

SENATE POLICY 23-06

Motion: to approve the Policy on Sponsored Projects Administration

Passed at the November 7, 2023, meeting of the University Academic Senate

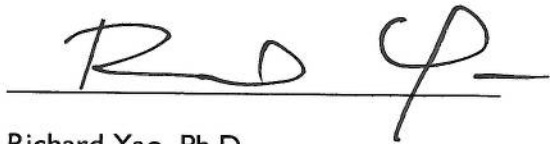
Approvals:



Jason E. Miller, Ph.D.
Chair, Academic Senate

11/30/23

Date



Richard Yao, Ph.D.
President

1/26/24

Date



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS POLICY MANUAL

Division of Academic Affairs

Policy Number: SP 23-06

AA.11.011

Approved By: Academic Senate
November 7, 2023

Effective Date: Spring 2024

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Approved By: Richard Yao, President
TBD

Policy on Sponsored Projects Administration

PURPOSE:

The primary purpose of this policy is to provide a framework for the administration of externally funded sponsored projects while ensuring the University's compliance with federal and state laws; CSU Executive Orders and policies; sponsoring agency requirements; CSU Channel Islands (CSUCI) policies; and other applicable laws, regulations, and requirements.

BACKGROUND:

California State University (CSU) requires that each campus develops and maintains policies regarding the solicitation, acceptance, and administration of awards from extramural sponsors for the conduct of research, scholarship, and creative activities. This policy establishes compliance with this requirement by the University. Since the President delegates authority to the Provost to conduct University business pertaining to research, and since the President delegates authority to the Vice President for Business & Financial Affairs to provide post-award administration for sponsored programs, this policy clarifies responsibilities so the Divisions can collaborate effectively, efficiently, and productively.

Sponsored programs provide significant benefit to the CSU and further its mission by facilitating education, research, scholarship, creative activity, public-private partnerships, workshops, conferences, institutes, and other projects that enrich the scholarly endeavors of faculty and students, and enhance the services provided by the University. It is important that CSUCI is a good and effective steward of sponsor funding, and that the institution complies with institutional, state, federal, and sponsor rules

POLICY:

Accountability:

Provost

Vice President for Business & Financial Affairs

Vice President for University Advancement

Chief Research Officer

Principal Investigators

Applicability:

Research & Sponsored Programs (RSP), University Advancement, Financial Services and other administrative

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units that have responsibility for externally sponsored financial and contractual obligations. Such obligations made by the CSU Channel Islands Foundation (Foundation) are beyond the scope of this policy, but the expectation is that the Foundation shall provide an analogous level of stewardship and oversight to awards it administers. Faculty and staff who have principal investigator status for grants and sponsored programs are responsible for understanding this policy and for the responsibilities described in the Policy on Principal Investigators.

Definition(s):

Contract: An agreement between the University or Auxiliary and a Sponsor to provide an economic benefit, generally in the form of services, for compensation. The agreement is binding and creates a *quid pro quo* relationship between the parties.

Cooperative agreement: a legal instrument of financial assistance between a Federal awarding agency or pass-through entity and a non-Federal entity that, consistent with 31 U.S.C. 6302–6305:

- (a) Is used to enter into a relationship the principal purpose of which is to transfer anything of value from the Federal awarding agency or passthrough entity to the non-Federal entity to carry out a public purpose authorized by a law of the United States (see 31 U.S.C. 6101(3)); and not to acquire property or services for the Federal government or pass-through entity's direct benefit or use;
- (b) Is distinguished from a grant in that it provides for substantial involvement between the Federal awarding agency or pass-through entity and the non-Federal entity in carrying out the activity contemplated by the Federal award.

Faculty: Faculty includes all regular instructional faculty, including department chairs and lecturers, librarians, coaches, and counselors and others covered by the CBA.

Grants: A financial contribution to a Recipient to carry out an approved project or activity. A Grant generally anticipates no substantial programmatic involvement of the Sponsor with the Recipient during performance of the project or activity but Sponsors usually require deliverables/progress reports and/or final report - and an accounting of the use of funds or return of unused funds.

Principal Investigators (PIs): The individual (whether referred to in the Contract or Grant as a Principal Investigator, Project Director, or other similar term) designated by the Sponsored Program Administrator to be responsible for ensuring compliance with the academic, scientific, technical, financial, and administrative aspects and for day-to-day management of the Sponsored Program. Eligibility to serve as a PI and detailed PI responsibilities are spelled out in the University's current Policy on Principal Investigator.

