



The University of Oklahoma, Norman Campus

**Office of Research Services (ORS)
Procedural Guidelines**

Updated: February 2026

The Office of Research Services (ORS) Procedural Guidelines provides the following related to the administration of proposals and awards for externally sponsored research. It discuss the services offered through ORS, identifies the roles and responsibilities associated with these procedures, and general proposal submission and award acceptance guidance for the University of Oklahoma Norman and Tulsa Campuses. The purpose of these procedures is to help ensure that all proposals and awards conform to sponsor requirements and are consistent with the University of Oklahoma's guidance and sound fiscal practices.

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OFFICE OF RESEARCH SERVICES

The mission of the University of Oklahoma is to provide the best possible educational experience for our students through excellence in teaching, research and creative activity, and service to the state and society. The goal of the Office of Research Services (ORS) under the Office of the Vice President for Research and Partnerships (OVPRP) is to function as a highly trained, customer service-oriented organization whose primary purpose is to support research and sponsored activities within the University community and to assist faculty in adhering to the federal and local compliance guidelines. ORS has responsibility for pre-award submission and award administration on the University of Oklahoma – Norman and Tulsa Campuses, including those sponsored programs funded through the College of Continuing Education. Units reporting to ORS are Proposal Services, Award Administration, and Research Information Services. ORS is the institutional unit authorized by the Board of Regents to submit proposals to and accept awards from external entities for financial support in the form of grants, contracts, and cooperative or other agreements. Signatory authority is granted annually by the Board of Regents; signatories with unlimited authority are the VPRP and the Executive Director of ORS. All awards and/or modifications exceeding \$250,000 are reported to the Board of Regents for ratification.

Research Information Services (RIS)

Research Information Services (RIS) distributes funding opportunity information to OU faculty, staff, and students on behalf of the OVPRP. Using a variety of sources, RIS disseminates information related to research and sponsored activities and state, federal, commercial, and -non-profit funding opportunities. RIS also manages [limited submission](#) announcements and internal competitions, and oversees sponsor accounts and portal access information. RIS is responsible for the coordination and scheduling of workshops and seminars relevant to research/sponsored activities, and also provides in-person, online, and recorded training events for faculty and staff. The goal of these training opportunities is to provide information, examples, and other resources to assist researchers in developing more competitive proposals and grow the OU research enterprise. To view a list of upcoming and recorded events, please visit our [Training and Development](#) page.

In addition, RIS manages proposal and award data through the Cayuse grants management system. Monthly reporting data is provided by the Data Manager and posted to the ORS website. The Data Manager also administers the ORS dashboard for sponsored research data, which is built on Microsoft Power BI and allows export of information filtered by criteria selections. The Data Manager also provides custom reports as needed from the proposal and award data. Please contact the [Data Manager](#) to request custom report needs, research proposals, and award data questions, and help with the Cayuse system.

RIS is also established as the primary point of contact for research/sponsored projects questions, either through direct support or appropriate referral through contacting ris@ou.edu.

Proposal Services (PS)

Proposal Services provides assistance to faculty and staff in the submission of proposals to external funding agencies. Assistance includes the review and interpretation of sponsor guidelines, review and guidance on developing proposal budgets, completing standardized forms, coordinating the internal routing of proposals, assistance with compliance of University, state, and federal regulations, and submission of the finished proposal to the sponsor (as applicable). Proposals to external sponsors may not be submitted without prior coordination with ORS Proposal Services.

Award Administration (AA)

Award Administration is responsible for the final review and approval of proposals, as well as the negotiation and acceptance of all awards, contractual agreements, and subcontracts on sponsored projects. Award Administration ensures that each project secures the necessary approvals from the appropriate compliance units and adheres to all University policies and procedures. Additionally, Award Administration serves as the primary point of contact with sponsors for all award administrative actions pertaining to awards.

ROLES AND RESPONSIBILITIES

The University is ultimately legally and financially responsible and accountable to the sponsor for the performance of the research funded and the proper use of funds, but without the full cooperation and vigilance of the Principal Investigator (PI) and research staff working in conjunction with the University administrative offices charged with oversight processes, the University could not fulfill its stewardship role.

Principal Investigators (PI)

Principal Investigators (PI) have primary responsibility for planning and carrying out the preparation and submission of proposals for external support, for the proper fiscal management and conduct of the project in accordance with the sponsor's requirements, and for the scientific and programmatic aspects of the sponsored project, including oversight of subcontractor performance and compliance with technical reporting requirements. The PI has a responsibility to provide accurate and complete information in all phases of the grant process. The PI must attest to the allowability and reasonableness of all expenditures at the time expenditures are authorized, and for monitoring the status of grant accounts to prevent overdrafts and erroneous charges. The PI Eligibility requirements are outlined in the [PI Eligibility guidance](#). Additional information on PI and ORS responsibilities is available in the [Proposals and Awards Roles and Responsibilities guidance](#).

Administrative Heads

An administrative head is the academic leader with programmatic, managerial, and fiscal responsibilities for a designated area such as a department, school, or center, usually carrying the title of dean, director, or chair. With respect to sponsored activities,

administrative heads are accountable for the performance of PIs and administrative staff under their supervision. They are also responsible for any commitments made to a sponsored project as indicated in the Cayuse routing package they certify and other documentation they provide related to a sponsored activity such as letters.

Vice Presidents

The Senior Vice President for Academic Affairs and Provost provide academic leadership for research and creative activities and has oversight responsibility for the conflict of interest committee. The Conflict of Interest Policy is outlined in the [Faculty Handbook sec. 5.10](#). The required forms, which must be completed and routed with the proposal when a potential or perceived conflict arises relative to a sponsored research activity, are available in the [Conflict of Interest guidance](#).

