Contract Compliance and the Federal Acquisition Regulation (FAR)

ORA CERTIFICATE PROGRAM
(MODULE 11)
20 APRIL 2016
Learning Objectives

- Participants will learn about the history of the Federal Acquisition Regulation (FAR)
- Participants will understand the differences between a contract and a grant
- Participants will learn about contract types and understand key FAR clauses
- Participants will learn about compliance requirements for federal contracts
- Participants will learn about important University policies
What is a Contract?

A legally binding agreement involving two or more people or businesses (called parties) that sets forth what the parties will or will not do.

Definition from NOLO’s Plain-English Law Dictionary
What is a Contract

Basic Elements of a Contract

- Mutual Assent (e.g., an offer to do X in exchange for Y, followed by an acceptance of that offer)

- Consideration (e.g., a promise to fix a leaky roof in return for a payment of $1,000 -- or a promise not to do something, such as not disclose another’s confidential or proprietary information)

- Capacity (e.g., rules often require a person to have reached a minimum age and to have soundness of mind)

- Legality (quality or state of being in accordance with the law)
Contract vs. Grant

Contract

زوار Procurement: funds appropriated by Congress for agencies to conduct business; used by the government to procure goods and services for its use

زوار Request for Proposals (RFP) or Request for Quote (RFQ)
Sponsor determines SOW/ Proposals are used to evaluate Prospective Offers

Grant

زوار Financial Assistance: funds appropriated by Congress to support a public purpose; advancements in Arts or Science, Social Welfare Programs, etc.

زوار Standard Sponsor Guidelines/Funding Opportunity Announcement
Project idea conceived by Principal Investigator
Contract vs. Grant

Contract

- Federal Acquisition Regulation (FAR)
- OMB Circulars: A-21 (FAR Subpart 31.3) & A-133 (FAR 52.215-2 Alt. II)
  - Note: Uniform Guidance
- Restrictive Terms & Conditions

Grant

- Uniform Guidance
- Expanded Authority
- Flexible Terms & Conditions
# Contract vs. Grant (Uniform Guidance)

<table>
<thead>
<tr>
<th>Type of Entity</th>
<th>Type of Award</th>
<th>Cost Principles</th>
<th>Administrative Requirements</th>
<th>Audit Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Educational</td>
<td>Grant</td>
<td>Subpart E</td>
<td>Subpart D</td>
<td>Subpart F</td>
</tr>
<tr>
<td></td>
<td>Contract</td>
<td>Subpart E</td>
<td>FAR</td>
<td>Subpart F</td>
</tr>
<tr>
<td>Non-Profit</td>
<td>Grant</td>
<td>Subpart E</td>
<td>Subpart D</td>
<td>Subpart F</td>
</tr>
<tr>
<td></td>
<td>Contract</td>
<td>Subpart E</td>
<td>FAR</td>
<td>Subpart F</td>
</tr>
<tr>
<td>Hospital</td>
<td>Grant</td>
<td>Subpart E</td>
<td>Subpart D</td>
<td>Subpart F</td>
</tr>
<tr>
<td></td>
<td>Contract</td>
<td>Subpart E</td>
<td>FAR</td>
<td>Subpart F</td>
</tr>
<tr>
<td>State &amp; Local</td>
<td>Grant</td>
<td>Subpart E</td>
<td>Subpart D</td>
<td>Subpart F</td>
</tr>
<tr>
<td></td>
<td>Contract</td>
<td>Subpart E</td>
<td>FAR</td>
<td>Subpart F</td>
</tr>
<tr>
<td>For-Profit</td>
<td>Procurement</td>
<td>FAR</td>
<td>FAR</td>
<td>FAR</td>
</tr>
</tbody>
</table>

Modified slide based on table developed by David Mayo, California Institution of Technology. Used with permission.
1779

Constitution of the United States

The power of the Federal Government to make purchases is an implicit power granted in Article I, Section 8 of the Constitution, which gives Congress the power to "to pay the Debts and provide for the common Defense and general Welfare of the United States", with the authority to establish post offices, raise and maintain armies, a navy, and other services to carry out this purpose.

Article I, Section 9 establishes the 'power of the purse', requiring appropriations to be passed by Congress and signed by the president before agencies can expend money.
**Bona Fide Needs Rule**

The *Bona Fide* Needs Rule originates from the first general appropriation act in 1789, which held that appropriations were for services “in the present year”, meaning that such funds could not be carried over into the next fiscal year. The *Bona Fide* Needs rule is a cornerstone of appropriations law and is codified in 31 U.S.C. 1502(a).

