
APPROVED ENTITY FOR FISCAL ADMINISTRATION OF SPONSORED ACTIVITIES

Category: Research

Date Established: 2/19/07

Responsible Office: Sponsored Projects Services

Date Last Revised: 08/28/17

Responsible Executive: Vice President for Research and Economic Development **Date Posted to Library:**

Summary

The Research Foundation is the only approved entity for the fiscal administration of sponsored activity.

Policy

POLICY STATEMENT

The University at Buffalo (UB, university) recognizes The Research Foundation for the State University of New York (Research Foundation) as the only approved entity for the fiscal administration of sponsored activity. Funds received from external organizations to support sponsored activity directed by UB faculty and staff as part of their university work must be deposited with and administered by the Research Foundation. The Research Foundation will accept and administer sponsored activity funding from public and private organizations.

UB will accept institutional responsibility or liability for third party claims resulting from acts or omissions of its faculty or staff in the course of their directing or participating in sponsored activity only when the funding for those sponsored projects is administered by the Research Foundation.

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

BACKGROUND

UB faculty and staff direct and participate in sponsored activities as part of their university work. The university is responsible for the safe and lawful conduct of sponsored activity undertaken by its faculty and staff and for ensuring that sponsored activities comply with all applicable rules and regulations.

In order for the university to effectively discharge its oversight responsibilities, the organization administering sponsored activity funds must be legally obligated to comply with State University of New York (SUNY) and UB policies and procedures, and allow UB unrestricted access to personnel and financial records relating to sponsored activities. Only the Research Foundation is so obligated and is the only organization that may accept and administer funds in support of UB sponsored activities. The Research Foundation has the policy, financial, and compliance infrastructure to meet the requirements of government, other publicly funded sponsors, and private organizations.

UB cannot require, monitor, or ensure compliance with laws, regulations, and SUNY and UB policies by organizations other than the Research Foundation, and disclaims all institutional responsibility and liability for acts and omissions of its faculty and staff in the course of performing sponsored activities when funding is accepted and administered by an organization other than Research Foundation.

APPLICABILITY

This policy applies to all funds received from an external organization in support of sponsored activities directed by UB faculty and staff.

The requirement to deposit all external funding with the Research Foundation applies when the sponsored activity is conducted in facilities owned or controlled by UB or by an external entity.

DEFINITIONS

Principal Investigator

A UB faculty or staff member who bears responsibility for the leadership of a project, program, or an activity. The PI accepts overall responsibility for directing the research, financial oversight, and compliance with relevant university policies and sponsor terms and conditions.

Sponsored Activity

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 during a specified period of performance. The proposed work requires a specific line of scholarly inquiry such as a work statement, testing of a hypothesis, a model project, or a defined set of deliverables. Deliverables may include programmatic, technical, and detailed financial reports during or at the conclusion of the project. Sponsored activity funding cannot be made to UB anonymously; the sponsor/funder must always be identified.

RESPONSIBILITY

Principal Investigator

- Specify the Research Foundation as the applicant organization and awardee of funds in all applications for sponsored activity funding.
- Inform Sponsored Project Services staff of all unsolicited sponsored activity awards that name any organization other than the Research Foundation as awardee and fiscal administrator.

Department Chair

- Promote faculty and staff awareness of this policy.

- Approve for submission only those sponsored activity applications that specify the Research Foundation as the awardee.

Sponsored Projects Services

- Submit only those applications for sponsored activity funding that specify the Research Foundation as the approved awardee and fiscal agent.
- Bring this policy to the attention of any organization that has made an unsolicited sponsored activity award to an entity other than the Research Foundation and make arrangements for the sponsored activity to be redirected appropriately.

Contact Information

Sponsored Projects Services
UB Commons, Suite 211
North Campus
Amherst, NY 14228
Phone: 716-645-2634
Fax: 716-645-2760
www.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](#)
[Policy on Distinguishing Gifts vs. Sponsored Projects in External Funding Received by the University at Buffalo](#)

Other Documents:

[OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)
[Public Officers Law](#)

Related Links:

History

- August 2017 Full review. Updated the policy to:
- require all external funding to be deposited with the Research Foundation; previously the UB Foundation was also an approved entity
 - align responsibilities with the requirement to deposit all external funding with the Research Foundation

Presidential Approval

Satish K. Tripathi, President

Date