

**BURRELL COLLEGE
OF OSTEOPATHIC MEDICINE
POLICY MANUAL**

SECTION: Finances
TOPIC: Federal Funds Compliance

Policy: B3050
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Page 1 of 2

Approved: Signature on File

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. At the College's discretion, non-federal awards may follow federal policies and procedures. 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 of the following three functions:

- Program (Principal Investigator/Program Director [PI]),
- Compliance (Office of Research and Sponsored Programs [ORSP]), and
- Financial Control (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):

PI, ORSP, Finance Office, and Office of Institutional Effectiveness.

PROCEDURE:

Grants management responsibilities are assigned as follows:

Proposal development: the PI in cooperation with the ORSP 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; Finance Office 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: ORSP 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 Finance Office 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