Relevance to Research Administration: The government's fiscal year end on September 30 is one of the busiest cycles in federal procurement, and often requires the University to turn around contracts quickly to avoid losing fiscal year funds.
1809 Misappropriations Act

Congress enacted this statutory control in 1809 as part of a reorganization of the War, Navy, and Treasury Departments to limit the Executive Branch in spending appropriations. The current version of the law as stated in 31 U.S.C. § 1301(a) holds that “Appropriations shall be applied only to the objects for which the appropriations were made except as otherwise provided by law.”

Relevance to Research Administration: Contracting Officers must use specific funds for intended purposes, and can suffer criminal penalties by violating this law.
Civil Sundry Appropriations Act of 1861

The Civil War created procurement needs for the federal government that were more effectively carried out through advertised solicitations for sealed bids, as established by this act.

Relevance to Research Administration: This act created the basis for the modern day federal solicitation. Sealed bids are still practiced in Government Contracting. Sealed bids do not allow for contracting by negotiation.
1870

**Anti-deficiency Act**

The first version of this Act can be traced to 1870 and is now codified in 31 U.S.C. § 1341. It holds that Federal employees may not involve the government in any obligation to pay money before funds have been appropriated for that purpose, with few exceptions.

Relevance to Research Administration: The Government shutdown in 2013 is a prime example of how a lack of federal appropriations can impact business as usual at the University.
Vannevar Bush, Director of the Office of Scientific Research and Development, published a report for President Truman making the case to invest government resources in creating grant making agencies for research and development, with the argument that investment in scientific development would wage against disease and protect the national security of the American people.

Relevance to Research Administration: This report is credited in leading to legislation establishing NSF, ONR, and NIH.

1945
1947

*Armed Services Procurement Act of 1947*

This act governed acquisition by defense agencies, creating the first consolidated rule book.

Relevance to Research Administration: This act established competitive negotiation as a method of Government Contracting and laid the foundation for the FAR.
Federal Procurement Policy Act of 1974

Established Federal Acquisition Regulation, for the codification and publication of uniform policies and procedures for acquisition by all executive agencies.

Relevance to Research Administration: Most of the University of Maryland's research and development contracts are government by the FAR.
Federal Acquisition Regulations System

- Codified at Title 48 of the Code of Federal Regulations (CFR)
- A system of uniform policies and procedures governing acquisitions by all federal executive agencies
- Consists of the Federal Acquisition Regulation (FAR) which is the primary document; there are agency specific acquisition regulations that implement or supplement the FAR.
- FAR Part 52 contains solicitation provisions and contract clauses
Government Contracting Parties

**Contracting Officer**

✧ Solicits and acquires goods/services, negotiates, and reviews Contractor requests for approval; only person authorized to approve changes to any of the terms and conditions of the contract, including cost/price adjustments.

**Contract Specialist**

✧ Solicits and acquires goods/services under direction of CO and engage in negotiations, also assists with contract administration.

**Contracting Officer Representative / Contracting Officer Technical Representative**

✧ Responsible for the administration of technical details within the scope of work and inspection, acceptance of deliverables and reports (not authorized to obligate government funding, change SOW, or to make any other changes to the contract).
Contracting by Negotiation

- Negotiations are not entertained in Sealed Bidding, in which proposals are evaluated without discussions with Contractor (FAR Part 14)

- Contracting by Negotiation rules are in FAR Part 15

- Government engages in discussions with prospective Contractor and allows opportunities to:
  - Revise Cost Proposal
  - Revise Technical Requirements
  - Type of Contract (Cost Reimbursable/Firm Fixed Price)
  - Contract Terms
Contract Types

Contract type is a major factor in the contract clauses prescribed under the Federal Acquisition Regulations (FAR)
Cost-Reimbursement Contracts

- Provides for payment of allowable incurred costs
- Obligated vs. Anticipated
- Incremental Funding
- Contractor may not incur expenditures beyond funding obligation without the approval of the Contracting Officer (except at own risk)
- Defined in FAR 16.301
Types of Cost-Reimbursable Contracts

- Other types of Cost-Reimbursable Contracts used by the Government include Cost Plus Incentive Fee, Cost Plus Award Fee, and Cost Plus Fixed Fee.

