

Award Acceptance & Set-up Policy



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Effective Date: April 3, 2007
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Issuing Authority: Office of the Senior Vice President for Research
Responsible Offices: Sponsored Programs, Grants and Contracts Accounting, and Office of the General Counsel

Purpose:

The purpose of this policy is to establish clear procedures for the acceptance, negotiation, and setup of all incoming externally funded sponsored program agreements at Howard University and related entities, business units, subsidiaries and affiliated organizations (hereinafter referred to collectively as “Howard University”), including but not limited to grants, contracts, cooperative agreements, subawards received as a subrecipient (Sub-Ins), fellowships, industry-sponsored agreement, and other external research funding mechanisms. This policy ensures compliance with federal, state, and institutional regulations governing sponsored research and establishes the Sponsored Programs Office (SPO) as the unit responsible for reviewing, negotiating, and accepting all externally funded awards. This policy applies only to sponsored awards received by Howard University (incoming awards). Outgoing awards (Sub-Outs) issued by Howard University are governed by the Subaward Execution and Approval Policy (600-013).

This policy applies to all sponsored awards where Howard University is the recipient or subrecipient of external funding.

- For direct awards received by Howard University from a sponsor (e.g., federal agencies, corporations, private foundations), this policy applies to all steps from review to award setup.
- For subawards issued to Howard University as a subrecipient (incoming subawards), this policy applies with additional compliance measures, including sponsor mandated flow-down terms, financial oversight, and subrecipient monitoring by the prime recipient.
- For subawards issued by Howard University to other entities (outgoing subawards), refer to the Subaward Execution and Approval Policy (600-013).

This policy also defines roles and responsibilities of involved parties, including the Principal Investigator (PI), the Sponsored Programs Office (SPO), and the Office of the General Counsel (OGC). By implementing this policy, Howard University ensures that all awards are processed efficiently, in compliance with [2 CFR 200 \(Uniform Guidance\)](#) and sponsor-specific requirements, and that financial and administrative oversight is maintained throughout the project lifecycle.

Policy:

It is the policy of Howard University that all incoming externally funded sponsored program agreements must be reviewed, negotiated (if necessary or appropriate), and formally accepted by the Sponsored Programs Office (SPO) as the designated institutional authority for award setup. SPO is responsible for ensuring compliance with institutional policies, sponsor terms, and federal regulations before an award is accepted and executed.

For incoming sponsored awards (Howard as prime recipient):

- Howard University negotiates directly with the sponsor to finalize the award terms.
- The Authorized Organizational Representative (AOR) within SPO signs and formally accepts the award.

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- The award is set up in Cayuse and Workday, and a kickoff meeting is held with the PI and appropriate administrators.

For incoming subawards (Howard as a subrecipient):

- Howard University negotiates with the prime recipient rather than the sponsor.
- The subaward agreement must be reviewed to ensure compliance with the sponsor-mandated flow-down terms (e.g., prior approval requirements, financial restrictions, reporting obligations).
- The agreement is executed by an AOR within SPO after review of terms and conditions.
- Howard University must comply with the prime recipient's subrecipient monitoring procedures, including financial and technical reporting deadlines.

All fully executed incoming awards and subawards must be stored in Cayuse for tracking and compliance purposes.

Definition of Sponsored Program Agreements:

A Sponsored Program Agreement is a legally binding commitment between Howard University and an external funding entity (e.g., federal, state, corporate, or nonprofit sponsor) in which funds are provided to support research, training, or other scholarly activities, with conditions regarding performance, reporting, and compliance. Sponsored program agreements require institutional acceptance and oversight to ensure regulatory and financial compliance.

Externally Funded Agreements that Are NOT Sponsored Programs:

Externally funded agreements that are considered gifts, donations, or unrestricted funds are not sponsored programs and are subject to Howard University's Gift Acceptance Policy. These funds do not require SPO oversight and should be coordinated through the Office of Development and Alumni Relations.

All agreements requiring an institutional signature must be signed by the Authorized Organizational Representative (AOR) within SPO or other individuals with signatory authority formally delegated by the Board of Trustees through the University President. The execution of externally funded sponsored awards is governed by this policy and cannot be conducted by faculty, departmental staff, or unauthorized individuals.

Sponsored accounts will not be created in the University's accounting system until an award is fully accepted by SPO. However, in cases where pre-award spending is necessary, allowable and approved, advance accounts may be set up in accordance with the Advance Accounts & Pre-Award Spending Policy (600-008).

