

**UNIVERSITY OF MAINE**  
**Office of Research and Sponsored Programs**  
**ADVANCE PROJECT POLICY & PROCEDURE**

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**I. Overview**

Advance projects give Principal Investigators (PIs) the opportunity to initiate sponsored research and begin incurring associated expenses prior to institutional acceptance of an award. In this way, advance projects allow PIs and departments to record and track expenditures directly to a project, eliminating the need to charge costs to, and subsequently transfer costs from other unrelated Peoplesoft chartfields (hereafter referred to as ‘chartfield’).

**II. Purpose**

This policy outlines the procedure for establishing advance projects as well as the accompanying risks and responsibilities of incurring project costs prior to the start date of an award, or the commitment of funds against a grant, contract or other agreement prior to receipt of an executed award document.

**III. Advance Project Fundamentals**

**A. Types of Advance Projects**

- 1. Pre-award Project – Allows for charging of expenses to federal and select non-federal sponsored projects up to 90 days prior to the start date of the award pursuant to sponsor specific regulations.

2. Late Award Project – Allows for charging of expenses to sponsored projects prior to receipt of the fully executed award agreement but not prior to the anticipated start date of the award (except as allowed by the sponsor).

## **B. Risks of Using Advance Projects**

OMB Circular A-110 authorizes federal awarding agencies to authorize grantees to incur project costs 90 calendar days prior to the award start date, or more than 90 calendar days with prior approval from the federal awarding agency, **but at the grantees own risk.**

The incurrence of pre-award costs in anticipation of a competing or noncompeting award imposes no obligation on the federal granting agency either to make the award or to increase the amount of the approved budget if an award is made for less than the amount anticipated and is inadequate to cover pre-award costs incurred.

## **C. Terms for Issuance of Advance Projects**

### **1. Acceptance of Financial Risk**

- a. Prior to the creation of an advance project, the PI's department Chair, or college or school Dean or unit Director must attest to his/her acceptance of the financial risks and responsibilities associated with such a project, and provide a collateral chartfield to accept charges should it become necessary to transfer expenses. [**Note: The collateral chartfield cannot be another project.**]
- b. If, for any reason, the PI does not receive an award, the award is not continued, the award is less than anticipated and inadequate to cover the pre-award/advance spending, or the sponsor does not approve the incurred pre-award/advance expenditures, the collateral chartfield will be charged for all un-reimbursed expenses.

### **2. Sponsor Authorization**

- a. Before incurring pre-award expenses, the PI must consult with his/her sponsor agency representative to confirm that pre-award expenses are permissible under the applicable sponsor regulations or terms and provide ORSP with written confirmation thereof.

### **3. Advance Project Spending**

- a. In all instances, the only costs that may be charged to the project budget are those that are:
  - i. Included in the approved budget; and
  - ii. "Allowable" in accordance with OMB Circular A-21, sponsor-specific regulations, University of Maine System APLs, University of Maine Policies.

### **4. Regulatory Compliance**

- a. Before an advance project will be created, the PI must ensure that all regulatory protocols have been approved by the cognizant University committee or office and are on file with ORSP, including:
  - i. Conflict of Interest Disclosure(s) for all individuals responsible for the conduct, design, or reporting of the proposed research;
  - ii. Use of Animal Subjects;

- iii. Use of Human Subjects;
- iv. Biohazards, radiation safety, hazardous materials, etc.;
- v. Export control regulations (see memo re: Export Control Regulations at: <http://umaine.edu/orsp/policy-procedure/compliance-and-certification-policies/>);
- vi. Intellectual property (see *Technology Transfer - Information for Faculty/Staff* at: <http://umaine.edu/dic/techtransfer/facstaffinfo/>).

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## IV. Establishing an Advance Project

### A. Requesting an Advance Project

1. **OPAS** - The PI must request in writing that an advance project be established by submitting a completed and signed [Organizational Prior Approval System \(OPAS\) Form](#).
2. **ORSP Review and Notification**
  - a. In reviewing the advance project request, ORSP will consider financial and compliance risks such as:
    - i. The likelihood of the PI receiving the award;
    - ii. The sponsor's funding history with the University;
    - iii. Award terms and conditions;
    - iv. Control of scope of work and/or key personnel;
    - v. Publication restrictions and/or confidentiality requirements; and
    - vi. Intellectual property terms.
  - b. **Notification**  
ORSP will notify the PI as soon as possible after receipt of the OPAS as to the status of the advance project request. Such notification will include chartfield information if the request is approved, or an explanation of the issues of concern if denied.

### B. Advance Project Management and Monitoring

1. The PI is responsible for managing the advance project in a manner consistent with a fully executed award agreement.
2. ORSP, the PI, and the department or school, are mutually responsible for communicating with each other on the status of negotiations, award notifications, and acceptance regarding the pending award.
  - a. If/when the award is accepted by the University, ORSP will remove the advance project from advance status; or
  - b. If/when the award is not received or accepted, the PI, department, or school will remove expenses from the advance project within thirty (30) days of receipt of written request from ORSP to do so. If not removed within this time frame, ORSP will transfer the expenses from the advance project to the collateral chartfield.

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## VI. Resources

ORSP *Organizational Prior Approval System (OPAS)* Form (for Requesting an Advance Project):  
[http://www.orsp.umesp.maine.edu/ORSPDocs/Info/OPAS\\_Form.pdf](http://www.orsp.umesp.maine.edu/ORSPDocs/Info/OPAS_Form.pdf)

OMB Circular A-21, “*Cost Principles for Educational Institutions*”  
[http://www.whitehouse.gov/omb/circulars\\_a021\\_2004/](http://www.whitehouse.gov/omb/circulars_a021_2004/)

OMB Circular A-110, “*Uniform Administrative Requirements for Grants and Agreements with Higher Education, Hospitals, and Other Non-Profit Organizations*”  
[http://www.whitehouse.gov/omb/circulars\\_a110/](http://www.whitehouse.gov/omb/circulars_a110/)

University of Maine System business process document “*Accounting for Grants and Contracts*”  
<http://www.maine.edu/system/oft/psfinancial/documents/BP-AccountingforGandCAUGUST272007.doc>

Allowable Costs Flowchart

<http://www.orsp.umesp.maine.edu/ORSPDocs/Info/ORSPTTraining/104AllowableCostsFlowchart3c.pdf>

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