

## **USC's Partnership for Sponsored Research and Other Scholarly Activities**

The University of Southern California is committed to helping its faculty secure financial resources in support of their research. Doing this requires a partnership among faculty investigators, schools (and their departments, research centers and institutes), and central administration on extramurally sponsored projects. This document describes the roles and responsibilities of these groups.

### **1. Principal Investigator Responsibilities**

Each sponsored project at USC is led by a principal investigator (PI, or in some cases multiple PIs), who is normally a faculty member of the university. The university empowers its investigators by providing them with the authority to lead and manage these projects. The PI has primary responsibility for the technical and administrative success of the project, including the ideas and methods that underlie the research or scholarly activity, creation and execution of the research plan, and academic integrity in all aspects of the work. The PI is also responsible for assuring that the work conducted under the project adheres to the terms of the award or agreement, and also to the policies of the sponsor and those of USC.

Examples of the PI's post-award responsibilities include:

- Execution of the project as outlined in the funded proposal.
- Carrying out the project's financial plan as presented in the proposal, or making changes to the plan following the sponsor's and USC's policies and procedures.
- Reporting project progress and submitting deliverables to the sponsor as outlined in the terms of award.
- Responding promptly to staff requests for approvals, information or decisions, particularly for the establishment of accounts
- Ensuring that an accurate record is maintained of project related expenses.
- Selecting, training, and evaluating project staff and students.
- Complying with all USC policies and procedures, maintaining high standards of research integrity, and protecting the welfare of research subjects.
- Complying with all applicable sponsor rules, regulations and/or terms and conditions of the award.

Although the PI is usually assisted by administrative staff for the creation of budgets, protocols, the TARA project submission, and the management of project funds, the ultimate responsibility for the financial and administrative management of the project rests with the PI. By approving a proposal submission, protocol, Medicare Coverage Analysis (for clinical trials), certification or the like, the PI signifies that he or she has read and agrees to these responsibilities and the contained information.

## 2. Schools, Departments and Center Responsibilities

Schools are responsible for protecting the university and ensuring that administrative support is provided to investigators for the preparation of budgets and forms and support in the fiscal and administrative management of sponsored projects. In some schools, this support is provided centrally by the school as a service for all of the school's PIs; in other schools, departments, centers or institutes provide this service locally, possibly in combination with central services. No matter which approach is followed, it is the school's responsibility to ensure that no PI is left without administrative support, that all PIs are aware of where to obtain support and that sufficient resources are available to meet reasonable PI needs.

Research administrators within schools, departments and centers offer a valuable service to PIs by providing a bridge to central administration. Because they often provide a direct personal interface to the PI, these local administrators can assist in finding and securing assistance from central administration. Although ultimate responsibility for compliance with rules, policies and regulations rests with the PI, research administrators should be knowledgeable in these areas and should be prepared to advise and support PIs to avoid mistakes.

Toward this end, research administrators should not approval proposals, protocols or the like on behalf of PIs, and should strive to ensure that PIs have read and understand the contained information. Because information on outside financial interests is confidential, research administrators should not answer conflict of interest questions, and should not complete conflict of interest disclosure forms.

## 3. Central Administrative Responsibilities

Central administration provides quality assurance with respect to the awards and agreements that the university negotiates and executes. This includes:

**Research Integrity and Ethics** with respect to protecting animal and human subjects, managing conflicts of interest, preventing scientific misconduct, and ensuring safety.

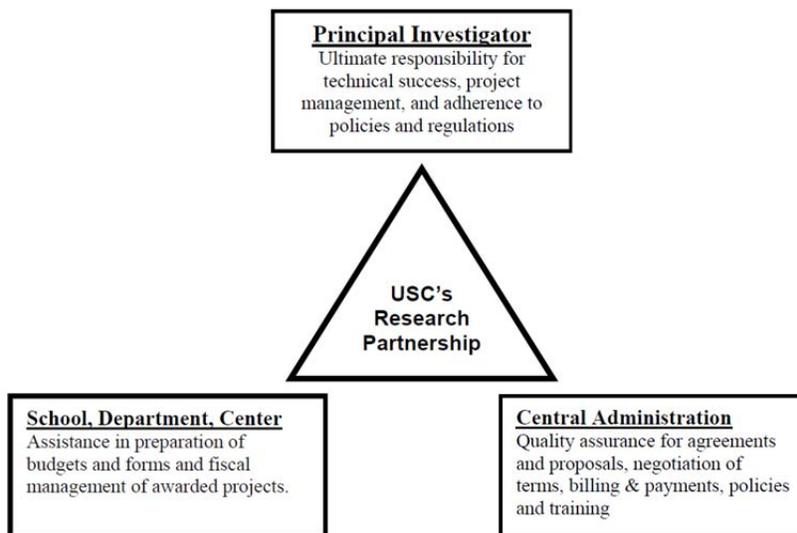
**Academic Principles**, ensuring that academic freedom is protected, students are not restricted from participation in research, work can be independently and openly disseminated, and work is not designed to serve an overtly proprietary purpose (such as product endorsement or advertising).

