

---

---

## 2101 ADMINISTRATION OF SPONSORED PROJECTS

---

---

Effective: December 1986  
Last Reviewed: May, 2018  
Last Revision: May, 2017  
Resp. Office: Research Services  
Approval: Research Services

---

### PURPOSE:

---

To ensure that funds provided from external sources to support research and other projects are administered in accordance with University policies as well as those of the sponsor. External sources include both governmental and private organizations.

---

### POLICY:

---

1. All externally sponsored projects for research or other purposes will be administered through Research Services, The Penn Center for Innovation, and the Office of Clinical Research in accordance with established University policies and procedures.
2. Any project, which meets any of the following criteria, is considered to be a "sponsored project" and will be administered accordingly:
  - a. The project commits the University to a specific line of scholarly or scientific inquiry, typically documented by a statement of work;
  - b. A specific commitment is made regarding the level of personnel effort, deliverables, or milestones;
  - c. Project activities are budgeted, and the award includes conditions for specific, detailed or formal fiscal reports, and/or invoicing;
  - d. The project requires that unexpended funds be returned to the sponsor at the end of the project period;
  - e. The agreement provides for the disposition of either tangible property (e.g., equipment, records, technical reports, theses or dissertations) or intangible property (e.g., inventions, copyrights, or rights in data) which may result from the project;
  - f. The sponsor identifies a period of performance as a term and condition of the award.

3. All externally sponsored research and teaching activities that involve human subjects, laboratory animals, use of radioactive materials, or biohazard activities must be reviewed by the appropriate University committees for compliance with University policies and governmental regulations.
4. Agreements to support continuing medical education are to be administered by the Office of Continuing Medical Education.
5. Questions regarding whether a particular award is a sponsored project should be directed to the Office of Research Services.

**RELATED INFORMATION:**

---

2227 Gift Policy

**ROLES AND RESPONSIBILITIES:**

---

**PRINCIPAL INVESTIGATOR**

---

- Appropriately route the project for internal review and approval

**BUSINESS ADMINISTRATOR**

---

- Appropriately route the project for review and approval

**CORPORATE AND FOUNDATION RELATIONS**

---

- Provide guidance to Business Administrators and PIs on the interpretation of this policy
- Consult with Office of Research Services on interpretation and application of this policy when necessary

**PENN CENTER FOR INNOVATION**

---

- Provide guidance to Business Administrators and PIs on the interpretation of this policy
- Consult with Office of Research Services on interpretation and application of this policy when necessary

**OFFICE OF CLINICAL RESEARCH**

---

- Provide guidance to Business Administrators and PIs on the interpretation of this policy
- Consult with Office of Research Services on interpretation and application of this policy when necessary

**OFFICE OF RESEARCH SERVICES**

---

- Provide guidance to Business Administrators and PIs on the interpretation of this policy
- Consult with Corporate and Foundation Relations on interpretation and application of this policy when necessary