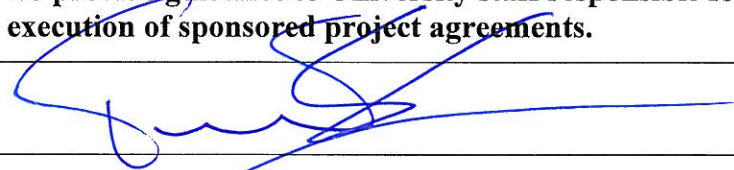




Florida Agricultural and Mechanical University
Division of Research
Office of Sponsored Programs

INTERNAL OPERATING MEMORANDUM

Memorandum No. 16A.017

Subject:	Review, Management and Monitoring of Sponsored Project Agreements	
Authority:	Sections 1001.74, 1001.75 and 1004.22, Florida Statutes; Rule 6C3-6, Florida Administrative Code	Date: 12/04/2015
Related References	2 CFR Part 200 Uniform Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), "FAMU BOT 2005-08 Sponsored Grants and Contracts Policy"	
Purpose	To provide guidance to University staff responsible for the review and execution of sponsored project agreements.	
Signature of Approving Authority		

1.0 POLICY STATEMENT

The Office of Sponsored Programs (OSP) reviews, negotiates, and coordinates the execution of sponsored project agreements, in accordance with applicable Florida and federal law. The President's designee is the Vice President for Research who serves as the authorized signatory for sponsored program agreements. All contracts are examined and approved by the Office of the General Counsel for appropriateness and legal compliance prior to their execution. Research, clinical and sponsored project contracts or agreements are monitored in accordance with applicable rules, regulations, and policies.

2.0 GENERAL INFORMATION

The institution is responsible for monitoring the performance of contractors as a key function of proper contract management and administration. The purpose of contract management and monitoring is to ensure that the contractor is performing all duties in accordance with the contract, the financial interests of the university are protected, and the university is aware of and addresses any developing problems or issues on a timely basis.

2.0 RESPONSIBILITIES

- 2.1 Principal Investigator (PI)** is responsible for ensuring the appropriateness of all charges on sponsored projects agreements are consistent and comply with funding requirements and compliance with institution policies and procedures.
- 2.2 Department/Division/College/School (DDCS) administrator** is responsible for review and approval of appropriate charges to sponsored project agreements within the college/school and proper management and retention of documents.

- 2.3 **Office of Sponsored Programs (OSP)** is responsible for the review, negotiation, and coordination of the execution of sponsored project agreements, including applicable certifications and assurances.
- 2.4 **Office of the General Counsel Office (OGC)** is responsible for the review and approval of sponsored agreements to ensure compliance with University regulations, Florida statutes and any other applicable laws.
- 2.5 **Office of Procurement Services (OPS)** is responsible for assigning a control number to all contracts. This enables the subcontract commitment to be encumbered in the university accounting system. PS is responsible for ensuring proper management and retention of documents.
- 2.6 **Office of Contracts and Grants (OCG)** is responsible for invoicing the sponsoring agency, cost transfer, cost share, and preparing and submitting all fiscal and financial reports to the funding agency. The OCG also reviews the award and fiscal reports when preparing financial reports to verify that all charges are allowable in according to the specified sponsored agreement.
- 2.7 **Organizational Development and Training (ODT)** is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the review, management and monitoring of sponsored project agreements, including but not limited to PIs, OSP and OCG staff and grants administrators.

3.0 PROCEDURES

3.1 PRINCIPAL INVESTIGATOR

The principal investigator is primarily responsible for the preparation of proposed scope of work to external funding organizations and assuring that the information contained therein is accurate and correct to the best of his/her knowledge. The following areas require the principal investigator's special attention.

- Administer and ensure the appropriateness of all charges on sponsored project agreements.
- Ensure there is an established period of performance, scope of work and deliverables to be included in the contract agreement.
- Review the terms and conditions of sponsored project agreement for allowable costs and to determine if prior approvals of any changes are required by the sponsoring agency.
- Monitor performance, evaluate quality of the work, and review progress made against the project agreement time schedule.
- Ensure that the work is being done according to the terms and conditions of the sponsored project agreement.
- Routes agreement through appropriate Department/Division/College/School, Office of Procurement Services, Office of the General Counsel and Office of Sponsored Programs.
- Maintain all documentation according to retention requirements.