The OVPRP is responsible for the development and/or dissemination of official guidance in the research and creative activities arena. For a list of OVPRP internal support and seed funding, please visit the [Internal Funding Opportunities page](#)

Compliance

The University's compliance mechanism have several areas of oversight, including but not limited to the Institutional Review Board (IRB) through the Office of Human Research Participants Protection (HRPP), the Institutional Animal Use and Care Committee (IACUC), Radiation Safety Office, and the Institutional Biosafety Committee (IBC) that are responsible for reviewing, approving, and overseeing research activities. The following categories of research must be submitted to the IBC for review and approval prior to initiation:

- Recombinant or Synthetic Nucleic Acid Molecules
- Biohazardous Agents Infectious Agents towards Humans
- Animal and Plants
- Toxin
- Recombinant DNA involved in Human

Processes and procedures for these compliance functions are found at:

- [Research Involving Human Participants](#)
- [Research Involving Animals](#)
- [Research Involving Recombinant DNA and Biohazardous Materials rDNA/Biohazards](#)
- [Research Involving Radioisotopes](#)

Audits

The Executive Director of ORS and the Assistant Vice President of Grants & Contracts Accounting (GCA) are the contacts for all audits of sponsored research and will function as University liaison(s) with external and internal auditors and/or evaluation teams. The

official, auditable financial records for sponsored research are maintained by GCA. The account sponsor and/or department should keep supporting records such as payroll and leave records, PCard expenditures, correspondence, and technical reports. Specifics on how long to maintain records can be found in the [Record Retention for University Departments Policy](#).

Ethics in Research

[The Research Integrity Officer \(RIO\)](#) at OU is responsible for upholding the standards of research ethics by educating researchers, promoting ethical practices, and preventing misconduct. The RIO investigates allegations of research misconduct, ensures the process is thorough and fair, and offers confidential consultation on ethical concerns.

RESEARCH INFORMATION SERVICES

Limited Submissions

When the sponsor limits the number of nominations or proposals that can be submitted from an institution or research unit, interested PIs should contact ORS Limited Submissions Coordinator at ors_limitedsubs@ou.edu before proceeding with proposal development. Selections of proposals to be the authorized submission from the Norman campus are through internal competition and/or permissions as needed through the limited submission processes.

Research Training and Development

RIS provides in-person, online, and recorded training events for faculty and staff. The goal of these training opportunities is to provide information, examples, and other resources to assist researchers in developing more competitive proposals and growing the OU research enterprise. Most trainings are optional; however, a number of research-related trainings listed below are mandatory for certain employees and researchers with funding from specific agencies.

Sponsored Research and Compliance Training

The Sponsored Research and Compliance Seminar is an institutional requirement for all University employees who are or may be involved in any aspect of externally sponsored projects (research, creative activity, instruction/training, or public service). This includes faculty, staff, temporary employees, graduate assistants, student employees, and individuals who monitor, reconcile, or manage sponsored project financial accounts. The training must be completed prior to the performance evaluation or before the receipt of any pending awards, whichever occurs first, and is required every four years. For additional information on the Sponsored Research and Compliance Seminar, please visit [ORS Research Training and Development page](#).

Responsible Conduct of Research (RCR) Training

Recipients of awards from the National Science Foundation (NSF), the National Institutes of Health (NIH), and the United States Department of Agriculture (USDA) National Institute of Food and Agriculture (NIFA) are required to comply with specific requirements to ensure appropriate training in the responsible conduct of research. For additional information on the RCR training requirements, please visit the [Responsible Conduct in Research](#) page.

NIH Other Support Training Requirement

Effective October 1, 2025, NIH [requires](#) recipients to provide training to all faculty and researchers identified as [Senior/Key Personnel](#) on the requirement to disclose all research activities and affiliations (active and pending) in Other Support ([see Other Support form](#)). This new training requirement builds on existing policy (see [NIH Grants Policy Statement \(GPS\), Section 2.5.1 "Just-in-Time Procedures"](#)) and is intended to strengthen compliance with NIH disclosure requirements.

All faculty and researchers identified as Senior/Key Personnel on an NIH proposal must complete the training prior to proposal submission. Senior/Key Personnel on existing awards must complete the training prior to submission of their Research Performance Progress Report (RPPR).

The training is available through OU's Navex Disclosure Management System. If you would like to voluntarily complete the training, please contact coi@ou.edu to be added to the campaign.

For additional information on Other Support requirements, please refer to [NIH Other Support guidance page](#).

Establishing and Maintaining a Supportive Environment for Sponsored Research

Sponsored research activities are the responsibility of the OVPRP through the ORS. The University of Oklahoma has formally adopted a [Standards of Conduct](#). Certification of all employees is required.

Conflicts of Interest (COI) and Financial Conflict of Interest (FCOI)

Conflicts of Interest (COI)

At proposal submission and award, the PI needs to declare conflicts of interest (COI), both financial, relational and nepotism. Information about nepotism and COI, along with required forms can be found on the [Provost's Resource](#) page. For additional guidance regarding Individual Conflicts of Interest Policy, view [Section 5.10 of the Faculty Handbook](#).

A **financial conflict** involves any actual or perceived financial gain or interest with another organization or person. A **relational conflict** involves any actual or perceived relationship with another organization or person that could affect or appear to affect decisions. This

includes such things as unpaid appointments to advisory boards, past relationships -such as creating a company but no longer being an owner, any blood or marriage relationship with key persons at the other organization involved in proposed work.

For proposal routing the following items are needed, as applicable:

- COI [Disclosure Form](#), [Review Form](#), and COI Management plan (see examples below)
- [Nepotism Waiver Form](#)
- PHS/DOE//NASA/NSF-FCOI Disclosure Form (required for proposals involving Public Health Service (PHS), Department of Energy (DOE), National Aeronautics and Space Administration (NASA), and National Science Foundation (NSF)), plus proof of training at award (additional recurring items may be needed through the life of a project).

Conflict of Commitment (COC)

A Conflict of Commitment (COC) occurs when a faculty member's outside activities—whether paid or unpaid—interfere with their ability to meet their primary professional obligations to the University. Unlike financial conflicts, which focus on monetary interests, COC is about the allocation of time and effort and whether external commitments compromise teaching, research, service, or sponsored project responsibilities.

Examples of COC:

- Accepting outside employment that overlaps with University duties.
- Extensive consulting or advisory work that reduces availability for OU responsibilities.
- Serving on external boards or committees in ways that conflict with sponsored project duties.
- Running a company or startup that detracts from University obligations.

OU does not prohibit external activities; however, they must be disclosed and may require management to ensure University responsibilities remain the priority. For additional information, please refer to the [Conflict of Interest](#) webpage.

