PURPOSE

The purpose of this operating procedure is to clarify and define the roles of the Principal Investigator (PI), Department Administrator (DA), and the Research Administrator (RA), with regard to receipt and set-up of new sponsored projects in the School of Medicine after award acceptance by VCU Office of Sponsored Programs (OSP). The Office of Sponsored Programs (OSP) has the final authority on all budgets being submitted for extramural funding and interpreting all sponsor guidelines and regulations.

INTRODUCTION

Grants and contracts for sponsored projects represent a contractual obligation between the grantor and the University for the performance of a specific activity through which the grantor, or sponsor, is entitled to receive some consideration or benefit. The contractual obligation is normally documented by a proposal and award combination, contract, or a written memorandum of agreement. The University assumes full legal responsibility for complying with all requirements imposed by the grantor or sponsor upon acceptance of grants and contracts for sponsored projects, including a requirement for a report of expenditures or a provision for an audit (refer to VCU’s policy Sponsored Programs Award Review, Negotiation, Acceptance and Notification). In turn, the School of Medicine must ensure its investigators and personnel are in compliance with all VCU and sponsor requirements for the acceptance and establishment of sponsored project awards.

Per VCU’s Policy Award Acceptance and Establishment, “the Office of Grants and Contracts (G&C) and Effort Reporting oversees pre-award spending account set-up and post-award administration of sponsored program awards. G&C’s principal objective is to provide accurate and timely financial reports to sponsors, interpret rules and regulations of the financial operation for the research community, act as a depositor of federal and nonfederal funds and operate the university’s effort reporting system.” The Research Administrator (RA) and Department Administrator (DA) work with G&C to establish an account for spending from sponsored project awards as soon as (or sometimes before) an award is accepted by OSP.

PROCEDURE

Receipt of Award Notice

1. Notice of award is sent via award letter or agreement by the sponsor to Office of Sponsored Programs (OSP) or directly to the PI. If sent directly to the PI, the PI or RA will send the award letter/document to OSP as soon as possible for review, negotiation of terms (if needed) and acceptance. The award document can be sent to OSP via email or via an Administrative Action in RAMS-SPOT. Refer to VCU’s policy Sponsored Programs Award Review, Negotiation, Acceptance and Notification for details on OSP’s process.

2. RA will review the award letter or agreement and any terms & conditions contained within. RA will note any technical or financial reporting requirements, deliverables, and when prior approval may be needed for project changes including budget and effort allocations. RA will communicate these items to the PI for awareness and specify responsibility for each.

3. RA will review the awarded budget against the original proposed budget with the PI. If the amount awarded differs significantly from the amount originally proposed, OSP may request a revised budget. PI must ensure that the original proposed scope of work can be performed given the amount awarded by the sponsor.
If there need to be changes to the scope of work, the PI and RA should work with OSP to communicate this back to the sponsor before the project begins.

4. A Banner index (account number) may be requested in advance of OSP’s acceptance of an award if pre-award spending is necessary or (most likely) award acceptance will occur after the project start date due to protracted negotiations. RA will utilize G&C’s Advance Banner Index Number Request form which will be signed by PI and Department Chair.

Acceptance of Award by OSP

1. PI and RA will receive notification email from RAMS-SPOT requesting completion of the Compliance Data Project form. This form will be completed with input from the PI and reviewed by the RA. Refer to OSP’s Compliance Data Project guidance on the OSP website.

2. After the award record has been created in RAMS-SPOT, the RA will review the entire award record and the Snapshot in particular for accuracy. Any questions regarding information in the RAMS-SPOT award record or Snapshot should be communicated to OSPAWARD as soon as possible via email or public comment in RAMS-SPOT.

Account Set-Up by G&C

1. G&C will provide a Banner Grant Create Notification Memo to the Fiscal Administrator for the department which should be forwarded to the RA as soon as possible. The RA will review the memo for accuracy, noting in particular:
   a. FA on index
   b. FACR distribution code
   c. Department/School
   d. Suffix on Grant ID matches sponsor type
   e. Budget period and project period

   Any issues should be communicated to the G&C Accountant listed on the memo as soon as possible.

2. If any internal subaccount indexes or external subaward indexes are needed, the RA will submit the Advance Banner Index Number Request form to the G&C Accountant. Other departments that require internal subaccounts should be consulted for FA, FACR distribution code, etc. All project indexes should be requested and ready for use within two weeks of the project start date whenever possible.

