Sponsored Research Award Policy

Effective: 01/01/2013
Reviewed: 12/09/2016

Policy Statement
The process of managing sponsored research awards is a shared responsibility between the Investigator and Palmetto Health Research Compliance. The Investigator’s responsibilities may be divided into two related but distinctly different sets of activities: those activities involving the management of the work of the project and the responsibility of spending project funds appropriately. This policy applies whenever Palmetto Health is engaged in research that is sponsored (governmental, non-profit, and/or for-profit). The Investigators are expected to comply with applicable laws, regulations, codes, guidance and best research practices, in respect to contract establishment and financial management of the research projects.

DEFINITIONS

1. **Designated Institutional Official**: The individual authorized by Palmetto Health who assumes the obligations of Palmetto Health’s Federalwide Assurance (FWA) with the Office for Human Research Protections and who assumes the obligations imposed by the Federal laws, regulations, requirements, and conditions that apply to research. Also referred to as the designated Signatory Official.

2. **Investigator**: An individual having the background and training in scientific and administrative oversight necessary to conduct and manage research activities.

3. **Research**: A systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge. Activities which meet this definition constitute research for purposes of this policy, whether or not they are conducted or supported under a program which is considered research.

4. **Research Staff**: Individuals who assist in a research project overseen by an Investigator.

5. **Sponsor**: An individual, company, institution, government agency or organization responsible for the initiation, management and financing of research.
POLICY SPECIFICATIONS

1. The Investigator will obtain the necessary institutional approvals prior to the initiation of the sponsored research project. Required approvals include the Palmetto Health Administrative Research Review (all research) and Institutional Review Board (human subject research).

2. Sponsored research requires a legal document (agreement/contract/grant/award letter) to be executed to define the responsibilities required of the Investigator and Palmetto Health, the terms and conditions of the Sponsor, and the budget provided by the Sponsor, if appropriate.

3. Sponsored research requires a coverage analysis, an internal budget with allocation schedule, and a budget feasibility analysis to be performed per the Palmetto Health Administrative Research Review Policy.

4. Sponsored research will be conducted in accordance with applicable and existing institutional financial policies for reimbursement of facilities and administrative (F&A) costs and conducted in a manner consistent with Federal cost accounting regulation, as appropriate.

5. Funds from Sponsors will be received by Research Compliance and disbursed as appropriate. Research Compliance staff will:
   
   5.1. Have a Palmetto Health account created to track revenues and expenses.
   
   5.2. Receive, log, match the payment with the corresponding research task, and deposit.
   
   5.3. Send invoices as needed for the project.
   
   5.4. Disburse the payments per the allocation budget of the final negotiated internal budget and/or by appropriate requests from the Investigator and/or Research Staff to the appropriate entities.
   
   5.5. Complete reconciliations of the projects’ finances on a regular basis.
   
   5.6. Exceptions to Research Compliance’s management of the funds may exist for Palmetto Health funded research (e.g. Grant-In-Aid awards and/or other reasons). Inquiries regarding applicability and requests for a waiver should be addressed to the Director of Research. Requests will be reviewed and forwarded to the Designated Institutional Official for final approval.

6. The Investigator or Research Staff must notify Palmetto Health of subject encounters (subject visits) and Research Compliance of research-related items/procedures/services that occur at either the Baptist, Parkridge, or Richland campuses per the Palmetto Health Administrative Research Review Policy.

7. Distribution of residual funds from sponsored research conducted as fixed price agreements with Palmetto Health, unless otherwise specified in the agreement, contract, or grant with Palmetto Health, will occur following study closure.
REFERENCES

- Palmetto Health Administrative Research Review
- Human Research Protection Program

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