

# Grants

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Effective sponsored project management is a collaboration among Principal Investigator(s); Departmental Administrators and other research staff; Sponsored Programs Administration (SPAdmin); and Sponsored Programs Accounting (SPAccting).

## **SPAdmin Role**

- Provides expertise and guidance to investigators and department personnel related to grant and contract submissions and management
- Protects the institution by monitoring for compliance with federal, institutional, and sponsor requirements
- Reviews and submits applications, agreements, and modifications in accordance with sponsor terms, conditions and program guidelines
- Negotiates final terms for government and non-profit grants, contracts, and subcontracts
- Reviews Conflict of Interest disclosures for personnel on the project
- Approves internal forms and applications prior to institutional signature
- Prepares awards for set-up by Sponsored Programs Accounting

Information related to each step in the grant submission, administration and close-out process can be found in the following pages:

- [Internal Deadlines](#)
- [Pre-Award Guidelines](#)
- [Just In Time](#)
- [Award Set-up](#)
- [Post Award Guidelines](#)
- [Award Close-Out](#)

# Internal Deadlines

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To reduce the risk of a proposal missing the sponsor's deadline or being withdrawn for non-responsiveness, the following internal deadlines are in effect:

- **At least two weeks before the sponsor's deadline**
  - Notify SPAdmin of your plan to submit a proposal
  - Identify sponsor and program
  - Provide a copy of the program guidelines, if they're not readily available online
- **At least three whole business days before the sponsor's deadline**
  - Provide a copy of your proposal to SPAdmin for review
    - All elements, *although the following can be in draft form*:
      - Abstract
      - Bibliography
      - Research plan
  - For electronic submissions
    - Grant access to SPAdmin
    - If access cannot be granted, then please download a copy and send to SPAdmin
  - For paper Submission
    - Send a copy to SPAdmin
    - Please wait for our approval before printing the final copy, in case any changes are needed
  - Route ADIS Internal Forms to SPAdmin for review

*For example: if your proposal must be received by the sponsor at 5:00 p.m. on Friday, then it is due to SPAdmin by 8:00 a.m. on Wednesday.*

## Per the Vice Chancellor for Research:

If you're submitting any of the following:

- Complex grants, such as NIH Program Project/Center Grants (P series)
- International collaboration
- Single IRB (sIRB) or Central IRB
- Subcontracts-out
- Voluntary cost-sharing

then:

- Notify SPAdmin *at least one month before the sponsor's deadline*
- Provide a copy and route ADIS Internal Forms *at least one week before the sponsor's deadline*

## **Additional Timelines:**

- Your college or department's internal deadlines for preparing proposals will be earlier than SPA's
- Limited submissions require two-months notice in order to identify the applicant(s)
- Major projects and programs require 90-days notice in order to obtain VCR approval

## **Please Note:**

- After you provide your proposal to SPAdmin, please remain available by telephone or email so we can communicate with you about any changes needed.
- SPAdmin's regular office hours are from 8:00 a.m. to 5:00 p.m., Monday through Friday. SPAdmin submits proposals during regular business hours.
- If UNMC is a subcontractor on another university's proposal, our external deadline may be earlier than the proposal due date. That is, our information may be due to the other university in time for its sponsored programs office to review it before proposal submission.

## **Frequently Asked Questions:**

- *Do "days" include weekends and holidays?*
  - No, "days" refer to business days.
- *What time is "close of business" for SPA?*
  - If we request an item by the "close of business," then we need it before the start of business on the next business day. For example, you may email it to us after 5:00 p.m., as long as it's in our inbox when we arrive the next business morning.
- *Can I continue to work on my research plan after the three-day mark?*
  - Yes, but please provide us with a draft of the research plan at the three-day mark so we can review for regulatory requirements.
- *What exactly do you need when?*
  - Final version due three days before:
    - All form pages
      - SF424 RR
      - RR Performance Sites
      - RR Other Project Information
      - RR Key Persons
      - RR Budget / PHS 398 Modular Budget
      - PHS Human Subjects and Clinical Trials Information
      - RR Subaward Budget Attachment
      - PHS 398 Cover Page Supplement
      - PHS 398 Research Plan
      - PHS Assignment Request

