

RG:02

Post-Award Policy

I. PURPOSE

The Office of Research, Grants and Sponsored Programs, under the auspices of the Executive Vice President for Academic Affairs, is formally charged with providing services to faculty and staff for securing and managing external support from federal, state, and other sources. It acts as a check for Primary Investigators and Project Directors to ensure compliance throughout the grant process. This policy ensures that proper procedures are followed from receipt to closeout of an award.

II. POLICY STATEMENT

The Primary Investigator/Project Director is responsible for the management of an award from the time that the application is submitted. Responsible completion of the project, submitting purchase requests, managing project/research personnel, and submitting reports related to project goals and updates on time is the responsibility of the PI/PD. In doing this, the PI/PD must update the Post Award Manager, who is responsible for the fiscal monitoring of grant awards. The ORGSP will serve as a check to ensure that expenditures are made in accordance with the approved budget as well as contract/federal terms and conditions, financial reports and invoices are submitted in a timely manner, and all fiscal matters have been satisfied during the life of the project, including the closeout phase. To ensure that the PI/PD is aware of the responsibilities of managing the award, the PI/PD must schedule a meeting with the Post-Award Manager prior to receipt of the grant line and sign an acknowledgement of their awareness of award requirements, University policies, and any other pertinent information.

The PI/PD is responsible for ensuring that all reports are submitted to the sponsor (with the exception of financial reports, which will be prepared and submitted in conjunction with the ORGSP office). All required reports will be submitted in accordance with the terms and conditions of the award. Some reports will be required to be submitted in hardcopy to specific persons at the sponsoring agency and others are submitted via the internet. When electronic submission of reports is required, all PIs must ensure that they are trained in the system for which their report will need to be uploaded. The Post-Award Manager will discuss this requirement during the initial meeting.

When closeout is reached, the PI/PD will work with the Post-Award Manager to ensure that all final deliverables/final reports (financial, progress, property, subcontract, patent, etc.) are made. Upon submission of all required documents to the sponsor, the project file is placed in the closed files and retained in accordance with the appropriate retention schedule (normally, records must be retained for seven years after submission of the Final Financial Report, or in the case of litigation, records must be retained until final resolution).

III. DEFINITIONS

Closeout: the period of performance or the time allotted for work and completion is due and it is time to cease expenditures and bring all activities to an end.

Principal Investigator/Program Director (PI/PD): Per [§ 75.2](#), “the individual (s) designated by the recipient to direct the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity.”

IV. AUDIENCE

Faculty, staff, and students of Lincoln Memorial University who receive external awards.

V. COMPLIANCE

The PI/PD should ensure that every effort is made to follow the stated guidelines, policies, and procedures of an award. Mismanaged projects present significant risk to the University, and as such, the mismanagement of a project may result in the PI/PD being placed on probation from applying for future awards, and/or be required to have a co-PI/PD for support. In cases where the Executive Vice President of Academic Affairs deems that willful mismanagement has occurred, further action may be taken, including but not limited to removal as PI/PD, denial of future applications, and/or termination.

VI. ROLES AND RESPONSIBILITIES

PI/PD: The Primary Investigator/Project Director assumes responsibility for directing the project or program being supported by the grant. The PI/PD is responsible and accountable to officials of the recipient organization for the proper conduct of the project, program, or activity. The PI/PD works with the ORGSP to submit all necessary documentation and reports to the awarding sponsor.

Dean/Chair: Supports the PI/PD and assures that the school provides adequate resources for the running of the award.

Office of Research, Grants, and Sponsored Projects: Serves as a check to ensure that expenditures are made in accordance with the approved budget as well as contract/federal terms and conditions, financial reports and invoices are submitted in a timely manner, and all fiscal matters have been satisfied during the life of the project, including the closeout phase.

VII. APPLICABLE STATUTES, REGULATIONS, AND RELATED POLICIES

[OMB Uniform Guidance 2 CFR §200](#)

IX. PROCEDURE

- 1.) The ORGSP receives notification that a proposed project has been selected for funding by the granting agency. Once this notification is received the Post-Award Manager starts the process of project initiation from the start (acceptance of award) to the end (close out of the project).
- 2.) The Post-Award Manager will submit to the finance office a request for a project account number. This account number will be assigned to establish and maintain the project budget.
- 3.) The Post-Award Manager will establish a project file that will consist of the proposal, guidelines, initial award document, and any amendments to the initial award document, prior approval requests, correspondence, compliance approval, fiscal transaction forms and documentation of actions taken from the initiation to final closeout of the project. The project folder is representation of the complete history of the project.
- 4.) The Post-Award Manager will notify the PI of their account number along with a copy of the budget and budget lines and any applicable documents necessary to conduct the project. A meeting between the PI and the Post-Award Manager is scheduled to discuss the fiscal aspects of the project such as procedures for purchases, signatures required and timelines for purchases.
- 5.) Some sponsors require interim reports (monthly, quarterly or annually) in order to track the status of the project and ensure that the project is being conducted in accordance with the approved scope.
- 6.) Some sponsors require interim reports, such as monthly or quarterly, for purposes of tracking the financial status of the project and for handling reimbursements due the University. The Office of Research, Grants and Sponsored Programs handles these interim billings or reports in conjunction with the PI or department. The progress report should contain a comparison of actual accomplishments with approved goals and objectives, PIs' research findings, and other data. Recipients generally will be expected to provide reasons why established goals were not met and to identify corrective actions. For most agencies that anticipate funding a project over a period of years, but make incremental awards one year at a time, an annual progress report is required prior to the sponsor's release of the next year's funding. A copy of the final progress report must be submitted to the sponsor in accordance with the terms of the award. A copy must also be submitted to the ORGSP.
- 7.) On multiple-year projects with federal agencies, the University may be required to request formal carryover of remaining funds from one budget period to the next. Excess balances run the risk of new funding being reduced unless there is a justifiable reason why such balances remain un-obligated.
- 8.) The University is required to submit a final report of expenditures generally 60 to 90 days subsequent to the termination of an award. All authorized expenditures and outstanding obligations must be determined and considered in preparation of this report. Accurate, timely, and complete input from the PI/PI and department is essential to prepare this report.

X. CONTACT INFORMATION

For more information regarding this policy, please contact the Office of Research, Grants, and Sponsored Programs.

XI. DOCUMENT HISTORY

Effective: 04-24-2024

- [The ORGSP Handbook](#)
- [Post-Award Checklist](#)