

PROCEDURAL STATEMENT

Procedural Statement Title: Sponsor Contact Guidance

Functional Area: Research Administration

Related Policy: APS 2005 Contracting Authority Policy
Effective Date: March 9, 2017
Approved by: Denitta Ward, Assistant Vice Chancellor for Research & Director, Office of Contracts and Grants
Vicki Nichol, Controller, Campus Controller's Office
Responsible Offices: Office of Contracts and Grants, Research Financial Services
Last Reviewed/Updated: September 3, 2020

I. PROCEDURAL STATEMENT

This document provides guidance on pre- and post-award roles of Investigators and other Sponsored Project Personnel, Department Administrators, the Office of Contracts and Grants (OCG), and Research Financial Services (RFS) for contacting a project's sponsor. Adhering to these guidelines will enable Investigators, or any sponsored project personnel, to focus on research and to facilitate efficient and effective communication throughout the award administration process, thereby reducing risk to the University of Colorado Boulder (CU Boulder).

II. DEFINITIONS

Department Administrators: Department support that is not directly billed to a Sponsored Project.

Investigator: Principal Investigator at CU Boulder

Sponsor: Outside organization that is providing financial resources for CU Boulder to perform work on a specified project.

Sponsor Administrative Contact: Sponsor Contractual or Authorization Contact. Other titles may include but are not limited to Contract, Grant, or Subcontract Administrator, Manager, Officer, etc.

Sponsor Technical Contact: Sponsor Principal Investigator, Scientific, or Technical Contact. Other titles may include but are not limited to Program, Project, or Technical Officer, Principal Investigator, Researcher, etc.

Sponsored Project Personnel: Lead Investigator funded by a sponsored research project and/or Investigator delegated personnel provided technical or administrative support.

Sponsored Project: A financial award from an external source (sponsor) that is governed by specific terms and conditions established in a written agreement between the sponsor and the University of Colorado for the purpose of research, scholarly activity, creative works, training, fellowships, purchase of specialized research equipment, or clinical trials.

III. GUIDELINES AND PROCEDURES

- A. In accordance with [University of Colorado's Administrative Policy Statement \(APS\) 2005](#), an individual's Contracting Authority must be granted through an official signatory delegation from the President to the campus Chancellor to the Chancellor's designee. As a result, **ONLY OCG has signature authority for sponsored projects**, not Investigators or Sponsored Project Personnel. OCG has been delegated with contracting authority on behalf of CU Boulder and any signature requirements should be submitted to OCG. See OCG's Policy Statement on Signature Authority for Sponsored Projects and OCG's [Signature Authority Delegations fact sheet](#) .
- B. Investigators and Sponsored Project Personnel should copy OCG staff, depending on the pre- or post-award status, and Department Administrators on any communications with a sponsor that do not involve scientific or technical matters. Investigators and Sponsored Project Personnel should also copy Department Administrators on all communications to OCG and RFS.
- C. OCG must formally submit a request to the sponsor for many pre- and post-award issues.
 1. Contact [OCG Proposal Analyst](#) for the following pre-award issues:
 - a. Application package issues
 - b. Budgeting matters
 - c. Content of specific components (e.g., which elements must be included in the cost proposal)
 - d. Deadline issues
 - e. Official requests for supplemental funding
 - f. Page or formatting limitations
 - g. Sponsor forms, certifications, assurances, questionnaires
 2. Contact [OCG Grant, Contract, or Subcontract Officer](#) for the following types of post-award issues:
 - a. Award transfers, relinquishments
 - b. Budget revisions requiring prior approval
 - c. Addition of subawards to existing project
 - d. Change in scope of the award
 - e. IRB/IACUC/EHS/IBC
 - f. Leave of absence
 - g. No-cost extensions
 - h. Non-disclosure agreements, material transfer agreements, and data transfer agreements
 - i. Documents received from sponsor needing university signatures
 - j. PI/Co-PI change(s)
 - k. Approval for an action or purchase that requires prior approval but was not requested previously (i.e. international travel, Co-PI transfer)
 - l. Subaward requests
 - m. Terms and conditions/negotiations
 3. Contact [OCG Compliance Officer](#) for the following types of award requests or questions:
 - a. Non-financial closeout releases
 - b. Nonfinancial closeout reports
 - c. Sponsor closeout documents sent to PI/Department needing CU Boulder signatures
 - d. Compliance certifications
 - e. Deliverables verification
 - f. Equipment purchases
 - g. Invention reports

- h. Property, including bailment (or loaned property) agreements
 - i. Award retention records
 - j. Technical or progress reporting requirements
4. Contact [RFS](#) for post-award, financial administration matters, including:
- a. Allowable costs
 - b. Audit inquiries, site visits
 - c. Billing, collections, and invoicing
 - d. Certification of ePERs
 - e. Cost share
 - f. Cost transfers
 - g. Financial compliance and closeout releases and reports
 - h. Financial reports
 - i. Financial retention records
 - j. Indirect costs/F&A rates
 - k. Budget deviation not requiring sponsor approval
 - l. Setup of projects and activities that do not require Sponsor approval
 - m. Speedtype inquiries
- D. Investigators and Sponsored Project Personnel are encouraged to contact the Sponsor Technical Contact, **not the Sponsor Administrative Contact**, in the following scenarios:
1. For the following pre-award requests:
 - a. Allowable purchases and/or costs (e.g. tuition, equipment)
 - b. Prior approval to exceed budget maximums
 - c. Prior approval to exceed [NSF's Two-Month \(2/9th\) Rule](#)
 - d. Technical aspects of the project
 2. For the following post-award requests:
 - a. A project is off schedule and an Investigator wants advice on how to proceed (i.e., no-cost extension, change in scope)
 - b. A request is made to an Investigator by the Sponsor for information regarding technical aspects of the project
 - c. An Investigator wants feedback from the Sponsor Technical Contact on a new idea or direction for the project
 - d. An Investigator wants to inquire about the expectation of additional or incremental funding
 - e. General discussion of how an award would be affected by a subaward or award transfer
 - f. Keeping a Sponsor Technical Contact apprised of project progress and status updates
 - g. Technical questions regarding progress reports
 - h. Upon OCG or RFS request
- E. Investigators and Sponsored Project Personnel are reminded that a Sponsor Technical Contact's correspondence or approval does **not** constitute formal Sponsor approval. Please work with your [OCG Grant or Contract Officer](#) to request formal Sponsor approval. Depending upon the Sponsor, a formal modification to the award may then be issued to CU Boulder to document the action.
- F. As a general rule, Department Administrators should not contact a Sponsor and should always route questions to OCG for formal inquiry. There may be exceptions to this rule if a PI delegates responsibilities to a Department Administrator, such as asking for general guidance on scientific

or programmatic questions. While rare, OCG or RFS may request for Department Administrators to contact the Sponsor.

This guidance represents select situations and is not a comprehensive list. ***When in doubt, always check with OCG or RFS before contacting the Sponsor.***

IV. HISTORY

Changes	Date	Approved By
Adopted	May 9, 2017	Denitta Ward and Laura Ragin
Revised to update reference from SPA to RFS, move of subaward additions to OCG Grant and Contract officer responsibilities.	September 3, 2020	Denitta Ward and Vicki Nichol