Shared Research Responsibilities

At Boston College, the responsibilities for the management of sponsored programs are shared among the Principal Investigator (PI), the Departmental Administrator (if present), and the Office for Sponsored Programs (OSP). Overall administration of University research resources – most especially space, faculty buyouts, tuition remission, and cost sharing – involves the Vice Provost for Research, Schools Deans, and Departmental Chairs.

In all, some six parties may work cooperatively to facilitate the development and submission of grant proposals (pre-award activities) and the administration and management of grant funds (post-award activities).

The parties may also come together to work out issues and problems in the application for and conduct of funded research, a topic we will turn to at the end of this memorandum.

For ease of presentation, we will consider the research responsibilities of the PI, Departmental Administrator, and OSP in pre- and post-award stages. We will make reference to the Vice Provost for Research, Deans, and Chairs at appropriate places in the discussion that follows.

Pre-Award Activities

In the pre-award period, the PI is responsible for all of the following:

- Preparing a complete and well written proposal that represents sound scholarship and respects the guidelines for the Responsible Conduct of Research
- Attaining necessary University approvals from the VP Research, Dean, and Chair for space, faculty buyouts, cost-sharing, tuition remission, and any other matter that may encumber University resources
- Delivering the completed proposal to OSP with sufficient time for this Office’s review and approval prior to a sponsor’s submission deadline.
- Except in the case of on-line submission, actually submitting the proposal to the sponsor on behalf of the University.

The Departmental Administrator is responsible for all of the following:

- Making their grant-related services known and available to School/Departmental faculty.
- Assisting the PI in preparing the proposal to ensure:
  - Compliance with sponsor guidelines
  - Inclusion of necessary and accurate budgetary form, certification, vitae, and appendices
o Coordination of review with VP Research, Dean, and Chair and securing necessary approvals before forwarding the proposal packet to OSP
o On-time delivery of the proposal packet to OSP – at least 5 days in advance of the submission deadline – and facilitating any changes OSP might suggest or require
o Close attention to any special requirements of the proposed project, e.g., extensive travel or specialized supplies
o Facilitation of PI reviews, both before and during the OSP review period

OSP is responsible for all of the following:

- Making clear to the University research community that it welcomes advance proposal drafts for preliminary comment and review, which may entail suggestions for strengthening the submission or helping the PI with the interpretation of sponsor guidelines
- Enumerating, where necessary, required certifications, e.g., drug-free workplace, respect for employee civil rights
- Reviewing submitted proposal packets for
  - Completeness of proposal statement (meets all sponsor requirements)
  - Completeness of proposal packet (includes all necessary and required University approvals)
  - Completed transmittal form (on which approvals for space, cost sharing, buyouts, tuition remission are noted along with any proposed use of hazardous materials or any need for IRB review)
  - Providing final signatory approval for submission of the proposal by the University on behalf of the PI

All along, OSP is expected to provide collegial consultation to the Departmental Administrator or the PI, as the case may warrant.

Post-Award Activities

In the post-award phase, the PI is responsible for the general oversight of the funded project. Major responsibilities include:

- Assuring that all project-related expenditures are reasonable, allowable, and “allocable” under the terms of the research award
- Hiring staff in a responsible fashion and ensuring they are paid on a timely basis
- Preparing and submitting required periodic and final project reports

The Departmental Administrator is responsible for the proper administration and implementation of PI-initiated actions. The Administrator’s duties include:

- Executing reimbursements that are reasonable, allowable, and allocable following approved BC procedures
• Conducting periodic review of a project’s budget to help ensure alignment of expenditures with project timelines
• Overseeing payroll transactions
• Maintaining records of all the above
• Raising potential or actual issues with the PI and bringing violations to the direct attention of the VP Research

To fulfill these responsibilities, the Departmental Administrator must have a working knowledge of OMB Circular A21, Section J, Cost Principles for Educational Institutions.

OSP is responsible for:

• reviewing major project expenditures
• facilitating payroll
• submitting invoices and financial reports to sponsors
• advising and consulting on any special needs or requirements of the funded research project

Issues and Problems

Where issues or problems arise in the development and submission of research proposals or in the conduct of extramurally-funded research projects, it is the shared responsibility of three parties – PI, Departmental Administrator, OSP – to work together to solve these challenges. Where good faith effort has taken place and a solution has not been achieved, it is the responsibility of any or all of these parties to bring a problem or problems to the Vice Provost for Research for resolution. If the issue involves matters beyond the purview of this Office, the VP Research will seek the involvement of other senior BC administrators in crafting an implementable outcome.

More detailed information can be found at:

Office for Sponsored Programs:
http://www.bc.edu/research/osp.html

Frequently Asked Questions:
http://www.bc.edu/research/osp/faqs.html

Responsible Conduct of Research
http://www.bc.edu/research/rcip/rcr.html

Government Regulations (OMB A-21, A-110, A-133)
http://www.bc.edu/research/osp/govreg.html

Boston College Research and Projects Policy
http://www.bc.edu/research/osp/policies/principles.html