- Attachments, as appropriate
  - Cover letter
  - Relevance
  - Facilities & Other Resources
  - Equipment
  - Biosketches
  - Other Support
  - Budget justification(s)
  - Human Subjects and Clinical Trials Information attachments, such as
    - Inclusion of Women, Minorities, and Children
    - Recruitment and Retention Plan
    - Study Timeline
    - Protection of Human Subjects
    - single IRB Plan
    - Data and Safety Monitoring Plan
    - Overall Structure of the Study Team
    - Statistical Design and Power
  - Specific aims
  - Vertebrate Animals
  - Select Agent Research
  - Multiple PD/PI Leadership Plan
  - Consortium/Contractual Arrangements
  - Letters of Support
  - Resource Sharing Plan
  - Authentication of Key and/or Chemical Resources
- Draft due three days before; final version due on day before:
  - Abstract
  - Bibliography
  - Research plan

# Pre-Award Guidelines

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SPAdmin can assist you with many aspects of developing and submitting a proposal. Once you identify a funding opportunity to which you intend to apply, please notify SPAdmin so that we can prepare to answer any questions you may have, discuss any special considerations, and submit your application in a timely manner.

## Funding Opportunities

A funding opportunity announcement (FOA) can take the form of a Broad Agency Announcement (BAA), program announcement (PA), PA with special referral guidelines (PAR), Request for Applications (RFA), or Request for Proposals (RFP). Generally, a FOA may be seeking PI-initiated projects (“unsolicited”) or sponsored-defined projects (“solicited”).

### GUIDELINES

A sponsor's guidelines generally include an identifier (e.g., FOA number); due date and time; paper or electronic submission instructions; required content and format; award amount, including F&A; period of performance; and eligibility requirements. These may be program-specific or applicable to the sponsor as a whole. Care should be taken to be sure you are accessing the current version of the guidelines.

### APPLICATIONS

A completed application generally is comprised of mandatory and optional forms, which are then submitted either in paper or electronically. Care should be taken to be sure you are accessing the most current version of any forms.

## Types of Proposals

A sponsor can require that proposal be submitted in one or two (or more) steps. Care should be taken to be sure your proposal meets the sponsor's expectations for each step in their process so that it will be accepted.

### Pre-Proposals

A sponsor may require an applicant to initiate consideration of a project via the submission of a pre-proposal. The sponsor may use the pre-proposals in order to invite full proposals only from applicants who are evaluated to be more competitive. Alternatively, the sponsor may use the pre-proposals to provide a mechanism to all applicants to submit full proposals. A white paper can

serve as a pre-proposal. A Letter of Intent allows a sponsor to gauge interests but generally does not function as a pre-proposal. Care should be taken to determine whether a pre-proposal is required or allowed.

## **Unsolicited Proposals**

If a sponsor does not require a pre-proposal, an applicant generally is welcome to submit a full proposal without first receiving feedback from the sponsor.

## **Solicited Proposals**

If a sponsor requires a pre-proposal, an applicant generally should submit a full proposal only after receiving feedback from the sponsor

## **Proposal Development and Submission**

The administrative aspects of developing and submitting a proposal are listed below:

### **INSTITUTIONAL POLICES & PROCEDURES**

SPAdmin reviews the sponsor's terms and conditions, the program guidelines, and the proposal to ensure compliance with UNMC's policies and procedures. It is important to keep in mind that a proposal must comply with both sponsor and UNMC policy. In cases in which sponsor policy is more restrictive, UNMC must manage the project carefully (e.g., if the sponsor does not allow any budget variance). In cases in which UNMC policy is more restrictive, sponsor policy does not override UNMC policy (e.g., if the sponsor allows the direct charging of facilities and administrative costs). SPAdmin welcomes discussion about differences in policy.

### **BUDGET DEVELOPMENT**

SPAdmin encourages you to use the internal budget form to calculate your budget and transfer the information onto sponsor budget forms. The internal budget form takes into account UNMC's fringe benefits, inflation factor, and F&A rates and UNMC's Institutional Base Salary and cost-sharing policies. Care should be taken to ensure that the requested amount is sufficient to complete the proposed project and is within sponsor parameters.

### **ADMINISTRATIVE DATA & SPONSOR FORMS**

Sponsors frequently request such institutional information as legal name, federal employer identification number, Data Universal Numbering System (DUNS) number, and federally negotiated facilities and administrative rates. This information is available on the [Institutional Information page](#). If a sponsor asks for institutional information that is not on the on-line list, contact [SPAdmin](#) for assistance.