COI Management Plan

When a conflict exists and can be managed, a COI Management Plan is required. The COI Management Plan should contain the following:

1. A list of the players and their relationship
2. A description of the activity that creates a COI between the players
3. The plan to manage the COI

Example 1:

1. Professor X is the parent of student Y
2. Professor X wishes to appoint student Y to his grant
3. Dept Chair Professor Y will review the appointment to determine whether student Y is qualified to serve the role on the grant, will establish the stipend for the student, and will conduct normal performance evaluations and approve reappointments, etc. (but Professor Y will direct the student Y work on the research project).

Example 2:

1. Professor X is a co-founder and co-owner of Company Y, and is also Department Chair
2. Company Y wishes to subcontract a grant to Professor X as PI and to rent university space under an FUA
3. Associate Dean Z will review and approve the subcontract statement of work and budget and will have signature authority for expenditures on the award for any salary or travel support of Professor X. Associate Dean Z will also review and approve the FUA terms, in collaboration with the Office of Research Services.

Financial Conflict of Interest (FCOI) Disclosure Requirements

All proposals and awards submitted to or funded by the PHS, DOE, NASA, and NSF require appropriate conflict of interest disclosures. The disclosure form is needed at routing by all PI, Co-PI, and Senior/Key Personnel on the proposal. This is a separate requirement from COI (above) and does not negate the probable need to also do the University COI process.

- [Submit a PHS/DOE/NSF-FCOI Disclosure Form](#)

Training Requirements

All PHS and DOE funded Investigators at OU must complete the online FCOI training via the [CITI Program](#). Successful completion of the training is required before the expenditure of funds on any newly funded projects, including noncompeting continuation awards. Training must be completed at least every four years.

New users to the CITI program must create an account. The same CITI account can be used for both the FCOI requirement and OU's IRB training requirement.

Definitions

Investigator, for the purposes of this guidance, means the Principal Investigator and any person listed by the Principal Investigator as responsible for the design, conduct, or reporting of their sponsored program(s). These individuals are listed at the time of proposal submission.

Normally, all senior research personnel should be listed as “Investigators.” All of the following should be considered, to the extent they are responsible for the design, conduct, or reporting of the sponsored program: professorial faculty, research associates, emeritus faculty, research collaborators, visiting scientists, post-docs, GRAs, or students.

PHS means the Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority of the PHS may be delegated. The components of the PHS include, but are not limited to:

Agency for Healthcare Research and Quality (AHRQ)

Agency for Toxic Substances and Disease Registry (ATSDR)

Centers for Disease Control and Prevention (CDC)

Food and Drug Administration (FDA)

Health Resources and Services Administration (HRSA)

Indian Health Service (IHS)

National Institutes of Health (NIH)

Office of Global Affairs (OG)

Office of the Assistant Secretary for Health (OASH)

Office of the Assistant Secretary for Planning and Evaluation

Office of the Assistant Secretary for Preparedness and Response (ASPR)

Office of Public Health and Science

Substance Abuse and Mental Health Services Administration (SAMHSA)

Other agencies may follow PHS regulations, these include (but aren't limited to) - Alliance for Lupus Research, Alpha-1 Foundation, American Asthma Foundations, American Cancer Society, American Heart Association, American Lung Association, Arthritis Foundation, CurePSP, JDRF - Juvenile Diabetes Research Foundation, Lupus Foundation of America, Patient-Centered Outcomes Research Institute (PCORI), and Susan G. Komen Foundation.

PROPOSAL DEVELOPMENT

There are several resources available to assist with proposal development. The [ORS website](#) provides comprehensive guidance and tools for preparing proposals, including step-by-step instructions, templates, and helpful resources.

Additionally, [the Center for Faculty Excellence \(CFE\)](#) offers support for developing research plans and proposals through collaboration facilitation, funding and resource development strategies, capacity-building opportunities, and research writing groups and services.

PROPOSAL SERVICES

Proposals to For-Profit Organizations

OU, as a state organization, does not normally allow proposals to commercial entities to have discounts or preferential treatment, and it is not uncommon that proposals with commercial entities may have non-disclosure, intellectual property, and other proprietary concerns. Primary Investigators should involve ORS early in any contacts to ensure appropriate coordination with Legal and the Office of Technology and Commercialization (OTC) is accomplished.

Gifts versus Awards

The following criteria are useful in distinguishing between a gift to support research and a sponsored award: Gifts are unrestricted funds provided to the University, usually through the University of Oklahoma Foundation, without any terms, conditions, or other obligations. Funds received to support research which include any terms, conditions, or obligations beyond the general provisions for treatment as a gift are considered a grant/contract and should be routed through ORS. Such awards are normally characterized by one or more of the following: A specific program of work or research is required, the sponsor will receive progress reports or an accounting of how the funds were expended, the award is for a specific period of time and/or there are intellectual property issues such as confidentiality or publication conditions associated with the award. Under University procedure it is not permissible to route research funding through the Foundation solely to avoid paying overhead/indirect costs. Note that sponsor restriction of indirect costs recovery is not a consideration in whether a proposal is a gift or an award.

Sponsor requirement of submission from a 501©(3) organization

Some external sponsors have a requirement for submission to be from a 501c3 organization; however, the University falls under a different nonprofit tax number. Many sponsors will accept submissions under this tax code, and for those that don't it may be possible for the OU Foundation to submit the proposal and then transfer the award to ORS for administration. PI should coordinate with ORS for help in determining the best way to proceed with these types of submissions.

Research Recharge Centers

A research recharge center is a University operating unit that provides a service, a group of services, or products to users principally within the University sponsored research community for a fee. The Financial Services Office maintains a comprehensive manual to facilitate the implementation of the fiscal procedures affecting Auxiliary Enterprises and Services Units. For those procedures, the operating unit should consult the *Policies and Procedures Applicable to Auxiliary Enterprises/Services Units*, which can be accessed at [Policies and Procedures Applicable to Auxiliary Enterprises/Services Units](#).

