Roles and Responsibilities of Principal Investigators/Project Directors

Executive Order (EO) 890, Administration of Grants and Contracts in Support of Sponsored Programs, established policy for all Sponsored Programs applied for, awarded to and/or administered by any campus of the California State University, the Office of the Chancellor, or any Auxiliary (EO 890, page 1). The Policy of The Trustees of the CSU is that “each campus shall establish necessary controls to ensure sound fiscal management of sponsored programs…..It is the responsibility of the Principal Investigator (or Project Director) and Sponsored Program Administrator (University or Foundation) to adhere to the fiscal terms and conditions of the Contract or Grant and to comply with the CSU and Auxiliary policies and procedures” (EO 890, pg. 7).

The CSU Dominguez Hills Foundation has in place for Principal Investigators/Project Directors policies that apply to post-award management of a contract or grant. The Office of Research and Funded Projects (ORFP) has guidelines for the preparation, review and approval of proposal budgets and expenses (pre-award) as described in EO 890. These pre-award and post-award policies and procedures must be aligned and clearly defined so Principal Investigators/Project Directors are cognizant of their roles and responsibilities in managing their contracts and/or grants.

Taking into account the stated role and responsibilities of Principal Investigators/Project Directors in EO 890, the CSUDH Policy on Administration of Grants and Contracts in Support of Sponsored Programs, the developing CSU Grants and Contracts Manual, the CSUDH Account Holders’ Handbook and documents from the ORFP, the Task Force on the Roles and Responsibilities of Principal Investigators/Project Directors has brought together policies and procedures from those documents that address, specifically, the roles of the Principal Investigators/Project Directors so that they understand clearly their role with regard to the development and management of their accounts. This compilation of policies and procedures will be explained to all Principal Investigators/Project Directors when they initiate the pre-award process and again if they are successful in obtaining funding. All Principal Investigators/Project Directors are expected to adhere to the stated roles and responsibilities from the inception to the conclusion of their contract or grant.

I. Selection of Principal Investigator/Project Director (PI/PD)

a. The qualifications of a Principal Investigator shall include employment by the University or the Foundation. Limited exceptions may be allowed for the appointment of Principal Investigators who are not employees of the University or the Foundation, but who are officially affiliated with the University, such as individuals with emeritus status or visiting professors or researchers, as

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recommended by a Dean or Director following appropriate consultation, and as approved by the Provost/Vice President for Academic Affairs or the Provost’s designee.

b. In cases where the incumbent Principal Investigator resigns, becomes incapacitated, or fails or refuses to perform the duties adequately, the Principal Investigator’s responsibilities may be reassigned by the Provost/Vice President for Academic Affairs or the Provost’s designee, in consultation with the Foundation and with the Sponsor.

c. When projects call for the distribution of responsibilities among Principal Investigators for multi-institutional Sponsored Programs, these responsibilities shall be specified clearly in the Grant or Contract proposal, shall be agreed upon in advance by the Principal Investigators, and approved by appropriate University and Foundation authorities.

(Items a-c are from EO 890 and the CSUDH Policy on Administration of Grants and Contracts in Support of Sponsored Programs)

II. Proposal Submission, Review, and Approval (Pre-award)

The information presented below applies to any potential award regardless of the magnitude of its budget. “Small” awards are not distinguished from “large” awards with regard to the proposal submission, review and approval. This information applies to any grants/contracts submitted by all Divisions of the University.

a. The Office of Research and Funded Projects (ORFP) will assist faculty/staff/administrators in defining and conceptualizing the project and identifying appropriate funding agencies.

b. The PI will prepare the proposal and discuss the intended project with the College Dean (or administrative supervisor) and appropriate financial staff to determine the potential impact of the proposed project on the College or administrative area.

c. The PI/PD will consult with ORFP during development of the budget section of the proposal and ORFP will prepare the budget documents including determination of direct and indirect costs. The Department/Division Chair and College Resource Managers must be consulted during budget preparation.

d. Proposals shall not be submitted to the sponsor without prior written approval of the President of the University or the President’s designee (the Provost/Vice President for Academic Affairs or the Provost’s designee), the University Chief Financial Officer or the CFO’s designee) and the Foundation Executive Director. Written approvals shall be obtained on the CSUDH Proposal Approval Form (Greensheet), once all other appropriate campus reviews and approvals have been secured on the form.

e. Grants requesting external funding for specific projects and/or programs are submitted to funding agencies by our faculty and staff on behalf of California State University, Dominguez Hills after
a campus approval process. Upon submission to the agency, these grants are reviewed by a panel of experts in the field and are assigned priority scores or graded in ways that provide some indication whether the grant is competitive for funding. The scores may also be paired with an extensive critique that includes comments by the reviewers and a summation by the panel chair. Reviews often discuss budget or programmatic concerns.

The scores and critiques normally are made available only to the PI/PD, even though the grants are institutional in nature. It is imperative that the University be made aware of the score and provided a copy of the critique so that the college, department and faculty involved can plan for implementation of the grant or its resubmission.

