A. General.

A-1. Principal investigators ("PIs") are frequently informed that a sponsor has made an award to the University but the University has either not received the award document or has received but not fully executed an agreement related to the sponsored project (see B-2). In such circumstances, a PI (or unit/college) may request that the Office of Sponsored Programs (OSP) set up a grant code early ("early setup"), thus allowing the PI to start work on the project and eliminating the need for cost transfers at a later date.

A-2. Frequently, for an existing project, the PI may be informed that the sponsor intends to issue an amendment to add time, funding, or both, but the amendment has not yet been received and/or fully executed (see B-2). The unit/college may request that OSP allow expenditures beyond the current allocation or end-date of the grant account, until an amendment is received ("advance funding"), thus eliminating the need for cost transfers at a later date and allowing the PI to continue working on the project without interruption.

B. Definitions.

B-1. Award Document or Notice of Award: Any of the various funding vehicles used by external sponsors to indicate that the sponsor is making a commitment to fund a proposal. These may take the form of:

a) a grant notice, which may or may not require signature by the University;

b) a contract or agreement, requiring execution by the University and the sponsor;

c) an award letter, which may or may not include a check payment in advance; or

d) a federal non-assistance contract.

For the purposes of this policy, contracts and other types of non-assistance agreements are not eligible for an early setup, unless an exception is given by the authorized official of the University.
**B-2. Fully-Executed Award or Amendment:** An agreement or amendment which has all of the required, authorized signatures, for both the University and the sponsor. For the sponsor, the authorized signatory is typically the granting or contracting officer; for the University, the authorized signatory is the Director of the Office of Sponsored Programs or authorized designee.

**C. Policy.**

**C-1. Early Setup.** Early setups are generally established not more than ninety (90) days and twenty-five percent (25%) of the expected first year’s funding amount.

a) For direct federally funded grants and cooperative agreements, the Vice President for Research and Economic Development (VPR ED), or designee, may provide the funding guarantee on the early setup.

b) For non-direct federally funded grants (flow-through) or cooperative agreements (at the discretion of the Director of OSP, or his/her designee), the unit/college must provide the funding guarantee on the early setup.

c) For all other sponsored program contracts, including industry sponsored contracts, OSP will perform a risk evaluation to determine if an early setup is reasonable. Upon OSP approval, the unit/college must provide the funding guarantee for the early setup.

d) Situations that arise outside of these parameters will be evaluated and a determination made on a case-by-case basis by the Director of the OSP, or designee.

e) If the project is subject to any additional compliance obligations, including but not limited to those subject to oversight by the IACUC (see APM 45.01), IBC (see APM 35.11, APM 45.20, and 45.23), IRB (FSH 5200), Radiation Safety Committee (FSH 1640.71) or financial conflict of interest (FSH 5600 and 5650), all associated requirements must be completed and approved via the appropriate authority before project work can begin and before an early setup will be established.

**C-2. Advance Funding.** Advance funding is generally authorized for not more than ninety (90) days and twenty-five percent (25%) of the expected funding amount. For direct federally funded grant projects, the Vice President for Research and Economic Development will provide the advance funding guarantee, as long as the unit/college provides
certification, using the template made available by the Office of Sponsored Programs that confirms that the PI is compliant with all deliverables and protocols per Section D-2.

To initiate advance funding approval, see D-2 below.

a) By submitting an advance funding request, the unit/college is requesting that OSP allow expenditures beyond the current allocation or end-date of the grant account for federal or state awards (but not contracts), only when the agency has indicated in writing to the University that it intends to issue an amendment for the proposed addition of time, funding, or both. If an amendment is not received to continue the project, all expenditures will be transferred to the unit/college guarantee source and the project account will be closed.

b) Situations that arise outside of the parameters cited in this policy will be evaluated and a determination made on a case-by-case basis by the Director of the OSP or designee.

c) If the project is subject to any additional compliance obligations, such as those subject to oversight by the IACUC (see APM 45.01), IBC (see APM 35.11, APM 45.20, and 45.23), IRB (FSH 5200), Radiation Safety Committee (FSH 1640.71), or financial conflict of interest (FSH 5600 and 5650), and the amendment that gives rise to the advance funding request either extends, alters, or creates new compliance obligations, all such research compliance requirements must be met before any work with respect to such obligations may be undertaken.

d) If advance funding is not approved by the unit and OSP, the PI must cease all project-related work and spending until an amendment is received and executed.

D. Process/Procedures.

D-1. Early Setup Request. The PI (or unit/college) must submit an Early Setup Request Form to OSP for review and approval. This form is available on the OSP website.

D-2. Advance Funding Request. Written advance funding approval is to be provided to OSP from the provost, dean, institute director, or equivalent, or an approved designee, prior to expenditures in deficit or past the end-date of a continuation project, confirming the following:
a) The project is in compliance with all project deliverables, including technical reports;

b) All project compliance protocols, if any, are up to date; and

c) The unit/college understands they will be responsible for incurred costs, should the amendment not be received and/or approved.

For sample unit/college certification and approval text, as well as additional details on advance funding (and how it differs from an early setup) please visit the Departmental Grant Administrator (DGA) tab of the OSP Website.

D-3. Non-Receipt of Award within 90 Days. Barring extenuating circumstances and the approval of the Director of OSP or designee to do otherwise, if an official award document, notice of an award, or amendment is not received within 90 days of the early setup establishment or advance funding approval, all expenditures must be transferred by the unit/college to the previously identified guarantee source identified.

E. Information. Any questions regarding the early setup of a sponsored project or advance funding of an existing project should be addressed to the Office of Sponsored Programs Post Award Unit at 208-885-6651 or by emailing the OSP Post Award team.