3. If cost share is required for the project, the RA will send completed and signed Cost Share Authorization forms to the G&C Accountant. All cost share indexes should be requested and ready for use within two weeks of the project start date whenever possible.

4. For all indexes set-up by G&C for the award (home index, internal subaccount indexes, and external subaward indexes), the RA must review each index (including cost share indexes) in both Banner and the PI Dashboard to ensure they have been set up correctly. Use the Dashboard Data Verification Guide and Troubleshooting Guide on SOM Research Administration’s website.

Beginning the Project

1. Establish an open line of communication between PI, RA, and DA along with a management plan (if necessary). As department structures and project needs vary widely, an initial meeting between the RA and the project team or (at minimum) the PI is best practice. At the initial meeting, clearly assign project duties and responsibilities. Communication between PI and RA should happen early and often. The RA
should email the project team and list all responsibilities, including administrative department contacts for
the technical team (i.e. the person the technical team should contact for effort changes, project purchasing or
travel requests, etc.). The PI should confirm responsibilities and notify appropriate personnel if any changes
are needed.

2. The RA will work with G&C if any re-budgeting on any grant index is required. OSP will be involved if
prior approval from sponsor is required. The RA will use G&C’s Budget Reallocation Request – Sponsored
Programs form. The form must be signed by the PI.

3. The RA will review the effort commitments in the RAMS-SPOT award record for all key personnel. These
effort commitments will also appear in the PI Dashboard to aid in award management. Any discrepancies
between the PI’s stated committed effort on the project and the effort level recorded in RAMS-SPOT should
be reported to OSPAWARD as soon as possible.

4. Budgets, index numbers, and effort commitments that involve other departments should be communicated
by the RA to the appropriate department staff.

5. Review all staff on the project. The RA will ensure project personnel are being charged to the correct index
at the appropriate effort level. Refer to “SOP 202: Managing Effort on Sponsored Projects” for more
information. The PI should instruct study team members to communicate changes to their efforts on the
project to the PI and RA if they change from the initially assigned time commitment.

6. Begin issuing subaward agreements to external entities. Refer to “SOP 204: Monitoring and Managing
Subawards” for more information on initiating sub awards.

7. The RA will create an electronic grant file to maintain the original proposal documents, original proposed
budget, revised current budget, award documents, and any management plans. The DA will ensure that the
department maintains a file of back-up documentation for reconciliation purposes as well as all future
expenses on the project.

RESPONSIBILITY

Principal Investigator (PI) The PI is primarily responsible for:

- Reviewing the scope of work if a project is funded and consulting with the RA and OSP if a budget has
  significantly changed
- Reviewing all terms and conditions related to stewardship of award funds, allowable expenses, reporting
  requirements, etc
- Approving revised budgets sent to G&C
- Communicating any changes in performed effort levels to the RA
- Communicating the new award index to project staff as needed and updating the award index with any
  supply centers or animal facilities
- Reviewing and signing Advance Banner Index Request forms and Budget Reallocation forms as needed
- Promptly providing documents that need signatures

Research Administrator (RA) The RA is primarily responsible for:

- Working with both G&C and OSP to ensure a speedy award set-up
- Reviewing any incoming award letter/document and terms & conditions
- Assisting the PI with completing the Compliance Data Project form in RAMS-SPOT
- Requesting advance Banner indexes (when necessary) and any internal/external subaccount indexes and cost share indexes
- Reviewing Snapshot in RAMS-SPOT for completeness and correctness
- Reviewing all indexes set-up by G&C to ensure they are correct and appearing in the Research Dashboard
- Assisting PI with any necessary re-budgeting
- Communicating with other departments and schools involved in the project
- Ensuring project personnel are charged to the correct indexes at the correct effort levels

**Department Administrator (DA)** The DA is primarily responsible for:

- Assisting with completion of any forms or gathering of signatures as needed
- Ensuring all Banner Grant Create Notification Memos and cost share indexes are forward to the RA
- Ensuring the department maintains a file of back-up documentation for reconciliation purposes as well as all future expenses on the project

**Office of Sponsored Programs (OSP)** The OSP Post Award Team is responsible for reviewing, negotiating, and signing any award letters/documents and awarding the proposal in RAMS-SPOT.

**Grants & Contracts Accounting (G&C)** G&C is responsible for setting up the Banner indexes, subaccount/subaward indexes, and cost share indexes when they receive notification from OSP that an award has been accepted. G&C will load budget to the indexes as necessary.