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| <b>Institutional Compliance Procedure</b> | Procedure Number | 11.2.3P           |
|                                           | Effective Date   | November 28, 2017 |

## 1.0 PURPOSE

In accordance with Management and Oversight Authority Policy 11.1 and Sponsored Awards Policy 11.2, the purpose of this document is to outline general procedures in support of the College's institutional compliance necessary for the acquisition and management of sponsored awards.

It is the policy of the College to comply with the regulations governing external funds, including institutional compliance requirements for sponsored awards.

Appropriate identification and documentation of institutional requirements, clear assignment of compliance ownership, and the development and management of effective internal controls and systems to support administration, oversight, and compliance reporting enable the most efficient use of resources and help ensure the College's compliance with all applicable laws, regulations, and sponsor requirements.

## 2.0 REVISION HISTORY

Adopted on: 11/28/17

Revised on: 08/04/26

## 3.0 DEFINITIONS

- A. *Institutional Compliance Element* – Institutional adherence to any law, regulation, or requirement that the College accepts as a condition of receiving a sponsored award.
- B. *Sponsored Award* – A sponsored award is the transfer of money or property from an external funder that requires performance of specific duties. The funding relationship usually reflects a joint partnership in setting/meeting project goals. Most governmental funding will be for the purpose of conducting a sponsored award. The funding mechanisms used to meet this purpose can include memoranda of understanding, grants, contracts, cooperative agreements, and other legally binding means of transfer.

## 4.0 PROCEDURES

- A. The President and President's Cabinet will assign institutional compliance element ownership.
- B. The Director of Sponsored Awards Services will review all sponsored award documentation for compliance requirements and document and verify current compliance and compliance ownership.
- C. When a new compliance element, or new need for verification is included in the terms and conditions of a sponsored award, the Director of Sponsored Awards Services will notify the President and work with responsible institutional offices during the award approval and acceptance process (Approval and Acceptance Procedure 11.2.2.1P).