The Chair's Roles and Responsibilities for Oversight of Sponsored Projects at GW

Office of the Chief Research Officer
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A principal investigator is primarily responsible for the direction and conduct of a sponsored project, and in that regard must comply with relevant regulations and policies and manage funds appropriately. The chair of the department or the director of a center or other unit that serves as the financial home base for a sponsored project is responsible for what happens in his/her unit and therefore has critical roles and responsibilities in the oversight of externally funded projects as well.

Chairs/directors not only nurture and support researchers in their units but also serve as University compliance managers, responsible for establishing and maintaining high standards of ethical conduct and fiscal responsibility in their units and for fostering a culture of compliance with regulations and policies pertaining to sponsored research. As financial managers of their units, they are also responsible for the financial health of its sponsored projects. If a PI overspends, fails to comply with federal regulations, or otherwise deviates from principles of sound research ethics and fiscal management, the department (i.e., the chair or director) will be held responsible -- for example, by having to cover a deficit due to PI overspending or a charge to an award that must be disallowed because it was inappropriate.

To ensure compliance, it is essential that chairs and directors understand their oversight responsibilities in relation to grants and contracts and regulatory issues surrounding sponsored research that may affect the department or individuals in the department. Chairs should be familiar with what is expected of investigators so that they can help orient new investigators to their responsibilities and provide ongoing guidance. A review of Fiscal Management and Ethics for Investigators, an on-line training program for PIs on the responsibilities [available at www.gwu.edu/~research/traininginfo.htm], will provide useful background.

Establishing a Culture or Compliance/Orienting New Investigators

A chair or director who has grant experience and/or fiscal management experience can be very helpful to new faculty and faculty who are directing their first sponsored projects:

- The chair should, first and foremost, try to establish a culture in the department in which compliance responsibilities are taken seriously, whether the issue is financial management, effort reporting, allowed versus unallowed costs, human subject protections, use of animals in research, or good laboratory practices, including the use of radio-active material and/or the use of select agents.
- The chair can mentor and advise faculty in proposal preparation and award management, helping new investigators anticipate problems, coaching them in how to do things correctly.
- The chair can help new investigators become familiar with research services at GW (www.gwu.edu/~research) and ensure they participate in fiscal responsibility training.

- The chair can establish mechanisms for sharing of information about grants management among faculty and graduate students (e.g., through periodic workshops, circulation of material via listserves, establishment of mentoring programs, and the like).
- The chair can strive to provide, within the constraints of available resources, needed department-level administrative support for sponsored projects and/or to make securing it a priority.
- The chair can keep a central file of examples of common business transactions (e.g., new hiring forms, change in status forms, travel reimbursement forms) to serve as models for new investigators.

Reviewing Routing Sheets and Proposals

One of the most important functions chairs serve in the research realm is to review and sign off on proposals submitted to Office of the CRO (OCRO). Several portions of the proposal routing sheet require close attention by the Chair. Yes, you are busy, and yes, faculty sometimes drop proposals on your desk nanoseconds before the deadline. However, we cannot say this strongly enough: **Watch out what you sign!** If you have ever signed off on a proposal that made large, unwanted financial commitments on behalf of your department, you will know what we mean. You are clearly responsible for whatever you certify when you sign your name on the routing sheet and other forms submitted with a proposal. You will want to have the complete proposal in hand and the time you need to review it before you sign anything. That can be facilitated by establishing procedures in your unit (for example, asking that proposals be submitted to a signature file in your office that will be reviewed each day at a specified hour, requiring 24 hours for review, and the like.)

Only authorized persons are allowed to sign contracts and agreements. You should be familiar with the University's policy on this:
http://my.gwu.edu/files/policies/SigningofContractsandAgreements1.pdf

Facilities

The Chair is in the best position to judge whether existing departmental facilities are sufficient to support a particular project in terms of the availability of necessary space, research facilities, and equipment and, if not, to assess any needs for renovation of space, installation of new equipment, and so on. A chair's role here is to help provide needed research facilities while avoiding surprise costs down the road because the PI did not anticipate accurately what the project would need. In some cases, a discussion with the PI can be helpful to ensure that all needs will be met and that steps will be taken before the proposal is submitted to estimate costs and determine who will pay them.

