Summary:
When a sponsored project is accepted Columbia and Lamont-Doherty Earth Observatory (LDEO) agree to be bound by its terms and conditions (T&C) which take effect as soon as the award is accepted. Most sponsoring agencies have General Terms & Conditions that relate to each award. Cooperative Agreements typically:

- Have additional terms and conditions that are unique and specific to the project.
- Require more sponsor oversight, which necessitates more detailed reporting.
- Are funded at higher dollar levels.

Because the T&Cs for Cooperative Agreements are non-standard it is critical that the PI and the team engaged in managing these projects clearly understand the requirements and have a plan for compliance.

Proper stewardship of awards to Columbia University (CU)/LDEO is a shared responsibility. By working together the responsible parties ensure compliance with federal regulations such as OMB Circulars A-21 and A-110 and the special terms and conditions that are part of the Cooperative Agreement. The Principle Investigator (PI) is supported by the Lamont-Doherty Earth Observatory Administration, CU Sponsored Projects Administration and CU Sponsored Projects Finance in these efforts. These offices provide information, guidance and expertise to the PI’s; however, it is the responsibility of the PI to ensure they have the proper knowledge of all terms and conditions for the Cooperative Agreement so they can ensure compliance.

The purpose of this Standard Operating Procedure (SOP) is to define the method by which the LDEO Contracts & Grants Office will ensure the PIs and Division Administrators (DAs) understand the award T&C for Cooperative Agreements.

Definitions:
CU Columbia University
DA Department/Division Administrators
InfoEd University system for sponsored award management
LDEO Lamont-Doherty Earth Observatory
NOA Notice of Award. Grant, cooperative agreement or fully executed contract.
PI Principal Investigators
SPA Sponsored Project Administration. The Columbia central administration department
responsible for all institution level preaward review and approval and certain postaward transactions and sponsor communication.

PIN  Project Information Notice. Internal Columbia form created in InfoEd, stored in ReportWeb and fed into ARC. Departments run their own PIN upon notification from ARC that a project has been setup or modified.

SPF  Sponsored Finance Administration. The Columbia central administrative department responsible for financial post award activities such as financial reporting, invoicing and cash draw downs.

Procedure:

New award T&C review meetings

- After receipt, review and distribution of the Notice of Award (NOA) and associated award documents, a meeting to review the Cooperative Agreement T&C will be set up with the appropriate project team, including PI, DA, Contracts and Finance Staff. Purchasing staff, the Assistant Director for Finance and Administration, the Human Resources Manager and the Observatory Director will be included in these meetings where appropriate, such as when the Cooperative Agreement is particularly large or complex.
- The LDEO Contracts Project Coordinators will send out an email to the project team upon receipt of award and will host the meetings.
- The Project Team will work with the Project Coordinator to set up a convenient date and location as soon as practical but in no instance more than one month after the award setup.
- The Project Coordinator responsible for each new award will develop handouts itemizing the reporting requirements as well as other specific terms & conditions for the Cooperative Agreement. The Project Coordinator will also create a sign-in sheet for the kick off meeting. The handout and documentation of attendance will become a permanent record for each award documenting that the Team participated in the meeting.
- The Project Coordinator will send out meeting reminders to ensure attendance.
- The Manager of the Contracts & Grants office has developed an internal spreadsheet that will track awards by date of receipt, attendees, and date the T&C meeting was held. A minimum of one kick off meeting will take place with all participants. If necessary, additional meetings will be scheduled over the life of the project.

Report due date tracking

- Contracts & Grants Project Coordinators are expected to review the NOAs to identify the award reporting requirements and due dates for Cooperative Agreements for which they have oversight responsibility.
- Contracts & Grants Project Coordinators are responsible for understanding reporting requirements and the method of submission for each Cooperative Agreement
- Contracts & Grants Project Coordinators maintain department specific excel spreadsheets capturing award detail, list of PIs, period of performance, reports and due dates. The requirements for Cooperative Agreements are included in this broader responsibility.
Notification of upcoming reporting due dates

- Notifications are sent out to PIs, CO-PIs and DAs via email and/or hard copy, during the 1\textsuperscript{st} week of every month for all reports due the following month.
- Each member of Contracts & Grants is expected to continue to follow-up via email and/or phone calls with PIs and DAs until reports are submitted and copies have been received and logged appropriately.
- Each member of Contract & Grants continuously updates their respective excel spreadsheets as notifications are released and reports are submitted.

Reporting non-compliance escalation process

- Utilizing the department specific detailed report tracking spreadsheets discussed above, a cohesive list of all overdue reports is assembled monthly. Each member of Contracts & Grants is expected to add their overdue reports to one spreadsheet. The task of reviewing the spreadsheet before distribution is assigned to one Project Coordinator and the Administrative Assistant. The list of overdue reports is then distributed to the following individuals for assistance with PI reporting compliance.

<table>
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<tr>
<th>LDEO:</th>
<th>Associate Directors of each division/department</th>
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<tbody>
<tr>
<td></td>
<td>Director of the Observatory</td>
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<tr>
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<td>Deputy Director for Research Management</td>
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<tr>
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<td>Assistant Director of Finance &amp; Administration</td>
</tr>
<tr>
<td></td>
<td>Division Administrators</td>
</tr>
</tbody>
</table>

For informational purposes only the following CU Officials get copies of this report:

- Executive Director, Sponsored Projects Administration
- Director, Sponsored Projects Finance

Reporting non-compliance enforcement

In all instances of receipt of a budget and proposal application package for review, the LDEO Contracts & Grants Project Coordinators cross checks the proposal participants against the overdue report list. If the PIs are flagged with an overdue report they are immediately notified that their report must be submitted to avoid proposal submission delay. The review of the new proposal continues but the proposal will not be released until the overdue report is submitted.

Escalation Procedure:

Disagreements regarding the interpretation or enforcement of an LDEO SOP will be resolved internally at LDEO by conferring with either the Assistant Director for Finance and Administration or the Observatory Director. Questions regarding University Policy will be referred to an appropriate party within the University’s Central Administrative Departments.

In the event an employee does not comply with University policy or procedure they would initially be subject to a verbal warning by their supervisor. Repeated failure to comply can result in further
disciplinary action, such as a written warning or an unfavorable performance review, up to and including termination of employment.

**Roles and Responsibilities:**

<table>
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<th>Manager</th>
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<th>Administrative Assistant</th>
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<td>Initiate communication to the Project Team to setup meeting</td>
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<tr>
<td>Coordinates meeting time and location</td>
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<tr>
<td>Generates Handouts</td>
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<tr>
<td>Sends out Reminders &amp; Followup</td>
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<td>Files documentation</td>
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<td>Perform</td>
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<tr>
<td>Updates Spreadsheet</td>
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**References:**

LDEO New Award Kickoff Meeting SOP

**Document History:**

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<tr>
<td>11/25/2012</td>
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