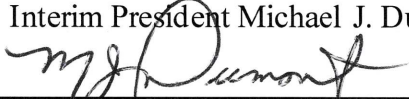




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Policy Administrator:	Provost and VP for Academic Affairs
Policy Initiator:	AVP of Research and Innovation
Authority:	EO 890 and Uniform Guidance 2 CFR 200
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Approved:	Interim President Michael J. Dumont
Approval Signature:	

Administration of Sponsored Projects Policy

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:

The Research and Innovation Office (RIO) has the authority and responsibility for all pre-award processes. RIO shall consult with Fiscal Services, but RIO has the ultimate authority and responsibility for all post-award processes. Both offices are responsible for effective coordination, and ensuring sound management of sponsored projects per CSU Executive Order 890.

Definitions:

Contract - A legally binding arrangement or performance agreement for carrying out a specific service or procuring a product that entails specific obligations for both sponsor and recipient. Generally, contracts will define specific details of the legal relationship between the participating entities and will incorporate the description and cost of the work to be performed either as a legally binding attachment or embedded in the contract document.

Cooperative Agreements - A legal agreement between the federal government and any other entity. A cooperative agreement is when the federal government transfers something of value, usually money, to a state government, municipality or private company for a public purpose. In this type of agreement there is substantial interaction between the federal government and the other party. The main difference between a grant and a cooperative agreement is that in a grant there is not substantial interaction between the federal government and the awardee, whereas, in a cooperative agreement there is substantial federal involvement associated with the stated agreement.

Faculty - Faculty includes all regular instructional faculty, including department chairs and lecturers. This may also include librarians, coaches, and counselors and others covered by bargaining Unit.

Grants - A type of financial assistance awarded to an organization for the conduct of research or other program as specified in an approved proposal. The proposal typically defines a scope of work or performance. The sponsor makes an award, which may be based upon a competitive review, and establishes terms and conditions for performance.

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 AVP of RIO to be responsible for ensuring compliance with the academic, scientific, technical, financial and administrative aspects and for day to day management of the sponsored project.

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

Sponsored Projects - Those activities, sponsored whole or in part, by sources external to Cal Maritime for which there is an expectation (implied or specifically stated) on the part of the sponsor for performance, deliverable(s) or outcome(s). Sponsored projects are generally conducted by faculty, but may be conducted by MPP staff or administrators. Sponsored projects are awarded through various mechanisms, such as grants, contracts, cooperative agreements, and/or other legally binding means of transfers. Gifts and donations are not considered sponsored projects.

Policy:

This policy specifies how the components outlined in Executive Order 890 are administered at Cal Maritime. In the event that a given contract 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. Principal Investigator (PI) - Responsibilities include but are not limited to:

Pre-Award

- a. Development of proposals in compliance with CSU, Cal Maritime, and sponsor's policies, procedures and requirements. The PI is required to follow Cal Maritime's policies and procedures related to conflict of interest reporting.
- b. The PI shall develop a budget of costs that are reasonable, allowable and allocable.
- c. In the event of multi-Institutional sponsored projects, ensure receipt of completed and authorized proposals from proposed sub-recipients prior to their inclusion in proposal submission.
- d. The PI shall submit to RIO all items required for proposal submission by the internal deadline set by RIO for proposal administrative review (PAR).

Post-Award

- a. Oversees the programmatic conduct and management of the project; preparation of the required technical reports; and completing the project and associated tasks/milestones in a timely and professional manner.
- b. Maintains back-up documentation for grant-related expenditures and contributions.
- c. Ensures that all expenditures on the award are allowable, allocable, and reasonable.
- d. Effectively train and supervise project personnel.
- e. Certifies effort for grant-related personnel so that sponsors are not charged more than their fair share of Cal Maritime employee expenses.

