

ADMINISTRATIVE DIVISION RSCH Office of Research		POLICY NUMBER RSCH 1.07
POLICY TITLE Administration of Sponsored Projects		
SCOPE OF POLICY USC System		DATE OF REVISION August 18, 2022
RESPONSIBLE OFFICER Vice President for Research		ADMINISTRATIVE OFFICE Office of Research

PURPOSE

This policy aims to ensure that funds received from external sponsors are administered in accordance with university policies as well as those of the sponsor. Funds received from external sponsors must be classified appropriately to account for the funds, recover costs, monitor project activities, and report on use of funding to internal and external constituents. External sponsors may include government agencies, corporations, private organizations, and individuals.

POLICY STATEMENT

All externally sponsored projects for research, training programs, or similar scholarly endeavors will be administered through the Office of Sponsored Awards Management (SAM) in accordance with established University policies and procedures.

A. Sponsored Projects

“Sponsored projects” commit the university to a specific line of scholarly or scientific inquiry, often defined by a statement of work, hypothesis, and/or defined set of deliverables; may include programmatic, technical, or detailed financial reports; and may feature any of the following criteria:

1. The project entails specific commitments regarding the level of personnel effort, deliverables, and/or milestones;
2. Project activities are budgeted, and the award includes conditions for invoicing; specific, detailed, or formal fiscal reports; fiscal compliance policy requirements; and/or auditing requirements by, or on behalf of the funding source;
3. The project funding is revocable, or the project agreement requires that unexpended funds be returned to the sponsor at the end of the project period;
4. The project agreement provides for the disposition of either tangible property (e.g., equipment, records, or technical reports) or intangible property (e.g., inventions, copyrights or rights in data) which may result from the project;
5. The project imposes restrictions on publication or other forms of dissemination of project results or outcomes;

6. The project agreement identifies a period of performance as a term and condition of the award;
7. Project funds are awarded following a competitive application or bid process. The absence of any of these conditions in the description of a project shall not necessarily constitute a determination as to how the awarded project funds will be administered.

B. 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

PROCEDURES

A. Responsibility for Consideration: During the development of all project proposals, and prior to any formal proposal submission, consideration must be given to the question of whether a proposed project should be classified as a “sponsored project” as defined in section I, particularly if the proposed project meets one or more of the criteria listed in section I.B. Oversight responsibility for ensuring that proposed projects are evaluated in this regard lies with administrators who have approval authority in the appropriate administrative chain for proposal submission.

B. Project Classification

1. When considering whether a proposed project should be classified as a “sponsored project”, questions should be directed to the Office of Sponsored Awards Management (SAM). The Director of SAM or designated staff will respond to informal inquiries in a timely manner to address any questions and resolve the question of project classification.
2. If informal discussions do not resolve the question of whether a project should be classified as a “sponsored project”, full project details shall be referred to the Vice Presidents for Research and Development, or their designates, for final resolution.

C. Submission of Sponsored Project Proposals: Sponsored project proposals must be submitted for administrative review and approval using the University’s designated process/system (USCeRA) prior to submitting to an external organization.

RELATED UNIVERSITY, STATE AND FEDERAL POLICIES
[FINA 3.00 Contract and Grant Accounting – Restricted Funds](#)

HISTORY OF REVISIONS

DATE OF REVISION	REASON FOR REVISION
June 11, 2015	New policy approval
August 18, 2022	Policy updated to standard template.