3.2 DEPARTMENT/DIVISION/COLLEGE/SCHOOL (DDCS)

- Department administrator should review sponsored project agreement budget to ensure compliance with policies and procedures.
- Assist PIs in the administration of their sponsored project agreement in making appropriate charges. Budget category overruns are the responsibility of the DDCS.
- Establish effective processes and controls that will ensure compliance with institutional policies and procedures.

- Communicate institutional policies and procedures to all responsible employees within the DDCS.
- Department administrator work with the PI to ensure that the agreement complies with the terms and conditions.
- Maintain document according to retention requirements.

3.3 OFFICE OF SPONSORED PROGRAMS (OSP)

- Sponsored project agreements are received and date stamped by OSP receptionist and referred to the Post-Award Associate Director (PAAD).
- PADD may refer sponsored project agreement to the grants specialist to check for pre-award file.
- Grants Specialist identifies the pre-award file of the project in the pre-award database and retrieves the file from the file room.
- PADD compares the agreement with proposal.
 - Exceptions, if any, are noted for future negotiation with sponsor.
 - Language of the agreement is reviewed.
 - Cost-share (matching) is reviewed for completeness and documentation.
- PADD refers agreement to staff to prepare routing slip to the Office of the General Counsel (OGC) for further review and approval.
- In the event that there is no pre-award file, the OGS refers the sponsored project agreement to the PAAD. The sponsored project agreement is assigned to a coordinator to request any missing documents and/or clarification of information from the PI.
 - Transmittal Form
 - Detailed Budget and Justification
 - Scope of Work
 - Proposal Guidelines, if applicable
- After the pre-award documents are reviewed and approved, the file is returned to the PADD for further processing.
- The pre-award file is completed and the signature of the vice president for research is obtained on the Transmittal Form, in those instances that the pre-award file was not initially reviewed in the proposal stage.
- Sponsored project agreements that have been reviewed and approved by OGC are routed to the vice president for research (president's authorized designee) for further review and signature.
- The vice president for research reviews, signs and returns the agreement to the OSP for processing and return to sponsoring agency.
- If OGC does not make any recommended changes, the agreement is mailed to sponsor for execution.
- If OGC recommends changes to the agreement:
 - The agreement is sent to sponsoring agencies contact, PI and vice president for review and approval of recommended changes.
- At least two original signed agreements are mailed to the sponsor for review and approval of changes and execution. The sponsoring agency is requested to transmit to the university an original or electronic copy of the agreement upon its execution.
- Executed agreement is received and date stamped by OSP receptionist and referred to grants specialist.

POST-AWARD

- PAAD may complete the post-award set-up or assign a coordinator to process the sponsored project agreement.
- PAAD or assigned coordinator retrieves the proposal information from PeopleSoft iRattler Financials (Version 1 (VI), copies the information to Final 1 (F1) and, if necessary, makes appropriate changes in accordance with approved budget and Contract Terms and Conditions.
- Participant costs are segregated from other costs related to the sponsored project agreement. A project and budget is set-up for all other costs and a separate project and budget is set-up for participant costs.
- Cost share/in-kind/cash and third party match amount with department number information are entered in the "Attributes" tab.
- If a coordinator sets-up the new award, the award package is forwarded to the PADD for review prior to routing to director.
- PAAD reviews information in Final Version (F1) to ensure that budget and other information have been correctly entered in to the system and submitted as F1 in iRattler Financials.
- If there are any corrections required, the award package is referred back to the coordinator for processing.
- PAAD or coordinator completes the New Awards Check List for Internal Control (Attachment 1) for routing.
- PADD refers new award information to Grants Specialist to be entered into OSP database to maintain records of all awards received.
- PAAD or coordinator drafts notification letter to the PI, prints the header, project and budget summary screens, assigned project number and required budget information for director's signature.
- The signed letter and award package are routed to grants specialist to create project file, documents are scanned, filed in project hard file, copy uploaded into scan project file located on server and a copy is emailed to PI, dean, OCG, Office of Academic Affairs, director, associate director and assigned coordinator(s).

SUBRECIPIENTS

- If the Agreement includes budget for subrecipient(s), a copy of the information is forwarded to a coordinator to prepare the subagreement in accordance with the Subrecipient Procurement, Management and Monitoring Procedures.
- The subagreement is not forwarded to subrecipient(s) until after the prime agreement is executed.

