

Roles and Responsibilities
for Sponsored Programs


Katie Stores, AVP for Finance, Operations,
& Research Administration

Category: OSP
Effective: March 1, 2023
Revision History: None
Review Date: March 1, 2027

OSP GUIDANCE 100.01

ROLES AND RESPONSIBILITIES FOR SPONSORED PROGRAMS

1. PURPOSE & SCOPE:

- 1.1 The Purpose of this Guidance is to set forth the University's expectations of the Principal Investigator, Office of Sponsored Programs, the College or Department, Financial Projects and Compliance, and Sponsored Projects Financial Management as it relates to responsibilities during the lifecycle of a Sponsored Program at West Virginia University and West Virginia University Research Corporation.
- 1.2 The effective management and monitoring of Sponsored Programs is an institutional responsibility shared by the key stakeholders in this Guidance. The degree to which each stakeholder performs or coordinates the management and monitoring activities for a Sponsored Program will vary depending on a number of factors, including but not limited to funding levels, budgeted costs, number and expertise of personnel, workload of the respective units, scale and scope of work (e.g. tasks and deliverables), use of subrecipients, reporting requirements, and sponsor-specific terms and conditions.
- 1.3 The terms "Principal Investigator" and "Sponsored Programs" are defined in General Policy 100, Principal Investigator Eligibility.

2. PRINCIPAL INVESTIGATOR RESPONSIBILITIES:

- 2.1 **General.** The Principal Investigator ("PI") is primarily responsible for all actions required to manage and complete the scientific and programmatic aspects of the Sponsored Program.
- 2.2 **Proposal Preparation and Submission.** The Principal Investigator is responsible for the accuracy, authenticity, and responsiveness of the content of the proposal and confirms that the proposal meets requirements outlined in a program announcement or guideline. This includes the following activities:
 - preparing technical proposal including scope of work, biosketches, other support, resources and environment, foreign component, other proposal components required by sponsor;
 - identifying staff, subrecipients, and subcontractors;
 - identifying other administrative requirements e.g., subcontracting plan, data management plan;

- preparing proposal budget or submit draft to Office of Sponsored Programs;
- identifying any space requirements and discuss with Department how these needs will be met;
- identifying sources of any required cost sharing, including submitting request for central institutional funds if appropriate;
- Preparing any authorization for a cost share or F&A rate consideration, including a waiver of the F&A rate, request to use a reduced F&A rate or request to reinvest the F&A into the sponsored project, and obtain all required signatures;
- assembling proposal and providing a copy of the proposal to the Office of Sponsored Programs Pre-Award Unit for final submission to a sponsor.

When support is available, the Principal Investigator may delegate certain proposal development and submission responsibilities to team members, research support staff, or Departmental Administrative Staff; however, the PI still maintains responsibility for accuracy, authenticity, and responsiveness of the proposal.

2.3 Award Management and Monitoring. The Principal Investigator is the initiator and knowledgeable supervisor of most actions related to the management and monitoring of a Sponsored Program. The Principal Investigator has primary responsibilities for ensuring that the work is conducted, and the funds are used in accordance with all sponsor and university requirements, which includes the following activities:

- ensuring appropriate technical conduct of the research effort, including ensuring the integrity and safeguarding of notebooks and scientific data; ensuring the completion, accuracy and timeliness of programmatic (technical) reports;
- managing project funds within the approved budget and ensuring expenditures are allowable and allocable to the funding designated, and post timely and within the active period of performance for the approved budget;
- managing personnel funded or performing effort under the Sponsored Program, including assignment of tasks with appropriate allocation of budgeted resources, monitoring, review, and evaluation of task/deliverable results by Co-Investigators and other research personnel, and collaboration with peers and colleagues to support the rigor of results;
- ensuring the conduct of any subrecipients, including initiating requests for and monitoring subrecipient agreements prepared by OSP;
- ensuring the quality, timeliness, and programmatic (technical) performance of subrecipients;
- communicating any necessary status change requests for the project, including rebudgeting, to their designated departmental representative and the Office of Sponsored Programs prior to implementing such changes on the project;
- ensuring compliance with federal and institutional mandates regarding human subjects research, animal care and use, conflict of interest, export control, and responsible conduct of research;
- complying with all university policies and sponsor terms and conditions pertinent to the

award, including but not limited to information technology, data security and privacy, employment;

- initiating all project-related transactions, including submitting requisitions for all equipment, supplies, and services needed for the project;
- working with department staff to ensure personnel appointments are initiated in a timely manner and appropriately updated;
- completing and submitting on time all required technical reports required by the sponsor;
- collaborating with the sponsor to identify its requirements for performance measurements consistent with Uniform Guidance and liaising with sponsor to ensure that work conducted by the University or Research Corporation and any of its subrecipients is being conducted consistent with the sponsor's requirements.

While the Principal Investigator retains primary responsibility for financial accountability, the Principal Investigator can delegate to an authorized representative.

