

**UNIVERSITY OF COLORADO COLORADO SPRINGS
OFFICES OF SPONSORED PROGRAMS AND RESEARCH INTEGRITY**

CONTRACT/GRANT APPROVAL

Date:

PI Name:

From: *Executive Director, OSPRI*

Reference: Cayuse #:
Sponsor:
Project Title:

Attached is a copy of the award for the above-referenced project. Review the award carefully to confirm appropriate project and budget periods, funding amounts, acceptable technical reporting requirements, correct statement of work, etc. Please complete the following based on your review, sign as indicated, complete the section after the certifications entitled "Other Items to Note" and **return to OSPRI as soon as possible.**

The award will be processed for University review, approval and signature as soon as possible after you complete and return contract/grant approval. If you have any questions, please contact OSPRI at osp@uccs.edu or 719-255-3619.

1. Contract/Grant document:

- a. ☐ Reviewed and Confirmed
- b. ☐ Exception should be taken - description of exceptions attached

2. Budget breakdown information:

- a. ☐ Proposal budget should be used
- b. ☐ Other – breakdown attached

3. Has there been any change in the planned contributions, as originally proposed and approved? ☐ No ☐ Yes (attach details) ☐ No contributions

4. This project will require subcontracts/subawards: ☐ No ☐ Yes

If yes, complete the Request for Subrecipient/Subcontract Agreement form located at <https://osp.uccs.edu/resources/forms>. This form is REQUIRED to issue the subcontract/subaward.

5. This project requires acquisition of supplies and/or services to be performed outside the United States that exceeds \$500,000: ☐ No ☐ Yes If yes, the PI is required to contact OSPRI.

6. This project includes bringing minors on campus?

- ☐ No ☐ Yes If yes, the PI is required to *contact the Vice Chancellor for Student Affairs.*

7. **This project has research security or technology needs:**
☐ No ☐ Yes (If yes, the PI is required to *contact the Office of Information Technology (OIT) at oit.uccs.edu/security*).
8. **This project has MOUs or letters of support from external (non-campus) entities that will be part of the project deliverables.** ☐ No ☐ Yes If yes, attach details
9. **This project involves on-campus units required for the project's success (e.g., financial aid, institutional research, advising, etc).** ☐ No ☐ Yes If yes, attach details
10. **This project involves undergraduate or graduate student training, curriculum, certificates, internships, and/or scholarships.** ☐ No ☐ Yes If yes, signature of Associate Dean of the College and the Dean of the Graduate School is required.
11. **To determine the applicability of export controls:**
a. Have any of your responses to the export control questions on the routing form for this project changed? ☐ No ☐ Yes If yes, attach details.
12. **Indicate the speedtype that will pay for any unallowable costs or expenditures:**
(NOTE: This speedtype must not be for a sponsored project fund and is typically the departmental speedtype)

Authorized Signature for above speedtype

Date

13. **Exceptions or additional information for this contract/grant:**

In addition to the above, acknowledge the items included after the certification section entitled “Other Things to Note” on page 4 by initialing in each of the boxes provided.

CERTIFICATIONS

I have read and agree to comply with all terms and conditions of the award, including timely submittal of reports, ensuring all project personnel complete required training, and I have reviewed the UCCS policy on [Roles & Responsibilities for Sponsored Programs Administration](#).

I understand that if I am delinquent on technical reporting, proposal submissions may be delayed.

I understand that managing sponsored projects is a shared responsibility among me, as principal investigator/project director (PI/PD), my departmental administrator, my department chair, the Office of Sponsored Programs and Research Integrity (OSPRI), Sponsored Projects Accounting (SPA) and other administrative units. Although it is reasonable and appropriate for me to rely on administrative staff (such as the departmental administrator) for assistance, I understand that I am ultimately responsible for programmatic and financial conduct.

I understand my annual conflict of interest disclosure must be current, and that if I fail to complete or update my disclosure, my project funds may be frozen.

I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812).

Signature of Principal Investigator **Date**

I confirm the proposed project is consistent with the objectives of my unit; I am aware of all requirements of this project, including any approved cost-sharing or matching commitments; and I am committed to providing them and will ensure that a qualified departmental administrator is assigned.

Department Chair **Date**

Dean/Division Head **Date**

Center Director, if applicable **Date**

College Associate Dean **Date**
(If the project involves undergraduate or graduate student training, curriculum, certificates, internships, and/or scholarships.)