2. Research and Innovation Office (RIO) - Responsibilities include but are not limited to:

Pre-Award

- a. Assist faculty and eligible staff in the development of sponsored project 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.
- b. Manages the Proposal Administrative Review (PAR process) to ensure proposals, reviews and approvals for grants and contracts adhere to Cal Maritime's policies and procedures in accordance with federal and state regulations and guidelines. PAR review should happen 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. .
- c. Reviews the budget prior to submission and provides information on current Cal Maritime costs (IDC, fringe benefits, etc.) and for allowability, allocability and reasonableness..
- d. The AVP of RIO serves 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.
- e. Notify the granting agency on the change of PI in the event that PIs responsibilities have been reassigned by the appropriate administrator.
- f. Coordinate with the PI to complete the Conflict of Interest (CoI) forms and coordinate relevant training with Human Resources (HR).

Post-Award

- a. • Assists in any initial project re-budgeting in order to facilitate an approved grant budget for the project.
- b. Coordinate with Fiscal Services once funded award is received.
- c. Maintain records of all submissions, communications, and notifications to, from or with the sponsor.
- d. Perform billing and reporting in consultation with Fiscal Services.
- e. Process semi-annual time and effort certification.
- f. Monitor and track cost share and match in consultation with the PI and Fiscal Services.
- g. Review, monitor, and approve all agreements and project expenses.
- h. 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.
- i. Ensure programmatic compliance with agency requirements, Cal Maritime policies, federal regulations, and relevant laws.
- j. Responsible for project closeout in a timely manner.

3. Deans/Dept. Chairs

- a. Review and approval of relevant PAR documents (e.g., project budget, MOU, proposed release time) prior to proposal submission.
- b. Review and approval of relevant Award Acceptance Forms (AAF) prior to a funded project proceeding.
- c. Monitor the timely fulfillment of grant/contract responsibilities of the PI

4. 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 Cal Maritime, school, and department academic strategic plans.

5. Human Resources (HR)

- a. Send out appropriate training to sponsored project faculty and staff in consultation with RIO.
- b. Maintain original financial disclosure records for all sponsored project faculty and staff.

6. VP of Administration and Finance

- a. Review and approval of the overall Cal Maritime fiscal, HR, logistical, facility

maintenance, and technology aspects of sponsored project proposals.

7. **Fiscal Services** - Responsibilities include but are not limited to:
 - a. Coordinate with RIO once funded award is received.
 - b. Perform billing and reporting in consultation with RIO.
 - c. Monitor and track cost share and match in consultation with the PI and RIO.
 - d. Review and record all sponsored project expenses.
 - e. Process required personnel cost transfers and release reimbursed time documents in PeopleSoft.

B. PI Eligibility

Tenured / Tenure-Track faculty, lecturers, professor emerita, MPP staff, or administrators 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 sponsored projects must undergo a Proposal Administrative Review (PAR) prior to submission, which includes:

1. Approval by the appropriate dean/supervisor and department chair of the PI.
2. Approval by the VP of Administration and Finance, Accounting Manager, AVP of RIO, and Provost/VP for Academic Affairs.
3. Other departmental and/or administrative approvals as deemed necessary (including but not limited to: Director of the appropriate Campus Center or Institute, 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 Authorizing Official, or his/her designee.

B. Acceptance of Awards

1. In the administration of sponsored projects, 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 AVP of RIO must ensure that a signed MOU for the award's PI is on file. The MOU outlines the responsibilities and expectations for PIs for awards administered by Cal Maritime.

C. Kick-Off Email

1. The PI, RIO, Fiscal Services, Provost/VP of Academic Affairs, Dean, Department Chair, and all applicable project staff will receive an email from RIO 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 RIO.

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](#).

5. Procurement

Disbursements and acquisition of contractual services, supplies and equipment must follow CSU and Cal Maritime sponsored projects procurement policies and procedures as well as any specific requirements of the granting agency. Refer to the RIO procurement [website](#).

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](#).

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](#).

8. Cash Handling

All sponsored projects cash handling should follow Cal Maritime Policy. Refer to Cal Maritime Cash Handling policy, [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](#). Relocation policy and costs at Cal Maritime should follow Cal Maritime Policy and [CSU Coded Memo HR 2018-07](#).

- 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 AVP of RIO, 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](#). RIO 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 RIO 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 RIO 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 RIO.

3. Post Award Custody and Retention

RIO 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.