**Fiscal Responsibility**, ensuring that the university is capable of meeting contractual obligations and that agreements do not expose USC to unwarranted risk or liability. Central administration's responsibilities include negotiating agreement terms, billing and financial reporting to sponsors, and payments to vendors and employees.

To meet these responsibilities, central administration oversees the creation and execution of research policies, in cooperation with the Academic Senate. Central administration

also provides training for research administrators, investigators and students in all of the above areas.

These quality assurance functions are coordinated by the Office of Research, among the various administrative units described in the [Guide to Research](#). The Office of Research also supports the PIs by assisting in the creation of multi-investigator proposals, particularly large proposals that span multiple schools. Through the Center for Excellence in Research, the Office of Research also provides education and mentoring on proposal preparation, research strategy and innovation in research.



#### 4. Detailed Responsibilities

Primary responsibilities are defined in the following pages by unit of the university, according to these categories: (1) identification of funding opportunities, (2) proposal preparation, (3) proposal review and approval, (4) proposal submissions, (5) award acceptance, (6) award set-up, (7) conducting the project – financial, (8) invoicing and financial reporting, (9) personnel and effort certification, (10) data and intellectual property management, (11) prior approvals, (12) subcontracts and subawards, (13) project end and closeout, and (14) audits. **Additional secondary and assistance obligations are denoted in a separate spreadsheet titled “Research Roles and Responsibilities.”**

## **4.1 Principal Investigator Primary Responsibilities**

### *Identification of Funding Opportunities*

- Seeking funding opportunities

### *Proposal Preparation*

- Develop, proofread, edit and revise technical or scholarly narrative
- Identify subcontractors and collaborators
- Request and secure budget, scope of work and relevant documents from subcontractors and consultants
- Identify need and request cost sharing funds or waivers or reductions of indirect costs
- Complete the conflict of interest disclosure questions originating from TARA, and ensure that all key personnel on Health and Human Services proposals have satisfied conflicts of interest requirements
- Obtain all needed regulatory approvals, through TARA submissions, prior to proposal award

### *Proposal Review and Approval*

- Review scientific, technical and scholarly portions of proposal
- Provide principal investigator certification originating from TARA

### *Proposal Submission*

- Request pre award or advance funding account

### *Awards Acceptance*

- Review terms and conditions of award/agreement for technical and financial components

### *Conduct the Project – Financial*

- Initiate purchases.
- Review and approval financial transactions
- Monitor and oversee financial expenditures
- Initiate re-budgeting requests
- Initiate no cost extensions
- Review reconciled accounts

### *Personnel and Effort Certification*

- Initiate hiring and appointment process
- Ensure accuracy of completed effort certification reports and submit/certify reports

### *Data and Intellectual Property Management*

- Complete invention disclosure form and submit to USC Stevens
- Ensure integrity of notebooks and data

### *Prior Approvals*

- Initiate prior approvals for changes to project

### *Subcontracts and Subawards*

- Upon receipt, complete Subcontract Authorization Form and obtain updated subcontract proposal
- Oversee programmatic aspects of subcontract/subaward
- Review, approve subcontract invoices and send to Accounts Payable

### *Project End and Closeout*

- Identify early close-out situations (e.g., project completion, early termination, etc.)

- Submit technical reports to sponsor and Department of Contracts and Grants
- Maintain technical reports for sponsored projects

#### **4.2 Department/Center Administrator Primary Responsibilities**

##### *Proposal Preparation*

- Request and secure budget, scope of work and relevant documents from subcontractors and consultants
- Develop budget
- Identify need for cost-share funds
- Coordinate space arrangements
- Complete the TARA proroposal submission
- Provide guidance to PI on proposal preparation

##### *Proposal Review and Approval*

- Review proposal packet for completeness and accuracy before sending to DCG
- Make revisions and corrections to proposal after institutional review, but prior to submission.

##### *Proposal Submission*

- For paper submissions, send proposal to sponsors after institutional approval
- For email submissions: submit proposal to sponsors after institutional approval
- Monitor preaward or advance funding account
- Prepare just in time documents

##### *Awards Set-Up*

- Prepare master budget, including any satellite budgets

##### *Conduct the Project – Financial*

- Prepare financial transactions (e.g., cost transfers, payroll, requisitions)
- Review and approve financial transactions
- Certify that cost sharing is documented

##### *Personnel and Effort Certification*

- Complete necessary adjustments to award charges and/or payroll distribution
- Prepare effort reports

##### *Prior Approvals*

- Review terms and conditions of award to determine if prior approvals are needed

##### *Subcontracts and Subawards*

- Initiate purchase requisition and send with Subcontract Authorization Form and updated subcontract proposal to DCG

##### *Project End and Closeout*

- Ensure all appropriate expenditures have been posted to accounts
- Resolve issues related to unreconciled accounts

