
APPROVED ENTITIES FOR FISCAL ADMINISTRATION OF SPONSORED PROJECTS

Category: Research
Responsible Office: Sponsored Projects Services
Responsible Executive: Vice President for Research

Date Established: 2/19/07
Date Last Revised: -
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Summary

Funds provided by an organization external to the University at Buffalo (UB) in support of any research, training, or other sponsored project directed by UB faculty or staff must be deposited with, and administered by, either The Research Foundation of the State University of New York (Research Foundation) or, if the funding is from a private organization and the Provost and Dean approve, by UB Foundation Services, Inc.

Policy

POLICY STATEMENT

Funds provided by an organization external to the university in support of research, training, evaluative testing, or public service projects (sponsored projects) directed by UB faculty or staff as part of their university work must be deposited with, and administered by, either the Research Foundation or UB Foundation Services, Inc. This requirement applies whether the sponsored project is conducted in facilities owned or controlled by UB or by an external entity. The Research Foundation may accept and administer sponsored project funding from public or private organizations. With the prior approval of the Provost and Dean, UB Foundation Services, Inc. may accept and administer sponsored project funding from private organizations. UB Foundation Services, Inc. may not accept funds from any publicly funded source.

UB will not accept institutional responsibility or liability for any third party claims resulting from acts or omissions of its faculty or staff in the course of their directing or participating in sponsored projects unless the funding for those sponsored projects is administered by either the Research Foundation or UB Foundation Services, Inc.

Failure to comply with this policy shall be deemed an action outside the individual employee's public employment or duties for the purposes of Section 17 of the Public Officers Law.

If the sponsor's written policy specifically requires that funds must be paid directly to the Principal Investigator (PI), they do not need to be deposited with and administered by, either the Research Foundation or UB Foundation Services, Inc.

BACKGROUND

UB faculty and staff direct and participate in sponsored projects as part of their university work. The University is responsible for the safe and lawful conduct of sponsored projects undertaken by its faculty and staff and for ensuring that those sponsored projects comply with all applicable rules and regulations. In order for the University to effectively discharge its oversight responsibilities, the organizations administering sponsored project funds must be legally obligated to comply with State University of New York (SUNY) and UB policies and procedures

and to allow UB unrestricted access to records of personnel and financial transactions relating to sponsored projects. Only the Research Foundation and UB Foundation Services, Inc. are so obligated and, are therefore the only two organizations that may accept and administer funds in support of UB sponsored projects. The Research Foundation has the policy, financial and compliance infrastructure to meet the complex requirements of government and other publicly funded sponsors and may, therefore, accept and administer funding from government agencies, publicly funded sources and private organizations. With the prior approval of the Provost and Dean, UB Foundation Services, Inc. may accept and administer sponsored project funding from private organizations. UB Foundation Services, Inc. may not accept funds from any publicly funded source.

Since UB can neither require, monitor, nor ensure compliance with laws, regulations and applicable SUNY and UB policies by organizations other than the Research Foundation or UB Foundation Services, Inc., it disclaims all institutional responsibility and liability for acts and omissions of its faculty and staff in the course of performing sponsored projects when the funding is accepted and administered by an organization other than the Research Foundation or UB Foundation Services, Inc.

APPLICABILITY

This policy applies to all funds provided by an organization external to UB in support of research, training, or other sponsored projects directed by UB faculty or staff.

DEFINITIONS

Principal Investigator

A Principal Investigator (PI) is a UB faculty or staff member who bears responsibility for the intellectual leadership of a project. The PI accepts overall responsibility for directing the research, financial oversight, and compliance with relevant university policies and sponsor terms and conditions.

Sponsored Project

A Sponsored Project is any externally funded research, training, evaluative testing, or public service project directed by UB faculty or staff as part of their university work that requires the university to perform a specified program or deliver a specified product.

RESPONSIBILITY

Who should know this Policy

- President
- Provost
- Vice Presidents and Vice Provosts
- Deans and Associate Deans
- Department Chairs
- Chief Financial Officers
- Principal Investigators
- Sponsored Projects Services staff

Principal Investigator

Specify the Research Foundation or UB Foundation Services, Inc. as the applicant organization and awardee of funds in all applications for sponsored project funding. Bring to the attention of Sponsored Project Services staff all unsolicited sponsored project awards that name as awardee and fiscal administrator any organization other than the Research Foundation or UB Foundation Services, Inc.

Department Chair

Promote faculty and staff awareness of this policy.
Approve for submission only those sponsored project applications that clearly specify the Research Foundation or UB Foundation Services, Inc. as the awardee.
Obtain approval from the Provost and Dean for UB Foundation Services, Inc. as the applicant organization and awardee of funds for sponsored project funding from private organizations.

Dean

When appropriate, approve UB Foundation Services, Inc. as the applicant organization and awardee of funds for sponsored project funding from private organizations.
Forward such requests to the Provost for approval.

Provost

When appropriate, approve UB Foundation Services, Inc. as the applicant organization and awardee of funds for sponsored project funding from private organizations.

Sponsored Projects Services

Submit only those applications for sponsored project funding that clearly specify the Research Foundation or UB Foundation Services, Inc. as the approved awardee.
Bring this policy to the attention of any organization that has made an unsolicited sponsored project award to an entity other than the Research Foundation of SUNY or UB Foundation Services, Inc. and make arrangements for the sponsored project to be redirected appropriately.
Ensure all faculty and staff have received a copy of this policy.

Contact Information

Sponsored Projects Services
402 Crofts Hall
North Campus
Amherst, NY 14260

Phone: (716) 645-2634
Fax: (716) 645-2760
Website: www.research.buffalo.edu
E-mail: info@research.buffalo.edu

Related Information

University Documents:

[Disclosure of All Funds Generated Through the Use of University Faculty or Staff Time and/or the Use of University Facilities](#)
[Financial Responsibility for Sponsored Projects](#)
[Principal Investigator Eligibility](#)

Other Documents:

[OMB Circular A-21](#) "Cost Principles for Educational Institutions"

[OMB Circular A-110](#) "Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations"

[Public Officers Law](#)

Related Links:

[UB Policy Library](#)

Presidential Approval

Signed by John B. Simpson

2/19/07

John B. Simpson, President

Date