

**BURRELL COLLEGE  
OF OSTEOPATHIC MEDICINE  
POLICY MANUAL**

SECTION: Finances  
TOPIC: Federal Funds Compliance

Policy: B3050  
Approval Date:  
Effective Date: 11-3-2023

Approved: Signature on File

Page 1 of 2

---

**POLICY:**

The College will administer all federal awards in which federal funds are received in a manner which ensures the College's compliance with all applicable sponsor terms and conditions. Administrative procedures will address both sponsor-defined monitoring and reporting requirements. Compliance responsibilities are divided into three broad categories, to be addressed by an internal **Project Management Team** made up of representatives from the following three offices:

- Program (Office of Outreach and GME),
- Compliance (Office of Research and Sponsored Programs), and
- Finance (Finance Office).

The Institutional Effectiveness Office holds overall responsibility for monitoring the College's compliance with applicable statutory and public policy requirements, including free speech, religious liberty, public welfare, the environment, and prohibiting discrimination.

**RESPONSIBLE OFFICIAL(S):**

Office of Outreach and GME, Office of Research and Sponsored Programs (ORSP), Office of Finance, and Office of Institutional Effectiveness.

**PROCEDURE:**

Grants management responsibilities are assigned as follows:

Proposal development: the Principal Investigator in cooperation with the Office of Outreach and GME will be responsible for preparing a grant proposal.

Proposal review, approval, and submission: ORSP is responsible for all non-budgetary compliance including compliance with the grant terms and conditions as well as applicable agency and federal regulations and requirements. ORSP is also responsible for the final proposal submission; Office of Finance is responsible for budgetary compliance.

Project Management Team leadership: ORSP will be responsible for leading the project management team for all awarded projects, which will ensure compliance with the grant terms and conditions as well as applicable agency and federal regulations and requirements.

Post-award PI support: The Office of Outreach and GME will be responsible for supporting the PI in understanding the grant terms and conditions as well as applicable agency and federal regulations and requirements, and in meeting specific programmatic requirements which include technical reporting, award monitoring and award end projections and reporting.

---

Post-award fiscal support: The Office of Finance will be responsible for sponsor invoicing and financial reporting and internal budget end projection and project close-out.

Post-award processes: ORSP will be responsible for maintenance of research compliance systems and processes.

**CROSS REFERENCE:**

2 CFR §200.300

2 CFR §200.302

2 CFR §200.328-329

Policy B3040 Financial Management System

Policy B8110 Sponsored Project Proposal Development and Submission

Policy B8120 Sponsored Project Award Acceptance