



## Administration- Sponsored Programs

<b>Policy Number:</b>	AA-09-004
<b>Policy Administrator:</b>	Provost and VP for Academic Affairs
<b>Policy Initiator:</b>	Dean of Extension Services
<b>Authority:</b>	EO 890 and Uniform Guidance 2 CFR 200
<b>Effective Date:</b>	March 2015
<b>Revised Date:</b>	June 2016
<b>Approved:</b>	President Thomas A. Cropper
<b>Approval Signature:</b>	/s/

### Purpose:

The purpose of this policy is to establish the process for all externally funded sponsored projects, while ensuring the University’s compliance with federal and state laws; California State University (CSU) Executive Orders and policies; collective bargaining agreements; sponsoring agency requirements; California State University Maritime Academy (Cal Maritime) policies; and other applicable laws, regulations and requirements.

### Scope:

This policy applies to all externally funded sponsored projects with relation to its immediate staff and those services coordinated with other Cal Maritime Departments.

### Accountability:

Sponsored Programs (SP) has the authority and responsibility for all pre-award processes and Fiscal Services and SP have the authority and responsibility for all post-award processes. Both offices are responsible for effective coordination, and ensuring sound management of Sponsored Programs as per Executive Order 890.

### Policy:

This policy specifies how the components outlined in Executive Order 890 are administered at Cal Maritime. In the event that a given agreement or grant contains terms and conditions that are not in conflict with but are more restrictive than those provided in this policy, the more restrictive terms and conditions of the agreement or grant shall prevail.

### A. Roles and Responsibilities

#### 1. Sponsored Programs (SP) - Responsibilities include but are not limited to:

- a. Review and approval of the overall aspects of agreement and grant proposals in consultation with Provost/VP for Academic Affairs.
- b. Review of proposal budgets and narrative summaries of proposals or requests for funding of research or other sponsored programs to sponsoring federal or state agencies, public or private corporations, private foundations or individuals prior to submission.

- c. Coordinate the routing of sponsored program proposals to assist the PI in complying with applicable CSU and Cal Maritime policies and regulations prior to the proposal being submitted to the receiving agency.
  - d. Assist faculty and staff in the development of sponsored program proposals including editing of the proposal narrative, preparing the budget, completing required agency forms, and fulfilling the prospective sponsor's requirements and pre-award compliance issues.
  - e. Serve in the capacity of Cal Maritime's Authorizing Official (authorized organizational representative) for providing sponsoring agency assurances such as drug-free workplace, lobbying, vendor debarment, equal opportunity, and other related documents required by granting agencies following the award.
  - f. Notify the granting agency on the change of PI in the event that PIs responsibilities have been reassigned by the appropriate administrator.
  - g. Coordinate with the PI to complete the Conflict of Interest forms and coordinate training with Human Resources (HR).
  - h. Coordinate with Fiscal Services once funded award is received.
  - i. Maintain records of all submissions, communications, and notifications to, from or with the granting agency.
  - j. Perform billing and reporting in consultation with Fiscal Services.
  - k. Process semi-annual time and effort certification.
  - l. Monitor and track cost share and match in consultation with the PI and Fiscal Services.
  - m. Review, monitor, and approve all agreements and grant expenses.
  - n. Assure that award terms and conditions are met; that the project stays within its budget; and funds are utilized pursuant to awarding Sponsor's regulations and prevailing cost principles.
  - o. Ensure programmatic compliance with agency requirements, University policies, federal regulations, and relevant laws.
  - p. Responsible for project closeout in a timely manner.
2. **Provost/VP of Academic Affairs**
    - a. Review and approval of the overall campus academic and potential cost sharing aspects of agreement and grant proposals to ensure consistency with campus, school, and department academic strategic plans.
  3. **Human Resources (HR)**
    - a. Send out appropriate training to sponsored project faculty and staff in consultation with SP.
    - b. Maintain original financial disclosure records for all sponsored project faculty and staff.
  4. **VP of Administration and Finance**
    - a. Review and approval of the overall campus fiscal, human resource, logistical, facility maintenance, and technology aspects of sponsored program proposals.
  5. **Fiscal Services** - Responsibilities include but are not limited to:
    - a. Coordinate with SP once funded award is received.
    - b. Perform billing and reporting in consultation with SP.
    - c. Monitor and track cost share and match in consultation with the PI and SP.
    - d. Review and record all agreements and grant expenses.
    - e. Process all required personnel cost transfers and release reimbursed time documents in PeopleSoft.
  6. **Principal Investigator (PI)** - Responsibilities include but are not limited to:
    - a. Development of proposals in compliance with CSU, Cal Maritime and funding agency policies, procedures and requirements. The PI is required to follow Cal Maritime's policies and procedures related to conflict of interest reporting.

