

University of South Alabama

Policy on Roles and Responsibilities in the Administration of Sponsored Projects

I. Purpose

The following describes the authority and accountability of the Principal Investigator/Project Director (PI/PD) in managing the fiscal administration of sponsored projects as well as the departments and units that support the sponsored projects.

II. Background

University of South Alabama (University) solicits and accepts contracts and grants for research, training, and public service projects from a variety of federal and non-federal sponsors (including industrial and commercial concerns, universities, governments, private foundations, and other organizations). With the acceptance of extramurally funded awards, the University agrees not only to provide technical or scientific expertise, but also to manage each award in conformance with various fiscal and administrative regulations. Responsibility for managing these grants and contracts is necessarily shared throughout the University environment. This policy provides guidance on the way this responsibility is shared.

III. Statement

The terms and conditions applicable to grants and contracts vary extensively. However, there is a requirement common to all awards: The PI/PD is responsible for the technical, administrative, and fiscal management of the project, which includes responsibility for any applicable subcontracts. In addition, the Department Chair, Dean, Office of Grants Administration (OGA), and Office of Grants and Contracts Accounting (OGCA) share in various aspects of the proposal and award management.

IV. Responsibilities

The Principal Investigator and Project Director (PI/PD) is the individual with responsibility for the technical, administrative, and fiscal management of a project, including any applicable subcontracts. As a practical matter, it is often necessary and appropriate to rely on staff members for assistance in carrying out much of this responsibility. The PI/PD and/or staff must:

- Be knowledgeable, at the proposal stage, about appropriate agency and University guidelines and restrictions relative to the conduct of research, training, and public service programs, and be willing to adhere to such guidelines and restrictions;
- Conduct the work supported by the grant or contract in a timely and professional manner;

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- Comply with the specific terms and conditions of each award as stated in the grant or contract documents and with all administrative requirements, as set forth in various sponsoring agency and University policy statements, concerning issues such as publication, patents, equipment screening, proprietary data, consultants, human subjects, animal subjects, computing equipment, recombinant DNA, cost sharing/matching, or regulated substances;
- Assure that expenditures made prior to the receipt of a fully executed contract or grant award are incurred only after obtaining specific authorized approval, that expenditures do not exceed the total amount of funds awarded, and that specific budget category expenditure limits are adhered to;
- Maintain budgetary control through the use of departmental bookkeeping and cost control systems and monthly reconciliation;
- Certify that all costs charged to each grant or contract specifically benefit the project being charged by reviewing and approving certifications of effort expended by employees, staff employee time sheets (e.g., personal activity report (PAR) forms), payments of vendor invoices for goods and services, check requests (non-payroll), travel reimbursements, requisitions to and acceptance of charges from campus service units, and similar charges to the project. If it becomes necessary to make after-the-fact adjustments in the allocation of certified costs, the PI/PD, or other knowledgeable person, must provide full justification and documentation of the costs being transferred;
- Comply with the reporting requirements of each grant and contract which may include periodic progress reports, annual reports of project accomplishments, reports of inventions, reports of publications generated, reports of major items of equipment acquired, cost sharing/matching reports, and financial reports. Although OGCA is responsible for the preparation and submission of reports of expenditures, the PI/PD must assure that all financial transactions, including cost sharing and matching, are properly recorded and/or documented in a timely manner so that the reports of expenditures can be submitted promptly:
- Review the subsidiary general ledger monthly and upon expiration of the grant or contract, and make adjustments as may be necessary to assure that the general ledger is cleared of any expenses not applicable to the award. Such adjustments may include transferring outstanding liens, transferring items of expense not allowable under that particular grant or contract, and transferring overdrafts to other permissible fund sources.
- Ensure that any subcontractors comply with the terms and conditions of each award as stated in the grant and contract documents and with all administrative requirements, as set forth in various sponsoring agency statements.

