University needs to access this information for legal and fiscal purposes, the records must be available to the authorized official(s) in a timely manner.

After five (5) years, or more as required by the sponsoring agency, the records may be electronically scanned and saved. The hard copy records may be shredded and discarded or recycled properly once an acceptable electronic copy is obtained unless the records must be retained for litigation, claims, or audit purposes. It may be discarded once all legal findings involving the records have been resolved and finalized.

Note: Communications by emails regarding grants/programs are also considered part of the programmatic records. The five (5) years or more record retention rule also applies to email.

## **T. Annual Progress Report**

To ensure continued financial support for the program or project, the PD/PI shall submit the annual progress report (APR) to the funding agency in a timely manner as specified in the sponsor agreement. Failure to submit the APR may delay funding and possibly result in a

reduction in the awarded amount or termination of funding. A copy of the APR shall be forwarded to the OSPR no later than thirty (30) days after the end of the budgeted period.

Note: A new budget may be required by the sponsor for multi-year grants. Prior approval is necessary from the OSPR before submission. See sponsor guidelines for further instructions.

## **U. Financial Report**

The financial status of the grants will be prepared and reported based on the University's official accounting records by the controller's office. It shall be submitted in a timely manner as specified in the sponsor agreement. Prior to submission, the PD/PI may, upon request, review and/or modify the report in a timely manner. The controller shall ensure that the financial report is accurate, complete, and consistent with the University financial accounting records.

## **V. Closeout Procedures**

Prior to termination of an externally funded project, the PD/PI will work with the immediate supervisor to 1) develop a plan for storage of and access to project records and 2) dispose of and/or transfer any unused materials and equipment. The PD/PI will also complete, or make arrangements to complete, all project-related reports. These processes shall be in accordance with the policies and regulation, set forth by the State of Oklahoma and the funding agency.

## **W. Grant Award Close-Out Reports**

To ensure future funding, all required close-out reports shall be submitted in a timely manner in accordance with each sponsor policy. Grants will be completely closed-out based on the submission and approval of the final reports as described below.

### **1. Final Invoicing**

To ensure timely submission of the final financial report, all open invoices must be received and paid within thirty (30) days after the expiration of the project period. This includes any subcontract and/or service invoices as noted in the sub- and/or service-agreements.

### **2. Final Financial Report**

The final financial report is important and necessary for the sponsor and the University to close out the grant. It must be submitted in a timely manner as specified in the sponsor agreement. The financial status of the grant will be prepared and reported based on the University's official accounting records by the controller's office. Prior to submission, the PD/PI may, upon request, review and/or modify the report in a timely manner. The controller shall ensure that the final financial report is accurate, complete, and consistent with the University financial accounting records.

### **3. Final Project Report**

A final project report shall be submitted by the PD/PI to the funding agency as specified in the sponsor agreement for all single-year, multi-year, and terminated grants. A copy of

the report shall be submitted to the OSPR no later than thirty (30) days after the project's end date.

#### 4. Invention/Patent Report

Any inventions or patents resulting from sponsored grants shall be reported appropriately as specified in the sponsor agreement and University policy to the sponsor and OSPR in a timely manner.

### **X. Facilities and Administrative (Indirect) Recovery Cost**

ECU shall recover facilities and administration costs as allowed on the sponsor agreement. The redistribution of indirect costs has been outlined and can be found on the University's indirect cost recovery policy. Reallocation of indirect costs requires prior approval from the OSPR. For further information regarding indirect cost recovery, please refer to the ECU [Indirect Cost Recovery policy](#).

### **Y. Approval**

Approved this 4<sup>th</sup> Day of August 2009:

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Duane C. Anderson  
Provost  
East Central University