- b. In the event of multi-Institutional sponsored programs, ensure receipt of completed and authorized proposals from proposed sub-recipients prior to their inclusion in proposal submission.
  - c. In the case of the incumbent PI's resignation, incapacitation, or failure or refusal to perform the duties adequately, refer to the MOU between PI and University form (MOU) or the appropriate administrator.
  - d. Effectively train and supervise project personnel.
  - e. The programmatic conduct and management of the project; preparation of the required technical reports; and completing the project in a diligent and professional manner.
- 7. CSU Office of the Chancellor**
- a. Legal advice concerning agreement or grant administration that might affect the CSU or the University must be coordinated through the CSU Office of General Counsel.

**B. PI Eligibility**

Tenured / Tenure-Track faculty, lecturers, professor emerita, or staff employees are eligible for PI status. A new hire in a tenure-track position is considered eligible as soon as she/he has indicated acceptance of the offer letter. Other individuals may attain PI eligibility by receiving prior approval from the President or designee. Failure to follow the policies and procedures for the conduct of a sponsored project or its administration can result in the loss of PI eligibility.

## **Procedure:**

### **A. Proposal Approvals and Submission**

All proposals for externally funded projects must undergo administrative review prior to submission, including:

1. Approval by the appropriate dean/supervisor and department chair of the PI.
2. Approval by the VP of Administration and Finance, Accounting Manager, Dean of Extension Services, Provost/ VP for Academic Affairs.
3. Other departmental and/or administrative approvals as deemed necessary (including but not limited to Director of the appropriate Research Center, Facilities Management, Institutional Review Board Committee, Police Services, Institutional Animal Care and Use Committee, and Procurement).
4. Any University assurances required by granting agencies must be signed by the VP of Administration and Finance, the Authorizing Official, or his/her designee.

### **B. Acceptance of Awards**

1. In the administration of sponsored programs, Cal Maritime is obligated to conform and comply with all relevant federal and state statutes and regulations and all directives issued by the California State University (CSU) Board of Trustees and the Office of the Chancellor. In order to meet these obligations, only specific individuals authorized by the President to act on behalf of Cal Maritime may accept grants and agreements awarded by federal, state, local government, and private agencies.
2. Prior to the acceptance of an award on behalf of Cal Maritime, the Dean of Extension Services must ensure that a signed MOU for the award's PI is on file with SP. The MOU outlines the responsibilities and expectations for PIs for awards administered by Cal Maritime.

### **C. Kick-Off Email**

1. The PI, SP, Fiscal Services, Academic Affairs Director of Planning and Operations, Dean, Department Chair, and all applicable project staff will receive an email from SP once the award is fully executed.
2. This email will serve to notify all applicable individuals that the award has been funded and will include as attachments the Trust Fund Agreement, Award Document, Budget, and Chartfield Request Form. This will also serve to notify staff to any award terms or conditions that are unique to the award.

### **D. Fiscal Administration**

#### **1. Budget**

Each accepted agreement/grant award must have an approved project budget, which includes direct and indirect costs as well as cost-sharing if applicable. Changes in a project's budget must be approved by Cal Maritime and may require prior consent of the funding source.

2. Approvals for post-award modifications to award agreements require varying levels of approval based on the significance of the modification. Post-award modifications are managed by SP.

#### **3. Direct Expenditures**

All agreement and grants expenditures must be in compliance with federal, state, and local government laws, rules, and regulations as well as CSU and Cal Maritime policy and procedures. When there is a variance between any agency and Cal Maritime guidelines, the agency or Cal Maritime regulation, whichever is more restrictive, shall govern.

#### **4. Recruitment and Appointment**

All recruitment and appointment activities must adhere to CSU and Cal Maritime policies and procedures. Salaries and fringe benefits will be compliant with the appropriate CSU unit

bargaining agreement. Salary for administrators and students must meet the CSU and Cal Maritime policies and conform to the funding agency's guidelines. Refer to Cal Maritime Human Resources website accessible at: <http://www.csum.edu/web/hr/home>

## **5. Procurement**

Disbursements and acquisition of contractual services, supplies and equipment must follow CSU and Cal Maritime Sponsored Programs procurement policies and procedures as well as any specific requirements of the granting agency. Refer to Cal Maritime Sponsored Programs Procurement website accessible at: <https://www.csum.edu/web/industry/sponsored-programs-procurement>.

## **6. Risk Management**

Cal Maritime will be responsible for establishing and collaborating with University Risk Management to maintain a risk management program, including the identification, measurement, evaluation, monitoring, and management of risks, reviewing insurance and establishing loss prevention and loss control programs. Refer to Cal Maritime Risk Management website accessible at: <https://www.csum.edu/web/fiscal-services/risk-management>.