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The Department Chair or Organized Research Unit Director is responsible for reviewing proposals submitted by departmental faculty members, particularly to determine:

- The eligibility of the individual designated as Principal Investigator/Project Director or Co-Principal Investigator;
- The appropriateness of the time commitments made by faculty members;
- Whether space will be available for the proposed project;
- That cost sharing and/or matching fund commitments set forth in the proposal can be met; and
- That, where appropriate, equipment screening procedures have been followed;
- Reviewing all proposals to assure that the proposed project is consistent with the educational and professional objectives of the school or college;
- Approving cost sharing and/or matching fund commitments contained in proposals.

Once an award is accepted, the Department Chair or Organized Research Unit Director has continuing responsibilities for the conduct of the project which include:

- Reviewing and approving financial transactions related to personnel, the purchase of equipment, re-budgeting of funds, or the retention of consultants, for consistency with project purposes and the terms and conditions of the award; and
- Identifying appropriate unrestricted fund sources at the departmental level to cover overdrafts and/or disallowances that PI/PD are not able to cover with funds under their jurisdiction.

Deans are accountable for all funds administered by units under their control as well as for the coordination of all programmatic elements within their school or college. This includes:

- Reviewing all proposals to assure that the proposed project is consistent with the educational and professional objectives of the school or college;
- Approving requests for Facilities & Administrative cost rates (formerly indirect costs) at less than full recovery;
- Approving cost sharing and/or matching fund commitments contained in proposals; and
- Identifying appropriate unrestricted fund sources to cover overdrafts and/or disallowances, which Department Chairs within the school or college have not been able to cover with funds under their jurisdiction.

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Office of Sponsored Programs (OSP) is responsible for:

- Reviewing and approving all proposals for research, training, and public service programs prior to submission to external agencies by the respective university departments. The Associate Vice President for Sponsored Programs serves as the designated Authorized Organizational Representative (AOR) and signs all application and assurance documents on behalf of the university based upon appropriate intra-university review as documented on a fully executed Transmittal Sheet for Proposals. Proposals are reviewed to assure that projects are consistent with University policy, agency terms and conditions, and application guidelines.

Office of Grants Administration (OGA) is responsible for:

- Negotiating and recommending execution of contracts and acceptance of grant awards to the University Contract Officer which are consistent with University policy and which contain terms and conditions acceptable to the University;
- Determining that a funding agency has made a binding commitment and expenditures are authorized under a grant or contract prior to its acceptance and/or execution;
- Informing appropriate campus personnel of the requirements and obligations imposed by the grant or contract, including the interpretation of award terms and conditions;
- Approving and officially transmitting requests for budget and/or time revisions requiring pre-approvals by the funding agency when recommended by the appropriate Vice President and approved by the Office of Grants and Contracts;
- Negotiating and recommending resolution of programmatic and financial discrepancies and disagreements that may arise between the university and external funding agencies.

Office of Grants and Contracts Accounting (OGCA) is responsible for:

- Maintaining records of expenditures for grant and contract funded projects (e.g., general ledger);
- Providing monthly ledgers to PI/PD;
- Reviewing transfers of payroll and non-payroll expenditures for conformance to agency and University policies and procedures;
- Managing the accounts receivable process that includes invoicing, letter of credit and collections.
- Preparing and submitting reports of expenditures to funding agencies and assisting in the close-out of contracts and grants;
- Closing out grant and contract accounts by transferring overdrafts and unallowable expenditures or adjusting the budget to clear out unexpended balances when the necessary information and documentation has not been provided within a reasonable amount of time by the PI/PD;
- Coordinating responses to audit reports and/or recommendations of disallowance of expenditures under grant and contract awards; and

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- Providing assistance to departments which are experiencing difficulties in the management of grant and contract funds.

The Senior Vice President for Academic Affairs, the Vice President for Medical Affairs and the Vice President for Financial Affairs (or their designee) have general oversight responsibility for policy issues associated with extramurally-funded research programs. Included is the responsibility for:

- Approving exceptions to PI/PD eligibility;
- Coordinating compliance with federal and other research regulations in matters such as human subjects, animal welfare, and biohazards; and
- Resolving disputes which arise concerning scientific propriety or academic policy.