Professional Staff: Professional staff includes all salaried and hourly employees other than faculty.

Sponsored Programs: Programs for work performed under Grants or Contracts funded by non-CSU funding sources (including non-CSU funded Contracts and Grants that are subsequently subcontracted to another campus).

Policy Text:

At California State University Channel Islands (CSUCI) all awards from governmental sponsors are made to and accepted by CSUCI. Corporate and private foundation grants may be submitted by and awarded to the Foundation, but because the Foundation is an auxiliary organization, the administration of grants to the Foundation is beyond the scope of this policy. RSP and Advancement will work collaboratively to determine

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gift versus grant status. If needed, final determination would rest with the CFO. The VP for University Advancement and the Provost in consultation with the VP for Business & Financial Affairs/CFO (or their designees) will determine which grant proposals may be submitted by the Foundation.

University faculty and professional staff members who work on any approved grants, contracts, or cooperative agreements shall comply with the policies and procedure guidelines in the ICSUAM Section 11000 *Sponsored Programs* or University policies and procedures in accordance with federal and state regulations and guidelines, whichever is more restrictive.

- Where campus policy is silent or nonexistent - CSU system-wide policy will prevail.
- Where campus policy is similar & prescriptive of system-wide policy – campus policy will prevail.
- Where campus policy conflicts with system-wide policy – CSU system-wide policy will prevail.

The University will demonstrate compliance with relevant federal and state regulations and guidelines.

This policy may be applicable to federally funded construction or infrastructure projects, but this policy does not apply to state construction grants to the extent they are subject to the policies and procedures in the CSU Public Works Manual. This policy does not apply to awards solely for student scholarships, grants, loans, or work study programs that lie entirely within the scope of CSUCI's Financial Aid office. Awards that include but are not limited to these types of student financial aid may be subject to this policy.

RESPONSIBILITIES

CSUCI is the entity that administers sponsored programs, and the Division of Academic Affairs has the principal responsibility for their administration. Research & Sponsored Programs (RSP) has primary responsibility for pre-award management, including proposal submission for all publicly funded (federal, state, local government, or agencies thereof) and all subawards (regardless of prime sponsor). Staff in the PI's unit, such as a Budget or Grants Analyst, may provide post-award support. Financial Services has responsibility for post-award financial administration including adherence to federal and sponsor cost principles, sponsor invoicing/billing, auditing and grant close out.

While CSUCI has the legal responsibility and authority for administering the grant and expending grant funds, CSUCI bestows to certain faculty and administrators the authority to act as PI for a sponsored program (see the Policy on Principal Investigators). The primary responsibility of the PI is to ensure sponsored program success. But PIs are also responsible for ensuring grant expenditures are allowable, allocable and reasonable and that all facets of the sponsored program adhere to CSUCI, CSU and sponsor rules and regulations. The success of a sponsored project is measured not only by the intellectual merit of the research or the technical results, it is also measured by the PI's commitment to judicious management of award resources and delivery on all obligations in accordance with the award. The authority granted by CSUCI to the PI is inextricably tied to the responsibility the PI has for conducting the grant in accordance with the approved proposal and budget and other guiding policies and regulations.

Other responsibilities for sponsored programs fall into two categories. The first, pre-award responsibilities are those that coincide with the preparation and submission of a proposal for project sponsorship (e.g., a grant proposal). The second, post-award responsibilities are those that are assumed when CSUCI or the Foundation agrees to accept an award from a sponsor for a project.

Pre-Award Responsibilities

Responsibilities for pre-award sponsored programs submitted by CSUCI lie with the Principal Investigator, the Research & Sponsored Programs office, Financial Services, and the Grant/Budget Analyst(s) who support(s) the development of a proposal.

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Principal Investigator (PI): PI responsibilities follow CSUCI's current Policy on Principal Investigator, which include, but are not limited to:

- The PI shall develop the project and communicate with University stakeholders regarding project plans and needs (e.g., Program Chairs, AVPs, Provost's office, Risk Management, Financial Aid, Institutional Review Board, Biosafety Committee, Space Committee, UAS Board, as appropriate) to ensure adequacy of resources for successful project implementation.
- The PI shall develop a budget of costs that are reasonable, allowable, and allocable.
- In the event that a sponsor requires cost-sharing, the PI shall maintain and provide documentation of all committed and voluntary uncommitted cost share to RSP and to the budget office of the sponsoring division (e.g., cash, in-kind, and space commitments).
- The PI shall submit to RSP all items required for proposal submission by the internal deadline set by RSP for proposal administrative review (PAR).