If a project will need new rental space, the Chair should facilitate contact with the Office of Investment Real Estate (Leslie Korn) and help the PI estimate space needs and costs. It will generally not be possible to begin the search for appropriate space until funding is assured, but it is advisable to determine needs well before the start date of the award and ask the Office of Investment Real Estate to begin seeking space as early as possible.

If it appears that new construction or renovation will be needed, it may need to be paid for through a combination of departmental, school, and central academic facilities funds. Architecture, Engineering, and Construction can be consulted to make a preliminary, rough estimate of the cost of building and renovation projects. Space and/or construction needs associated with Medical Center activities should be coordinated through the Office of Health Research, Compliance and Technology Transfer.

Since GW has had more than one example of costs turning out to be much higher than anticipated, probing questions are in order! Particular attention should be paid to electrical power requirements; heating, ventilation, and air conditioning; other utilities (e.g., water, gas, sinks); stock storage units vs. custom millwork; and phone and data requirements. Hazardous materials abatement may also increase the cost of a project substantially.

Cost Sharing

Chairs and directors, as well as deans, must also sign off with respect to direct cost cost sharing on awards, which can involve facilities, equipment, personnel, and other direct costs. If a cost sharing commitment is made, it must be honored, or else GW may owe money to the sponsor when all is said and done. Chairs also sign off on proposed indirect cost cost sharing, final approval of which rests with the Chief Research Officer (CRO) (Academic Affairs) or the Associate Vice President for Health Research, Compliance, and Technology Transfer (Medical Center).

GW's policy is to minimize both direct cost and indirect cost cost sharing— e.g., on federal awards, not to cost share indirect costs at all unless such cost sharing is mandated by the sponsor (see Policy on Cost Sharing on Federal Sponsored Agreements at http://my.gwu.edu/files/policies/CostSharingonFederalSponsoredAgreements.pdf and, for guidance on GW procedures, see http://www.gwu.edu/~research/budgetbasics.htm#cs). Our goal as an institution is to have sponsors bear as much of the total cost of research as possible, given sponsor regulations and the terms and conditions of specific awards. The chair should NOT sign off on involuntary indirect cost sharing.

When cost sharing is mandated by the sponsor, the chair normally plays a broker role in negotiating with other contributors to cost sharing such as the dean and Associate Vice President for Research and Graduate Studies or, in the Medical Center, Associate Vice President for Health Research, Compliance, and Technology Transfer, to secure the necessary cost sharing funds. He/she is also responsible for ensuring that the department indeed has any resources it pledges to cost share and delivers them. When cost sharing takes the form of a percentage of an individual's salary, the chair should ensure that the individual has the time to give and will in fact work the stated percentage of time on the proposed project.

Conflict of Interest Disclosure Forms

Chairs also sign off on the Conflict of Interest disclosure forms completed by all faculty, including research professors, and senior research staff associated with a particular project – and indeed, by federal definition, by all investigators, defined as individuals responsible for the design, conduct, or reporting of the research. Here again, your role is critical.

The chair should check that all key personnel on a proposal have indeed completed a disclosure form. If any forms indicate that a potential conflict may exist, the chair should make sure that the investigator has attached a description of the potential conflict and that it is complete and clear. He or she should make a copy and discuss it with the investigator to ensure complete information.

The chair is responsible for offering at least a preliminary judgment at the time of proposal submission about whether there is indeed a perceived or actual conflict and, if so, whether it is manageable and if so, how. The chair should inform the dean directly regarding any identified conflicts. The dean must then decide whether to sign the routing sheet. He/she may decide not to allow a proposal to go forward as is if the conflict is serious or may decide that the situation can be kept from becoming a problem through a sound management plan.

Depending on the dean and the dean's preferences, the chair may be called upon at a later point to draft a management plan to ensure that a conflict of interest that has been recognized is appropriately managed. The dean must then forward the decision and management plan, if any, to the EVPAA for review and concurrence. An award cannot be accepted, nor may work on one proceed, unless any conflict of interest issues are resolved. Finally, the chair may be given responsibilities for implementation of a conflict of interest management plan once the project begins.