Therefore, the PI/PD or the faculty/staff member submitting the grant is required to provide a copy of the score and critique to the Dean of Graduate Studies and Research as soon as they are available. Upon receipt of the documents, the Dean will discuss with the PI/PD any steps necessary for implementation or resubmission of the grant application.

f. Awards of contracts or grants shall not be accepted without prior written approval by appropriate officials of the University and Foundation responsible for the following areas, if applicable: (a) academic/programmatic; (b) fiscal; (c) health and safety; (d) human and animal subject research; (e) space; (f) major technical resources and equipment; and (g) risk management.

g. The CSUDH Proposal Approval Form shall provide notice to all personnel responsible for the preparation of proposals and applications for Sponsored Programs that, if awarded, the Recipient of the Contract or Grant shall be the Foundation and not an individual, department, or other constituent unit.

h. If the Sponsor requires electronic submission of a grant proposal, ORFP will serve as the sole access to electronic submission systems for grant proposals.

i. Amendments and modifications to contracts and grants only require the approval of the Foundation Executive Director or designee unless the amendment involves a significant change in scope, or requires additional commitment, cost or risk to the University. Submission of amendments and modifications, which contain any of the items listed above, must be preceded by the completion of a new CSUDH Proposal Approval Form.

(Items a-i are contained in EO 890, CSUDH Policy on Administration of Grants and Contracts in Support of Sponsored Programs, the CSU Contracts and Grants Manual, the CSUDH Foundation Account Holder’s Handbook, and ORFP Handbook)

III. Post-Award Responsibilities of the Principal Investigator/Project Director

a. The PI/PD is responsible for having knowledge of and being in compliance with relevant policies and procedures established by the University, the Foundation and the awarding agency.
b. The PI/PD will seek assistance for the administration of grants and contracts from staff in the University Office of Research and Funded Projects, the Foundation’s Grants and Contracts Administration Office, the Department/Division Chair and the College Resource Manager not only for proposal preparation but for carrying out projects if they are awarded. Deans, Department/Division Chairs and Center Directors share the primary responsibility for the management of Grants/Contracts within their units.

c. If the grant or contract requires additional personnel, the PI/PD will hire personnel to work on the project and process necessary paperwork in accordance with Foundation Personnel Policy and the University Office of Human Resources. The PI/PD will also train and supervise project personnel.

d. The PI/PD is responsible for the programmatic conduct and management of the project, for preparation of the required technical/progress reports and for completing the project in a diligent and professional manner.

e. The PI/PD is responsible for completing effort reports for faculty working on the project (federal projects only) within one month of the completion of each semester.

f. The PI/PD is responsible for purchasing budgeted equipment and supplies, arranging for budgeted travel, consultants and conferences or meetings.

g. The PI/PD will maintain all records for the project including all technical/progress reports.

(Items a-g are from the CSUDH Foundation Account Holder’s Handbook and the developing CSU Contracts and Grants Manual)

h. Budget.

1. The Foundation is responsible for final certification of project budgets, pre-award and post-award, and budget change review procedures. For a contract or grant, the PI/PD is responsible for executing the project in conformance with the approved budget. The PD/PI cannot make any decisions related to the conduct of the grant/contract that have a significant impact on the Foundation or University without obtaining the approval of the Executive Director and the College Dean, their designees or appropriate MPP.

2. The PI/PD will provide a final copy of the approved budget to the Foundation before work begins and copies of any correspondence with the sponsoring agency or any other pertinent information. If there is any deviation from the approved budget or subcontract, prior approval must be obtained from the funding agency and proper notification given to the subcontractor, Executive Director and College Dean or appropriate MPP.

3. Jointly with Foundation personnel, the PI/PD is responsible for assuring that contractual/award terms and conditions are met, that the project stays within its approved budget, and funds are utilized pursuant to awarding agency regulations and prevailing cost principles.
The College Dean, Department/Division Chair, or other administrative supervisor, has the overall responsibility for ensuring the Grant or Contract meets the requirements of the funding agency and will work closely with the PI/PD and Foundation to meet this requirement.

4. All funds received for the Grant or Contract by the PD/PI are deposited with the Foundation. Under no circumstances are any funds to be placed in any off-campus bank account.

5. The Department/Division Chair and College Financial Managers will assist the PI in the financial monitoring of their accounts and will provide the PI with accurate and timely information about expenditures and review and approve financial transactions related to personnel, purchase of equipment for consistency with project purposes and the terms and conditions of the Grant or Contract.

6. The PI/PD, Department/Division Chair and Dean are responsible for ensuring compliance with any cost sharing requirements and reporting the shared costs to the Foundation at six month intervals from the beginning of budget period and at the end of the budget period.

(Budget items 1-6 are from EO 890, the developing CSU Contracts and Grants Manual, CSUDH Policy on Administration of Grants and Contracts in Support of Sponsored Programs and the CSUDH Foundation Account Holder’s Handbook)

IV. Misconduct

The CSU Dominguez Hills policy, Misconduct in Scholarship and Research, is the campus policy approved by the Office of Research Integrity within the U.S. Department of Health and Human Services for processing complaints of research misconduct. Employees working on Sponsored Programs who are also CSU employees shall remain subject to consequences for unprofessional behavior, failure or refusal to perform duties adequately, or other misconduct within the administration of the Sponsored Program, pursuant to the CSUDH Policy on Administration of Grants and Contracts in Support of Sponsored Programs and to the University’s discipline system. (ORFP Handbook, Appendix D).