### **4.3 School Primary Responsibilities**

#### *Identification of Funding Opportunities*

- Distribute funding opportunity information

#### *Proposal Preparation*

- Provide expert guidance on funding opportunities
- Identify and delineate acceptable cost-share burden between schools
- Approve space requests
- Approve request for indirect cost waivers or reductions
- Provide guidance to department on proposal preparation

#### *Proposal Review and Approval*

- Verify that cost sharing quantified in proposal (e.g., budget, justification, SOW) is reported in TARA.
- Review proposed cost sharing for appropriateness
- Approve cost sharing
- Provide school review and approval of proposal

#### *Proposal Submission*

- Approve preaward or advance funding request

#### *Conduct the Project – Financial*

- Approve re-budgeting requests
- Certify that cost sharing is documented

#### *Project End and Closeout*

- In the absence of the PI (e.g., transfer, long-term absence) prepare and submit technical reports to sponsor and DCG

#### *Note on Clinical Trials*

- For industry sponsored clinical trials, the Keck School of Medicine is responsible for budget preparation, coverage analysis, proposal submission, contract negotiation and billing, regardless of where the proposal originates at USC. For other clinical trials, the Keck School of Medicine is responsible for coverage analysis, if required, regardless of where the proposal originates at USC.

#### *Note on Health and Human Services (HHS) Proposals*

- Because key personnel must satisfy conflict of interest requirements prior to proposal submission for HHS proposal, schools are strongly encouraged to verify that requirements are satisfied early in the proposal preparation process.

#### **4.4 Department of Contracts and Grants Primary Responsibilities**

##### *Proposal Preparation*

- Review terms and conditions identified in funding opportunities/solicitations

##### *Proposal Review and Approval*

- Provide institutional review of proposal, including verification that HHS conflict of interest requirements have been satisfied by key personnel
- Provide institutional approval of proposal
- Provide cover letter identifying exceptional terms/conditions identified in funding opportunity/solicitation
- Record proposal data in appropriate university systems for tracking and reporting

##### *Proposal Submission*

- For electronic submissions: submit proposal to sponsors after institutional approval
- Confirm status of award, firm commitment and/or allowability of pre-award spending with sponsor
- Establish preaward or advance funding account
- Review, approve and submit just in time documents to sponsor

##### *Award Acceptance*

- Send award notification to PI/Department
- Negotiate terms and conditions with sponsor
- Confirm acceptance of exceptional terms and conditions
- Approve award terms and conditions and if applicable, execute award/agreement

##### *Awards Set-Up*

- Confirm that regulatory compliance approvals are in place
- Request revised/updated budget(s) if needed
- Assign account number and establish account in university system
- Prepare award summary documents
- Initiate subcontract authorization forms for approved subawards/subcontracts

##### *Conduct the Project – Financial*

- Submit re-budgeting requests to sponsor for approval, if required by terms/conditions of the award/agreement
- Approve no cost extensions (or forward to sponsor for approval)

##### *Prior Approvals*

- Provide guidance on terms and conditions
- Approve prior approvals delegated to USC
- Forward prior approval requests to the sponsor, when sponsor approval is required
- Obtain sponsor's decision regarding changes to the project and update university systems, as necessary

##### *Subcontracts and Subawards*

- Upon receipt of a prime award, initiate subcontract authorization form and send to PI and department/center
- Prepare, negotiate, and sign subcontracts/subawards and subsequent modifications

##### *Project End and Closeout*

- Maintain and submit final invention reports to sponsor

#### **4.5 Sponsored Project Accounting Primary Responsibilities**

##### *Invoicing and Financial Reporting*

- Prepare and submit the invoice or financial report
- Receive and deposit payments from sponsors
- Produce and record a letter of credit draw request (federal awards)
- Monitor and pursue collections of overdue payments from sponsors

##### *Project End and Closeout*

- Prepare final financial invoice/report
- Submit and maintain financial reports to sponsor
- Inactivity award accounts in financial system

#### **4.6 Primary Responsibilities of Other Units**

##### *Office of Research and Research Advancement*

- Seek funding opportunities for interdisciplinary proposals
- Accept or reject exceptional terms and conditions
- Conduct USC internal review process for institutionally limited proposals

##### *Clinical Trials Office in Keck School of Medicine (for industry sponsored clinical trials in all schools)*

- Record proposal data in appropriate university systems for tracking and reporting
- Complete coverage analysis, regardless of sponsor type
- Send proposals to sponsor after institutional approval
- Negotiate terms and conditions with sponsor
- Confirm acceptance of exceptional terms and conditions

##### *Purchasing*

- If applicable, prepare small business subcontracting plan

##### *Accounts Payable*

- Pay subcontract invoices approved by PI/Department

##### *Financial Analysis*

- Maintain the effort certification database and reporting system
- Resolve problems or follow up on certifications not submitted
- Review and audit personnel expenditures
- Coordinate external audits for the entire university
- Coordinate A-133 audit

##### *USC Stevens Center for Innovation*

- Review and approve incoming material transfer agreements