- The University operates under “Cost Contracts” (no fee).

- While the University does not propose fee contracts, it may need to issue them to commercial subcontractors working under Government Prime Awards on a fee (for profit) basis.
Contracts for Research and Development

“Because the absence of precise specifications and difficulties in estimating costs with accuracy (resulting in a lack of confidence in cost estimates) normally precludes using fixed-price contracting for R&D, the use of cost-reimbursement contracts is usually appropriate.”
- FAR 35.006(c)
Audit Requirements


➤ Government has the right to examine and audit all records and other evidence sufficient to determine costs anticipated or incurred were done properly

➤ Alt. II incorporates OMB Circular A-133
  - Ensures contracts will be audited in accordance with standards appropriate for educational institution
Allowable Costs

52.216-7 Allowable Cost and Payment (Jun 2013)
Alternate II (Aug 2012)

- Costs must actually be “incurred” before they are paid by the Government
- Incorporates OMB Circular A-21
- Prescribes method of payment and invoicing procedures
- Gives the Government the right to adjust previous payments in the event of an audit or if a cost is otherwise found to be unallowable by the Contracting Officer
Limitation of Funds

52.232-22 Limitation of Funds (Apr 1984)

➤ Requires the Contractor to notify the Contracting Officer in writing 60 days in advance when it anticipates it will have incurred 75 percent of the total amount obligated on Contract.

➤ As prescribed in 32.705-2(b), clause inserted in solicitations and contracts if an incrementally funded cost-reimbursement contract is contemplated.

➤ PIs and Departments must forecast spending needs on a regular basis (at least monthly).

➤ PIs and Departments must alert ORA to notify the Contracting Officer under this clause.
Limitation of Costs

52.232-20 Limitation of Cost (Apr 1984)

- Notification requirements are similar to Limitation of Funds Clause (send 60 days in advance of exceeding 75% of funding)
- Notification utilized when Contractor has reason to believe that total costs will be greater or substantially less than had been previously estimated
- Government may negotiate increase in contract price or terminate the agreement
- Only the Contracting can authorize work to exceed the authorized cost ceiling in writing (not the COR or COTR)
Firm-Fixed Price Contracts

“A firm-fixed price contract provides for a price that is not subject to any adjustment on the basis of the contractor’s cost experience in performing the contract. This contract type places upon the contractor maximum risk and full responsibility for all costs and resulting profit or loss. It provides maximum incentive for the contractor to control costs and perform effectively and imposes a minimum administrative burden upon the contracting parties.”

-FAR 16.202-1
Firm Fixed Price Contracts

As with Cost-Reimbursable contracts, the University expends funds on Firm-Fixed-Price Contracts under a no fee basis.

University does not submit detailed invoices, but cost proposals are still auditable.
Payments

52.232-2 Payments under Fixed-Price Research and Development Contracts (Apr 1984)

▷ Invoices are based on milestones or deliverables (not incurred costs)

▷ Government may reject invoices if milestones or deliverables are not met
What happens if we have money left?

The University has established an administrative procedure in place for this scenario:

“Sponsored Program Procedure for Balances on Fixed Price Contracts: Administrative Procedure A10.3”
Indefinite-Delivery Contracts

- Can be either Cost-Reimbursable or Fixed-Price
- Provides for Delivery Orders or Task Orders to be issued under a base contract with general terms and conditions
- May cover multiple projects involving different PIs for certain tasks
Other Contract Types

- Time and Materials Contracts are used when it’s not possible to estimate the duration of the work or costs with confidence; fixed hourly rates are required.

- Labor Hour Contracts are a variation of time and Materials Contract, where materials are not being delivered; fixed hourly rates are required.

- Letter Contracts are contractual instruments that authorize the contractor to begin work while a definitive contract is negotiated.
Compliance

OTHER CONTRACT NOTIFICATIONS
AND PRIOR APPROVAL REQUIREMENTS
E-Verify

FAR 52.222-54 Employment Eligibility Verification (Oct 2015)

» Purpose is to stop unauthorized employment of individuals who are not legally allowed to work in the United States

» E-Verify is an Internet-based system that compares information from an employee's Form I-9 to data from U.S. Department of Homeland Security and Social Security Administration records to confirm employment eligibility

» Department is responsible for initiating the process for employees assigned to the contract with E-Verify clause incorporated