On occasion, an investigator may not disclose a conflict of interest but the Chair may have knowledge suggesting that there may be one--for example, knowledge that:

- A proposed consultant is the husband of the investigator.
- A company from which the project will purchase supplies is the investigator's firm.

In such cases, the Chair should take a proactive stance and raise the issue with the investigator, seeking a written disclosure before the proposal is sent forward if there is indeed a perceived or actual conflict of interest.

A Chair is also responsible for completing his or her own annual Conflict of Interest disclosure questionnaire for officers and management employees on an annual basis.

Planned Effort

The chair should also review the proposal budget to ensure (1) that costs appear to be reasonable in light of what the chair knows of costs in his/her field, and (2) to review the percentage of time each individual will spend on the project. The chair may know that an investigator has such a heavy load already that he or she cannot possibly commit the amount of time proposed to the particular project and would have a conflict of commitment as a result. The chair is also in the best position to assess the reasonableness of the effort proposed in relation to the work to be done.

Where a Project is to be Based

It is also advisable for the chair to take note of where a particular project is to be located within the University, in terms of its “org” in Oracle lingo and whether it is on or off campus. Will it be based in the chair’s department only, will the budget be split between two departments, or will it be based in another department? The answer will have a bearing on which department is financially responsible if anything goes wrong and which department receives credit for the project (e.g., when sponsored project funding is reported or REIA awards are made).

The Allocation to Multiple Investigators and/or Units form associated with the routing sheet is an opportunity to state a preference for shared credit for a project. In many cases, this can best be done by establishing separate awards in separate departments or schools, as when Professor Abel in Chemistry will be doing part of a project while his collaborator, Professor Cain, does his portion of the work in the Department of Medicine. Credit can also refer simply to credit for the project where credit is awarded, as in REIA distributions. The Chair should ensure that whatever the investigator says on this form is acceptable from a departmental perspective.

Note too whether a project is to be based at Foggy Bottom, at the Virginia Campus, or off campus. A project can be designated as off campus only if space is provided by an outside entity (typically the funding agency) or is rented space rather than GW space. In such cases, the 26% indirect cost rate reflects only the administrative portion of facilities and administrative costs; rent must be built into the direct cost budget if off-campus rental space is needed. Doing fieldwork or data collection at remote sites does not qualify a project as off campus.

Catching Other Problems

The chair may have knowledge that a statement on the routing sheet or in the proposal is misleading or inaccurate. He/she should raise any such issues with the investigator and, if need be, with OCRO if these issues might compromise the project or the University’s compliance with federal regulations or sponsor requirements.

Administrative Establishment of Awards

On occasion, an investigator will learn that a new award is to be made or an existing award continued and will want to begin spending money before the official award document reaches the University. In such cases, it is possible to request “administrative establishment” of the award, meaning that an award will be set up in the financial system but GW will be fronting its own funds and therefore runs a risk if for any reason the external funding never arrives or has a later than expected effective date.

Both the chair and the dean must sign off before OCRO will establish an award administratively, and **they then bear the financial responsibility** if University funds are spent but the external funding does not arrive as promised. The chair's responsibility is clear: Determine what evidence the PI has that the funding will indeed be coming (preferably something in writing) and evaluate it carefully in order to avoid a financial liability.

Distinguishing Grants vs. Gifts

Before a proposal is even written, this question may arise: What projects need to go through the OCRO? First, they need not be research projects; externally funded training and service projects are also often managed through OCRO. Second, one may need to determine what is a gift and what is a grant, contract, or cooperative agreement. Guidance on this issue is available on the GW policy web page titled, "Research Grants and Contracts Definition," http://my.gwu.edu/files/policies/GrantsandContractsApplicationProcessingfinal.pdf.

Very simply, gifts do not have strings attached to them; they can be used in a variety of ways to fulfill the donor's intent. There is no requirement of financial reporting on how the funding was spent, no cost sharing requirement, no indirect charges (although the absence of indirect costs alone does not define a gift), and no specific deliverables or products to be produced. Grants and contracts have those features and others. The policy indicates that having even one of the properties of a sponsored project means the proposal should be processed through OCRO and the award, if it comes, should be set up as an "A" fund with oversight by OCRO. This is because we are responsible as an institution for complying with sponsor requirements in such areas as financial reporting, a compliance function that is built into OCRO procedures.