Research recharge centers recover their costs through charges to benefiting users. The OVPRP and ORS assist operating units with the initial development of a rate for the activity based on projected direct costs and monitor ongoing centers to ensure the validity of the rate based on actual costs. Users are invoiced by the recharge center using the approved rate. The unit will establish a PeopleSoft Department number. A recharge center can sell to external users, as well as internal University units. External users are defined as units that do not have a University Department number in PeopleSoft, or students, faculty or staff acting in a personal capacity. Rates authorized for the recharge center may be used on sponsored research projects. For additional information, please visit the [Recharge Centers](#) page.

Proposal Routing Process

The [requirements for routing](#) of externally funded [research] projects prior to submission is set forth in the research guidelines and procedures.

Information Sheet Submission (Initial Step)

Once the PI has identified a potential sponsor for a project and has determined that he or she is interested in submitting a proposal, the first step is the submission of an Information Sheet (Infosheet) found [here](#). Infosheets are required at preliminary proposal stage – this includes letters of intent, statements of interest, notices of interest, white papers, preliminary proposals, random order of magnitude submissions, concept papers, etc.

Submission of the Infosheet initiates the assignment of a c who assists the PI with budget development, internal routing, and the submission process. This also initiates the review of the proposal information by the Office of Technology Commercialization (OTC), the Office of Export Control (OEC), and other compliance offices as applicable. The Proposal Specialist will respond to the submission of an Infosheet normally within 24 working hours. If a PI fails to receive such a response, s/he should contact ris@ou.edu.

Recommended Timing

ORS strongly encourages PIs to submit the Infosheet as early as possible, preferably no later than two weeks before the sponsor deadline for standard proposals and at least four weeks when subcontracts, cost share, or complicated guidance are involved.

Submitting the Infosheet early ensures adequate time for ORS to review sponsor requirements, address cost share or rate questions, and gather subcontract documentation.

Late Infosheets limit the level of support ORS can provide. If the Infosheet is submitted one business day before or on the day of the sponsor deadline, there may be insufficient time to assign it to a Proposal Specialist, review submission requirements, or begin routing. In such cases, the PI assumes responsibility for any submission issues or lack of ORS support. Additionally, submitting the Infosheet this late conflicts with the University submission policy requiring all final proposal documents to be provided to ORS at least three business days before the sponsor deadline.

If an Infosheet is not submitted and/or a proposal is submitted directly to the sponsor without ORS knowledge or routing, ORS will have no institutional record of the proposal and will not have conducted any review or compliance checks. In these circumstances, ORS reserves the right to delay, decline, or conditionally accept an award resulting from a proposal submitted outside the ORS process.

Internal Routing Requirements

Although ORS does not set arbitrary timelines for routing, it is expected that the PI will give the ORS staff adequate time to fully support the proposal effort to include review of the program guidelines, assistance in developing the proposal budget, preparation of the routing materials, physical routing of the proposal for institutional authorizations and the shipping/electronic submission of the proposal. When circumstances prevent the provision of adequate lead time, services must be reduced to accomplish a timely and authorized submission. Circumstances beyond the control of ORS such as quantity of proposals, short notice proposals, campus closures, and system outages may also affect services.

For the internal routing process, the PI must provide the Proposal Specialist with a draft abstract, summary, or statement of work, a detailed budget on the OU budget template, and a draft budget justification. If cost share is involved, the package to provide the match must be reflected in the budget and justification along with third-party documentation as appropriate. If a subcontract with another entity is proposed, a letter of commitment along with a statement of work, detailed budget and budget justification and rate agreement (if Indirect Costs (IDC) rates are charged) are required. The letter must articulate the entity's commitment to participation and specify explicitly the amount requested in the budget. If cost share is provided it must state the amount and be signed by an official authorized to bind the subcontractor. Subcontractors with a federally negotiated and approved Facilities and Administrative (F&A)/IDC rate will be allowed to charge F&A/IDC to the project as applicable. If the subcontracting entity has never received a federally negotiated and approved F&A/IDC rate, they may elect to charge the allowable de minimis rate as permitted under the Uniform Guidance (see [2 CFR §200.414](#)).

The Proposal Specialist is responsible for reviewing the budget for current and appropriate rates and salary amounts, verifying the credit splits, entering cost sharing commitments, and generating and compiling the routing package. The Proposal Specialist will generate any certifications or assurances required by the guidelines. If OU is requested to be a subcontracting partner, the Proposal Specialist will initiate the official commitment letter that is required by the lead organization.

University Routing and Approvals

The University routing process is completed electronically via the [Cayuse SP](#) system. The routing package is routed through the University for review and approval by the following personnel: the PI, Co-PIs, administrative heads for each PI and Co-PI; the budget unit head and dean of the college for all PIs and Co-PIs, who respectively confirm that the budget and academic unit and college requirements are satisfied; any other affiliated departments or centers as applicable; and ORS, who assumes responsibility for ensuring that the University administrative requirements are satisfied. ORS is empowered to submit proposals based upon the approvals garnered through the routing process. If a sponsor allows submission from a PI, the internal routing process for permission to submit must still be accomplished with ORS. Special consideration such as research compliance issues, potential conflicts of interests, cost sharing commitments, etc., may require that other University officials be involved in the review and approval process.

The routing process is not completed until the Award Administration unit in ORS has approved the submission by signing the routing proposal. Submissions made before approval from ORS (or done without the internal routing for approvals) are not official University submissions and may be administratively withdrawn if the submission is found to be non-compliant with University or agency requirements. Submissions made without ORS approval may not be eligible to participate in the standard SRI distribution. If a submission has been made without ORS review, please notify ORS immediately so routing after-the-fact and necessary approvals can be obtained.

Budget Development Guidelines

ORS assists PIs with budget development to ensure compliance with federal, sponsor, state, and university requirements. University policy requires that all submitted proposals include a budget using the ORS budget template, regardless of the sponsor's forms or requirements.

At the submission stage, budgets represents the PI's best estimate of the true costs of the proposed work. Budget revisions or updates may occur during award negotiation in coordination with ORS, and expenditure-related changes are coordinated with Grants & Contracts Accounting (GCA). Some changes also require coordination with ORS and the sponsor.

General budget guidance is provided below, with additional information available on the ORS website. Many sponsors will also provide specific requirements for budgets and budget justifications, including quotes or proof of cost basis

Salaries & Wages

Salaries and Wages included in proposals are based on actual appointments or projected appointments, using reasonable costs for the career field and type of work involved. It is allowed to include anticipated pay changes in proposal projections, such as a change in appointment resulting in higher pay or to start a proposal based on including a projected cost-of-living increase.