» Employees hired prior to 11/6/86 are not subject to the E-Verify process
### 52.219-8
Utilization of Small Business Concerns
Jan 2011

### 52.222-2
Payment for Overtime Premium (Note: The dollar amount in paragraph (a) of this clause is $0 unless otherwise specified in the contract.)
Jul 1990

### 52.222-3
Convict Labor
Jun 2003

### 52.222-21
Prohibition of Segregated Facilities
Feb 1999

### 52.222-26
Equal Opportunity
Mar 2007

### 52.222-35
Equal Opportunity for Veterans
Sep 2010

### 52.222-36
Affirmative Action for Workers with Disabilities
Oct 2010

### 52.222-37
Employment Reports on Veterans
Sep 2010

---

### Employment Eligibility Verification
Jul 2012

### 52.225-13
Restrictions on Certain Foreign Purchases
Jun 2008

### 52.227-1
Authorization and Consent and Alternate I
Dec 2007, Apr 1984

### 52.227-2
Notice and Assistance Regarding Patent and Copyright Infringement
Dec 2007

### 52.227-11
Patent Rights - Ownership by the Contractor (Note: In accordance with FAR 7.303(b)(2), paragraph (e) is modified to include the requirements in FAR 7.303(b)(2)(i) through (iv). The frequency of reporting in (a) is annual.)
Dec 2007

### 52.227-14
Rights in Data - General Alternate IV
Dec 2007

### 52.227-16
Additional Data Requirements
Jun 1987

### 52.227-23
Rights to Proposal Data (Technical)
Jun 1987

### 52.228-7
Insurance - Liability to Third Persons
Note: DHS recognizes that the University of Maryland maintains its own self insurance program and documentation is available upon request.
Mar 1996

### 52.230-2
Cost Accounting Standards
May 2012

### 52.230-3
Disclosure and Consistency of Cost Accounting Standards
May 2012

### 52.230-6
Administration of Cost Accounting Standards
Jun 2010

### 52.232-9
Limitation on Withholding of Payments
Apr 1984

### 52.232-20
Limitation of Cost
Apr 1984

### 52.232-23
Assignment of Claims
Jan 1986

### 52.232-25
Prompt Payment and Alternate I
Oct 2008, Feb 2002

### 52.232-33
Payment by Electronic Funds Transfer--Central Contractor
Oct 2003
Travel

- Travel under a contract requires prior approval by either Contracting Officer, Contract Specialist or COR/COTR even if included in approved budget

- Sponsor requires specific details, such as name of travelers, purpose of trip, destination, number of travel days, and estimated costs (foreign travel may require additional information or requirements before approval)

- Travel done in accordance with FAR Subpart 31.3 not Federal Travel Regulations or other regulation
G.6. Travel Costs
Travel and subsistence are authorized for work performed under this task order. The Contractor will be reimbursed for allocable, allowable and reasonable travel expenses only at the per diem rates specified in applicable Federal Travel Regulations and in accordance with FAR PART 31. Travel expenses shall not be burdened with profit or fee. The Contractor shall use the most economical method of travel available. Local travel within the Washington, DC area (which includes Prince George’s County, MD) will not be reimbursed. Prior to the start of travel, the Contractor shall:

(1) Conduct a cost analysis prior to the start of travel to determine the most cost effective means of travel. Alternate airports must be used where available and within a reasonable commuting distance, if it will result in lower costs.

(2) Submit to the COR a list of those personnel requesting travel, including the location personnel are travelling from, and an estimate for the anticipated travel cost, based on the cost analysis conducted, for approval in advance of each travel event.

G.7.3. Upon completion of this task order, if the Government provided or the Contractor acquired Government property, the Contractor shall coordinate with the Contracting Officer and COR for final disposition. Refer to section D.1 for packaging and shipping instructions.

