

ROP/04 POST AWARD MANAGEMENT OF EXTERNALLY FUNDED

Policy Details

Section	Description
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1: INTRODUCTION

1.1 Description

Application: The Post-Award Management of Externally Funded Research policy applies to all externally funded research activities.

Exceptions: Frameworks governing the management of doctoral training awards are excluded from this policy.

Applications for approval of exceptions to this scheme should be made through the Director of the Research Office

1.2 Aims

All major funders require external research funding to be managed appropriately and expended for the purpose for which it is awarded. The management of Post-Award operational processes, associated authorisation responsibilities and local monitoring requirements have been devolved to the Faculty Deans, Faculty Research Services and Academic Departments. This policy describes the business controls in place to sustainably manage the College's research portfolio and the minimum monitoring requirements.

The College's Post-Award Management of Externally Funded Research Policy aims to:

- a) Establish the Post-Award operational responsibilities devolved to Faculties and delegated to the Academic Departments and Faculty Research Services.¹
- b) Clarify lines of accountability and provide consistent and clear lines of authority.
- c) Outlines the tools available to meet these responsibilities, including the [Funder Golden Rules](#) and Oracle BIEE [Dashboard Reports](#).
- d) Set minimum monitoring requirements for Faculty administrative functions to establish common standards, engender responsibility and improve efficiency.
- e) To provide a platform for subsequent Faculty review, delegation and monitoring of Post-Award management responsibilities.

¹ Faculty Research Services is used in the context of this policy as an umbrella term encompassing Faculty Research Services, Joint Research Office and Faculty Contracts teams

2: POST-AWARD OPERATIONAL PROCESSES: GOVERNING PRINCIPLES

- 2.1 The President has devolved operational responsibility for the management of research awards (through the Provost) to the Faculty Deans. Ownership of the associated processes is delegated to the Academic Departments and Faculty Research Services.
- 2.2 Authorisation to undertake research award management processes is only delegated to staff with the necessary skills and knowledge of relevant College procedures, processes and systems; the terms and conditions of funding; and any externally imposed conditions, regulations and guidelines.
- 2.3 At the highest level, Faculty Research Services are responsible for the following Post-Award processes:
- Review, negotiation and acceptance of research awards
 - Initial budget set-up and subsequent updates to award details/status and budget on the pre-award management system and Oracle Grants Management System (up to account closure and archiving)
 - Financial approval of research funded staff adverts, appointments and contractual changes and the management of related staff charging processes
 - Management of overheads and FEC journals (i.e. Indirect and Directly Allocated Costs)
 - Regular account review and reconciliation of awards
 - Preparation and submission of financial claims, invoices and expenditure statements to funders.
 - Coordination of research partner expenditure statements and payments
 - Raising purchase orders relating to research collaborative agreements and subcontracts
- 2.4 At the highest level, Academic Departments are responsible for the following Post-Award processes:
- Supporting the Principal Investigator (PI) with the scientific delivery and financial management of the research
 - Preparation and submission of scientific reports
 - Non-financial aspects of recruiting and appointing research funded staff
 - Management of timesheets in line with funder terms and conditions, e.g. facilitation of timesheet completion, quality-checking, submission, retention of supporting evidence of absence, and line management approval of timesheets
 - Procurement and approval of non-staff expenditure and staff expenditure in line with funder terms and conditions
 - Identification and timely communication of requests for extensions and supplements
 - Budget planning, expenditure forecasting and management of under/overspends
 - Management of continuing obligations post end date, e.g. research data management; open and unrestricted access to published research; Researchfish submissions etc.

The **Faculties** shall ensure that:

- 2.5 Academic Departments and Faculty Research Services are aware of and accept the responsibilities outlined under this policy.
- 2.6 Delegation to Faculty Research Services is firstly to the Faculty Research Services Manager or equivalent officer. Subsequent delegation must conform to part 2.2.
- 2.7 Delegation to the Academic Department is jointly to the Principal Investigator (PI) and the senior administrative officer associated with the PI's academic department, e.g. Departmental Operations Manager or equivalent. Subsequent delegation must conform to part 2.2.

3: ACADEMIC DEPARTMENT RESPONSIBILITIES AND MINIMUM MONITORING REQUIREMENTS

3.1 The following core principles apply to externally funded research projects. All expenditure should be:

- a) directly charged to the account for which the purchase is intended
- b) in line with the awarded budget
- c) in accordance with the funder’s terms and conditions
- d) incurred between the project start and end dates

Any deviation from the original budget (outside of the terms and conditions of award) should be approved by the funder prior to the commitment of expenditure.

3.2 The Principal Investigator (PI) is responsible for delivering the research objectives and all expenditure charged to the research project. The PI is accountable to their Head of Department (HOD).

