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## Policy and Procedure

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### **TITLE: Review and Management of Sponsored and Non-sponsored Programs**

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#### **PURPOSE:**

To inform the HPHC/I research community of the management of sponsored and non-sponsored projects.

#### **PERSONS AFFECTED:**

This policy & procedure (P/P) applies to all Harvard Pilgrim Health Care, Inc. (HPHC) and Harvard Pilgrim Care Institute, LLC (HPHCI) (collectively, HPHC/I) personnel engaged in research, teaching or research administration activities in support of the charitable and educational mission of HPHC, Inc.

#### **POLICY:**

The Office of Sponsored Programs (OSP) is responsible for the pre-award internal review and post-award administration of all sponsored research, teaching, and service activities that are externally funded. In addition, non-sponsored activities, particularly those that involve human subjects, require review and administration by OSP.

Occasionally, it is not clear whether specific activities should be managed by OSP. In such cases, the activity will receive an advance review by the Director of OSP. If the Director and the Principal Investigator are unable to agree on the status of the activity, they will present their considerations through the HPHC VP of Finance to the HPHC Medical Director, who will make the final determination on the status of the activity.

#### **Department of Population Medicine (DPM)**

All of the Department's proposals for research and teaching must be reviewed and approved by OSP.

#### **Non-DPM Investigators**

A variety of HPHC Departments include staff that have academic backgrounds or sponsored research, teaching needs or capabilities. If any HPHC employee applies for external funds for teaching or research programs, they will be required to submit the proposal and award documents to OSP. OSP will make a determination if the project needs to be managed in OSP. Some sponsor conditions that may require OSP oversight include: contract or signed letter; expenses are tracked; reporting; return of funds.

**DEFINITIONS** (see **GLOSSARY** for meaning of the terms listed below):

*Non-Sponsored Program* means a research or teaching project that is not funded by any external or internal source.

*Post-Award* means the period after the funding is received. of the project and when the research or teaching program is conducted.

*Pre-Award* means the beginning of the grant lifecycle, which includes announcing opportunities, submitting applications, and reviewing applications.

*Sponsored Program* means a research or teaching project that is funded by either external or internal sources.

**PROCEDURE:**

**Pre-Award**

The investigator is responsible for obtaining the most current version of the Sponsored Programs Application (SPA) from OSP (<https://www.hphcinstituteosp.org/osp>) and for obtaining the necessary approvals required before the project can be approved for conduct.

Principal Investigators or other interested persons should contact their OSP Grants Manager as soon as possible to discuss potential sponsored programs.

This is especially important for non-DPM investigators as the proposed projects may not require the entire SPA.

The initial SPA form must be submitted to the OSP Grants Manager at least three weeks prior to a planned submission to an external sponsor. Request for Applications (RFA) or Request for Proposals (RFP) format instructions and/or sponsor guidelines must also be made available at this time.

The time required to review and approve a sponsored proposal depends on the complexity of the proposal. Investigators are advised to have the **final** sponsor application to the OSP Grants Manager 2 days before the submission date. This allows for final review and correction of any errors prior to the submission close date.

**Post-Award**

OSP is responsible for post-award activity including, but not limited to internal approval tracking; contract and subcontract negotiation; account set-up, and expenditure approval. OSP provides financial reports to investigators, staff and sponsors and submits non-competitive annual reports as required by the sponsor.

**REVISION HISTORY:**

<b>Department:</b> OSP	<b>Title:</b> P & P Review and Management of Sponsored and Non-Sponsored Programs
<b>Effective Date:</b> 1/4/2021	<b>Owner:</b> Director, Office of Sponsored Programs
<b>Replaces P/P Dated:</b> April, 2016; 7/15/2019	
<b>Related Documents:</b> Sponsored Programs Application	
<b>References:</b>	
<b>Approved By:</b>	