G.8. Final Payment
Final payment under this contract requires (1) receipt and acceptance by the Government of all required services and/or supplies; (2) final accounting for and disposition of Government property; (3) the assignment to the Government of any refunds and the release discharging the Government from liabilities per the terms and conditions of the award; and (4) final audit by the cognizant audit agency, if necessary.
Subcontracting Plans

FAR 52.219-9, Small Business Subcontracting Plan (Oct 2015)

- Required for contracts expected to exceed $700,000
- PI and Department must work with procurement to complete Subcontracting Plan required by RFP
- Incorporated into Contract
- Applies to all non-salary and benefits costs
- University has Master Subcontracting Plan
Task Order Request for Proposal for BOA HSHQDC-10-A-BOA36 (University of Maryland) HSHQDC-12-R-00043 Comprehensive Testing of Imminent Messages for Mobile Devices Project

L.6. Submission Requirements for Technical Proposal and Subcontracting Plan

L.6.1. For Factor 1, Technical Approach (see Section M.1.1 for evaluation criteria for this factor), the technical proposal shall include:
(a) A completed small business subcontracting plan (a template is provided as a separate attachment to this solicitation for the Offeror to complete). Other formats of a small business subcontracting plan may be acceptable, however, it must include the essential information required by FAR 52.219-9 Small Business Subcontracting Plan.

(b) If subcontracting opportunities exist, but none can be provided to small businesses, then the Offeror must provide a statement/rationale to justify why any proposed non-small business subcontractor(s) would be essential for the performance of the SOW (e.g., an explanation of the impact to the technical capability of adequately completing the SOW task/deliverables without the proposed non-small business subcontractor(s)).

<table>
<thead>
<tr>
<th>Type of Business</th>
<th>Goals FY2012 and FY2013 (2 Year Goals)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB Sub</td>
<td>45%</td>
</tr>
<tr>
<td>SDB Sub</td>
<td>5%</td>
</tr>
<tr>
<td>HUBZone SB Sub</td>
<td>3%</td>
</tr>
<tr>
<td>SDVOSB Sub</td>
<td>3%</td>
</tr>
<tr>
<td>WOSB Sub</td>
<td>5%</td>
</tr>
</tbody>
</table>
Subcontracts

52.244-2 Subcontracts (Oct 2010) ALT 1 (Jun 2007)

Contractor must receive written permission from Contracting Officer before issuing new Subcontracts

Subcontracts are requested by the PI and Department using the Subaward Request Form – they are not automatically issued

Subcontracts can take time to negotiate
Equipment

52.245-1 Government Property (Apr 2012) ALT II (Apr 2012)

- Government retains ownership of equipment purchased with contract funds
- Status of equipment must be reported annually
- Non-profits must ask permission at the end of the contract to retain equipment (disposition)
- Non-profits are allowed to retain ownership of equipment under 5k with permission of CO
G.7. **Government Property**

G.7.1. The Government may provide property or equipment for use in performance of this task order. This property or equipment shall be used only for the work required under this task order in accordance with FAR 52.245-1 Government Property (AUG 2010).

G.7.2. The Contractor shall control, protect, preserve, use, maintain, and repair any Government property or equipment provided for, or purchased for, performance under this contract in accordance with sound industrial and business practices and the requirements of this contract.

G.7.3. Upon completion of this task order, if the Government provided or the Contractor acquired Government property, the Contractor shall coordinate with the Contracting Officer and COR for final disposition. Refer to section D.1 for packaging and shipping instructions.
Reporting Inventions

52.227-11 Patent Rights – Ownership by the Contractor (May 2014)

 setInterval (Bayh-Dole)

 clearInterval (Bayh-Dole)

 University must report subject inventions

 PI submits disclosure to the Office of Technology and Commercialization (OTC)

 OTC Submits reports on behalf of University

 Failure to report can result in assignment of patent rights to Government
Task Order Request for Proposal for BOA HSHQDC-10-A-BOA36 (University of Maryland)
HSHQDC-12-R-00043
Comprehensive Testing of Ingestion Messages for Mobile Devices Project