- 2.4 Absence or Transfer of Responsibilities.** The Principal Investigator must inform the Office of Sponsored Programs when he or she will not be available for any continuous period of more than three months (due to sabbatical leave, illness, or other approved leave) or when the Principal Investigator either withdraws from the project entirely or proposes to devote substantially less effort to the project than was anticipated at the time of award. When a Principal Investigator resigns from the University or plans to transfer to a new university, the Principal Investigator must notify their supervisor and the Office of Sponsored Programs as soon as is practical.

3. OFFICE OF SPONSORED PROGRAMS RESPONSIBILITIES:

- 3.1 General.** The Office of Sponsored Programs is the central administrative office responsible for submitting proposals and accepting awards on behalf of West Virginia University and West Virginia University Research Corporation. It is also the office with the primary responsibility for corresponding with a sponsor related the terms and conditions of the award and ensuring compliance with such terms and conditions.

- 3.2 Proposal Preparation and Submission.** The Office of Sponsored Programs is responsible for ensuring the institution is eligible for an award. Further, it will evaluate proposal submissions for the following:

- consistency with University and Research Corporation policy and business practices;
- completeness and consistency with sponsor requirements, including, requests for application, broad agency announcements, and requests for proposal information and certification requirements; and
- budget and budget justification accuracy.

Once a review is completed, the Office of Sponsored Programs is primarily responsible for ensuring the complete submission of a proposal and updating the submission as necessary.

- 3.3 Award Management and Monitoring.** While the Office of Sponsored Programs personnel do not have the technical capacity to monitor Sponsored Program programmatic progress, it

provides support and oversight throughout the lifecycle by facilitating interventions by other key stakeholders or capable personnel. The Office of Sponsored Programs has primary award management and monitoring in the following areas:

- Serve as the Authorized Organizational Representative for a Sponsored Program grant or agreements and submitting documents that required any institutional certifications, this includes negotiating and executing agreement including subawards.
- Serve as the point of contact for a sponsor and coordinate with the other key stakeholders and institutional officials to provide a response to a sponsor's inquiry or request regarding administrative, financial, or programmatic progress of a given Sponsored Program including WVU or WVURC compliance with terms and conditions.
- Pause, suspend, or terminate the administrative or funded activity of a Sponsored Program at WVU or WVURC in instances when programmatic, financial, or administrative concerns warrant such action.

4. COLLEGE OR DEPARTMENT RESPONSIBILITIES:

- 4.1 General.** College and Department leadership, including Deans, Associate Deans for Research, and Chairs are both the administrative and discipline-specific supervisory positions over the PI of a Sponsored Program. PIs are subordinate to these individuals and subject to their direction and oversight for all assigned job duties at the University or Research Corporation. As such, the College or Department is responsible for ensuring that the PI has the appropriate qualifications to manage a Sponsored Program through training or experience and the resources to support the Sponsored Program. Similarly, in a non-academic unit, the Supervisor of a PI and the respective Vice President will provide the management or monitoring. The research administration personnel available to support PIs throughout the life cycle of a Sponsored Program varies between Colleges and Departments
- 4.2 Proposal Preparation and Submission.** Depending on the resources and personnel of a College or Department, the PI may have additional personnel available to support the preparation of a budget and justification; format proposals documents; coordinate subrecipient information, and submit to OSP or a sponsor.
- 4.3 Award Management and Monitoring.** As part of annual performance reviews and other routine workload or performance management and monitoring, the College or Department may identify performance or programmatic issues. When additional management or monitoring is deemed necessary because of lack of experience, resources, or performance or programmatic issues, the College or Department is primarily responsible for the implementation a performance plan and monitoring plan.

5. FINANCIAL PROJECTS AND COMPLIANCE RESPONSIBILITIES:

- 5.1 General.** Financial Projects and Compliance plays an integral role in Sponsored Programs by supporting the institutional and managing compliance with effort reporting, property management, and subrecipient monitoring. When a key stakeholder identifies an issue or has a question related to compliance with personnel effort, property management, and subrecipient monitoring, Financial Projects and Compliance supports monitoring activities in conjunction

with the other units by providing information for specific award compliance and general institutional compliance.

6. SPONSORED PROJECTS FINANCIAL MANAGEMENT:

- 6.1 General.** Sponsored Project Financial Management is primarily responsible for the financial oversight of the University and Research Corporation's Sponsored Programs including invoicing, billing, financial reporting, and project closeout. Further, Sponsored Project Financial Management is primarily responsible for maintaining sponsored award financial records for the University and Research Corporation.
- 6.2 Award Management and Monitoring.** Sponsored Project Financial Management provides the following financial reports to support the PI's management of a Sponsored Program: monthly expenditure reports; budget summaries; and detailed financial reports for cost monitoring. Further, Sponsored Project Financial Management with the support of Shared Services provides a segregated monitoring on approval of expenditures. When a Shared Services identifies an issue or has a question related to costs incurred or award financial performance, Shared Services can escalate to the College or Department to enforce compliance and accountability.