

TITLE: Awards and Rejections

DESCRIPTION

Details how awards and rejections are handled by Sponsored Programs Administration and researchers at Creighton University.

PROCEDURE/PROCESS

Supplemental Information Prior to Award

Occasionally a sponsor will require additional information prior to an award. All responses to requests for additional information must be routed through Sponsored Programs Administration for review, approval, and signature of the authorized institutional official before they are submitted to the sponsor.

Notification of Award

Sponsors send notification of awards to Sponsored Programs Administration, the Principal Investigator, or the Program/Project Director. If Sponsored Programs Administration receives the award notice, they immediately send a copy to the Principal Investigator or Program/Project Director and the department administrator. Sponsored Programs Administration will request the investigator/department administrator review the budget in InfoEd; they can then make any changes. Once the budget has been approved, it will be sent to Grants Accounting via InfoEd to establish a fund number for the awarded project. If the investigator receives the award notice directly, he or she shall forward a copy of the notice to Sponsored Programs Administration and complete the budget review in InfoEd. The Principal Investigator or Program/Project Director shall notify co-investigators and other project participants of the award.

Pre-award Costs

Some sponsors, such as the National Institutes of Health (NIH), will reimburse investigators for pre-award costs incurred up to 90 days prior to the effective date of an award, if such costs are 1) necessary to comply with the proposed project schedule and 2) would be allowable under the grant, if awarded, without prior approval from the sponsor. Prior to incurring any pre-award costs, investigators shall complete the [Request for Spending Authority Form](#) and obtain appropriate signatures from his or her chair, dean, and vice president guaranteeing coverage of any pre-award costs if the grant or contract is not awarded.

Setting up a New Project Fund

The InfoEd budget is used to set up new project funds in Creighton's accounting system. Sponsored Programs Administration will compare this budget with the original proposal budget and with the award statement. Sponsored Programs Administration will then submit the budget to Grants Accounting via InfoEd to set up a fund. Grants Accounting will notify the Principal Investigator or Program/Project Director of the fund number and will send a copy of the notification to the Department Administrator and Sponsored Programs Administration.

New project funds are set up according to the terms and conditions of the grant award statement or contract. Most grant funds are set up in full by budget year. For example, if an investigator is awarded a grant of \$300,000 for three years and has budgeted \$100,000 for each year, the University would set up a fund with \$100,000 available for the first budget year.

Most funds for industry-sponsored studies are set up on a check-by-check basis. For example, in clinical trials, the sponsor's distribution of funds often depends on the number of completed patients in the trial. The investigator shall provide information on completed patients to the sponsor and shall invoice the sponsor for costs expended, as defined in the terms and conditions of the contract. Upon receipt of a payment from the sponsor, the project budget is increased by the amount of the payment. The investigator must be able to cover costs up front, seeking reimbursement only after costs have been incurred. If the sponsor does not provide start-up funds, an investigator must find other resources to cover the costs of initiating the project. At Creighton, two options are available to assist investigators in initiating an industry-sponsored study, as follows:

- **Pooled funds**—A pooled fund allows an investigator to manage multiple industry-sponsored projects out of one fund. The investigator may initiate a new project by using money from the pooled fund until costs of the new project can be reimbursed. Pooled funds can be established for multiple studies awarded to one principal investigator, or for multiple studies awarded to various principal investigators within the same department. An investigator can establish a pooled fund for industry-sponsored studies if the following conditions are met:
 - All of the studies have the same indirect cost rate
 - None of the sponsors require external financial reporting

If an investigator establishes a pooled fund, Grants Accounting will not be able to track the expenditures of individual projects within the pooled fund. If a PI wants to track expenditures for an individual project within a pooled fund, he or she will be responsible for maintaining books for the project. Upon receipt of the first check for the second industry-sponsored study, an investigator may establish a pooled fund by completing and submitting the Drug Study Pooling Form to Sponsored Programs Administration and completing the awarded budget form in InfoEd.

