

## University Policy 4101: Sponsored Programs

**Category:** Academic Affairs

**Subcategory:** Research

**Covered Individuals:** USU Employees and Students

**Responsible Executive:** Vice President for Research

**Policy Custodian:** Office of Research; Executive Director of Sponsored Programs

**Last Revised:** 2026/01/16

**Previous USU Policy Number:** 4102<sup>1</sup>

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### 4101.1 PURPOSE AND SCOPE

The purpose of this policy is to define the roles and responsibilities of [Sponsored Programs](#) at Utah State University (USU). These include overseeing and setting internal requirements for external proposal submission, award negotiation and approval, and the handling of related agreements. This policy outlines requirements relevant to all University faculty, staff, students, and any other individuals performing or administering Sponsored Programs on behalf of USU.

### 4101.2 POLICY

USU routinely engages with external sponsors to fund research and creative activities (Sponsored Programs) to further the research mission of the University and to provide opportunities for student involvement, learning, and training. Individuals engaged in the performance or administration of Sponsored Programs are responsible for adhering to all applicable federal and state laws, University policies and procedures, and Sponsor or agreement-specific terms and conditions.

#### 2.1 Proposal Submission

USU requires all proposals to complete internal routing, review, and approval processes prior to submission to an external [Sponsor](#). This includes review and approval by the [Principal Investigator's](#) home department, college, and applicable research center(s), if any. The internal review and approval process is required for all proposals where a formal request for proposals or notice of funding opportunity is available, as well as for informal discussions with a Sponsor about a prospective Sponsored Program.

Under Utah State University Policy 1010: Contract Signature Authority and Delegation, the Sponsored Programs Office (SPO) has delegated signature authority to submit proposals on behalf of USU. SPO has the authority to decline to submit a proposal if USU cannot accept the terms and conditions set by the sponsor for the sponsored award, or if problematic issues for USU are identified within the proposal during the review process.

Proposals that commit the University to establish research centers or institutes upon receipt of an award require special handling. [Researchers](#) planning to submit a proposal for this type of funding must consult with the Vice President for Research during proposal development.

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<sup>1</sup> Prior to January 2026, content about sponsored projects existed within Policy 4102: Research. Additionally, the policy number 4101 was assigned to Time and Effort Reporting. The policy number 4111 is now assigned to Time and Effort Reporting.

## 2.2 Award Review, Negotiation, and Acceptance

Under Utah State University Policy 1010: Contract Signature Authority and Delegation, SPO has delegated signature authority to review, negotiate, execute, and modify sponsored award agreements on behalf of USU. No other University employee has the authority to sign Sponsored Programs agreements for USU. SPO reviews and negotiates terms and conditions to ensure compliance with University policies, procedures, and federal and state laws. SPO has the authority to decline an award if USU is unable to accept the terms and conditions set by the sponsor.

## 2.3 Execution of Subawards

Under Utah State University Policy 1010: Contract Signature Authority and Delegation, SPO has delegated signature authority to negotiate and execute [Subawards](#) to [Subrecipients](#).

## 2.4 Sponsored Program Administration

The performance of the proposed scope of work and the administration of the award are primarily the responsibility of the Principal Investigator, with assistance from Business Services.

SPO monitor and oversees the contractual components of a Sponsored Program, including Subawards, throughout the lifetime of the award and the contractual closeout of the award upon completion of the scope of work.

Sponsored Programs Accounting is responsible for the setup of all Sponsored Programs at USU in USU's financial system of record. During the duration of the award, Sponsored Programs Accounting is responsible for monitoring expenses, preparing and submitting invoices, and preparing and submitting financial reports. Additionally, Sponsored Programs Accounting is responsible for Subrecipient monitoring and for the financial close out of the award upon completion of the scope of work.

## 2.5 Facilities & Administrative Costs

Proposals for Sponsored Programs must include payment of Facilities and Administrative Costs (F&A) in accordance with recognized rates governing indirect-cost reimbursement. Any waiver of F&A costs must be approved by the Principal Investigator's Department Head and Dean or Vice President, and by the Vice President for Research.

## 2.6 Restricted Research

USU is primarily a fundamental research institution, where research outcomes are openly shared. The Office of Research must approve any exception to Researchers' ability to openly share, including publish, the results of a Sponsored Program.

If a sponsor, such as a private entity or other university, seeks to share proprietary information with a USU Principal Investigator through an agreement such as a confidential disclosure agreement (CDA), SPO will review the nature of the request and, if appropriate, negotiate and execute an agreement with the sponsor on behalf of USU.

## 2.7 Principal Investigator Eligibility

Principal Investigators serve as the University employee responsible for the proper conduct and management of a project. To be eligible for this role, a Principal Investigator must hold, or be expected to hold by the time USU receives an award, an appointment as a faculty member, postdoctoral fellow, adjunct professor, research associate, research faculty, or visiting faculty (if their position spans the entire period of the award governing their project) and be designated as a Principal Investigator by their department head and dean.

University department heads, center directors, and deans or vice presidents (in cases where the prospective Principal Investigator is employed by USU under a non-academic unit) determine who may

serve as a Principal Investigator. All Principal Investigator designations may be subject to review by the Vice President for Research.

USU students may not serve as a Principal Investigator but may serve as a co-Principal Investigator on a project.

In addition to the Principal Investigator eligibility requirements outlined above, the University may apply additional requirements to PI eligibility in more specific circumstances, such as sponsored research or research involving human subjects.

