

Compliance Requirements for Sponsored Projects

The issue of compliance for sponsored projects encompasses several areas - financial requirements, regulations that govern the use of human or animal subjects, as well as requirements for hiring personnel. The Principal Investigator, with guidance by the Sponsored Programs office, is the primary individual in charge of overseeing execution of the project objectives. As such, the PI is responsible for the following:

- Confirms that the entire proposal meets the requirements outlined in the 'Request for Proposals; (RFP) / program solicitation;
- Oversees preparation of the technical proposal;
- Identifies budgetary requirements for the project;
- Identifies match or cost-sharing sources as required by funding agency / program;
- Initiates the appropriate applications for human subject, animal subject, Hazardous Materials Biosafety use, or other compliance requirements as necessary.

What follows is a basic framework for compliance oversight.

1. Compliance

The institution has a comprehensive system in place that provides for written policies and practices covering the scientific conduct and the administrative and financial management of sponsored programs.

2. Fiscal Administration

The institution's cost estimating, recording, accumulating, and reporting, along with its financial system, Banner, are designed in accordance with generally accepted accounting principles, and the costing provisions of federal regulations known as Uniform Guidance, [2 CFR 200](#). The financial and technical terms and conditions of the funding agency for each award are incorporated as well. They are designed to assure that the federal government and other sponsors bear their fair share of total project costs. Areas of responsibility include:

1. Allowable Costs. The institution has in place a financial control system that limits costs charged to accounts funded by a sponsor to costs allowable by that sponsor, in amounts that are properly allocable. The Direct Costs section and Direct Costs versus Indirect Costs Matrix of the Grants Management Manual can be used to determine allowability.
2. Proposal Costing. The institution has a proposal costing and financial system, which provides for consistency in preparation of proposal budgets to satisfy both internal procedures and external regulations.
3. Financial Accounting and Reporting. The institution has an established financial system that complies with federal, state, and institutional regulations and/or policies.
4. Cash Management. The institution has a cash management system that complies with federal, internal, and, as necessary, state regulations and which provides adequate control and necessary flexibility to make timely deposits and disbursements of sponsored project funds.
5. Compensation. The institution has compensation policies that are consistently applied to all employees and a system for documenting compensation, including supplemental payments, into the financial system of the institution. These systems comply with federal requirements of [2 CFR 200](#). The section on Staffing the Project provides details on hiring and charging personnel to grants.
6. Cost Sharing. The institution has procedures for properly documenting cost sharing in the same manner as costs funded by the sponsor. These policies and procedures comply with federal requirements of [2 CFR 200](#). Details on cost sharing are in this section of the grants management manual.
7. Cost Accounting Standards. The institution has appropriate systems to ensure compliance with the cost accounting standards mandated by the federal government in [2 CFR 200](#) and has a system to update cost accounting practices as appropriate.

3. Procurement The institution has a procurement system in compliance with state requirements and the federal requirements of 2 CFR 200 for acquiring goods and services in a competitive, fair, and timely manner.

4. Management of Permanent Equipment The institution has a management system governing permanent equipment acquired from both federal and non-federal sources.

5. Human Resources The institution has a human resources management program including written personnel policies and procedures available to all employees that provides safeguards to assure that the institution complies with laws and regulations regarding recruitment, hiring, terms, conditions and termination of employment. The section on [Staffing the Project](#) provides details on hiring and charging personnel to grants.

6. Compliance Assessments and Audits The institution has a formal system for compliance assessment and audit that demonstrates that the institution complies with both internal policies and federal regulations.

7. Compliance with Protection Regulations The institution has systems that comply with federal and, where necessary, state and local government regulations and with requirements of non-federal sponsors in the areas of protection of human subjects and of animals, the environment, and in the operation of its facilities. The University's [Office of Research Compliance](#) and Compliance and Risk Management's [Laboratory Safety Office](#) oversee these functions and work with PIs and Sponsored Programs to make certain externally funded projects are compliant. The PI is primarily responsible for complying with these regulations.

8. Proposal and Award Management. The institution provides information on prospective sponsors and processes proposals in compliance with sponsor guidelines and has a system to manage externally funded programs in accordance with the requirements of each sponsoring agency. The institution has a system to assure adequate reporting of performance of sponsored programs as well as for the management of records and other technical data.

