Questionable Sponsors

Purpose
The following information is provided to the research community to clarify the university’s position and on a research-related issue. This information concerns business decisions that safeguard the financial environment associated with sponsored research and reflect best business practices.

Administration
The Offices of Sponsored Programs and Sponsored Accounting are responsible for maintenance and review of this Process.

General Discussion and information
Occasionally, relationships are established with sponsors that become problematic or even unsustainable. The reason(s) for such a deterioration can happen for many reasons, i.e., the sponsor may fail to remit payment in a timely manner; the sponsor may attempt to change the terms and conditions of the award after negotiations are concluded; the sponsor may attempt to exert undue influence on the research outcomes; or the sponsor may be involved in questionable practices that are, or could be perceived to be, a circumstance of research misconduct or a conflict of interest. Any faculty, college, or department personnel should immediately contact the Executive Director OSP or the Director of Sponsored Accounting if s/he suspect actions that might cause the University to regard continued interaction with the organization as collaboration with a “Questionable Sponsor.”

Process
If, after review and analysis a sponsor is deemed likely to be ‘questionable,’ they will be indicated as such and subject to the following OSP process:

PREAWARD:
At the time of proposal preparation and if the proposal is being submitted to a sponsor that is unfamiliar and/or other than a Federal or State agency, Pre Award will review the “Questionable Sponsor” folder that resides on the OSP shared-drive. To that end the following will be done:

- If the sponsor is shown on the “Questionable Sponsor List,” the OSP Executive Director will be contacted immediately before proceeding with the proposal.
- If processing lead time does not allow for contact with the OSP Executive Director; or advice is not available for any reason, the Senior Director of the Faculty Support Center will make the decision on whether to proceed. If the proposal is submitted under these circumstances, at a minimum, an email will be sent to the Stevens PI advising him/her that:
  o “The proposal is being submitted to a Questionable Sponsor with a noted history that, in the past, has been a cause for concern. Because inadequate time was allowed for a complete review of the proposal that normally includes consultation with the OSP Executive Director when processing a proposal to a sponsor thus identified; you are advised that the proposal may be administratively withdrawn if further discussion does not support the submission.”
The Proposal Routing Form will be notated and prominently marked for the OSP Account Analyst, should an award be forthcoming.

POSTAWARD:
The Postaward Account Analyst reviews the Routing Sheet to see if the sponsor has been noted by Preaward to be a “Questionable Sponsor.” If “YES,” the Specialist will do the following:

- Engage in a dialogue with the OSP Executive Director
- OSP Executive Director will engage a dialogue with the Director of Sponsored Accounting to determine a course of action
- The payment terms will be established in COEUS, i.e., advance pay, a combination of advance pay and cost reimbursable; after a discussion between the PI and either the OSP Executive Director or the Director of Research Accounting
- The sponsor and award is entered on the “Questionable Sponsors List” in order to track the sponsor’s actions and detail the history

PRINCIPAL INVESTIGATOR:
Any faculty, college, or department personnel suspecting actions (see first sentence of “General Discussion and Information” in this SHARRPI) that might cause OSP to regard continued interaction with the organization as collaboration with a “Questionable Sponsor” should immediately contact the Executive Director OSP or the Director of Sponsored Accounting.

The designation of ‘questionable sponsor’ indicates a previous circumstance that has been problematic in some way. If the difficulty was fiscal in nature, there is an increased likelihood that OSP would negotiate extremely conservative, or cautious, remittance terms, i.e., advance payments, or possible combinations of advance pay and cost reimbursable.