

# UConn HEALTH

**POLICY NUMBER 2004-09**

**November 8, 2016**

**POLICY: PRE-AWARD ACCOUNTS  
(RESEARCH/SPONSORED PROGRAMS)**

**PURPOSE:**

To create accounts to incur expenses prior to receiving sponsored program award notices or executed agreements.

**DEFINITION:**

Under certain conditions, UConn Health may agree to establish a sponsored program account in advance of receipt of the final documentation from the sponsor. In such situations, the project account is established and identified as being in a state known as pre-award. Pre-award accounts are allowed for the charging of the project expenses to avoid subsequent cost transfers upon final set up of the project.

**POLICY STATEMENT:**

1. The Principal Investigator (PI) will present to Sponsored Program Services (SPS) documentation indicating that the application to the awarding agency has been selected for funding. The PI or designee will initiate this by submitting the proper forms and documentation through the proper signatories to include the Department Chair.
2. Types of Pre-award:
  - a. Pre-award – The use of a pre-award at-risk account allows the charging of expenses on authorized federal projects and some non-federal projects prior to the start date of the award. Pre-award in these situations is governed by Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”, 2 CFR §200.458) and/or the sponsor terms and conditions.
  - b. Advance award – The use of an advance award at-risk account allows the charging of expenses to the account prior to receipt of the Notice of Award or an executed project agreement but not before the start date of the project. Pre-award in these situations is authorized by UConn Health policy.
3. Pre-award is not permitted on clinical trial projects unless the clinical trial is part of a federal project subject to expanded authority.
4. All compliance approvals (i.e. Institutional Review Board (IRB), Animal Care Committee (ACC), Conflict of Interest (COI), etc.) are the responsibility of the PI. If any compliance approvals are incomplete or pending as of the date of pre-award, the PI will certify that no activity related to the corresponding compliance issue will be conducted until such approval is obtained.

5. Departments are responsible for reviewing account activity and assuring that costs charged to the pre-award account are in compliance with that specific account set up.
6. Procedures related to the establishment and management of pre-award accounts are incorporated by reference to this policy. Pre-award procedures are maintained and amended as needed by Research Administration and Finance.

Jeffrey Seemann (Signed)

3/6/17

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**Jeffrey Seemann, PhD**  
**Vice President for Research**

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**Date**

Andrew Agwunobi (Signed )

3/9/17

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**Andrew Agwunobi, M.D., M.B.A**  
**CEO, Executive Vice President for Health Affairs**

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**Date**

**New Policy: 12/10/04**

**Revised: 08/11/06, 10/8/13, 11/8/16**

**Links:**

[Institutional Prior Approval System Form](#)