Graduate School Dean **Date**
(If the project involves graduate student training, curriculum, certificates, internships, and/or scholarships.)

OTHER THINGS TO NOTE:

*****Initial each item*****

Institutional Compliance/General Compliance

Exports Control Laws & Regulations

- The University of Colorado Colorado Springs (University) is committed to complying with all applicable United States export control laws and regulations. It is each employee's responsibility to understand or seek guidance on any export control requirements related to his or her work and to ensure that no exports are made contrary to those requirements. For additional information, see: <https://osp.uccs.edu/export-controls>
- Contact Mike Sanderson at msander3@uccs.edu or 719-255-3044

Telecommunications and Surveillance Equipment

- Effective August 2020, federal government agencies will no longer be able to contract with universities, companies, and other organizations that make use of certain telecommunications and surveillance equipment manufactured by specific companies that Congress has determined present a risk to secure communications. **Purchase and/or use of equipment identified below is prohibited.**
 1. Telecommunications equipment produced by-
 - a. Huawei Technologies Company,
 - b. ZTE Corporation, or
 - c. any subsidiary or affiliate ;
 2. Video and telecommunications equipment produced by-
 - a. Hytera Communications Corporation,
 - b. Hangzhou Hikvision Digital Technology Company,
 - c. Dahua Technology Company,
 - d. or any subsidiary or affiliate,
 3. Telecommunications or video surveillance services provided by such entities or using such equipment.

Data Security/Privacy Protection

- Some U.S. government agencies (e.g., DoD, GSA, NASA, DHS) and private sponsors are implementing requirements for safeguarding information provided by, collected, or maintained on their behalf.
 1. If researchers receive funding that is subject to information security requirements, that information will need to be safeguarded through a set of defined standards. These standards may include access control, physical security standards, and IT system security.
 2. Researchers who have awards with these requirements should research out to OIT at oit.uccs.edu/security for guidance.

Enhanced Employee Whistleblower Protections

If your award is a grant from a federal agency or a federal flow-through, you are responsible for notifying your employees about their rights under the Enhanced Employee Whistleblower Protections. See: <https://osp.uccs.edu/research-compliance/enhanced-whistleblower-protection>

Foreign Corrupt Practices Act (FCPA)

UCCS is committed to complying with all applicable law including the FCPA to prevent corrupt payments to foreign government officials and others considered to be “instrumentalities of a foreign government”. Since UCCS is a U.S. legal institution, the FCPA applies to all personnel and operations worldwide, regardless of location or nationality. For additional information, contact OSPRI.

Use of Human Subjects, Animals, Recombinant or Synthetic Nucleic Acid Molecules and Other Hazardous Materials

- Approval to involve human subjects, animals, recombinant DNA and other hazardous materials must be received **PRIOR** to their involvement/use. There are **NO exceptions**.

Drug-Free Workplace Act

The PI/PD is responsible for notifying all employees of the following:

- **Policy:** The University of Colorado prohibits the unlawful manufacture, distribution, dispensation, possession or use of any controlled substance in the workplace and, as a condition of employment, employees (including student employees) must abide by the terms. For the policy click here: [policy](#).
- **Reporting Requirements:** Employees (including student employees) engaged in the performance of a federal grant or contract must inform the Director of Human Resources or his/her designee of any criminal drug conviction in the workplace within five (5) days of the conviction. *The University, in turn, is obliged by law to report certain convictions to the federal government; and*
- **Resources:** Employees may contact the Employee Services/Benefits Office (1-855-216-7740) or Human Resources (719-255-3372) for information regarding available resources, programs and services. Students may contact the University Counseling Center (719-255-3265) or the Student Health Center (719-255-4444).

Trafficking in Persons, Prostitution, and Related Activities

The Federal government has adopted a strong policy against trafficking in persons. An employee of the University or subaward institution directly engaged in the performance of work under the federal award:

- Shall not engage in forms of trafficking in persons during the period of performance of this award,
- Shall not procure commercial sex acts during the period of performance of this award, and
- Shall not use forced labor in the performance of this award. The awarding agency requires the University to notify all persons who perform work on this award of this policy. See your specific award terms and conditions

for applicable governing regulation and for further information on compliance and reporting. Additional information may be found at:
<https://osp.uccs.edu/research-compliance/combating-trafficking-in-persons>