## 4101.3 RESPONSIBILITIES

### 3.1 Principal Investigator

The Principal Investigator is primarily responsible for the overall programmatic and financial administration of the Sponsored Program. This includes the following duties:

- development of the proposal
- ensuring the proposal meets the sponsor's requirements
- ensuring that the proposal is routed, reviewed, and approved internally in accordance with USU's internal deadline for proposal submission
- directing the performance of the proposed scope of work
- monitoring and overseeing the work of Subrecipients, reviewing and approving Subaward invoices, and coordinating with SPO for the initiation and modification of Subaward agreements
- managing the budget of the Sponsored Program to prevent overspending or unallowable costs
- monitoring expenditures monthly to ensure errors are corrected in a timely manner consistent with the requirements of Utah State University Policy 4102: Cost Transfers on Sponsored Awards
- meeting reporting requirements in a timely manner consistent with sponsor requirements
- adhering to all applicable laws, policies, procedures, and terms and conditions associated with the Sponsored Program agreement and any related agreements (e.g., data use agreements or CDAs)
- Ensuring others working on the project (e.g., graduate students) adhere to all applicable laws, policies, procedures, and terms and conditions associated with the Sponsored Program agreement and any related agreements (e.g., data use agreements or CDAs coordinating with SPO and Sponsored Programs Accounting, as needed, to maintain compliance

### 3.2 Department or Unit Head

Department heads are responsible for the following duties:

- reviewing and approving proposals prior to submission to the Sponsor
- ensuring the proposed work aligns with the department's strategic priorities and academic mission
- approving the commitments of departmental resources (for example, lab space, personnel, equipment, cost share)
- confirming Principal Investigator eligibility
- monitoring effort and commitments
- financial oversight to prevent overspending or unallowable costs

### 3.3 Dean/Vice President

The dean or vice president (in cases where the sponsored program falls under a non-academic unit) is responsible for the following duties:

- reviewing and approving proposals prior to submission to the Sponsor
- ensuring the proposed work aligns with the college's/unit's strategic priorities and academic mission
- approving the commitments of college or unit resources (for example, lab space, personnel, equipment, cost share)

- confirming Principal Investigator eligibility

### 3.4 Business Services

Business Services is responsible for the following duties:

- reviewing and approving proposals prior to submission to the Sponsor
- reviewing the financial components of the proposal (for example, budget justification, F&A allocation, cost share)
- monitoring spending throughout the duration of the Sponsored Program to prevent overspending
- reviewing transactions for compliance with applicable regulations, policies and procedures, and terms and conditions of the award to avoid unallowable costs
- providing financial information to the Principal Investigator to assist them with their fiscal administration responsibilities

## 4101.4 REFERENCES

- [Uniform Guidance](#) 2 CFR 200

## 4101.5 RELATED USU POLICIES

- [Policy 1010: Contract Signature Authority and Delegation](#)
- [Policy 4100: Research](#)
- [Policy 4102: Cost Transfers for Sponsored Projects](#)
- [Policy 4105: Open Access to Scholarly Articles](#)
- [Policy 4107: Research Data](#)

## 4101.6 DEFINITIONS

**Principal Investigator.** Any Researcher who has primary responsibility within the University for the design, conduct, and reporting of research.

**Researcher.** Any person affiliated with USU whose role statement, job description, employment assignment, area of study, or function within the University, either in whole or in part, includes conducting research/creative endeavors or other activities overseen by the Office of Research. This includes faculty, professional research staff, research assistants, laboratory and clinical personnel, and others as may be designated by the Vice President for Research. Indicators that an individual qualifies as a Researcher include, but are not limited to, serving as an investigator or key personnel on proposals submitted to Sponsors (which can include instructional or other sponsored activities), submitting protocol applications to research oversight committees (e.g., Institutional Review Board, Institutional Biosafety Committee, Institutional Animal Care and Use Committee), and applying for or mentoring internally funded research/creative endeavors.

**Sponsor.** An individual, organization, agency, or entity outside the University that provides funding to support a Sponsored Program. Sponsors usually define specific objectives, terms and conditions, and reporting requirements associated with the use of the provided funding. Sponsors may include, but are not limited to, federal government agencies, state agencies/divisions, county and city governments, public and private institutions of higher education, industry, and private foundations.

**Sponsored Program.** Externally funded research, instruction, public service, training, testing, or scholarly activities that are typically supported through a formal agreement (e.g., grant, contract, cooperative agreement, etc.) between the university and a Sponsor. Sponsored Programs typically involve a defined scope of work or objectives with associated deliverables, timelines, and budget(s). Sponsored Programs are governed by specific terms and conditions set forth by the sponsor and often require formal reporting, compliance, and accountability.

**Subaward.** An award provided by USU to a subrecipient for the subrecipient to contribute to the goals and objectives of the project by carrying out part of a Sponsored Program received by USU.

**Subrecipient.** An entity that receives a Subaward from USU to carry out part of a Sponsored Program. The term Subrecipient does not include a beneficiary or participant.

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**Information below is not included as part of the contents of the official policy.** It is provided only as a convenience for readers/users and may be changed at any time by persons authorized by the president.

## RESOURCES

### Guidance

- [Sponsored Programs Accounting](#)
- [Sponsored Programs Office](#)
- [USU's Internal Deadline for Kualii Proposal Submission](#)

### Contacts

- Executive Director  
Sponsored Programs Office  
<https://research.usu.edu/spo/>  
[sponsoredprograms@usu.edu](mailto:sponsoredprograms@usu.edu)

## POLICY HISTORY

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