3.3 Academic Departments are jointly responsible (with Faculty Research Services) for the sound financial management of research funds and mitigation of risk in line with the College’s [Purchasing Policy](#).

Academic Department Responsibilities

3.4 Departments are responsible for the following Post-Award activities:

Table 1 - Activities and Responsibilities

Staff Costs
Recruitment of research staff, e.g. preparation of job description, job advert.
Staff interview and selection.
Initiation of HR recruitment processes - staff contract requests, contractual changes.
Staff expenditure journals - submission of requests supported by appropriate cost justification.
Timesheet management, e.g. facilitation of timesheet completion, quality checking, approval and retention of supporting evidence.
Non-Staff Costs
Approval of all non-staff expenditure in line with funder and College policies.
Procurement of goods or services in line with tendering policies and associated thresholds, and specific funder terms and conditions.
Student stipends and tuition fee payments - initiation and approval.
Budget planning, forecasting and monitoring throughout the project lifecycle
Monitoring of higher risk non-staff expenditure e.g. equipment, travel and subsistence expenses, non-staff journals, professional services / fees.
Initiation of journal transfers supported by evidence of the appropriateness of the transaction.
Account Management
Approval of financial variation between application and award before award acceptance.
Extension and Supplement requests to funder where required.
Budget virement requests to Faculty Research Services.
Review and approval of final Invoices and Expenditure Statements
Management of underspends or overspends.
Scientific Management
Planning, monitoring and dissemination of research progress for College and research partner activities.
Preparation and submission of interim and final scientific reports.
Post end-date obligations, e.g. research data management, open and unrestricted access to published research, management of arising intellectual property, Researchfish submissions.
Ethics Code - management of scientific activity in accordance with College and funder requirements, e.g. conflicts of interest, research integrity, safeguarding, equality and diversity
Sub-recipient oversight and due diligence reviews of research partners and subcontractors.

Academic Department Monitoring Requirements

- 3.5 Minimum administrative standards have been set for Academic Department administration to ensure appropriate governance of research funding management.
- 3.6 Where the requirements of this policy have significant resource implications, Departments may employ risk-based prioritisation with appropriate justification
- 3.7 Project expenditure should be reviewed at least quarterly for Research Council, European Commission and charity funding, and at least annually for non-regulated funders such as industry.
- 3.8 Various College tools are available to support Academic Departments, including the [Spend Detail](#) and [Spend Against Budget](#) reports automatically provided to grant-holders through Report2Web on a monthly basis. Authorised Departmental administrative users also have access to a number of Oracle BIEE [Dashboard Reports](#) to help them manage their awards. They give detailed information on awards, projects and proposals per Faculty to support the monitoring of expenditure against budgets.
- 3.9 Potentially ineligible expenditure should be discussed with the PI and if appropriate, a corrective journal transfer should be processed. Adequate documentation must be retained to evidence the appropriateness of the transaction in line with funder terms and conditions.
- 3.10 Adjustments should be made in a timely manner so that rates of expenditure and availability of funds can be accurately monitored.
- 3.11 It is recommended that Exception Reports are reviewed at least quarterly. Where exceptions are identified, follow up action should be taken in a timely manner and evidenced appropriately.

The following reports are available to Academic Departments:

Table 2 - Exception Reports and Descriptions

Exception Report	Description
Equipment budget with no equipment spend	Identifies active awards with no equipment spend against an equipment budget
Equipment budget greater than £25K but spend is less than £20K	Identifies active awards with equipment budget greater than £25K but where equipment spend is less than £20K
Project more than 3 months old with staff and/or bursary budget and no spend	Identifies active projects which started more than 3 months ago with staff or bursary budget, but no staff/bursary spend
Research Councils Starting Report	Identifies Research Council awards with staff and/or bursary budget with staff/bursary spend, grouped by age
Project/Award end date within 9 months	Identifies awards which have an actual end date within the next 9 months.
Projects not closed after actual end date	Identifies awards which have passed their actual end date but not closed yet.

4. FACULTY RESEARCH SERVICES RESPONSIBILITIES AND MINIMUM MONITORING REQUIREMENTS

- 4.1 Faculty Research Services are jointly responsible (with Academic Departments) for the sound financial management of research funds and mitigation of risk in line with the College's [Purchasing Policy](#).
- 4.2 Faculty Research Services are required to monitor research project expenditure to ensure appropriate governance of research funding management and minimise the risk of financial sanction by funders.

