

EXTERNALLY SPONSORED PROJECTS POLICY

SLT 3.11

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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 *externally sponsored projects*. Externally Sponsored Projects do **not** include Purchasing Agreements but **may** include some Philanthropic Gifts for Academic Support and/or Research.

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. Externally Sponsored Projects received without prior approval will only be accepted at the discretion of an Authorized Organizational Representative.

All requests for funding (e.g., proposal, assistance, application, cooperative agreement, consortium agreement, letter, etc.), whether electronic or not, seeking external support for research and other sponsored projects must be submitted to the Office of Sponsored Programs (OSP) for review and approval prior to submission to external sponsors.

Externally Sponsored Projects will be administered by the appropriate Authorized Organizational Representative as defined below.

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 either the Vice Provost for Research Administration or Vice President for University Development and any University employee(s) to whom they have 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 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 but **may** include some Philanthropic Gifts as outlined in more detail in the Sponsored Project or Gift Guide (link). Since the term Grant can refer to a Sponsored Project or a Philanthropic Gift, it is important to consider both the intent of the funding and the requirements of the grant to determine its management. The funder's description of the funds as a gift, sponsored project, or other terminology does not affect GVSU's classification of it as a Sponsored Agreement or Philanthropic Gift.

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. University Development will determine the charitable nature of this type of giving in accordance with Council for Advancement and Support of Education (CASE) Global Reporting Standards and Internal Revenue Service (IRS) guidelines, which may differ from reporting for

financial statement purposes. Philanthropic Gifts do **not** include Purchasing Agreements but **may** include some Externally Sponsored Projects as outlined in the [Sponsored Project or Gift Guide](#).

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.