By contrast, if funding for an activity is defined as a gift rather than a sponsored project, it must be brought to the attention to the Office of Advancement if that office is not already involved. Whether the gift is designated for a particular faculty member or program or for the department as a whole, it should be processed through that office and deposited in an existing departmental R fund, or in an R fund newly created for the purpose through the Budget Office, unless it is an endowment (in which case an E fund is created). Gifts often are given for a particular purpose, and chairs should be familiar with the document describing a gift's purposes. They should then institute procedures to ensure that the department fulfills the donor's wishes (e.g., by ensuring that scholarship or student travel funds go to eligible students), and they should monitor spending to prevent a deficit, whether the R fund is primarily under their direct control or under the control of someone else in their unit (e.g., a center director).

On occasion an individual faculty member may receive money from an external entity as an individual rather than through the University. Certain fellowships are set up this way, or a faculty member may serve as a consultant for an organization. Such individual activities generally do not require the establishment of a sponsored project. However, faculty should keep in mind the Policy on Conflicts of Interest and Commitment's mandate not to deny the University revenue that it is entitled to receive (which would be the case if projects that should be GW sponsored research projects because they are directly related to the individual's scope of responsibilities at GW were conducted outside the University). See http://my.gwu.edu/files/policies/ConflictofInterestandCommitment.pdf

Research Compliance Oversight

Chairs play a critical role as leaders of their faculties in ensuring that all researchers take seriously our obligations as an institution to adhere to federal research compliance regulations, including the following:

- protection of human subjects
- protection of animals
- laboratory safety and handling of biohazards, select agents, and radiation
- export control (restriction of access by enemies of the United States to certain information and technologies)
- avoidance of research misconduct (plagiarism, falsification, fabrication of data).

For example, the chair should make clear that all activities by faculty, students, subcontractors, and consultants involving human participants must be approved **in advance of data collection** by the appropriate Institutional Review Board (IRB), without exception, and should facilitate compliance with both federal regulation and the policies and procedures established by the Office of Human Research in the Medical Center (www.gwumc.edu/research).

Chairs also have a specific responsibility to review and sign off on several research compliance forms used by the Office of Health Research, Compliance, and Technology Transfer. For example, submission of an application for IRB approval requires the chair's signature (as do forms pertaining to animals, hazardous materials, and radiation).

Often the proposal routing sheet indicates only that IRB approval is pending; the completed IRB form comes for chair/director signature only later, sometimes after the proposal is funded. Human subjects research cannot begin until IRB approval is secured, although in some cases the project can begin spending funds in advance of IRB approval in order to undertake such tasks as developing final research protocols in preparation for data collection.

Award Management

Over the life of a sponsored project, the chair or director is required to sign off on several types of forms and therefore has important roles in ensuring that grant and contract funds are spent appropriately. Basic familiarity with the concepts of allocability, allowability, and reasonableness, as laid out in OMB Circular A-21 (Cost Principles for Educational Institutions) and summarized in GW's training module, Fiscal Responsibility and Ethics for Investigators, www.gwu.edu/~research), is a helpful guide. To be charged to an award an expense must be specifically related to the work of that award (i.e., allocable). It must be allowable according to sponsor guidelines (e.g., routine office supplies and secretarial support, as well as alcohol, are generally not allowable on federal awards). Finally, it must be reasonable in terms of price and appropriateness to project needs. Although chairs do not review and approve all grant and contract expenditures, they have specific responsibilities in the following areas:

Review of Financial Status

Chairs and directors approve granting access to the financial system to members of their units and should urge all PIs in their units to gain access to the EAS system, to monitor their Budget Performance Reports (BPRs) regularly, and to fix any problems they discover in a timely way. The reality is that not all PIs are going to be fiscally responsible, however, and that means that chairs should also monitor their awards periodically to avoid negative financial consequences for the department.