Faculty Research Services Responsibilities

4.3 Faculty Research Services are responsible for the following Post-Award activities:

Table 3 - Activities and Responsibilities:

Award Review and Acceptance
Initial review of award – funder terms and conditions, billing and financial reporting, project activation, partner/sub-recipient involvement, timesheet requirements
Liaison with PI and Academic Department about financial variation between application and award if relevant
Re-negotiation of award terms and conditions with funder where required
Award Acceptance on behalf of the College
Starting Certificate submission to funder
Award Set Up – Pre-Award management system, Oracle Grants Management System and associated system interfaces
Electronic circulation of key project documents to PI and Department including: <ul style="list-style-type: none"> • Award Letter and/or final contract, • Funder Terms and Conditions, • Golden Rules (if available), • Budgeting Form • Any special requirements or obligations e.g. timesheet completion
Confirmation of sponsorship, ethics and other regulatory approvals prior to associated activity where required
Timesheets - communication of timesheet requirements and supporting evidence needed
Account Management
Reconciliation of accounts, including account set-up check and review of large expenditure/income variances
Preparation and submission of invoices/claims and Expenditure Statements
Foreign currency management
Initiation of Refunds and Credit Memos
Review and processing of budget virements in line with funder terms
Extensions/Supplements - process system amendments to award
Preparation of final invoice/claim and/or Expenditure Statement and initiation of PI/Department review before submission to funder
Award Closure - Closure of the account on Oracle Grants Management System
Staff Costs
Financial approval of staff advertisements, staff employment contracts and contractual changes
Financial approval and processing of staff expenditure journals
Staff commitment forecasting and communication of variances to Departments
Timesheet management – final collation, checking / retention of timesheets as per funder and College policies
Non-Staff Costs
Monitoring of research partner and subcontractor expenditure and overhead transactions
Managing transfers for Indirect and Directly Allocated costs
Retention of evidence of the appropriateness of journal transfers
Project Management
Preparation of research collaborative agreements and associated purchase orders
Coordination of research partner expenditure statements and processing of payments
Audit - financial preparation, analysis of expenditure and collation of evidence as per audit requirements
Transferring awards to or from other institutions and managing processes to accept/relinquish awards in line with funder requirements

Faculty Research Services Monitoring Requirements

4.4 Monitoring procedures include a minimum set of checks to ensure that core documentation is submitted to funders at the appropriate time (i.e. award acceptance forms; starting certificates; final expenditure statements).

For each award, the following information should be recorded:

- Account Code, Funder name, Funder Grant Reference, Project Title, PI Name, Department, Dates of Checks, Comments,
- Announced and Actual Start Date, Announced and Actual End Date, Deadline for Acceptance, Date of Acceptance Submission,
- Deadline for Starting Certificate, Date of Starting Certificate Submission,
- Deadline for Final Expenditure Report, Date Scientific Report Reminder Sent, Date Final Expenditure Report Submitted,

4.5 It is recommended that Exception reports should be reviewed at least quarterly. Where exceptions are identified, follow up action should be taken in a timely manner and evidenced appropriately.

The following reports are available to Faculty Research Services:

Table 4 - Exception Reports and Descriptions

Exception Report	Description
Spend deviation > 30% from income.	Identifies awards that started over a year ago and have a 30% or more discrepancy between spend and income
FEC journals not initiated	Identifies awards which have Directly Incurred staff spend but no FEC journals have been initiated yet
No income more than 9 months after start date	Identifies awards which started more than 9 months ago and have no income credited yet
Project/Award end date within 9 months	Identifies awards which have an actual end date within the next 9 months.
Projects not closed after actual end date	Identifies awards which have passed their actual end date but not closed yet.

4.6 Faculty Research Services also have access to Oracle BIEE Dashboard Reports which provide detailed information on awards, projects and proposals to support the management of the award portfolio and resolution of any issues arising.

5. FACULTY RESPONSIBILITIES

The Faculty Dean and Faculty Operating Officer are accountable for Post-Award Management activities covered by this policy and shall ensure that:

- 5.1 Academic Departments and Faculty Research Services are aware of and fulfil the responsibilities outlined under this policy.
- 5.2 Faculty oversight is in place so that Post-Award processes and activities are delivered in accordance with this policy by the responsible owner, i.e. Principal Investigator, Department administrative officer, Faculty Research Services.
- 5.3 Heads of Department (supported by their senior Department administrative officer) take responsibility for ensuring that the minimum monitoring requirements outlined for Academic Departments within this policy are undertaken and any issues arising are resolved in a timely manner.
- 5.4 Faculty Research Services are responsible for undertaking the minimum monitoring requirements outlined for Faculty Research Services within this policy and resolving issues arising in a timely manner.
- 5.5 Authorisation to undertake Post-Award management activities and formal approvals is only delegated to staff with appropriate knowledge of the relevant College policies and procedures, the terms and conditions of funding and any other externally imposed conditions, regulations or guidelines (see part 2.2). A record of all delegated responsibilities should be retained and must be in line with College and funder policies and any subsequent changes to these.