The following agreements must always be reviewed and executed by SPO or a designated authorized signatory. This list is not exhaustive, and SPO should be consulted for additional agreement types:

- Grants and Cooperative Agreements (including those from federal, state, and private sponsors)
- Research contracts and Subcontracts
- Confidentiality Agreements (NDAs/CDAs)
- Memoranda of Understanding (MOUs) and Collaboration Agreements
- Material Transfer Agreements (MTAs)
- Industry-sponsored Agreements

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- Consultant Agreements tied to Sponsored Programs or Projects (General consulting or service contracts not tied to sponsored projects fall under the Contracting Policy 300-007) and should be processed through Procurement.)
- Teaming Agreements
- Other Sponsored Program commitments requiring institutional acceptance

Consequences of Unauthorized Agreement Execution:

Any individual who enters into a legally binding agreement related to sponsored programs or projects without the proper institutional authority does so at their own personal risk. Unauthorized commitments will not be recognized by Howard University, and the individual may be held personally liable for any financial and/or legal consequences. Furthermore, individuals who engage in unauthorized execution of agreements may face disciplinary action in accordance with university policies.

Business Process Description:

Award Acceptance and Setup Overview:

The award acceptance and setup process ensure that all externally funded awards are reviewed, approved, and managed in compliance with sponsor terms and institutional policies. This process involves multiple steps, including notification, negotiation (if appropriate and necessary), formal acceptance, and account set up for financial management.

The Sponsored Programs Office (SPO) is responsible for the institutional acceptance of awards and ensures that all required compliance approvals (e.g., IRB, IACUC, COI) are in place before an award is activated. SPO will validate the awarded terms against the originally submitted proposal to ensure alignment before award acceptance, execution and setup. SPO will enter award setup information into Cayuse for account creation.

The SPO Pre-award team is responsible for the financial setup of awards in the university's accounting system. SPO Post-award ensures PIs are notified of award activation.

The business process follows these key phases:

- 1. Award Notification:** The sponsor issues an award notice, which is received by SPO via the Office of Research Ticketing System. If an award notice is sent directly to a Principal Investigator (PI) or department, it must be forwarded to SPO immediately.
- 2. Award Review and Negotiation:** SPO reviews the award terms and determines whether negotiation is required. If any terms conflict with university policies or pose a compliance risk, SPO will engage with the sponsor and appropriate internal central offices and PIs to negotiate appropriate modifications.
- 3. Legal Review (If required):** If the award contains non-standard terms, such as intellectual property restrictions, liability clauses, or foreign funding considerations, or is a contract, SPO will coordinate with the Office of General Counsel (OGC) to ensure appropriate legal review.
- 4. Award Acceptance and Execution:** The Authorized Organizational Representative (AOR) within SPO formally accepts the award by signing the agreement or acknowledging the acceptance in the sponsor's system.
- 5. Account Setup in Workday:** Once the award is accepted, SPO inputs award details in Cayuse and submits all required documentation for financial account setup in Workday. PIs and departmental administrators receive confirmation when the account is activated.

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6. Post-Award Kickoff Meeting: SPO convenes a meeting with the PI, department administrators, and other relevant stakeholders to review the terms and conditions of the award, including reporting requirements, financial compliance, and allowable expenses.

7. Ongoing Compliance and Award Management: Throughout the award period, the PI and departmental staff must ensure compliance with sponsor terms, including timely financial reporting and proper expenditure tracking. SPO provides guidance as needed.

Roles and Responsibilities:

Sponsored Programs Office (SPO):

Responsible for reviewing, negotiating, and accepting all externally funded sponsored agreements. SPO ensures compliance with university policies and sponsor requirements and coordinates with PIs for programmatic changes and OGC when legal review is needed.

Authorized Organizational Representative (AOR):

The institutional signatory authority for sponsored program agreements housed within SPO is responsible for signing and accepting externally funded awards.

Principal Investigator (PI):

Responsible for overseeing the technical and programmatic aspects of the award, complying with sponsor requirements, and working with SPO to ensure compliance.

Office of General Counsel (OGC):

Reviews agreements when unusual legal risks, intellectual property concerns, or exceptional financial liabilities are present.

Compliance Considerations:

All awards and subawards must comply with:

- [2 CFR 200 \(Uniform Guidance\)](#), institutional policies, and sponsor-specific terms.
- Subawards must include a flow-down of federal regulations and sponsor-imposed conditions.

Related Policies/Events:

- Subcontract Execution and Approval Policy
- Intellectual Property Policy
- Cost Sharing Policy
- Award Acceptance & Set-up Procedure
- Advance Accounts & Pre-Award Spending Policy
- Proposal Development & Submission Policy
- Costing Allocation
- Procurement
- Research Regulatory Compliance
- Financial Conflict of Interest in Research Policy
- Contracts Signing Authority Levels and Administrative Requirements Policy

Forms and Links

- Howard University Research Website