Overview

This policy describes the shared responsibility for the administration of Awards accepted as Contracts, Grants, Cooperative Agreements or Subawards at SFI. Through designated officials with delegated authority, SFI solicits and accepts Awards on behalf of SFI from a variety of organizations for organized research and other sponsored activities (i.e. education, community service, etc.). Federal, state, and local governments, industrial and commercial concerns, institutions of higher education, private foundations, and other non-profit organizations, provide extramural funding.

Awards take on the appearance of Contracts, Grants or Cooperative Agreements when they include requirements such as a specified period of performance or a specific scope of work to be followed or other conditions or obligations required of the SFI to fulfill the terms of the Award. Awards without restrictions generally constitute gifts.

1. Statement

With the submission of proposals and the acceptance of Awards, SFI agrees to provide technical or scientific expertise, and to manage each Sponsored Project in compliance with various fiscal and administrative regulations. Specific individuals and select administrative support units share responsibility for managing Sponsored Projects.

a. Principal Investigators are responsible for the proposal preparation, acquisition of appropriate approvals (i.e., human subject, animal subject, use of biohazardous materials, etc.) and licenses, scientific and technical conduct and reporting, and fiscal and programmatic management of the project, which includes responsibility for any applicable Subawards.

b. The Director, Sponsored Research Development and Administration and Director of Finance/Accounting share primary responsibility for the day-to-day management of Sponsored Projects.

c. The Director, Sponsored Research Development and Administration, has general oversight responsibility for policy-related matters associated with Sponsored Projects. He or she is also responsible for coordinating compliance with federal and other research regulations in areas such as the protection of human and animal research subjects, scientific integrity, conflict of interest, and environment, health and safety.

d. A number of other units, including Human Resources, have expertise in varied subject areas and provide a wide spectrum of support services related to the administration of Sponsored Projects.
2. **Responsibilities**

**PRINCIPAL INVESTIGATOR**

It is reasonable and appropriate for the Principal Investigator (PI) to rely on administrative staff for assistance in carrying out responsibilities under a Sponsored Project. However, it is expected that the PI will:

a. Be knowledgeable about appropriate agency and SFI guidelines and restrictions relative to the budgeting of both direct and indirect costs, proposal preparation, the conduct of organized research and other sponsored activities, and be willing to comply with such guidelines and restrictions;

b. Secure appropriate federal and local approvals such as New Drug Applications (NDA), Investigational Device Exceptions (IDE), human and animal subject approvals, and approval to use biohazardous materials and/or recombinant DNA;

c. Comply with the specific terms and conditions of each Award as stated in the Contract, Grant, Cooperative Agreement, or Subaward documents and with all administrative requirements, as set forth by the federal government, sponsoring agency, and SFI policy statements, as applicable;

d. Adhere to specific budget restrictions, ensuring that activities do not begin and expenditures are not incurred prior to the receipt of a fully-executed Award unless necessary and authorized advanced approvals have been obtained, and that expenditures do not exceed the total amount of funds obligated;

e. Certify that all costs charged to a Sponsored Project are accurate and specifically benefit the project being charged including the certification of salaries charged to federal Awards;

f. Provide justification and documentation of costs being transferred, if after-the-fact adjustments in the allocation of certified costs become necessary;

g. Comply with the reporting requirements as stated in the Contract, Grant, Cooperative Agreement, or Subaward documents, including the submission of periodic and final programmatic reports, financial reports, invention reports, and inventory and equipment reports; and

h. Ensure that any subrecipients comply with the terms and conditions of each Award as stated in the Subaward documents and with all administrative requirements, as set forth by the federal government and sponsoring agency, as appropriate.

**PRESIDENT AND VICE PRESIDENT FOR SCIENCE**

They are responsible for reviewing proposals developed by faculty, in particular to:

a. Ensure the proposed project is consistent with the research and educational objectives of SFI;

b. Determine the eligibility of the individual designated as Principal Investigator (PI) or Co-Principal Investigator in accordance with SFI Policy for Principal Investigator Eligibility;
c. Ensure the appropriateness of the effort committed to the project made by SFI faculty, staff and Postdoctoral Fellows;

d. Ensure that appropriate on-campus or off-campus space has been identified and is available for the project;

e. Confirm that support will be provided for the administration of the project;

f. Determine that cost sharing and/or matching fund commitments set forth in the proposal can be met; and

g. Ensure that where appropriate, equipment-screening procedures have been followed.