3.4 OFFICE OF PROCUREMENT SERVICES (OPS)

- Office of Procurement Services is responsible for assigning a control number to all contracts. This enables the subcontract commitment to be encumbered in the university accounting system. OPS is responsible for ensuring proper management and retention of documents.
- When appropriate, preparing a solicitation, bid/solicitation exemption form or sole source justification, in consultation with the PI and OSP, if consulting agreement exceeds the

university's bid threshold amount, in accordance with Florida Statutes and university rules. The OPS reviews for:

- Determination if an individual contractor is a person or firm who provides a commodity or service to the university but does not have any employment or other relationship or connection with the university, except as provided in section 112.313, F.S;
- Working with the PI and/or departmental administrator in the review and approval of Contract Approval and Summary, Sponsored Project Agreement, Monitoring Plan; and Risk Assessment forms;
- Review and ensure that all forms are attached to the sponsored project agreement and proper documentation are attached and completed properly;
- Upon complete review, OPS assign contract number and return to OSP;
- OPS process e-requisition to procure sponsored project agreement;
- E-requisition requires entry by a requester, and approval by PI, OPS and OPS;
- Once all approvals are obtained, funds for sponsored agreement are encumbered.
- Ensuring proper management and retention of documents.

3.5 OFFICE OF THE GENERAL COUNSEL (OGC)

- The Office of the General Counsel is responsible for the review and approval of sponsored project agreements to ensure their compliance with University regulations, Florida Statutes and any other applicable law.
- All sponsored project agreements must be reviewed by the OGC unless they are modification of a previous contract with no changes. Such reviews and approvals shall be obtained before the contract is executed.
- OGC reviews the following forms for structure and legality; reviews for sufficiency of disclosure statement; and completes a general review of the content and returns to OSP.
- OGC reviews Contract Approval and Summary, Professional Services Agreement, Monitoring Plan, and Risk Assessment forms.

3.6 OFFICE OF THE CONTROLLER (OC)

- The OC Accounts Payable (AP) section processes all vendor payments. They are responsible for ensuring timely payment of all invoices, auditing payment for compliance regulations and mailing out warrants issued to vendor/provider.
- AP section is responsible for processing the sponsored project agreement invoices for payment and costs transfers in accordance with university policies and procedures.
- The AP reviews all invoices for payment by checking the following:
 - PI approval and signature on invoice for payment to the consultant (vendor/provider);
 - PI must ensure deliverables are met prior to the approval of the invoice.
 - Invoices are in accordance with the deliverables and due dates included in the agreement;
 - Invoices have an invoice number, date, reference a FAMU contract number and contains sufficient detail and backup documentation for an audit. This includes receipts and/or travel vouchers if applicable;
 - All sponsored project agreement invoices must be sent to OSP for processing;
 - Upon review and compliance by OSP, invoices should be routed through ImageNow to FAMU OC Accounts Payable; and

- PIs and departmental administrator(s) should ensure receipt of goods/services within iRattler Financials.
- The OC is responsible for the proper management and retention of all applicable documents.

3.7 OFFICE OF CONTRACTS AND GRANTS (OCG)

- OCG is responsible for the proper invoicing of the agency for charges incurred on sponsored projects agreements.
- Prepares all fiscal and financial reports.
- Maintains financial reporting information for proper management and retention.

3.8 OFFICE OF ORGANIZATIONAL DEVELOPMENT AND TRAINING (OODT)

The training team is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the review, management and monitoring of sponsored projects, including but not limited to PIs, OSP, OCG and grants administrator.

4.0 DISTRIBUTION OF DOCUMENTS

The grants specialist makes copies of the documents and sets-up the new file. Copies of the documents are referred to all relevant parties.

5.0 RECORD RETENTION

The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.

SAMPLE

Division of Research

Office of Sponsored Program

New Awards Check List for Internal Control

Date: _____

To: _____

From: _____

New Award Project _____

Federal _____

Prime Agency _____

Please provide copies of the attached documents to the following offices:

Office	Copies Made (Enter an X")	_____
_____ PI	_____	New Award Information
_____ Dean	_____	_____
_____ C&G	_____	_____
_____ Academic Affairs	_____	_____
_____ Tech Transfer	_____	_____
_____ Other	_____	_____
_____ Budget	_____	_____
_____ DoR	_____	_____
_____ OSP	_____	_____