

## **Guidance for Compliance in Submission of External Funding Proposals and Requests**

The Office of Research and Sponsored Programs (ORSP), via the Authorized Organizational Representative, is required to sign off on the submission of all proposals seeking external grants and awards funding.

**Only the Authorized Organizational Representative  
can submit a proposal on behalf of the University.**

There are a few exceptions to this requirement. As a rule of thumb, external funding that will require the disbursement of funds through a university account must be approved for submission by the ORSP, as these are awards made to the University and not any one or more individuals.

Any submission that does not adhere to University guidelines is considered non-compliant. Malicious intent to circumvent compliance guidelines can be regarded as scholarly misconduct and a breach of ethical considerations as outlined in responsible conduct in research training.

All external grant funding can affect a University in many different ways, which we broadly term compliance. Compliance includes components such as waivers of F&A or indirect costs, adherence to match and in-kind commitments, safety, space and facilities, laws involving human subjects, animals, and biohazards, federal, state, and CSU System laws and regulations, issues related to intellectual property rights, financial compliance, and reporting, negotiations with funding organizations, and making sure that the University maintains records for all external support for audit requirements. The ORSP is the official liaison between the campus, the Research Foundation, and the funding agency.

Since the AOR is responsible for protecting the campus from unnecessary risks and liabilities associated with external funding, and in this capacity, reserves the right to refuse external funding due to non-compliance.