No one can commit more than 100% of their time based on a 40-hour work week. It is also rare for anyone to commit 100% of three summer months. A commitment of this nature would mean the PI cannot take vacation, publish or work on articles, or do other research or work beyond the one grant with this time commitment.

Student personnel are paid through the University payroll system as employees. Any determination for whether an activity qualifies for compensation as a scholarship or fellowship should be made at the proposal stage. Guidelines for consideration of scholarship and fellowships can be found in the [OU Scholarships Forms and Resources](#).

Projects utilizing graduate research assistants must include salary at the minimum (or higher) amount established by the Provost and the appropriate tuition remission in each budget. The current Tuition Remission Agreement is available on the [ORS Tuition Remission Practice guidance page](#).

Fringe Benefits

The University uses a rate-based distribution system for allocating fringe benefits to sponsored research accounts. Rates are negotiated annually with OU's cognizant agency, DHHS. Current fringe benefits rates for sponsored research may be found at https://www.ou.edu/budget/fringe_benefits/account_codes.

Equipment

The University's threshold for capitalization is \$5,000. Only those items with a unit cost over \$5,000 and a useful life of one year or more should be listed in the budget as equipment. The amount may include shipping, installation and training as allowed by the sponsor. Parts to fabricated pieces of equipment may also be included provided the cumulative value meets the threshold for capitalization and the item will become an inventoried asset. Note that state agencies may have a lower threshold.

Equipment purchased, fabricated, or created that is not retained by the University and listed on inventory is not treated as an equipment item in the budget. It is an Other Direct Cost.

Subcontracts/Consultants/Vendors

Subcontractors provide programmatic input into the research project and collaborate closely with the PI regarding the scientific design and completion of the research project. Subcontractors are also referred to as "subrecipients." ORS Award Administration negotiates and prepares the OU subcontract with information provided by the PI and the subcontract organization.

Please note that OU Health Campus (HC) is a separate entity from OU Norman and thus subcontracts/subawards are used when teams involve both organizations. For unpaid collaborators at OUHC, a Memorandum of Understanding (MOU) will be prepared.

The ORS screens all named subcontractors at the proposal stage through the Office of Export Controls (OEC). If a subcontract is added to the final award and has not previously been screened, then the ORS will work with the OEC for clearance prior to issuing the subcontract.

Independent Contractor or Consultant provides a variety of services on research projects, ranging from data analysis to serving on advisory committees. It is common for consultants to be handled as contracts (vendors).

Former University employees and retirees must be paid through the payroll system unless they have been separated from the University for at least one (1) year. It is very common for retirees to maintain research ties to the University, and they may be PI's and Co-PI's on proposal submissions.

Contracts/Vendors have little to no programmatic involvement in the proposed work and are usually providing some type of service or product either off the shelf or something very similar to purchases made by different customers. Testing services or fees and software programs are two examples.

Note that it is possible for an organization to have different types of relationships with OU on different proposals, based on how involved they are in programmatic decisions/publications and other items. If you need assistance in determining whether a subcontract, consultant, or vendor relationship is present, talk to your Proposal Specialist and use the [decision matrix](#). The Independent Contractors form is available [here](#). The PI must complete a [decision checklist](#) for each subcontract involved in the proposal.

Materials and Supplies

These are consumable supplies related to the project being proposed. Generally, office supplies are unallowable as direct costs since those costs are treated as indirect costs. If you are using office types of supplies for allocable project costs, then they are project supplies. Common examples of allowable costs in this category include laboratory supplies, gases, animal purchases, etc. If a sponsor allows computer purchases, they are typically included here, but must be justified as necessary for the project, as standard office desktops or laptops are normally treated as indirect costs.

Communications

Generally, telephone service charges are unallowable as direct costs since those costs are treated as indirect costs. However, at OU, telephone costs are not included in the calculation of the F&A rate calculation, and telephone service costs are billed monthly for each individual unit. Therefore, in situations where a research project requires a dedicated line, those charges may be recovered as direct costs. This is not allowed if the phone is used for any other purpose; charges for pro-rated use are unallowable. Costs for long distance calls that are directly allocable to a particular project are allowable costs.

If the nature of a project(s) requires the use of a cellular telephone and the agency approves those charges, those charges may be allocated to sponsored research accounts in accordance with the [University's Communication Device and Services Policy](#). Justification of need must be evidenced in the proposal or otherwise in writing as documentation for the file.

Postage stamps may not be purchased with grant funds; however, metered postage fees may be allowed.

Gift Cards

Gift card guidance (policy, forms, etc.) can be found on the [Financial Services](#) website.

Travel

University travel procedures apply to all sponsored research and may be accessed at [Concur Travel](#). However, if specific agency guidelines for a sponsored research project are more restrictive than University guidelines, then agency rules shall apply. Individuals should be familiar with the specific cost allowability provisions of their sponsored research award. An amount larger than that allowed under the University's guidelines will not be reimbursed. Many funding agencies require prior written approval for unbudgeted travel, foreign travel or travel exceeding the budgeted amount. Federal sponsors expect the use of the governments per diem rates and many non-federal sponsors also encourage use of the government rates.

For additional information regarding export controls and international travel please consult the [Office of Export Controls](#).

Cost Sharing/Matching Funds

At the proposal stage, cost sharing commitments are documented as a part of the routing process. The anticipated source of funds should be identified in the routing package. Some sponsors require [cost sharing](#) or matching as evidence of the University's commitment to the project. Often academic time, associated fringe benefits, and the associated unrecovered indirect costs are used to meet this requirement. Graduate student support, equipment, travel, supplies, tuition remission, etc. may also be used to meet cost sharing requirements as applicable. Cost sharing from the OVPRP typically is not provided unless formally required by an agency in writing. It is in the University's best interest to only provide cost sharing commitments when required by the sponsoring agency.

Monies for a required cash match may be available from the OVPRP funds (usually at least three weeks should be planned for the request to be reviewed). The OVPRP's procedure for cost sharing and OVPRP Cost Sharing Request Form may be accessed at <https://ors.ou.edu/about/CMSCostShare.asp>.

