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**1. Purpose.** To set forth the regulations and procedures governing the application for, the administration of, and the accounting for sponsored projects.

**2. Definitions.** For the purpose of these regulations and procedures the following definitions apply.

**2.1 “Financial and Administrative Costs”** (sometimes known as indirect costs) means the costs of general support and administrative management necessary for proper implementation of an externally funded project. These costs include, but are not limited to:

- Utilities;
- Clerical;
- Office space;
- Accounting;
- Library;
- Custodial services; and,
- Project management.

**2.2 “Principal Investigator” (PI)** means the Employee who initiates the application for the external funding, and, if funding is received, is responsible for the administration of the project. When there is more than one PI, the term applies to them collectively.

**2.3 “Sponsored Projects” (projects)** means specific educational, creative, and/or research projects funded by third parties.

**2.4 “Sponsoring Agency”** means the governmental and/or non-governmental organization or private party not associated with the University which provides funding for the project.

**3. Employee Compensation.** Compensation for Employees performing work on grant and/or other externally sponsored projects shall be consistent with regulations set forth in Subject D. Classification and Compensation unless the sponsoring body is more restrictive.

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#### **4. Pre-Award--Application Procedure.**

**4.1 Application Review and Approval Process.** The PI shall submit a completed Internal Approval Form for Sponsored Projects along with a complete project application for official University review and approval. Applications shall not be submitted to the sponsoring agency until all required reviews and approvals are completed. The following are a part of the official review and approval process and are listed in the order the reviews and approvals shall proceed.

- The PI's Department Head for approval;
- The applicable Dean for approval;
- The Sponsored Projects Director/Grant Facilitator for review;
- The Grants Accountant for review;
- The Provost and VPAA for approval; and,
- The VPAT for approval and authorized contracting signature.

**4.2 Legal Applicant Name.** All applications for sponsored funding shall be submitted in the name of Washburn University of Topeka.

**4.3 Application Deadline.** The PI's deadline for submitting the application for the reviews and approvals as outlined in Section 4.1 above is 14 days prior to the sponsoring agency submission deadline. Applications submitted after that date may not be ready by the sponsoring agency due date.

**4.4 Human and Animal Subject Research.** A PI shall submit an application to the Institutional Review Board (IRB) for approval of a proposed research project involving human subjects. For projects involving animal subjects the application shall be submitted to the Animal Care Committee. An application for this type of project is not ready for submission to the Department Head until the IRB approves the research activity. See the Faculty Handbook, Appendices IV and V.

#### **5. Pre Award—Available Assistance.**

**5.1 Sponsored Projects Director/Grant Facilitator Responsibilities.** The Sponsored Projects Director/Grant Facilitator shall provide resources and assistance to:

- Foster project ideas;
- Locate funding opportunities;
- Strengthen grant writing skills;
- Develop project proposals; and,
- Meet University and sponsoring agency application requirements.

**5.2 Other Assistance.** The Grants Accountant is available to assist in the preparation of the project budget.

**5.3 Sponsored Project Tracking.** The Sponsored Projects Director/Grant Facilitator shall maintain files for all proposed and pending project applications.

**5.4 Grants Office Contact.** For information about available technical assistance for application preparation (including forms and materials), visit the following website:  
<http://www.washburn.edu/php/grants-office/index.php>.

**6. Post Award--PI Financial Administrative Responsibilities.** The PI shall be familiar and comply with University regulations and procedures governing project proposals. The PI is also responsible for the administration of projects. Following are additional regulations and procedures for which the PI is responsible.

**6.1 Financial Information/Control.** The PI shall maintain detailed financial information and control of the project jointly with the Grants Accountant. (See Section 6.3 below.)

**6.1.1 Commitments against a project shall be made only after:**

- The project effective date; and,
- The original copy of the approved project award document is in the possession of the Grants Accountant.

**6.1.2 All expenditures shall be authorized and made:**

- Only within the project period;
- According to project requirements;
- Within funds available for each expense classification; and,
- According to the more stringent of 1) project regulations or, 2) University purchasing regulations.

**6.1.3 Process close-out expenses** according to the sponsoring agency's requirements.

**6.2 Financial Reporting.** The PI shall:

- In writing, advise the Grants Accountant of any financial reporting requirements upon receipt of the project award; and,
- Work with the Grants Accountant to complete the final equipment inventory for submission to the sponsoring agency.

**6.3 Budget Changes.** The PI shall consult with the Grants Accountant to request any changes in the project budget. Official requests for budget changes shall be submitted to the sponsoring agency through the Grants Accountant.

**6.4 Patent Reports.** The PI shall, with the assistance of the Grants Facilitator, prepare and submit required patent reports, if applicable.

**6.5 Project Related Correspondence.** The PI shall:

- Initiate all project related correspondence; and,
- Provide the Grants Accountant and Grants Facilitator a copy of the correspondence.

**6.6 Compliance.** The PI is responsible for:

- Monitoring compliance with all programmatic sponsoring agency regulations;
- Communicating identified instances of non-compliance to the Grants Accountant and the Sponsored Projects Director/Grant Facilitator; and,
- Communicating to the Grants Accountant and the Sponsored Projects Director/Grant Facilitator a specific corrective action to be taken to remedy the situation, and the time frame in which such remedy is to be implemented.

**6.7 Drug Free Policy Statement.** Each Employee in a federal grant activity shall be provided a copy of the University's Drug Free policy statement by the PI responsible for the activity.

**6.8 Additional Responsibilities.** The PI shall, as required, prepare and submit:

- All programmatic reports to sponsoring agency;
- Employee Time Certification Forms to the Grants Accountant; and,
- The record of In-kind Contribution Form to the Grants Accountant for all required in-kind matches.

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**7. Post Award--Grants Accountant Responsibilities.** The Grants Accountant shall be familiar and comply with:

- University regulations and procedures governing projects; and,
- Project-related financial regulations of the sponsoring agency.

**7.1 Financial.** The Grants Accountant shall be responsible for maintaining the official financial records, and control of financial aspects of the project including, but not limited to:

- Approving all project expenses to ensure accuracy, reasonableness, and conformity with allowable costs;
- Completing and submitting all required financial reports and requests for funds; and,
- After consultation with the PI, submitting any budget changes to the sponsoring agency.

**7.2 Compliance.** The Grants Accountant is responsible for:

- Monitoring compliance with all non-programmatic project-related sponsoring agency regulations, both financial and non-financial. This includes all matters subject to the annual audit of federal financial programs under Office of Management and Super Circular (formally the Budget Circular A-133);
- Communicating identified instances of non-compliance to the PI and Sponsored Projects Director/Grant Facilitator;
- Communicating to the PI a specific corrective action plan to be taken and the time frame in which the specified remedy is to be implemented;
- Notifying the Sponsored Projects Director/Grant Facilitator and the Director of Finance of the non-compliance and the specific corrective action plan and time frame; and,
- Notifying the Director of Finance of any potential questioned costs relating to the non-compliance.

**7.3 Files.** The Grants Accountant shall maintain post award files including, but not limited to:

- The original copy of the project award document;
- Project related correspondence;
- Submitted Employee time certification Forms;
- Submitted Record of In-kind Contribution Forms; and,
- Financial records.

#### **7.4 Project Equipment.**

**7.4.1 Ownership of any equipment purchased for the project** shall be ascertained by the Grants Accountant. Ownership must be documented in writing by the awarding agency.

**7.4.2 Final equipment inventory reports required** shall be prepared and submitted to the awarding agency by the Grants Accountant.

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