

# EXTERNALLY SPONSORED PROJECTS POLICY

SLT 3.11

**Date of Last Update:**

September 04, 2019

**Approved By:**

- Senior Leadership Team

**Responsible Office:**

Center for Scholarly and Creative Excellence

## POLICY

This document establishes Grand Valley State University's (University) official policy governing the administration of proposals, awards, contracts, and agreements for *all externally sponsored projects*. Externally Sponsored Projects do **not** include Purchasing Agreements or Philanthropic Gifts.

The purpose of this policy is to help ensure that all proposals and awards for externally sponsored projects conform to federal regulations, including the Office of Management and Budget 2 CFR 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (a.k.a., the Uniform Guidance)—and are consistent with GVSU's academic and business policies and sound fiscal practices.

## POLICY STATEMENT

Only an Authorized Organizational Representative of the University may submit proposals to fund and/or otherwise support externally sponsored projects on behalf of the University.

In addition, an Authorized Organizational Representative may accept on behalf of the University any Externally Sponsored Project award resulting from such proposal submissions or other solicitation processes. The University will not normally accept awards received from outside sources without prior proposal approval as provided in this policy.

## DEFINITIONS

**Assistance Action:** The main purpose of an assistance action is to transfer money, property, services, or anything of value to the recipient in order to accomplish a public purpose of

support or stimulation. The agency must have legal authority to award assistance agreements for this purpose. Grants or cooperative agreements are used to award assistance funds.

**Authorized Organizational Representative:** An Authorized Organizational Representative is the Vice Provost for Research Administration and any University employee(s) to whom the Vice Provost for Research Administration has delegated oversight responsibility for the administration and management of Externally Sponsored Projects at the University. Only an Authorized Organizational Representative has the authority to submit proposals, accept awards, and sign contracts and agreements for Externally Sponsored Projects on behalf of the University.

**Externally Sponsored Project:** Externally Sponsored Projects include all projects supported by way of grants and cooperative agreements (direct Assistance Actions); incoming or outgoing sub-recipient agreements or subawards (pass-through Assistance Actions); certain incoming or outgoing contracts (i.e., *externally sponsored* Procurement Actions), including direct contracts, [service agreements, and consulting agreements](#); pass-through subcontracts and service agreements; and certain other agreements, including master collaboration agreements, material transfer agreements, and data-use agreements—whether funded or unfunded. Externally sponsored projects do **not** include Purchasing Agreements or Philanthropic Gifts.

**Philanthropic Gift:** A philanthropic gift is an instrument by which an outside donor voluntarily transfers money, services, or property from a donor to the University. There is no expectation of direct economic benefit or the provision of goods or services to the donor, although donors can place stipulations on gifts that direct the funds to the donors' areas of interest. The absence of quid pro quo language helps define the charitable nature of this type of giving.

**Procurement Action:** The main purpose of a procurement action is to acquire property or services by purchase, lease, or barter for the use or direct benefit of the purchaser (whether the purchaser is the university purchasing from an outside entity or an outside entity purchasing services from the university). An agreement or contract is used as the legal instrument to award a Procurement Action.

**Purchasing Agreement:** An agreement entered into by the University through its Procurement Services Office and an outside vendor or supplier to purchase goods and/or services. Examples of non-sponsored purchasing agreements include software licenses, pricing agreements, equipment maintenance agreements, custodial and facilities services, landscaping services, and office supply-vendor agreements.

For more information about this policy and the procedures established to ensure compliance

with it, please contact the Office of Sponsored Programs at 616-331-6826 or [osp@gvsu.edu](mailto:osp@gvsu.edu).

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