The constitution of the State of Oklahoma in Article 10, Section 15, prohibits the extension of state resources by loan or credit to any individual, company, corporation, or association, municipality, or political subdivision. Therefore, no University match may be included on proposals to for-profit companies and organizations or to provide match on a university submission to cover a for-profit company or organization.

Facilities and Administrative (F&A)/Indirect Costs (IDC)

Facilities and Administrative (F&A) costs, also known as indirect costs, related to externally funded sponsored research projects are recovered in accordance with the University's federally approved F&A Rate Agreement as negotiated with the Department of Health and Human Services (DHHS). It is the standard practice of the OVPRP of the University of Oklahoma-Norman Campus to recover the full cost reimbursement of indirect costs at the federally-approved applicable rate on all externally funded projects, including research, public service, training and instruction grants and contracts.

The University of Oklahoma will honor an F&A rate lower than our federally negotiated rate if the sponsoring agency publishes the cap within their guidelines. In these instances,

F&A will be calculated based upon Total Direct Costs (TDC) with no exclusions unless otherwise stated. The default indirect cost rate used on proposals is the one associated with the Activity Code of Research (often called the 'full' rate). The University also allows an IDC of 26% for proposals with state agencies and city offices which must be approved prior to use. If a PI believes a different Activity Code might apply such as Other Sponsor Activity (OSA) or a lower IDC rate such as off-campus then they should submit a request through their Proposal Specialist. To view the current IDC rates, please visit the [OU Research Services Rates and Reports](#) page.

Sponsored Research Incentive (SRI) Program

The Sponsored Research Incentives (SRI) program was established as an incentive for departments and research units to encourage their faculty and researchers to seek external support for their research/creative activities.

The Sponsored Research Incentive process can be accessed on the [OU Research Services website](#).

Fixed Price Subaward (University of Oklahoma)

The Uniform Guidance (2 CFR 200.333) mandates that prior written approval from Federal sponsors is required if the OU wishes to issue a fixed price subaward rather than a cost-reimbursement subaward. By federal regulation, the total cost of each fixed price subaward may not exceed the simplified acquisition threshold, which is currently \$350,000. OU will not issue a fixed amount subaward that exceeds the simplified acquisition threshold without written approval from a Federal sponsor.

- A fixed price subaward must meet the requirements for fixed amount awards in 2 CFR 200.201:
- Project scope is specific and if adequate cost, historical, or unit pricing data is available to establish a fixed amount award based on reasonable estimate of actual cost
 - *Fixed amount negotiated using the cost principles (or other pricing information) as a guide
- Payments are based on meeting specific requirements of the Federal awards
 - *Options include partial payments for milestone or unit price for a defined unit

Under a fixed price agreement, various milestones and/or deliverables are established along with a corresponding price for each. Once a milestone is met or a deliverable received and accepted by the OU PI, the Subrecipient may invoice for the corresponding amount due. Invoices need not include details of expenses. The first milestone/deliverable may be the full execution of the subcontract, which can be beneficial when dealing with entities that do not have the resources to incur expenses for later reimbursement.

A fixed-price sub-award may be appropriate when there is a very clear work scope, cost estimate, and defined deliverables. However, the inherently unpredictable nature of research limits the ability to define specific research outcomes in advance.

Steps When Reviewing a Fixed Price Agreement

- The University of Oklahoma will follow the following steps when reviewing a fixed amount subaward involving a federal sponsor:
- OU will review the fixed price agreement to ensure various milestones and/or deliverables are established with a corresponding price for each.
- In the event that the fixed price agreement possible exceeds the simplified acquisition threshold prior to awarding it, OU will not award the fixed price agreement until it receives written approval from the Federal Sponsor (if required by the said Federal Sponsor) permitting OU to do so.
- In the event that written approval is not provided, OU will work with the Federal Sponsor to ensure the necessary procurement steps are taken in order to receive the required written approval.

COMPLIANCE REVIEW

If the project will involve compliance issues such as the use of rDNA, biohazards, human research participants, animals, or radioisotopes, or be subject to export control regulations, embargoes or sanctions, the PI will need to obtain approval letters from appropriate departments prior to an award being set up. For projects involving the use of rDNA /biohazards and radioisotopes, the IBC approval is not required for internal routing and/or submission of the proposal. However, all required IBC and/or other sponsored related approvals must be provided to ORS prior to the release.

Approvals for the use of animals, and human research participants, can be obtained “just in time” unless the sponsor requires it at submission, so it is not necessary to have approval at the time of the proposal submission. Although the submission may be marked as ‘Pending’ for these items the sponsor may still require components of information related to this part of the proposal. While submission may be able to be done in a ‘pending’ status, no project/award can commence until all applicable compliance approvals are documented by the ORS. Proposals that have the potential for intellectual property and/or export controls issues are identified at the proposal stage and a full review of the project is conducted at the award negotiation stage as necessary.

COMPLIANCE MONITORING

The PI is responsible for ensuring research involving human research participants, animals, rDNA, Select Agents, narcotics or biological toxins, human blood or body fluids, radioactive materials, hazardous materials, or other regulated activities comply with federal and state laws and University guidelines.

Oversight for research compliance is the responsibility of the Office of Compliance. Compliance policies are found on the Compliance website which may be accessed on the [OU Compliance website](#). ORS documents approvals for research compliance requirements. No PeopleSoft Department number will be established, or work authorized until research compliance approvals are verified. Non-compliance will result in suspension of a research account until compliance is assured.

Export Controls

The Office of Export Controls (OEC) guidance for OU-Norman can be accessed on the [OU Export Controls website](#).

While the ORS and the OEC have the responsibility for monitoring sponsored research to facilitate export controls compliance, ultimately the PI is responsible for ensuring compliance.

Intellectual Property

The Office of Technology Commercialization (OTC) is responsible for activities related to material transfers, non-disclosure agreements related to proprietary information, patents and licensing. The Office of the Senior Vice President for Academic Affairs and Provost is responsible for copyright activity. The University's Intellectual Property Policy can be accessed here: [OU Intellectual Property Policy](#). The website for the OTC is available here: [Office of Technology Commercialization](#). The ORS works closely with the OTC on all research issues related to intellectual property.