9. Intellectual Property The institution has an intellectual property management system adequate to comply with terms and conditions of its agreements with external sponsors and institutional policies, as well as with pertinent laws and regulations including those of the federal government. The University's [Office of Technology Commercialization](#) oversees this process and works with Sponsored Programs to make certain externally funded projects are compliant.

10. Research Integrity The institution has a formal system, embodied in written policies and guidance, that commits the institution and its faculty, students and research staff to design, conduct and report their scholarly activities in accordance with accepted standards of integrity and ethical behavior.

11. Electronic Research Administration The institution has appropriate procedures in place to allow it to access and utilize the electronic proposal, award, administrative and financial management systems of the federal government or other sponsors.

12, General Research Management The institution has a clearly defined process for the review of research management policies and for decision making on implementation of such policies (and) has trained personnel who are knowledgeable of sponsor regulations, requirements and procedures.

Federal Regulations, Guidelines, and Information

Below are links for many federal regulations as well as specific agency guidelines and other useful information for sponsored projects administration.

Federal Grant Regulations

[2 CFR 200](#) (Uniform Guidance)

[Federal Demonstration Partnership Research Terms and Conditions](#)

[Federal Acquisition Regulations](#)

Agency Guidelines

- [Department of Agriculture \(USDA\)](#)
- [Department of Commerce \(DOC\)](#)
 - [National Institute of Standards and Technology \(NIST\)](#)
 - [National Oceanic and Atmospheric Administration \(NOAA\)](#)
- [Department of Defense \(DOD\)](#)
 - [Air Force Office of Scientific Research \(AFOSR\)](#)
 - [Army Corps of Engineers](#)
 - [Army Medical Research and Materiel Command \(USAMRMC\)](#)
 - [Army Research Office \(ARO\)](#)
 - [Defense Advanced Research Projects Agency \(DARPA\)](#)
 - [Office of Naval Research \(ONR\)](#)
- [Department of Education](#)
- [Department of Energy](#)
- [Department of Health and Human Services \(HHS\)](#)
 - [Administration for Children and Families](#)
 - [Agency for Health Care Research and Quality \(AHRQ\)](#)
 - [Centers for Disease Control and Prevention \(CDC\)](#)
 - [Food and Drug Administration \(FDA\)](#)
 - [Health Resources and Services Administration \(HRSA\)](#)
 - [National Institutes of Health \(NIH\)](#)
- [Department of the Interior \(DOI\)](#)
- [Department of Justice \(DOJ\)](#)
- [Department of Labor \(DOL\)](#)
- [Department of State \(DOS\)](#)
 - [Fulbright Program](#)
- [Department of Transportation \(DOT\)](#)
- [Environmental Protection Agency \(EPA\)](#)
 - [EPA: Grant and Cooperative Agreement Desk Top Resource for Non-Profit Recipients](#)
- [Institute of Museum and Library Services \(IMLS\)](#)
- [National Aeronautics and Space Administration \(NASA\)](#)
- [National Archives and Records Administration \(NARA\)](#)
- [National Endowment for the Arts \(NEA\)](#)
- [National Endowment for the Humanities \(NEH\)](#)
- [National Science Foundation \(NSF\)](#)
- [Occupational Safety and Health Administration \(OSHA\)](#)
- [United States Agency for International Development \(USAID\)](#)
- [United States Institute of Peace \(USIP\)](#)

Other Federal Information

[Catalog of Federal Domestic Assistance \(CFDA\)](#)

[Grants.Gov](#)

[Fly America Act](#)

[Government Printing Office \(GPO\) Access](#)

[Interagency Edison \(Invention Reporting\)](#)

[Library of Congress](#)

[U.S. General Services Agency \(GSA\)](#)

[Domestic Per-Diem Rates](#)

[Foreign Per-Diem Rates](#)

[U.S. Government Manual](#)

[U.S. Patent and Trademark Office](#)

[Use of Human Subjects](#)

[Use of Animal Subjects](#)

Kent State University Links

[Division of Research and Sponsored Programs](#)

[Grants Accounting](#)

[Policy Register](#)

[Office of Research Compliance](#)

[Business Administrator Services \(BAS\) Forum](#)

[Business Administrator Services \(BAS\) Forms Library](#)