Conflict of Interest

All individuals who are responsible for the design, conduct or reporting of basic, animal, or clinical research (including, but not limited to, obtaining informed consent, making decisions about eligibility to participate in research data, collecting data, entering data, analyzing data, assisting in writing and submission of research manuscripts for publication or presentation) must:

- have a current Conflict of Interest disclosure on file
- complete any required Conflict of Interest training
- ensure compliance with campus and sponsor Conflict of Interest requirements
- if needed, have a Conflict of Interest Management Plan on record before work begins

For sponsor specific requirements and more information, see:
[Conflict of Interest | Ethics and Compliance Program \(uccs.edu\)](#)

NSF/NIH Funded Research

NSF Grants (all) or NIH Training Grants

- All undergraduate students, graduate students and post-docs must complete the UCCS program of education in the Responsible Conduct of Research (RCR) requirements:
 - Completion of the online RCR program hosted by CITI, <https://about.citiprogram.org> **AND**
 - Receive discipline-specific mentoring by the PI/PD and key personnel during the course of the grant.
- The PI/PD is required to provide documentation to OSPRI, upon request, that this requirement has been met. There are **NO exceptions**, regardless of the length or dollar amount of the award.
- NSF and NIH and UCCS strongly encourage additional real-time RCR training to supplement these two required RCR trainings which are available here: <https://rcr.uccs.edu/>

NIH Public Access Policy

Scientists are required to submit final peer-reviewed journal manuscripts that arise from NIH funds to the digital archive PubMed Central at <https://www.ncbi.nlm.nih.gov/pmc/> upon acceptance for publication. To help advance science and improve human health, the Policy requires that these papers are accessible to the public on PubMed Central no later than 12 months after publication.

Harassment

Effective October 21, 2018, if there is a finding or determination of harassment (sexual or otherwise) against any PI or co-PI on an NSF grant, the university must inform NSF. NSF will work with UCCS to determine the appropriate course of action, which may include appointing a substitute PI or reducing the award amount. More information at https://www.nsf.gov/news/news_summ.jsp?cntn_id=296610&org=NSF&from=news

PI Change In Status

Some agencies, such as NIH, require notification when there is a change in the Program Director's/Principal Investigator's status, which would include a change in employment or leave status, such as being placed on administrative leave. NIH information may be found here: <https://grants.nih.gov/grants/policy/harassment.htm>

Financial

Electronic Personnel Effort Reporting (ePER)

Employees receiving salary, except for hourly students, are required to complete Electronic Personnel Effort Reporting (ePER) training and to certify their effort through ePER each semester.

Student Financial Assistance (Grants/Scholarships/Stipend/Student Hourly Employment)

If your project involves any form of student financial assistance, contact Jevita Rogers at jrogers3@uccs.edu to ensure aid may be awarded in a timely fashion.

Salaries

- Salary to an employee (excluding hourly employees) **over and above** their **base pay**, is **unallowable**.
- **Summer salary** for faculty is an allowable cost, up to three full months, from all sources, or in accordance with sponsor terms & conditions (some sponsors have restrictions).
- **Payment must be for the time period work is performed**. For example, a faculty member may not work on a project during the AY and receive salary in the summer for that AY work.
- **Additional pay** is rarely allowable. Contact OSPRI.
- Salary may be **no higher than actual rate of pay** or pay for similar activities paid with other funds. For example, if an instructor paid with University funds receives \$3,000 for teaching a course, an instructor on a sponsored program may not be paid funds in excess of \$3,000.
- As noted above, all individuals (except student hourly) paid from a sponsored project must complete an **Electronic Personnel Effort Report (ePER)** each semester.
- **Clerical and Administrative salaries** are **unallowable**, unless considered beyond routine and specifically identified in the proposal and approved by the sponsoring agency.

Vacation and sick leave reporting

All **employees** appointed in a Research Associate job (such as Professional Research Associate) or Research Professor job (such as Senior Research Professor) or other 12-month faculty position and other staff **accrue vacation and sick leave**. **ALL vacation and sick leave must be reported**. The Principal Investigator/Project Director and supervisor (if different) are responsible for ensuring leave is reported in accordance with University policies and procedures. All days, with the exception of University holidays, must be worked or claimed as vacation or sick leave (or other approved leave type). This includes periods when the regular faculty and students are not in session.

