

**Office of Research and Sponsored Programs**  
**West Chester University of PA**  
[www.wcupa.edu/research](http://www.wcupa.edu/research)

**Principal Investigator's Post-award Roles and Responsibilities Checklist**

While certain tasks identified below may be delegated to other staff or project team members, the Principal Investigator has absolute responsibility for the overall conduct of the sponsored project including all financial, administrative, technical and compliance aspects of the project.

**PI's Post-award Administrative Responsibilities**

**1. Terms and Conditions of award dictated by Sponsor**

- a. Review terms and conditions of award as well as sponsor's policies, particularly those pertaining to the expenditure of funds, and manage the program in accordance with these parameters.
- b. Discuss any concerns with ORSP at the time award is received.
- c. Clarify what constitutes timely requests for prior approval (by both ORSP and sponsor) of proposed changes to the scope of work, the budget, or other conditions and of no-cost extensions. Note that program officers at federal agencies generally do not have the authority to approve changes in award terms and conditions (including scope of work, budget alterations, unallowable expenditures); these changes must be approved by agency grant and contract officers.
- d. PI should review and understand sponsor's deliverables requirements — including financial and programmatic reports.

**2. Records Retention**

- a. PI must oversee and maintain records of program staff meetings, advisory board meetings (if applicable), and any other significant correspondence among the project staff.
- b. Establish system for maintaining research and/or other program-related records. All records must be maintained for at least 3 years from the date of the final financial report submitted to the funding agency.

### 3. Regulatory and Compliance requirements

- a. Principal investigators, students, and staff working on the project must complete training on the ethical and responsible conduct of research (RCR). In order to comply with RCR requirements, you must enroll in the on-line Responsible Conduct of Research course offered through the national Collaborative Institutional Training Initiative (CITI). This comprehensive course is designed to fulfill the Federal Government agencies requirements for formal training in the responsible conduct of research. In order to create and account with CITI and complete your training, please visit the Research Compliance page of the Research Website: <http://wcupa.edu/research/researchCompliance.aspx>
  - i. Please e-mail [lvassallo@wcupa.edu](mailto:lvassallo@wcupa.edu) the names of the students or staff working on the project.
- b. Where program involves human subjects (IRB), use of animals (IACUC), biohazards, workplace health and safety requirements, you must ensure compliance with appropriate regulatory requirements  
Please review the IRB information at: <http://wcupa.edu/research/irb.aspx>  
IACUC information: <http://wcupa.edu/research/researchCompliance.aspx>
- c. Ensure compliance with US Export Control laws. Export Control Laws are federal laws and regulations that restrict the transfer of certain materials (including university owned laptops), technology, related technical data and certain services to internationals in the United States and outside the United States in the interest of protecting the national security and domestic economy. For more information about export control laws go to: <http://wcupa.edu/research/exportControl.aspx>
- d. Act immediately if any issues are identified that may involve conflict of interest and research misconduct. For more information visit: <http://wcupa.edu/research/researchCompliance.aspx>

### Fiscal Requirements

#### 4. Fiscal Responsibilities

- a. Verify the reasonableness and allowability of any expense BEFORE it is incurred.
- b. PI will create a tracking sheet to monitor expenditures and confirm they are in alignment with the line item grant budget.
- c. If available, review SAP web reports monthly to verify that expenditures are posting correctly.
- d. PI must review and approve all expenses and charges to the grant fund. Contact Person: Kelly Smith of restricted funds: [ksmith3@wcupa.edu](mailto:ksmith3@wcupa.edu); 610-436-2518

## 5. Hiring Personnel

- a. Anyone hired by the university, including all student workers, must complete the following background checks:
  - i. PA State Police Clearance
  - ii. PA Child Abuse History Clearance
  - iii. FBI Criminal History Clearance

Please contact Stacie Kranzley ([skranzley@wcupa.edu](mailto:skranzley@wcupa.edu)) in the HR office to begin the background check process for your student workers.

- b. If the grant is paying student wages, the student payroll request form must be filled out: [http://www.wcupa.edu/INFORMATION/AFA/BUDGET/R2H\\_Student.xls](http://www.wcupa.edu/INFORMATION/AFA/BUDGET/R2H_Student.xls) Directions for filling out the form can be found here: <http://www.wcupa.edu/hr/payroll/documents/StudentPayFormInstructions.pdf> A list of all required forms for student payroll: <http://www.wcupa.edu/hr/payroll/studentPayroll.aspx>
- c. If a faculty member is to be compensated from the grant funding, the Dual Compensation form must be completed. Pre-approval from Human Resources is required. For more information on dual compensation go to: <http://sp.wcupa.edu/vp/afa/HR/payroll/SitePages/Dual%20Compensation.aspx>
- d. If staff is being hired (SCUPA positions), [Human resources](#) must be contacted in order to initiate the hiring process.
- e. PI will receive an effort report after each term (fall, spring, summer, winter) during the active grant period. PI must coordinate distribution and collection of completed and signed effort reports from any project team member who is listed on the grant budget as receiving compensation. The PI must return all forms to Catherine Spaur. <http://wcupa.edu/research/documents/WCUEffortForm.pdf>
- f. Coordinate certification of volunteer hours tracking sheets for those who are working “in kind”.
- g. Establish a system for monitoring and overseeing all employees, consultants and vendors of the project to ensure duties are being executed and deliverables are received as expected. Notify ORSP immediately if concerns about performance of the project team arise.
- h. Establish a system for carefully monitoring student workers hours. It is the PI’s responsibility to ensure the student does not work over the hours allotted in the grant budget.