### **PROPOSAL REVIEW & CLEARANCE**

SPAdmin is UNMC's official signature authority for sponsored projects. SPAdmin is responsible for verifying UNMC's eligibility and the accuracy, validity, and conformity with the most current institutional guidelines of all the administrative, fiscal, and scientific information in an application.

SPAdmin's Director's ink signature on a paper application or electronic signature in an on-line system certifies that UNMC will be accountable both for the appropriate use of any funds awarded and for the performance of the grant-supported project or activities resulting from the application.

Generally, SPAdmin will submit the application on a department's behalf to the sponsor after review. A department can make arrangements with SPAdmin to submit an application. Ideally, the department will provide SPAdmin with a review copy of the complete application, but SPAdmin will accept a subset of "key components."

**In cases in which a sponsor accepts proposals that are not signed and/or submitted by an institutional official, the department remains responsible for obtaining SPAdmin's approval before submitting.**

In addition to the application, SPAdmin requires a set of internal forms, signed by the appropriate parties. These forms provide SPAdmin with the information needed to understand your project and the documentation that your unit supports your application.

## **TERMS & CONDITIONS**

By submitting an application to a sponsor, UNMC is certifying to the sponsor that it will comply with the terms and conditions of the grant, if awarded. SPAdmin must review a sponsor's terms and conditions prior to application submission.

## **SIGNATURE AUTHORITY & DELEGATION**

The Director of SPAdmin is the official signature authority for sponsored project applications. If the Director is unavailable, other UNMC personnel are authorized to sign on the Director's behalf and SPAdmin will route your proposal to the appropriate signer.

## **DEADLINE MANAGEMENT**

SPAdmin will make every effort to submit your application in a timely manner. To ensure successful submission, SPAdmin strongly encourages early actions, including:

- Notifying SPAdmin of a PI's intent to submit an application at least two weeks before the deadline
- Submitting signed internal forms to SPAdmin at least three business days before the deadline
- Providing a review copy of the application to SPAdmin at least three business days before the deadline
- Planning to submit your application
  - For electronic applications, at least one day before the deadline
  - For paper applications, at least two days before the deadline

# Just In Time

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“Just in Time” refers to the period after application submission and peer review and before selection for funding. During this period, the sponsor may request additional information that was not required to be submitted with the application. “Just in Time” balances the sponsor’s need for accurate, timely information with the desire to minimize the burden on the applicant.

Frequently required information under the "Just in Time" period include:

- Other Support
- Proof of Regulatory Compliance
  - CITI Training
  - IRB
  - IACUC
  - IBC
- Advance Accounts

Brief descriptions of each of these and what you might be required to provide are listed below.

## Other Support

“Other Support” includes all financial resources available in direct support of an individual’s research endeavors. It is used by the sponsor to identify and resolve potential overlaps in the science, budget, or effort. For each active and pending project, the following information should be provided:

- Project number
- PI
- Source
- Project period
- Annual direct costs
- Effort (cannot exceed 12 person months)
- Title
- Description
- Overlap (if applicable)

ADIS can be used to generate NIH-compliant “Other Support.”

## Proof of Regulatory Compliance



**CITI Training** If your project involves human subject research, personnel must be trained in the protection of human subjects. UNMC uses the web-based Collaborative IRB Training Initiative (CITI), which was developed by a consortium of ten research institutions, including UNMC. SPAdmin will provide a letter that certifies those personnel have completed CITI training, as tracked in the IRB's database. [Read more](#) about CITI Training.

**IRB** If your project involves human subject research, an IRB protocol must be approved and active for the project. You must provide the IRB protocol number to SPAdmin. [Read more](#) about IRB requirements.

**IACUC** If your project involves research using live vertebrate animals, an IACUC protocol must be approved and active for the project. At "Just in Time," SPAdmin initiates a "compare" of the application and the IACUC protocol; the IACUC office reviews both and certifies to SPAdmin that they match. You must provide the IACUC protocol number to SPAdmin in order for the "compare" to be requested. Protocols which have been determined to "match" will be linked to the award so that animal work may be requested during the project. [Read more](#) about IACUC requirements.

**IBC** If your project involves research using recombinant DNA molecules or select agents, an IBC protocol must be approved and active for the project. You must provide the IBC protocol number to SPAdmin. [Read more](#) about IBC requirements.

## Advanced Accounts

A "Just in Time" request is no guarantee that an award will be made. You may want to consider establishing an advance account, if your PI has received other indications that funding is likely.

[Request](#) an advance account.

# Award Set-up

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When a notice of award is received, SPAdmin and SPActng work with the department to set up the award in UNMC's sponsored program systems.