Space Needs Associated with Proposals

Commitments for adequate space or needed renovations to support proposed sponsored activities is noted by the PI on the information sheet and may be included in the proposal routing package as needed. The OVPRP will coordinate with PI and their departments on identified needs. One of the functions of space management is to make every reasonable effort to ensure that these commitments can be met if a proposal results in an award. Assignment of space is the shared responsibility of the Vice Presidents, Deans, Directors and Chairs.

Proposal Submission

Most sponsors will provide direction on how the proposal is to be submitted. If the sponsor indicates electronic submission is to be done using grants.gov then ORS will do the submission using the University's System to System (S2S) software under Cayuse.

If the sponsor allows the PI to do a variety of submissions such as an electronic system, email, or personal delivery, then the PI may choose the method. If the PI opts to mail the proposal it is recommended a trackable method be used; fees for mailing are the responsibility of the PI or PI's department.

The PI and the proposal specialist work together to ensure the proposal is submitted by the stated deadline. If the PI is allowed to submit the proposal by the sponsor, then the Proposal Specialist will contact him/her when the necessary reviews and signatures have been obtained. At this point, the proposal is cleared for submission. If the PI is doing the submission, they are to provide a copy of the submitted proposal to ORS immediately following the submission.

ORS proposal submission policy requires all final proposal documents to be submitted to ORS at least three business days prior to the sponsor submission deadline. If all final proposal documents are submitted to ORS before that deadline, we will review these documents, ensuring proper formatting and compliance before submission. However, if the proposal documents are received later than three business days prior to the submission deadline, we will submit/upload them without a review or compliance check. Should there be any rejection due to non-conformity/non-compliance or other related matters, or if inconsistencies with the University's policies arise if there is a notification of award, the responsibility to resolve these issues will rest with the PI and their respective Department or College. This includes resolving any financial discrepancies with the budget.

Additionally, the Infosheet is a required part of the ORS submission process. If an Infosheet is not submitted and/or a proposal is submitted directly to the sponsor without ORS knowledge or routing, ORS will have no institutional record of the proposal and will not have conducted any review or compliance checks. In these circumstances, ORS reserves the right to delay, decline, or conditionally accept an award resulting from a proposal submitted outside the ORS process.

Electronic submissions must be made during normal working hours even if the guidelines allow a later time.

Proposal Revisions

Whenever any change is to be made in the budget or statement of work of a pending proposal that has already been submitted to a sponsoring agency, ORS must be notified. The appropriate Proposal Specialist or Award Administration Coordinator will notify the PI if the revised proposal and/or budget must be processed and rerouted for University approval. If a reroute is necessary, the revised budget, justification and any accompanying changes in the scope of work must be processed for the same approvals as the original proposal to ensure that all parties who signed the original are aware of the changes. Generally, a budget change of more than ten percent (10%) from the original budgeted amount or changes in cost share commitments require a revised statement of work and re-routing.

AWARD ADMINISTRATION

Notice of Grant Award or Receipt of Contract

The ORS Award Administration (AA) section is the official receiver of all Notices of Grant Award (NGA) and contracts from the sponsoring agency and disseminates this information to the PI. Occasionally, the PI may receive the NGA. The PI should forward the NGA to the ORS Award Administrator/Coordinator so that the award can be negotiated as needed.

Subawards

Upon full execution of the prime award and activation of the sponsored account, the Award Administrator/Coordinator submits a Request for Subaward form to the ORS Subaward

Coordinator who prepares and negotiates the subaward agreement. The need for and sponsor approval of modifications to subawards are verified by the Award Administrator/Coordinator who submits a Request for Subaward Modification form to the Subaward Coordinator, who then prepares and negotiates the subcontract modification. ORS utilizes the following template subcontract agreements:

- FDP Subaward Agreement
- Subcontract Agreement (template when FDP Agreement is not acceptable)
- Memorandum of Understanding

A copy of the fully executed subaward is sent to the Director of Grants & Contracts Accounting (GCA).

Subrecipient Monitoring

It is the standard practice of the ORS at the University of Oklahoma-Norman Campus to follow the 2 CFR 200 requirements for subrecipient requirements. To ensure compliance, the following procedures are followed.

Determination of whether a proposed subrecipient should be categorized as a subrecipient or vendor relationship is made at the proposal stage by the PI in consultation with ORS; however, this designation may change depending on the award documents. Generally, a subrecipient must have significant responsibilities in the performance of the statement of work to the degree that subrecipient personnel would qualify as Co-PIs on research resulting from the entire project and would have authority to publish results independently for their portion of the work. Proposed subrecipients must submit a letter of commitment signed by an authorized institutional official agreeing to perform the agreed upon statement of work in accordance with an agreed upon subrecipient budget. The subrecipient must document a negotiated F&A/IDC rate at the time of proposal submission or, subrecipient may elect to charge the allowable de minimis rate as permitted under the Uniform (see [2 CFR §200.414](#)). Subrecipient documents are routed with the routing packet for approvals.

Commonly Used Agreements

Grant: A grant is a financial assistance mechanism used when the federal government supports a public purpose (e.g., research, education, or outreach) without substantial involvement. It typically:

- Provides funding with broad objectives
- Allows the recipient significant autonomy
- Is governed by administrative requirements, not procurement rules

Example: A researcher receives a grant to study climate change impacts, with minimal agency involvement beyond reporting.

Contract is a legal agreement used when the principal purpose is to acquire goods or services for the direct benefit or use of the government. It is typically:

- Highly structured and binding

- Includes specific deliverables, timelines, and performance standards
- Subject to strict federal acquisition regulations (FAR)
- Used when the government has substantial control over the work

Example: A federal agency hires a university to develop a prototype device with detailed specifications.

Cooperative Agreement

A cooperative agreement is similar to a grant but involves substantial involvement by the federal agency in the project. It is used when:

- The government and recipient share responsibility for the project
- The agency may collaborate on design, implementation, or evaluation
- Flexibility is needed, but with active oversight

Example: A university and a federal agency co-develop a public health intervention, with the agency participating in planning and data analysis.