Supplies & Other Expenses

Unless beyond routine and/or specifically identified in the proposal and approved by the sponsoring agency, the following expenses are **unallowable**:

- **Postage**
- **General Office Supplies**
- **Copying**
- **Food**

Financial Reporting and Billing

- All financial reports and billing are **processed through Sponsored Projects Accounting (SPA)**.
- Review your monthly reports for proper expenditures, payroll and budget balances. **Correct errors within 30 days.** See [cost-transfer procedures](#).

Equipment

- Equipment purchases over \$5,000 must have prior written approval from your sponsoring agency.
- You are responsible for ensuring that any equipment purchased with federal funds is maintained in good condition. At the end of the project, the equipment must be used and/or disposed of in accordance with specific sponsor rules. Contact SPA for more information if this applies to you.

Subcontracts/Subawards

If you answered yes to item 4 on the Contract/Grant Approval Form above, you are responsible for specific monitoring requirements and certifications. Contact OSPRI.

Grant Specific Requirements/Additional Terms

Award Terms and Conditions

- Become familiar with specific **terms and conditions** for this award.
- In addition to sponsor terms and conditions, **campus & system policies and procedures** must be followed.

Publications

Check your sponsor rules regarding acknowledging its support in press releases, journal publications, etc.

Other Reports

Technical: check your award and note when your technical reports are due. Although OSPRI generally does not need a copy, notify OSPRI that the report has been submitted. If any financial information is included, coordinate with SPA.

Prior Approvals

- **Some changes require PRIOR sponsor approval.** Check with OSPRI and your specific terms and conditions. Examples include:
 - Disengagement from the project by the approved Project Director or Principal Investigator
 - Decrease in effort of key personnel

- Re-budgeting
- Change in scope of objectives
- Change of Principal Investigator/Project Director
- No-cost time extensions

Other Additional Terms

Records

- Ensure proper maintenance of expenditure documentation and human resource records as prescribed by campus & system policies and procedures. Sponsored Projects Accounting will notify you of the appropriate destroy date for expenditure and HR records maintained in the department.
- Describe how all items relate to the goals and objectives of your project when submitting purchase and/or reimbursement requests, travel expense reports, etc.
- ALL original receipts are required, regardless of dollar amount. For example, even though the CU expense system does not require receipts for purchases \$25 or less, sponsors DO require these.
- Programmatic/technical reports, data, consent forms, lab notebooks, etc. should be kept indefinitely, or as otherwise directed.

Period of Performance

Costs may not be incurred **before** the start date or **after** the end date.

Preferred Vendors

Purchases should be made using University price agreements, i.e., using preferred vendors. For more details, go to <https://www.cu.edu/psc/procedures>. Individuals CANNOT be reimbursed for personal purchases of commodities covered by University price agreements.

Intellectual Property

- Invention Disclosure: All UCCS employees are required to report inventions to the CU Technology Transfer Office (TTO). The invention submission forms can be found on the TTO website: <https://www.cu.edu/techtransfer/>
- Staff at the El Pomar Institute for Innovation and Commercialization (EPIIC) are available to help you through this process. They may be reached at 719-255-3686. If inventions need to be reported to your sponsor, TTO will prepare and submit the report(s).
- After a disclosure is made: TTO will work with you to decide if the invention is patentable and marketable. If so, once a licensee is identified, TTO negotiates a license agreement. Proceeds from the license agreement are distributed as follows: 25% to the inventor(s) personally, 25% to the inventor's lab account, and 50% to the campus.
Final Inventions: OSPRI will coordinate with the CU Technology Transfer Office and submit.
- **Property**: SPA will prepare and submit.
- **Others**: Contact OSPRI

Phones

Monthly phone charges, including “softphones”, installation costs & cell phone charges are *typically* **unallowable** costs, unless dedicated to this project and approved by the sponsor. Long-distance charges specifically identifiable to your program are *typically* allowable.

Travel

- Costs are considered **incurred** at the **time travel takes place**, not when the reservation is made or the conference registration fee paid.
- Foreign travel: **All air travel being paid for with federal funds must comply with the Fly America Act, which requires that a U.S. air carrier be used.** This applies whether funding is received directly from the federal agency or through a subcontract. There are few exceptions; **cost savings is not considered an appropriate exception.**
- Mileage: Reimbursable miles are limited to the number driven in excess of the number of miles involved in the individual's daily commute (round trip) for work.
- Hotel/Per diem: Per diem rates may be found at:
<http://www.gsa.gov/portal/category/21287>.