<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>52.215-23 Limitations on Pass-Through Charges (OCT 2009)</td>
<td></td>
</tr>
<tr>
<td>52.216-7 Allowable Cost and Payment (JUN 2011) (FAR Subpart 31.3)</td>
<td></td>
</tr>
<tr>
<td>52.216-11 Cost Contract – No Fee (Apr 1984)</td>
<td></td>
</tr>
<tr>
<td>52.219-8 Utilization of Small Business Concerns (Jan 2011)</td>
<td></td>
</tr>
<tr>
<td>52.19-9 Small Business Subcontracting Plan (Jan 2011)</td>
<td></td>
</tr>
<tr>
<td>52.222-2 Payment for Overtime Premiums (JUL 1990)</td>
<td></td>
</tr>
<tr>
<td>52.222-3 Convict Labor (JUN 2003)</td>
<td></td>
</tr>
<tr>
<td>52.222-21 Prohibition on Segregated Facilities (FEB 1999)</td>
<td></td>
</tr>
<tr>
<td>52.222-26 Equal Opportunity (MAR 2007)</td>
<td></td>
</tr>
<tr>
<td>52.222-35 Equal Opportunity (SEP 2010)</td>
<td></td>
</tr>
<tr>
<td>52.222-26 Affirmative Action for Workers With Disabilities (OCT 2010)</td>
<td></td>
</tr>
<tr>
<td>52.223-7 Employment Reports on Veterans (SEP 2010)</td>
<td></td>
</tr>
<tr>
<td>52.223-38 Compliance with Veteran’s Employment Reporting Requirements (SEP 2010)</td>
<td></td>
</tr>
<tr>
<td>52.223-50 Combating Trafficking in Persons (FEB 2009)</td>
<td></td>
</tr>
<tr>
<td>52.223-54 Employment Eligibility Verification (JAN 2009)</td>
<td></td>
</tr>
<tr>
<td>52.223-6 Drug-Free Workplace (MAY 2001)</td>
<td></td>
</tr>
<tr>
<td>52.223-18 Contractor Policy to Ban Text Messaging While Driving (AUG 2011)</td>
<td></td>
</tr>
<tr>
<td>52.224-1 Privacy Act Notification (APR 1984)</td>
<td></td>
</tr>
<tr>
<td>52.224-2 Privacy Act (APR 1984)</td>
<td></td>
</tr>
<tr>
<td>52.225-13 Restriction on Certain Foreign Purchases (JUN 2008)</td>
<td></td>
</tr>
</tbody>
</table>

52.227-11 Patent Rights—Ownership by the Contractor (DEC 2007)

<table>
<thead>
<tr>
<th>Additional Requirements (JUN 1990)</th>
<th>52.228-7 Insurance – Liability to Third Parties (MAR 1996) Note: DHS recognizes that the University of Maryland maintains its own self insurance program and documentation is available at the task order level</th>
</tr>
</thead>
<tbody>
<tr>
<td>52.229-3 Federal, State, and Local Taxes (APR 2003)</td>
<td></td>
</tr>
<tr>
<td>52.230-2 Cost Accounting (OCT 2010)</td>
<td></td>
</tr>
<tr>
<td>52.230-3 Disclosure and Consistency of Cost Accounting Practices (OCT 2008)</td>
<td></td>
</tr>
<tr>
<td>52.230-5 Cost Accounting Standards – Educational Institution (OCT 2010)</td>
<td></td>
</tr>
<tr>
<td>52.230-6 Administration of Cost Accounting Standards (JUN 2010)</td>
<td></td>
</tr>
<tr>
<td>52.232-9 Limitation on Withholding of Payments (APR 1984)</td>
<td></td>
</tr>
<tr>
<td>52.232-17 Interest (OCT 2010)</td>
<td></td>
</tr>
<tr>
<td>52.232-20 Limitation of Cost (APR 1984)</td>
<td></td>
</tr>
<tr>
<td>52.232-22 Limitation of Funds (APR 1984)</td>
<td></td>
</tr>
<tr>
<td>52.232-23 Assignment of Claims (JAN 1985)</td>
<td></td>
</tr>
<tr>
<td>52.232-33 Payment by Electronic Funds Transfer—Central Contractor Registration (OCT 2003)</td>
<td></td>
</tr>
<tr>
<td>52.233-1 Disputes (JUL 2002)</td>
<td></td>
</tr>
<tr>
<td>52.233-2 Protest After Award (AUG 1996) Alternate I (JUN 1985)</td>
<td></td>
</tr>
</tbody>
</table>
IV-2.00 Policy on Solicitation and Acceptance of Sponsored Projects

▷ Applications may be submitted and awards accepted directly by the designated officer on each campus (Office of Research Administration)

IV-2.20 Policy on Classified and Proprietary Work

▷ University does not conduct federal classified work nor permits the use of University facilities or resources for classified work on campus

▷ University will not enter into an agreement that bars investigator(s) from publishing or otherwise disclosing the findings publicly
Federal Acquisition Regulation

www.acquisition.gov
Contact Information

Takeia Bradley
Contract Manager, ORA
301-405-8061 / tbradle3@umd.edu

Marcine Snyder
Contract Manager, ORA
301-405-6177 / msnyder2@umd.edu