## **7. Travel**

Travel and reimbursement for travel that is authorized and funded by a sponsored project will follow all applicable federal, CSU, and, Cal Maritime travel policies and procedures. All travel occurring for Sponsored Programs is required to be approved by the appropriate administrator prior to the travel taking place. Prior to any travel reimbursements being paid the Sponsored Programs Travel Audit Checklist form is required to be attached to the travel reimbursement form. In addition, all Sponsored Program travel must comply with the Fly American Act for all international travel. (<http://www.gsa.gov/portal/content/103191>) Refer to Cal Maritime Travel website accessible at: <http://www.csum.edu/web/fiscal-services/travel>.

## **8. Cash Handling**

All sponsored projects cash handling should follow Cal Maritime Policy. Refer to Cal Maritime Cash Handling policy at the following link. [Cal Maritime - Cash Handling Policy](#)

## **9. Cost Sharing**

All sponsor-required cost sharing must be accounted for and documented in the same detailed manner as sponsor-funded costs. Refer to Cal Maritime Cost Sharing Policy and Procedure.

## **10. Relocation Costs**

All relocation costs are allowable, subject to limitations per 2 CFR 200.464 (<https://www.gpo.gov/fdsys/granule/CFR-2014-title2-vol1/CFR-2014-title2-vol1-sec200-464>). Relocation policy and costs at Cal Maritime should follow Cal Maritime Policy and CSU Coded Memo HR 2012-02 (<https://cyou.calstate.edu/Policies/HRPolicies/HR2012-02.pdf>).

## **11. Cal Maritime is the award agency subject to audit and review by these agencies and is, therefore, responsible for the proper expenditure of funds and submission of timely and accurate financial reports.**

## **E. Conduct of Research**

The Dean of Extension Services, with assistance from the PI, is responsible for providing oversight of the conduct of research and ensuring progress toward fulfillment of agreement or grant requirements.

## **F. Environmental Health and Safety**

### **1. Approval of the Use of Humans as Subjects in Research**

All projects entailing the use of humans as subjects in research—including interviews, questionnaires, surveys, observations, educational tests, and secondary analysis of previously collected data—must be reviewed and approved by the University's Institutional Review Board

(IRB) prior to initiation of the project. Depending upon the perception of potential risk, and/or sponsor requirements, initiation of the approval process may be required prior to submission of the proposal.

**2. Approval of the Use of Covered Animals as Subjects in Research**

All projects entailing the use of animals as subjects in research must be reviewed and approved by the University's Institutional Animal Care and Use Committee (IACUC). Depending upon the perception of potential risk, and /or sponsor requirements, initiation of the approval process may be required prior to the submission of the proposal. Refer to Cal Maritime's Policy on the Animal Care and Use Committee.

**3. Risk Management**

All projects requiring the use of hazardous materials and/or equipment requiring special safety measures or training must be reviewed and approved by Risk Management.

**G. Ownership, Custody and Retention of Sponsored Program Records**

**1. Ownership**

Unless the agreement or grant specifies to the contrary, Cal Maritime shall own the records relating to the sponsored projects. Any agreement or grant that provides for ownership by or license to any person or entity other than the University shall provide the University the right to access and use those records for purposes consistent with the educational mission of the University.

**2. Record Retention**

Unless the agreement or grant specifies to the contrary, Cal Maritime is subject to the record retention policies and procedures noted in Executive Order 1031

(<http://www.calstate.edu/recordsretention/documents/RSP.pdf>). SP shall retain, at a minimum, custody of the following records in compliance with Executive Order 1031:

- a. Original copies of Proposal Approval and Routing Forms (PARF), submitted proposal summaries and related documentation until such time that a funding decision is made. If the proposal is funded, the original copies shall be retained by SP along with the fully executed award and the Award Acceptance Form (AAF). If the proposal is not funded, the original copy shall be retained by SP and can be returned to the PI if requested.
- b. Original conflict of interest forms for governmental agencies shall be retained by Cal Maritime's HR Department.
- c. All records related to the Rights of Human Subjects in Research including but not limited to completed applications, minutes of Institutional Review Board Meetings, and all documentation filed with the Department of Health and Human Services Federal wide Assurance of Protection for Human Subjects filings shall be retained by SP.

**3. Post Award Custody and Retention**

SP shall retain custody of the agreement and grant business documents; contracts, invoices, agency funding reports, etc., in compliance with Executive Order 1031.

**4. Retention Extension**

Records shall be kept for a period longer than Cal Maritime's record retention policy when:

- a. Specific directions are set forth in the agreement and grant requiring a longer period of time. Cal Maritime will retain and allow access to all financial records, supporting documentation, statistical records, and evaluation and program performance data for the time specified by the agency.
- b. The records are the subject of a pending audit or litigation.