



## **Guidelines for Requesting a Pre-Award Spending Project**

**Effective Date:** July 1, 2019

**Issuing Authority:** Office of Research and Economic Development

**Responsible Officer:** Associate Vice President for Research,  
Office of Research and Economic Development

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### **I. PURPOSE**

The purpose of this guideline is to provide assistance in requesting and obtaining a Sponsored Project account prior to receipt of a notice of grant award or fully executed agreement, under conditions where this is appropriate and meets legal, regulatory, and sponsor requirements.

### **II. GUIDANCE STATEMENT**

This guidance outlines the requirements for obtaining a Sponsored Project account and for incurring costs on the assigned Sponsored Project account before the Sponsored Project award process is completed, within the official project start and end dates.

### **III. BACKGROUND**

Occasionally, it is allowable and desirable to establish an account and initiate allocation of effort and expenses for a Sponsored Project for which the official notice of award has not been received, the agreement has not been fully executed or spending prior to the official start date needs to occur.

Implementation of this guidance will permit allowable expenses up to 25% of the expected award amount including salary and associated fringe benefits to be charged at the time expenses are incurred. Proper use of pre-award spending accounts reduces audit risk by avoiding expenditure corrections from a non-sponsored “holding” account.

The University of Wyoming will not invoice or draw down funds for these projects until the project is awarded.

#### IV. SCOPE

This guidance applies to the following types of projects:

- Federal grants which may be awarded with a period of performance backdated to a known period prior to the award date.
- Industry and Federal awards into UW that may be finalized during the period of performance, whose start date will be prior to the signature date on the Agreement.
- Foundation grants which may provide informal notification of award prior to the official notification, provided other terms and conditions of this guidance are met.
- Federal grants which are awarded with a period of performance postdated and spending needs to occur prior to the official start date.

#### V. DEFINITIONS

**Pre-Award Spending Project:** An account established before the award has been completed in order to incur cost associated with the project within the project's start and end dates.

**Institutional Animal Care and Use Committee (IACUC):** Established at institutions in accordance with the **Public Health Service Policy on Human's Care and Use of Laboratory Animals** and has broad responsibilities to oversee and evaluate the institutions' animal programs, procedures, and facilities. IACUC review and approval is required for all PHS supported activities involving live vertebrate animals prior to funding.

**Institutional Review Board (IRB):** IRBs are set up by research institutions to ensure the protection of rights and welfare of human research subjects participating in research conducted under their auspices. IRBs make an independent determination to approve, require modifications in, or disapprove research protocols based on whether human subjects are adequately protected, as required by federal regulations and local institutional policy.

**Principal Investigator (PI):** The individual judged by the applicant organization to have the appropriate level of authority and responsibility to direct the project or program. He/she is responsible and accountable for the proper conduct of the project or activity.

**Office of Research and Economic Development (ORED):** The Office of Research & Economic Development works with faculty, staff and students in all seven colleges and UW's outreach programs to link research, technology transfer, and economic development efforts to enhance federal, state and private sector support for faculty and graduate student scholarship.

For requests for a pre-award spending project, the Associate Vice President for ORED or their designee is the position with authority to grant pre-award spending projects.

## **VI. PROCEDURES**

Preaward spending projects will be allowed provided the following conditions are met:

- The PI has submitted all necessary proposal information, budget, compliance submissions, and other forms required as part of the normal Sponsored Project proposal process.
- The PI has completed and submitted a **Request to Create a Preaward Spending Project**.
- Proof of acceptable evidence of the likelihood of funding shall be provided and included in the request. Acceptable evidence may include:
  - Email notification from the sponsor
  - Just-in-time request for final information; or
  - Notice of grant award to a primary recipient with whom UW will have a subaward that was included in their awarded budget submission, once subaward negotiations have begun.
- Spending in advance of a finalized agreement will be acceptable to the sponsor, including any pre-award dates proposed.
- Expenses are allowable and allocable to the project.
- No expenses requiring IRB, IACUC, Conflict of Interest or other compliance approvals are made prior to such approvals being received.
- No subawards may be issued during pre-award spending.
- The PI and Chair/Dean/Center Director accept full responsibility for funding the activity from non-sponsored sources should the Sponsored Project not be awarded or finalized, or any expenses charged to the project be disallowed.

## **VII. SUBMISSION AND APPROVAL**

- The PI submits all required proposal information.
- The PI submits the **Request to Create a Preaward Spending Project** to the Office of Research and Economic Development (ORED) via the [InfoReady Review](#) platform.
- The Associate Vice President for ORED or their designee will review the request and either approve or deny the request.
- If approved, the Office of Research and Economic Development, Research Services will create the PT record and forward to the Office of Sponsored Programs (OSP) for account establishment and will also inform the PI.

## **VIII. SETUP AND MONITORING**

OSP will establish each preaward account and be responsible for maintaining the account in preaward status until the award is finalized. At that time, the account will be administered like other awards.

**IX. CLOSING DOWN OF UNFUNDED PREAWARD ACCOUNTS**

- When a sponsor does not fund a project for which a preaward account has been established, it is the responsibility of the PI to immediately notify OSP.
- The PI and/or Dean/Center Director are required to transfer all expenses to a non-sponsored account within 30 days.
- It is the responsibility of OSP to make sure all transfers are initiated and completed.
- If a preaward account has not been funded within 60 days and has not been extended, the Associate Vice President of ORED will be responsible for assessing whether the account should be closed.