The information below will guide you through the award set-up process, unique terminology, and issues that impact award set-up.

## Award Process

### Types of award

How a project is categorized has ramification for administration, including application of F&A rates, WBS numbering in SAP, and institutional reporting. Awards at UNMC are generally categorized as follows:

#### **RESEARCH (per Uniform Guidance)**

*Research and Development means all research activities, both basic and applied, and all development activities that are performed by non-Federal entities. The term research also includes activities involving the training of individuals in research techniques where such activities utilize the same facilities as other research and development activities and where such activities are not included in the instruction function. "Research" is defined as a systematic study directed toward fuller scientific knowledge or understanding of the subject studied. "Development" is the systematic use of knowledge and understanding gained from research directed toward the production of useful materials, devices, systems, or methods, including design and development of prototypes and processes.*

#### **INSTRUCTION (per Uniform Guidance)**

*Instruction means the teaching and training activities of an institution. Except for research training as provided in subsection b, this term includes all teaching and training activities, whether they are offered for credits toward a degree or certificate or on a non-credit basis, and whether they are offered through regular academic departments or separate divisions, such as a summer school division or an extension division. Also considered part of this major function are departmental research, and, where agreed to, university research.*

#### **PUBLIC SERVICE (otherwise fits UNMC's mission)**

*To lead the world in transforming lives to create a healthy future for all individuals and communities through premier educational programs, innovative research and extraordinary patient care.*

## **Award Document Types**

Award documents are generally categorized as follows:

- Grant: Financial assistance for the conduct of a program in which the sponsor anticipates no substantial programmatic involvement
- Cooperative agreement: Financial assistance for the conduct of a program in which the sponsor will have substantial programmatic involvement
- Contract: Mechanism for procurement of a product or service with specific obligations

How a project is categorized has ramifications for administration and negotiation of terms and conditions.

## **Award Review**

To accept external funding, UNMC must agree to the sponsor's terms and conditions for spending funds, conducting the project, and reporting on outcomes. Careful review of the sponsor's requirements is needed to ensure UNMC can meet them.

**Note:** Some sponsors require an applicant at the time of application to agree to accept their terms and conditions, should an award be made.

## **Award Acceptance**

Once SPAdmin has determined that the award terms and conditions are acceptable, UNMC accepts the award, by signing an agreement and accessing funds (e.g., cashing a check).

## **Authorized Official**

The Director of SPAdmin is the official signature authority for sponsored project agreements. If the Director is unavailable, other UNMC personnel are authorized to sign on the Director's behalf.

## Documentation and notification of project requirements

UNMC uses “checklists” and “halfsheets” to communicate between offices about new projects and changes to existing projects.

Checklists are used when the award amount is being changed:

- New project set-up
- Non-competing continuations
- Supplements
- Renewals
- Closeouts with adjustments

Halfsheets are used if the award amount is not being changed:

- No-cost extension
- Rebudgeting
- Approval to charge administrative costs directly to a project
- Subcontract-out being executed
- Subcontract-out being modified
- Closeouts with no adjustments

Once SPAdmin and SPAcctng have completed award set-up or modification, departments can access the checklist and halfsheets in ADIS.

## Basic Agreements

SPAdmin reviews every agreement to ensure that UNMC can comply and is protected. Agreements can be categorized broadly as follows.

### Federal

Typically, UNMC receives Notices of Award (NOAs) or Notices of Grant Awards (NGAs or NOGAs) from federal sponsors, including NIH and HRSA. An NOA (or NGA or NOGA) typically provides project-specific details about funding commitments, start and end dates, and any special restrictions. It also incorporates the sponsor’s grants policy by reference.

UNMC also receives Contracts/Agreements from federal sponsors, including DOD. A Contract/Agreement typically provides more specific details about applicable regulations, including Federal Acquisition Regulations (FAR) clauses.

## State

The NE DHHS uses a standard template with all NU campuses.

## Non-profit

Many national non-profit foundations use a standard template with universities and refer to posted policies and procedures. Some smaller organizations may issue very detailed or very brief award documents. Although many of UNMC's non-profit sponsors tend to follow the NIH's general award process, others may have unique requirements. For example, many sponsors allow UNMC to rebudget up to 25%; some sponsors limit rebudgeting to 10% or lower.

## Industry

SPAdmin's Contracts team handles industry-sponsored agreements. UNeHealth handles industry sponsored Clinical Trials agreements.