- **Permission to set up a budget in full**—An investigator may request permission to have a project fund set up in full. In this case, the University makes available to the investigator the full amount of funds budgeted for the project, rather than increasing the fund only upon receipt of payment from the sponsor. This option works for investigators who do not have multiple studies to pool. To have a budget set up in

full for a clinical study that is funded on a per-patient basis, the investigator shall complete the Request for Spending Authority Form and obtain appropriate signatures from his or her chair, dean, and vice president guaranteeing coverage of any not recovered from the sponsor. If this option is selected, this study is exempt from being pooled.

Managing Multiple-Year Awards

The way in which yearly renewal of awards is handled varies depending on the sponsor, and is usually defined in the terms and conditions of the award statement. Most sponsors require annual progress reports. For some sponsors, these reports function as the application for renewal. Others require separate renewal applications. Some require a statement of continued University approval in the form of a newly signed cover page. Regardless of sponsor requirements, all yearly renewals shall be routed for approvals via InfoEd.

Federal law requires that Creighton obtain a yearly statement from Principal Investigators or Program/Project Directors regarding any known or suspected conflicts of interest. Since conflict of interest is addressed in the InfoEd system, submitting and routing a progress report in the system at each annual renewal ensures that this requirement is met. In addition, it helps Sponsored Programs Administration keep track of progress on sponsored projects and maintain an up-to-date and accurate database of sponsored project activity at Creighton.

Post-Award Activity

During the project period, all grant expenditures are reviewed and approved by Grants Accounting according to the terms and conditions of the award statement and the Office of Management & Budget (OMB) [*Part 200 —Uniform Administrative Requirement, Cost Principles and Audit Requirements for Federal Awards*](#) (“Uniform Guidance”). Throughout the project period any required financial reports to the agency must be prepared and submitted by Grants Accounting.

Investigators who have questions about moving funds within a project budget, carrying funds over from one year to the next, or requesting a no-cost extension at the end of the project period (request for additional time without a request for additional funds) should contact Sponsored Programs Administration for assistance.

To request to move funds on a grant that has been awarded under expanded authority (as stated in the terms and conditions of the award statement), investigators shall submit a request in writing to Sponsored Programs Administration. Sponsored Programs Administration will review the sponsor guidelines and award statement and, if the requested change is allowable, will approve the request, make any changes in the InfoEd system, and forward the request to Grants Accounting. Grants Accounting will make the necessary changes in the Banner accounting system.

If a Principal Investigator wants to request to move funds on a grant that has not been awarded under expanded authority, he or she shall contact Sponsored Programs

Administration for assistance. The Principal Investigator will draft a letter of request to the agency and submit to Sponsored Programs Administration for review and submission to the agency. All requests to the agency must be co-signed by the Principal Investigator or Program/Project Director and the Authorized Institutional Official.

If a Principal Investigator wants to request a no-cost extension at the end of the project period, he or she should refer to the Sponsored Administration Procedure SPA-07, "[No-Cost Extensions](#)."

Rejections

Sponsors usually send notification of rejections directly to the Principal Investigator or Program/Project Director, along with reviewer comments. If an investigator receives a rejection letter, he or she shall forward a copy to Sponsored Programs Administration. Investigators do not need to forward a copy of reviewer comments. However, if PIs would like assistance with revising a proposal, they may submit a copy of reviewer comments to Sponsored Programs Administration so they can help to determine how to develop a more competitive proposal. The Principal Investigator or Program/Project Director shall notify co-investigators and other project participants of the rejection.

Requesting Feedback

Whether an investigator's proposal is funded or rejected, it is important to request feedback from the sponsor. Investigators should request a complete copy of reviewer comments, asking for detailed information on why the proposal was or was not funded. This information will prove helpful the next time the investigator applies for funding, whether it is for the same project or a new project. Investigators should use the feedback to evaluate the proposal.

Applicable Regulations, Document(s):

Policy

Additional Documents