Service Agreements

The University guidelines and procedures on the use of Service Agreements can be accessed her: [Service Agreement Guidelines](#). Service agreements are required for person(s) or entities providing services at a predetermined fixed rate; they do not collaborate regarding the programmatic content of the project. Once the proposal has been fully routed for approvals and the Certification for Service Agreement Form has been fully executed, Award Administration will prepare the Service Agreement for signature. When all parties have signed the Service Agreement, the Award Administrator/Coordinator will complete the award actions and turn the award over to GCA for award account set up.

Consortia Agreements

Consortia guidance can be found here: [Consortia Guidelines](#). Award Administration will prepare and negotiate the consortia agreements.

Facilities Access

In keeping with State of Oklahoma constitutional provisions and subject to applicable law and all pertinent University rules and regulations, it is the Research and Development (R&D) Facilities Access procedure of the University that a private business may access University R&D facilities if the University, acting through its appropriate officers and employees (e.g., Department Head, Dean having oversight responsibility for programs taking place in the facility, Executive Director of Research Services, etc.), determines, in its sole and absolute discretion, that: (i) pursuant to written agreement, the private business is involved in a collaborative project with the University involving University faculty or student collaborators or University technology; (ii) the private business provides sufficient legal and financial consideration for such use (material and substantial economic benefit

to the State and/or University, can be a factor); (iii) the results of the collaboration have potential economic value for the parties; (iv) the facilities and their use by the private business participating in the collaborative project are suitable to the origination, nature, and purposes of the facility, in the University's sole and absolute discretion; and, (v) such access would materially benefit the University and further one or more of the University's missions. The OVPRP in consultation with University Operations is responsible for the negotiation and authorization of such use through a formal agreement. Such agreements are annually renewable.

Changes to the Statement of Work

Requests to the sponsor for any changes to the statement of work must be submitted through ORS AA. PIs should contact their Award Administrator/Coordinator to request any modification(s) to an award.

No Cost Extension Requests

No Cost Extension (NCE) requests should be routed through the appropriate Award Administrator/Coordinator. If required, the Award Administrator/Coordinator will submit the NCE request, signed by an authorized institutional official, to the Sponsor. NCEs are requested to complete the programmatic obligations of the grant and cannot be granted if the justification given is simply to spend unobligated funds. If a NCE request is anticipated, the PI should contact the Award Administrator/Coordinator for guidance on the sponsor's requirements and any deadlines.

Change of Principal Investigator

Requests should be routed through the appropriate Award Administrator/Coordinator. The AA will work with the PI for any changes. Depending on the circumstances for the change the PI will need to provide a justification of why the change is necessary, a copy of the proposed new PI's Curriculum Vitae and any other documents required by the sponsor. Award Administration will submit a request to the sponsor requesting the change.

Change of Grantee Institution

Change in Grantee Institution requests on behalf of PIs joining the University are submitted by AA to the sponsor after the internal routing process at OU has been completed. If the award is already under administration at the PI's prior organization, the AA will coordinate between the PI and prior organization.

When a PI is transferring to another academic institution, ORS will contact the sponsor regarding the transfer of the grant or contract and any unexpended funds that may remain. Financial closeout of awards takes a minimum of 30 days after the PI designates an internal project end date so that GCA can process all pending expenditures on a project. Award Administration will coordinate and also aid the PI in determining the Sponsor guidelines

that pertain to the transfer of equipment and in accordance with Section 4.13 Criteria for Transferring Equipment and/or Funds of the Regents Policies which can be accessed [here](#).

Re-budget Request after the Project is Awarded

Re-budget requests are primarily handled by GCA; however, the Grant Analyst will forward necessary forms to Award Administration to review when sponsor approval is required. So, the University can remain compliant with University and sponsor guidelines and the Award Administrator/Coordinator will work with the PI to submit the formal request to the sponsor.

Reports

Compliance with report submission timelines is important not only to the PI in maintaining the integrity of their award relationship with their sponsors, but overdue and missing reports also harm the University's image and relationships with the sponsors. It can also result in stopped payments to other PI's awards and delinquency reports to various offices within the University, the sponsoring organization, Congress, and the public.

Technical Reports

Technical Reports are the responsibility of the PI and must be prepared and submitted by the PI according to the terms of the award. If the Sponsor contacts ORS regarding a past due report, the Award Administrator/Coordinator will send a reminder email to the PI. PIs should provide a copy of all final reports to ORS for the official records on the award.

Patent Reports

Patent Reports are due to the sponsor at the close-out of the award. At close-out, Award Administration will contact the PI and OTC to ascertain if any inventions have been disclosed. Negative reports are required by sponsors for compliance, the AA in Award Administration will submit a *negative* report to the sponsor. When there has been a disclosure of invention, OTC has responsibility for submission of the required patent report. OTC also has responsibility for *iEdison*.

Finance Reports

Finance Reports are submitted with coordination and support from GCA.

Closeout Reports

Most agencies require submission of closeout reports, including the final progress and invention disclosure reports through their electronic systems like NIH eRA Commons and NSF Research.gov. The PI and ORS must submit these reports collaboratively. PIs needing any specific guidance should contact their Award Administrator/Coordinator.

Grants & Contracts Accounting (GCA)

Grants & Contracts Accounting (GCA) is a separate department from ORS which provides post-award administration and financial support to principal investigators, project directors and sponsors. GCA is responsible for all activities concerning external and internal audits of sponsored program expenditures and the resolution of audit exceptions. It is the office assigned the responsibility of assuring compliance of cost sharing, effort reporting, cost allowance, and both direct and indirect facilities and administrative cost allocations. PIs should also work with GCA when submitting sponsor financial and/or equipment reports. The GCA website can be found at [Grants & Contracts Accounting](#).

Advance Spending of Award

If it is necessary for expenditures to occur prior to receipt of a fully executed agreement, the PI should complete an Advanced Account Authorization [Form](#), which must be authorized by GCA.

Establishing the PeopleSoft Department Number for Sponsored Research

A signed agreement which is authorized by ORS is required before GCA can establish a PeopleSoft number related to the sponsored activities

ADDITIONAL GUIDANCE

Because of the complexity of sponsored research activities, issues often arise that are not specifically covered by an existing process or procedure. The ORS follows the guidance found in Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and, for contracts, the applicable Federal Acquisition Regulations.