## Terms & Conditions

At a minimum, a sponsored project agreement should address:

- Scientific, administrative, financial, and reporting requirements
- Identification of the key personnel, with roles and responsibilities
- Compensation, including dollar ceiling, method and schedule of reimbursement, type of supporting documentation required, and timing
- Ownership and disposition of intellectual property and real property
- Applicable public policy requirements

Terms and conditions that may require negotiation are described below:

**Choice of law and venue** "Choice of law" refers to the legal jurisdiction while "Venue" refers to the physical location.

**Indemnification** refers to a guarantee to compensate another party for any loss or damage that occurs in the future.

**Copyrights** refers to the intellectual property right granted to an author.

**Patents** refers to the intellectual property right granted to an inventor.

**Publications** Board of Regents Policy on Ownership of Intellectual Property states that "the prompt and open dissemination of the results of research undertaken at the University of Nebraska and the free exchange of information among scholars are essential to the fulfillment of the University's obligations as an institution committed to excellence in research, education, and service."

**Payment Schedules** Typically, payment to UNMC by a sponsor is made:

- - In response to a quarterly invoice from UNMC SPAcctng office for reimbursement of actual expenses
  - In response to an invoice from the department based on deliverables met
  - On a set payment schedule

**Incorporated by Reference** Some agreements may not specifically state every term or condition but instead refer to other documents.

**Federal Acquisition Regulations (FAR)** clauses define how to do business with the federal government in a procurement environment. [Link to the FAR website.](#)

## Sub-award Set-up

Once a sub-award is received and the agreement is signed by both parties, SPAdmin sets up the sub-award in the SPAdmin database. SPAdmin then sends data electronically to SPAcctng to set up accounts in SAP. When this is complete, a "checklist" (or "halfsheet") with project information is posted to ADIS for the PI and department to access.

# Post Award Guidelines

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## Reporting Requirements

### Technical

The PI is responsible for preparing the technical report. Either the PI or SPAdmin can be responsible for submitting the report, either via an electronic system and/or in paper. SPAdmin's review of a technical report is focused on whether it contains the required elements and is in the proper format; scientific content is the incumbent on the PI.

### Financial

SPAcctng is responsible for preparing and submitting the financial report, via an electronic system and/or in paper, based on the information in SAP. Financial reporting and invoicing often occur simultaneously. Contact [SPAAccounting](#) for questions related to post award financial compliance.

### Changes

In general, UNMC is allowed some flexibility to implement a project differently than was proposed. Depending on the sponsor's guidelines and the nature of these changes, they may be made:

- At the PI's discretion
- With approval from SPAdmin
- With notification to the sponsor
- Only with approval from the sponsor

Changes are formalized as a revised Notice of Award or amendment. They may include changes to:

#### 1. Scope

It is understood that an investigator will make adjustments as new information is received throughout the project. These adjustments are often reported to a sponsor via the next progress report. Should the investigator take the project in a new direction, it may be necessary to involve the sponsor earlier.

Potential indicators of a change in scope include:

- Change in the specific aims approved at the time of award
- Change from the approved use of live vertebrate animals or involvement of human subjects
- Shift of the research emphasis from one disease area to another
- Application of a new technology
- Adding a new subcontract or an international component
- Change in other senior/key personnel not specifically named in the NOA

## 2. **Re-budgeting**

It is understood that actual costs might not equal what was anticipated on a proposal budget. Actual expenditures are reported to a sponsor via the next financial report. Should the actual costs differ significantly from what was anticipated, it may be necessary to involve the sponsor.

“Significant rebudgeting” generally refers to an expenditure in a single direct cost budget category that deviates (increases or decreases) from the categorical commitment level established for the budget period by 25 percent or more of the total costs awarded.

Sponsors may set lower thresholds or set line-item restrictions (e.g., equipment). Also, any funding restrictions contained in the funding opportunity announcement would still apply (e.g., if the FOA did not allow salaries, one could not re-budget into the salary line-item).

## 3. **Effort**

When a certain level of effort is stated in a proposal, either in terms of Person Months or percent effort, UNMC has made a commitment to the sponsor that that individual will spend that time on the project, either paid for by the award or cost-shared by UNMC. It is understood that month to month time may fluctuate, but the individual must spend the stated average over the project period.