With help from their Research Service Coordinators, chairs can learn how to obtain Report 082, which provides a nice summary of the financial status of each award located in an "org" or department, as well as its start and end dates. **Chairs should monitor the budgets of awards and should confer with PIs and RSCs as budgets diminish to prevent overspending. Overspent funds will be charged to the department.** Similarly, a chair may then want to run a BPR and scan the expenditure detail for any apparent irregularities (e.g., tuition awards that do not seem appropriate, extraordinary amounts of travel). Chairs should also not be shy about extra monitoring of anyone about whom they have suspicions (e.g., because of past problems) or anyone who is new at grants administration and may not know what to look for in reviewing BPRs. GW's policy on general financial management responsibilities is at http://my.gwu.edu/files/policies/FinancialManagementResponsibilityPolicy.pdf

To summarize, chairs and directors of units housing sponsored projects have a number of clear responsibilities and are accountable for compliance with regulations and policies governing sponsored research and for proper management of sponsored project funds in their units. Specifically, chairs and directors are accountable for:

- Establishing and maintaining a culture of compliance in which high ethical standards prevail and investigators understand their responsibilities with respect to research and related regulatory issues.
- Attending and requiring other responsible persons to attend regulatory training sessions.
- Seeing that external funds are handled properly within the University depending on whether they are grants/contracts or gifts.
- Carefully reviewing proposals and attesting through their signatures on the routing sheet that facilities for the project will be available and at the costs estimated, that any departmental cost sharing promised will be available, that any conflicts of interest will either be prevented or managed appropriately (in collaboration with the dean), and that proposed personnel levels of effort and other budget items appear reasonable.
- Urging all members of the department/unit to take seriously their research compliance obligations and reviewing and signing research compliance forms pertaining to human subjects, animals, hazardous materials, and the like.
- Taking responsibility for any financial risk associated with administrative establishment of an award before external funding is secured.
- Ensuring through one's signature that any stipend recipients are registered students in fields of the study related to the award.
- Ensuring through one's signature on personnel and effort reporting forms that University personnel policies are followed, that individuals are hired and terminated appropriately,

and that, to the best of one's knowledge, submitted effort reports reflect actual effort on federal awards.

- Understanding and following Supply Chain's P card policies and procedures, and properly overseeing P card expenditures charged to sponsored projects in one's unit.
- Understanding and following other relevant procurement policies—especially regarding consultants, travel, and subcontracting.
- Monitoring award expenditures periodically to prevent financial liabilities to the department/unit, especially as the closeout of an award nears, and reviewing especially closely any awards for which there is reason to be concerned about inappropriate expenditures or overspending.
- Understanding and accepting one's responsibilities as an administrator for research compliance and fiscal management in one's unit.

Chairs and directors are not alone, of course. Responsibility for compliant sponsored project activity is shared by principal investigators and their staffs, chairs/directors, deans, and relevant assistant and associate vice presidents and vice presidents. Chairs and directors *are*, however directly and primarily responsible for what goes on their units. They must, therefore, provide meaningful and thorough oversight on behalf of the department or unit and be accountable for their actions and failures to act. This means being watchful, thinking before signing forms, and raising questions when they need to be raised rather than forwarding paperwork on, figuring that someone else down the line will catch a problem. Most importantly, chairs and directors can and should help all department members -- faculty, staff, and students alike -- understand our shared responsibility as good stewards of the funds we receive from the federal government and other sources to help carry out our research, education, and service missions.

Stipends

Stipends are monetary gifts to support a student's education and living expenses. Stipend recipients cannot be assigned tasks, work hours, and the like because they are not paid employees. Some grants and contracts have an explicit training component that warrants the payment of stipends and/or tuition awards to graduate students or sometimes undergraduate students.

The chair or director has a key role in signing off on stipend payment forms to ensure that a stipend recipient: (1) is indeed a registered student, and (2) is in a field of study related to the scope of work of an award. So, for example, if a professor of physics proposes to pay a stipend to Harry Doe, the chair is responsible for ascertaining that Harry Doe is a physics student at GW (or, in special instances, at another institution) and that he will be doing research for his program of studies related to the scope of the professor's award. On occasion, students outside the field in which the sponsored project is being done can qualify to receive a stipend if their study relates to the scope of work of the sponsored project (e.g., if the physics project involves applications of computer science). The chair's oversight is critical in ensuring that stipends are paid only to students who qualify for them.