## 6. Procurement

- a. Initiate purchases in accordance with WCU policies and procedures. Please be aware that there are WCU policies and procedures to follow depending on the amount of the purchase. For more information, please review

<http://wcupa.edu/Information/AFA/FBS/PROC/PO/>

- b. Purchasing card: If you will be making many purchases for supplies, you may consider applying for a p-card that will be tied to your grant funds. To apply for a p-card click [here](#) and select Card Systems Enrollment from the dropdown. Contact [Kelly Smith](#) or [Nicole Bobbert](#) if you have additional questions regarding p-cards.
- c. All materials and supplies purchased through this grant must remain WCU property and not the PI's or anyone else's personal property.
- d. Check award requirements for the use of small/minority/women-owned businesses.
- e. Receive and approve invoices from the subaward, verifying that the costs are reasonable and necessary to accomplish the work.

## 7. Property

- a. Maintain purchase, location, and disposal records for capital equipment purchased with award funds.
- b. All equipment acquired with grant funds controlled by WCU are considered University property.

## 8. Service/consultant agreements

- a. Do not make commitments for services/consultants prior to receiving required WCU approval.
- b. Consultants/Services: Pursuant to the PASSHE Expenditures of Public Funds, Guidelines, Standards and Limits, all monies received by the university are public funds including but not limited to restricted or unrestricted grant funds. Since these funds are public funds they are subject to all appropriate laws, rules and regulations. All University purchases greater than \$19,400 must be publicly advertised and competitively bid under institutionally established business practices. Such competitive bidding will be undertaken centrally by Business Services and documented appropriately for audit purposes. The provision of services may not commence until a fully executed contract is in place. For More information:  
<http://wcupa.edu/INFORMATION/AFA/FBS/PROC/PO/QuickRef.asp>
- c. In order to begin the contracting process an e-req must be entered into the financial system along with (i) a justification of the need for the service, (ii) the name, address and EIN or Social Security number of the vendor or individual providing the service and (iii) a copy of the proposal for services. The proposal should include what service is being provided, the time frame for the work, the cost and any other pertinent information relating to the service. Once the e-req is received by Purchasing and all information is provided, Purchasing will issue a Service Purchase Contract (SPC). The SPC will then be sent to the

vendor for signature. Once the SPC is returned to Purchasing WCU's Contracting Officer will sign the SPC. SPC's in excess of \$5,000 must also be forwarded to university legal counsel and, if in excess of \$20,000 to the Commonwealth Attorney General for review and approval. For more information: <http://wcupa.edu/Information/AFA/FBS/PROC/PO/>

## 9. Preparing the Subaward/Subcontract

- a. Contact ORSP who will work directly with the PASSHE legal counsel and the subawardee to develop the subaward agreement.
- b. ORSP will work with the Finance and Business Services to develop the subcontract.

## 10. Manage Project Travel

- a. Even if a grant is funding travel, you must obtain approval for travel to be charged to an award, in **advance** of incurring expenses, from your immediate supervisor.
- b. Travel outside the contiguous United States requires approval from the University President's, Assistant Vice President for International programs, Dean and Provost. Travel to Alaska and Hawaii are considered outside the US.
- c. In accordance with WCU's Travel Policy, manage Travel activities, expenditures, records and reimbursements in order to ensure full and prompt recovery. Ensure that all travel is allowable under grant terms.
- d. Submit Travel Reimbursement Form within 30 days of completion of travel. Original receipts are necessary for reimbursement. Itemized meal receipts are also necessary. Alcohol is not a reimbursable expense. The name of the form for travel reimbursement is a Travel Expense Voucher. If advance funds are needed, the Advance Travel Authorization form should be completed. These forms are available at : <http://wcupa.edu/Information/AFA/FBS/Forms/Forms.asp>
- e. All invoices/travel vouchers/PO's, etc. require the appropriate approvals, Dept. Head and any additional approvals necessary, as well as the Grant and Contract Accountant. The Grant and Contract Accountant will pass on the form to Purchasing or Accounts Payable depending on the type of expense reimbursement.

## 11. Tuition Awards

- a. Record and reconcile all tuition awards made under the award.

## 12. Facilitate Project Close-out

- a. Coordinate award close out with Finance and Business Services and ORSP.

**13. Post-Award Audit**

- a. Support any Post-Award Audits as requested by Finance & Business Services and ORSP.