Generally, we must seek prior approval by the sponsor if the PI or other key personnel will:

- Withdraw from the project entirely
- Be absent from the project during any continuous period of 3 months or more
- Reduce time devoted to the project by 25 percent or more from the approved level

It is important to monitor incremental effort changes in order to engage sponsors when the threshold is crossed.

## 4. **Carry-forward**

Most NIH (and NIH-style) awards are funded in one-year budget periods as part of a five- (or less) year “cycle.” Treatment of funds that remain at the end of each year vary by sponsor and program.

For most NIH awards (“SNAP”), UNMC has been granted “expanded authorities” to carry “forward” (or carry “over”) funds from one budget period to the next, without prior agency approval. For these awards, if the amount remaining is greater than or equal to 25% of the amount awarded for that year (exclusive of any other funds), then UNMC must explain in the progress report why there is a significant balance and how those funds will be used in the next budget period.



For some NIH awards (non-“SNAP”), UNMC must request prior agency approval to carry “forward” (or carry “over”) any funds from one budget period to the next, by:

- Submitting a request that explains why there is a significant balance and how those funds will be used in the next budget period
- Reporting the balance on the financial report

Other sponsors’ policies may:

- Be similar to NIH
- Be more restrictive (e.g., no movement of funds between budget years)
- Be less restrictive (e.g., no segregation of funds between budget years)

In order to manage cash flow, it is important to understand a sponsor’s carry-forward policies. Some investigators may think it is prudent to conserve funds during the award, in order to have sufficient funds on hand for unforeseen emergencies or to extend the project period (see No-Cost Extension below), but they run the risk of the sponsor determining the funds are not needed and pulling them back.

5. **No Cost Extension (NCE)** For most NIH awards (“SNAP”), UNMC has been granted “expanded authorities” to extend the project end date once for up to one year in order to complete the project. To extend the end date a second time and/or beyond one year, UNMC must require approval from the sponsor.

Other sponsors’ policies may:

- Be similar to NIH
- Be more restrictive (e.g., end date cannot be changed)
- Be less restrictive (e.g., end date can be changed multiple times)

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## Continuation

After the initial award is made, the project may continue with additional funding from the sponsor.

### Non-competitive (progress report)

A sponsor may initially commit to several years of funding, contingent on satisfactory progress. Most NIH (and NIH-style) awards are funded in one-year budget periods as part of a five- (or less) year “cycle.” A non-competitive continuation of the project may be triggered by the submission of a progress report. It does not have to be peer reviewed again.

### Competitive (renewal)

A sponsor may consider funding a project again. Most NIH (and NIH-style) awards can be renewed. A competitive continuation of the project takes the form of a complete application. It has to be peer reviewed again.



# Award Close-Out

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After the funded project is complete, UNMC must administratively close out the project with the sponsor and internally.

## Technical Reporting

In general, a final technical report should include:

- Summary of progress made toward the achievement of the originally stated aims
- List of significant results (positive or negative)
- List of publications
- Report on the inclusion of study subjects (gender, minority, children)
- Description of any data, research materials (such as cell lines, DNA probes, animal models), protocols, software, or other information resulting from the research that is available to be shared with other investigators and how it may be accessed

Please see your notice of award for project- and sponsor-specific requirements, due date, and submission mode.

## Financial Reporting

Sponsored Programs Accounting will work with you to reconcile the SAP account and submit the final financial report to the sponsor. In order to close the account,

- All financial activity must be recorded
- All funds due to UNMC must be received
- Any unexpended funds must be returned to the sponsor or moved to a non-sponsored account, as allowed by sponsor policy

UNMC typically has 90 days to submit the final financial report, covering activity since the last report and all cumulative activity.

## Invention Reporting

If any inventions were conceived or first actually reduced to practice during the project:

- UNeMed must report them to the federal government via the iEdison system (if federally funded) or the sponsor's Intellectual Property office
- SPAdmin must report them to the sponsor's Grant Management office, using the:
  - HHS 568
  - DD 882
  - Other form

## **Auditing**

After a project is completed and closed out, UNMC's reporting responsibilities continue for a period of time, including:

- Sponsored Programs Accounting including the award (if federal) on UNMC's A-133 audit
- Sponsored Programs Accounting makes the results of the audit available to sponsors (e.g., other universities that have subcontracted to UNMC)
- Sponsors can choose to examine UNMC's financial records

## **Record retention**

UNMC must retain financial and programmatic records and supporting documents after the close of the project. Disposition schedules vary by NU and sponsor policy and by document type. UNMC's Director of Business Services serves as UNMC's records retention officer.