**APPENDIX I:
DELEGATION OF POST-AWARD FINANCIAL MANAGEMENT RESPONSIBILITIES**

The Faculty Research Services Manager and Head of Department may further delegate Post-Award Management and monitoring requirements to staff with the appropriate skills and knowledge of:

- Relevant College policies and procedures
- Terms and conditions of funding
- Any externally imposed conditions, regulations or guidelines

6.1 All staff with involvement in financial matters must observe the appropriate sections of [Ordinance C1: Financial Matters](#) and the College’s [Financial Regulations](#).

Academic Department Delegation

- 6.2 The Principal Investigator (PI) has overall responsibility for the scientific, technical and financial management of their research award. This includes adherence with the terms and conditions of funding and College policies, fulfilment of reporting requirements, and timely notification of significant project changes to the funder.
- 6.3 The PI cannot delegate accountability for their award, but may delegate responsibility for the day-to-day management of project finances to appropriate Departmental staff including the administration of staff and non-staff budgets, as long as these activities comply with relevant College policies (e.g. [Recruitment](#) and [Purchasing](#)) and are within the terms and conditions of funding. Delegation must conform to part 2.2.

Faculty Research Services Delegation

6.4 The Research Services Manager or equivalent officer retains overall accountability for Post-Award management activities but may delegate operational responsibility to nominated staff within a suitable control environment. The Research Office should be notified when responsibilities are delegated.

The following responsibilities may be delegated to specific Faculty Research Services roles:

Table 5 - Responsibilities and Approved Delegates

Responsibilities	Approved Research Services Delegates
Award Acceptance	Grants Manager; Senior Grants Administrator; Grants Administrator; Research Finance Manager
Authorisation of: Starting Certificates; Budget amendments; Staff Appointments; Journals; Labour Distribution Adjustment Journals; Interim / final claims; expenditure statements	Grants Manager; Senior Grants Administrator; Grants Administrator; Research Finance Manager
Authorisation of Overheads/FEC journals	Grants Manager; Research Finance Manager
Authorisation of Non-staff Journals (excluding Overhead/FEC journals)	Grants Manager; Research Finance Manager
Authorisation of: Buyers on Research Accounts; Goods and Service Purchase Requisitions/Orders; Payment of Goods and Services; Expense Claims	Refer to College Purchasing Hierarchy
Authorisation of Research Partner Payments	No delegation permitted
Authorisation of Foreign Currency Exchange Loss/Gains	Grants Managers; Research Finance Manager

**APPENDIX II:
ACCOUNT SET-UP CHECKS AND ACCOUNT REVIEWS**

Account Set-Up Checks

- 7.1 Account Set-Up checks should be undertaken by Faculty Research Services within 3 months of award set-up and stored in the award file (see [Award Set-Up Checklist](#) template).
- 7.2 Account Set-Up checks should review funder-specific requirements (e.g. award acceptance, starting certificates) and ensure data has been correctly entered during system set-up in the Oracle Grants Management System (e.g. selecting the correct funder group, burden schedule, VAT code).

Account Reviews

- 7.3 Account Reviews should be undertaken by Faculty Research Services regularly and stored in the award file (see [Account Review](#) template).
- 7.4 Where claims or invoices are submitted periodically based on actual expenditure (e.g. charities, European Commission, US Federal Agencies), awards should be reviewed prior to each claim.
- 7.5 For awards **over** 24 months with profile or automated payments (e.g. Research Councils, Wellcome Trust), awards should undergo an interim review and a review prior to the Final Expenditure Statement and Invoice. Further reviews are highly recommended for projects longer than 42-months.
- 7.6 For awards **under** 24 months with profile or automated payments (e.g. Research Councils, Wellcome Trust), awards should be reviewed at key financial touchpoints, e.g. when confirming staff appointments; allocating income against the project.
- 7.7 Detailed Account Reviews are not required for commercially funded projects unless the invoicing terms require transactional reporting or where the project is co-funded by a non-commercial funder.
- 7.8 Account Reviews should examine all project and sub-project transactions to identify potentially ineligible expenditure. As a minimum, account reviews should scrutinise salary costs; timesheets (only if this is a specific funder requirement); research partner payments; overheads; non-staff costs; and student stipends and tuition fees.
- 7.9 Account Reviews should include a full reconciliation comparing expenditure and income per budget heading per claim period. An assessment of variances between expenditure and income should be undertaken. Large variances should be investigated and discussed with the PI and Department Administration to establish the cause and determine if any further action is required.