Guidance regarding how to process stipends is available at http://stipends.gwu.edu

The relevant policy, "Taxable and Non-Taxable Payments to Students," is at http://my.gwu.edu/files/policies/TaxableandNonTaxablePaymentstoStudents.pdf

Personnel

Chairs also sign off on personnel forms—hire forms and Change in Status (CIS) forms. Chairs should help ensure that investigators follow GW's hiring procedures--for example, that they adhere to equal opportunity guidelines, do not allow individuals to work before their appointments are approved, and restrict full-time students to no more than 20 hours a week during the academic year.

In general, a tenure track faculty member has a variety of responsibilities and should not be charging 100% of their time to sponsored awards. If, for example, a faculty member is teaching a course or preparing a major proposal in a specified effort reporting period, they can not charge 100% of their time to sponsored awards in that period unless such activities are explicitly required as part of their work on the sponsored projects. If personnel charges are disallowed, any disallowed charges will be charged to the department's budget.. The chair should not sign the personnel form if the effort is inappropriate.

Chairs are responsible for the distribution and collection of effort reporting forms every 6 months for individuals who charge time to federal awards and should review the completed forms returned to them. They sign off directly on the effort reports of all PIs, who in turn approve the effort reports of their research staff. Chairs/directors should be especially alert to situations that could result in false effort reports, as they mean disallowed salary charges and possible penalties to the University. Most notably, it is not appropriate to charge people's time wherever there happens to be grant money available rather than where they devoted their effort. If a chair becomes aware that a particular investigator is submitting a large number of CIS (Change in Status) forms, he or she should raise questions about whether charges are being moved inappropriately based on where the funds are rather than where the work was done. This is an extremely serious matter; other universities have incurred substantial fines for violations.

It is also inappropriate to charge an award for 100% of a faculty member's time during the summer when, in fact, he or she is not working full time on sponsored activities. If, for example, the faculty member was in fact on vacation a month of the summer or also taught a course, her effort report could not state that she devoted 100% effort to the grant. If this situation is discovered only after the fact, a portion of the salary paid by the grant would be owed to the sponsor. That means it would need to be charged instead to the department's budget. The chair or director is in a better position than anyone else in the University to notice situations that spell trouble and should raise issues with the investigator and, if need be, the OCRO.

Finally, chairs need to be aware, and to make PIs aware, that terminating an employee (and therefore stopping the flow of salary checks) requires positive action—namely, submission of a CIS form to terminate the employee. When an award is ending and runs out of funds to pay salaries, individuals previously paid by the award will, by default, be paid instead by the department/unit unless a termination form is submitted in time to prevent unearned checks from being issued. It will then fall to the department to either recover the unearned salary from the employee or absorb the cost. The process of terminating an employee because funding has run out should begin at least 90 days before the anticipated end of work, and should be coordinated with the Employee Relations office in Human Resource Services.

P-Cards

Although chairs and directors do not review and approve all of the types of business transactions conducted by investigators with grant and contract funds, they can do much to educate faculty about GW business policies and processes. They are also specifically responsible for authorizing individuals to have P-cards and should review P-card transactions for all cost centers within their units. In some departments, a department staff person holds a single P card used to make purchases on behalf of multiple members of the department; in others, multiple department members have their own P cards. Increasingly, principal investigators are finding it convenient to have P cards, but with the privilege comes extra responsibility to ensure that any purchases are allocable, allowable, and reasonable given the scope of a sponsored project.

Chairs should consider carefully whether to grant P-card privileges to individuals within their units, should impress on all card holders their responsibilities, and should work with Supply Chain to retract an individual's P-card privileges if they are abused. Chairs also have an important role in reviewing P-card expenditures; they should be alert to warning signs such as vendors or specific purchases that do not seem to be relevant to the mission of a sponsored project, large expenditures, and multiple transactions with the same dollar amount. P-card expenditures charged to sponsored projects are also reviewed by OCRO for allowability, given the terms and conditions of an award. However, the P-card form that a potential P-card holder and department head must sign if charges are to be made to sponsored projects makes clear that any charges to a sponsored project that turn out not to be allowable will be charged to the "default alias," i.e., to the department. See Supply Chain's P-card site for additional guidance: http://wwwlgwu.edu/~supchn/pcard.htm