UNIVERSITY OF MIAMI
SPONSORED PROGRAMS POLICIES AND PROCEDURES

Section C: Non-Financial Compliance Issues
Policy C1: Compliance with and Dissemination of Sponsored Regulations

Approval: April 9, 1996
Revision: January 5, 2005
Reviewed: December 2006

PURPOSE:

To establish the responsible offices for compliance with and dissemination of sponsored agency policies, guidelines, rules, and regulations (hereafter referred to as policies). In accepting award agreements from federal and nonfederal sponsors, the university agrees to abide by the policies that are given by the sponsor and to ensure that the University community is informed and knowledgeable of them.

DEFINITIONS:

None

POLICY:

The University will comply with the policies established by the sponsor and with all terms and special conditions given for a specific award. The University will also ensure that these policies are disseminated to principal investigators/project directors (PI) and/or their designee (department administrators).

REFERENCES:

None

PROCEDURES:

Compliance with Sponsor Regulations

1. When the university accepts a grant or contract from a sponsor, it becomes bound by the policies of the sponsor. In addition, the University becomes bound to any terms and special conditions of the specific award.

2. Research Administration (Pre-Award), Sponsored Programs (Post Award Administration), the PI, and, if necessary, General Counsel, are responsible to ensure that all awards undertaken contain only policies, terms, and conditions with which the University can comply.
3. Compliance with sponsor policies is the responsibility of the PI. The PI is supported by the Research Administration (RA) and the Sponsored Programs (SP) Offices, who are responsible for assisting the PI’s administrative efforts in complying with these policies.

4. RA and SP are responsible for monitoring and assimilating all policies, as well as obtaining clarification or interpretation of these policies.

5. The Directors of the RA and SP Offices are the University’s primary contact points for all sponsor business. The Controller’s Office is responsible for all audits.

**Dissemination of Sponsor Regulations**

1. RA and SP Offices will maintain a library of all necessary sponsor policies and all sponsor websites. These offices will also ensure receipt of updates to manuals, publications, and notifications from sponsors.

2. The Director of SP will communicate directly with the sponsor when a specific policy is subject to interpretation and requires clarification to enable the university to comply. The Director also has the responsibility to recommend a course of action to be followed that is consistent with the policy.

3. When the sponsor or other sources have indicated a policy is in the process of change, the Director of SP will evaluate the impact of the proposed changes and communicate this, along with the status, to the university community.

4. The following offices are responsible for maintaining their sections of the Sponsored Programs Policies and Procedures: Research Administration, Sponsored Programs, Technology Transfer, Human Subjects Research Office, Veterinary Resources, and the Office of the Controller who maintains the Sponsored Programs website.