Research & Sponsored Programs (RSP):

- Manages the Proposal Administrative Review (PAR process) to ensure proposals, reviews and approvals for grants and contracts adhere to CSUCI's policies and procedures in accordance with federal and state regulations and guidelines. CSUCI strives to perform such review prior to submission, but in cases where time does not allow, an after-the-fact PAR process may be allowed. PAR review shall occur prior to award acceptance.
- Reviews the budget prior to submission and provides information on current CSUCI costs (IDC, fringe benefits, etc.) and for allowability, allocability and reasonableness.
- Performs proposal submission. Grant proposals to corporate or private entities may be submitted by RSP or by the Foundation depending on sponsor requirements.
- If time allows, RSP may review proposal packages for completeness and compliance with sponsor technical requirements.
- If time allows, RSP may revise proposal drafts (with PI permission) and assist with provision of form/budget templates, and RFP analysis.

Financial Analyst/Grant Accountant (Business & Financial Affairs):

- Reviews the budget prior to submission for allowability, allocability and reasonableness.
- Provides feedback and information on valuation of cash and in-kind cost share commitments and advises on PI tracking needs for such commitments.

Grant or Budget Analysts:

- A departmental/unit Analyst may assist the PI in budget development.
- A RSP Grants Analyst will review budget for allowability, allocability and reasonableness, and may weigh in on likely post-award workload requirements for the grant, if funded.

Post-Award Responsibilities

When a sponsor awards funding to CSUCI for a sponsored project, the responsibility for realizing the goals of that project rest with the PI, but that individual receives post-award administrative support of two kinds: post-award support and post-award administration. These are provided by an employee (e.g., a Budget Analyst) in the PI's unit or assigned by the Provost or their designee and Financial Services.

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Principal Investigator: PI responsibilities should follow CSUCI's current Policy on Principal Investigator, which include, but are not limited to:

- Oversees project management, including the timely reporting to sponsor and the submission of all required internal and external project-related documentation.
- Maintains back-up documentation for grant-related expenditures and contributions.
- Ensures that all expenditures on the award are allowable, allocable, and reasonable.
- Certifies effort for grant-related personnel so that sponsors are not charged more than their fair share of University employee expenses.

Research & Sponsored Programs:

- Assists in any initial project re-budgeting in order to facilitate an approved grant budget for the project.
- Works with PI to facilitate sponsor communication regarding amendments, no-cost extensions, scope of work changes, and/or budget modifications that require prior sponsor approval.
- Oversees issuance of sub-awards and sub-award amendments/renewals.

Financial Analyst/Grant Accountant (Financial Services):

- Initiates setup of project accounting string.
- Meets with PIs and Analysts regularly to review grant expenditures and responds to questions regarding allowability of expenditures and other budget-related questions.
- Researches sponsor guidelines to ensure compliance with sponsor and federal guidelines.
- Works with PIs and Analysts on budget revisions/modifications.
- Coordinates F&A recovery on sponsored projects.
- Manages billing and financial reporting.
- Coordinates the effort-reporting process.
- Audits grant expenditures at any time and leads sponsor-initiated expenditure audit processes.
- Leads the grant close-out process.

Grant or Budget Analysts:

- Assists PI's in administering their projects including support in processing for purchasing, personnel actions, and other project-related actions.
- Assists PI in maintaining back-up documentation for grant expenditures.
- Serves as internal control check for sponsor compliance issues. Refers questions on compliance to PI and other sponsored projects administrators.
- Reconciles grant expenditures on a regular basis.
- When needed, works with PI to develop project expense projections, and assists with planning for budget modifications.
- Works closely with PIs, Financial Services, RSP and other professional staff to assist the PI in meeting award requirements.
- Reminds PIs of report deadlines and assists in obtaining, completing, and submitting any required documentation or forms.

EXHIBIT(S):

Sponsored Programs Administration

Proposal Approval and Submission Overview