Once an Award has been made, the Director, Sponsored Research Development and Administration and the Director of Finance or his/her delegatee has continuing responsibility to ensure that administrative staff:

a. Reallocate appropriate funds into the appropriate budget categories;

b. Review and approve financial transactions related to personnel, the purchase of equipment, rebudgeting of funds, or the retention of consultants for consistency with project purposes and the terms and conditions of the Award;

c. Maintain budgetary control through the use of bookkeeping and cost control systems and monthly reconciliation with the general ledger;

d. Provide the PI with accurate and timely information about expenditures; confer with the PI in order to make adjustments as may be necessary to ensure that the general ledger is cleared of any expenses not applicable to the Sponsored Project. Such adjustments may include transferring outstanding liens, transferring items of expense not allowable under that particular Award, and transferring overdrafts to other permissible fund sources;

e. Identify appropriate unrestricted fund sources at the central accounting level to cover cost-sharing commitments, overdrafts, and/or disallowances that PIs are not able to cover with funds under their jurisdiction; ensure that equipment purchased or acquired under Contracts, Grants, Cooperative Agreements or Subawards are accounted for and/or disposed of in accordance with sponsor and SFI requirements.

The Finance Office is responsible for the preparation and submission of reports of expenditures. The Director of Accounting is responsible for ensuring that all financial transactions are properly recorded in a timely manner so that the reports of expenditures can be submitted promptly to sponsors.

VICE PRESIDENT FOR SCIENCE

He or she has overall responsibility for all Contract, Grant, Cooperative Agreement and Subaward funds administered by the Finance and Sponsored Research Administration Offices, and for the coordination of all programmatic elements:

a. Review of all proposals to ensure that the proposed project is consistent with the research and educational objectives of SFI;
b. Review and approval of requests for PI exceptions;

c. Approval of cost-sharing and/or matching fund commitments contained in proposals; and

d. Identification of appropriate unrestricted fund sources to cover overdrafts and/or disallowances

DIRECTOR, SPONSORED RESEARCH DEVELOPMENT AND ADMINISTRATION

As the SFI official with delegated authority to submit proposals and accept Awards, the Director, Sponsored Research has responsibility to:

a. Review, approve, and submit all proposals for organized research and other sponsored activities to ensure that projects are consistent with SFI policy, agency terms and conditions, and application guidelines;

b. Negotiate, execute, and accept Awards that are consistent with SFI policy and which contain terms and conditions that minimize administrative burden, and limit exposure to compliance issues;

c. Provide pre- and post-Award consultative service and support to PIs and SFI staff;

d. Interpret Award terms and conditions and inform PIs, staff and appropriate personnel of the requirements and obligations imposed by the sponsor's Award;

e. Review and approve certain post-Award transactions for consistency with Award terms and conditions; and

f. Serve as liaison with sponsors, maintain the SFI's official file of record, participate in agency site visits and audits, and assist in closeout activities.

FINANCE OFFICE

Finance Office staff are responsible for financial management of extramurally supported Contracts, Grants, Cooperative Agreements, and Subawards. Finance Office staff will:

a. Set up extramural Awards in the financial system by assigning fund numbers, linking expenditure accounts to funds and appropriating funds;

b. Review and certify expenditures for extramurally funded projects for consistency with sponsor and SFI policies and Award terms and conditions;

c. Conduct post-audit reviews of selected transfers of payroll and non-payroll expenditures for conformance to agency and SFI policies and procedures;

d. Prepare and submit invoices and financial reports of expenditures;

e. Obtain adequate and timely reimbursement for Award expenditures from sponsoring agencies;
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f. Generate payroll system forms, reviewing signed and completed forms and/or providing assistance to others in completing forms as required under federal regulations;

g. Close out funds, transferring overdrafts and unallowable expenditures or adjusting the budget to clear out unexpended balances after conferring with the PI;

h. Respond to sponsor audit requests.

3. Definitions

Award: Financial or other support for a specific project being conducted under a Contract, Grant or Cooperative Agreement, or gift.

Contract: A written agreement under which the SFI conducts research, training, or public service. Specific obligations are generally imposed on all parties to the Contract and milestones and/or deliverables are often required.

Cooperative Agreement: A version of a Grant in which the sponsor participates in the project along with SFI personnel.

Grant: A written agreement under which the SFI conducts research, training, or public service. Deliverables other than technical or financial reports are generally not required.

Principal Investigator (PI): A SFI employee (normally a faculty appointee) who has primary responsibility for the scientific and technical conduct, reporting, fiscal and programmatic administration of a Sponsored Project.

Sponsored Project: A specific research, training, public service project, or other program that receives support from external sponsors and/or SFI programs under a Contract, Grant, Cooperative Agreement, or Subaward. Support may be in the form of funding, equipment or other material contributions.

Subaward: Agreement that transfers to another organization a portion of the work being conducted under a Contract, Grant, or Cooperative Agreement.

4. Related Policies and Procedures

Principal Investigator Eligibility Policy (GM02)

Delegation of Authority - To Solicit and Accept or Execute Certain Extramural Grants and Contracts signed by SFI President

2 CFR 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards