**D. POST AWARD PROCESS**

The post award stage is an exciting time. The Office of Sponsored Program Services (SPS) sets up the accounts associated with an award. It is important to remember that awards are made to the university, not to individual PIs. This signifies the university's willingness to assume legal and financial responsibility for administration in accordance with terms specified and failure by PI to comply can result in University-wide disciplinary actions. Responsibility for administration of the award is shared with the institution by the PI, Dept. Admin, Chair, Dean or Director and SPS.

1. **Post Award/Account Setup**
   Sponsored Program Services (SPS) sets up an account when: 1) SPS is notified by WSU Spokane Office of Research and/or OGRD, or 2) the CON Finance Office requests account to be set up.

   Usually the WSU Office of Research or OGRD is notified of the award and initiates the account by completing the "half sheet" or "sideways form" provided by SPS. In turn, SPS sets up account using dates specified in award letter or in proposal document and will apportion the award monies into "Objects" according to the budget included in the proposal.

   In some cases, the Department may initiate the account set up with SPS using the SPAR form. Administrators may request account set up when:
   - Award is assured but award letter is not available, or
   - Investigator will begin work prior to start date on award, or
   - SPS is unable to set up account due to backlog or concerns with award letter

   All department initiated requests must be guaranteed meaning the requesting Department is guaranteeing payment of the funds in the event that the award does not follow.

2. **Account Administration**
   All awards are subject to regulation. It is the principal investigator's responsibility to understand and comply with these regulations:
   - Use of federal funds is required to comply with:
     o OMB Circulars A110 and A21
     o Agency Terms and Conditions
     o WSU Policies and Procedures
     o College/Department Policies and Procedures
   - Use of non-federal funds is required to comply with:
     o See award document for specifics
     o WSU Policies and Procedures
     o College/Department Policies and Procedures
     o

3. **What are Facilities and Administrative Costs (F&A)**
   Many grants and contracts pay the University indirect costs known as Facilities and Administration fees (F & A). F & A allocations to academic units are made quarterly based on actual F & A fees collected the previous quarter. The current indirect cost/fringe benefits Negotiation Agreement can be found on the Sponsored Programs Services website: http://sps.wsu.edu/FandA.

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**4. Role and Responsibilities of Entities Involved in Funded Research**
The role and responsibility of each entity involved in funded research is outlined below:

**a. During Funded Proposal Project Dates**
   *i. Role and Responsibilities of the PI*
   - Conducts overall management of all scientific and programmatic aspects of the sponsored project.
     o Conducts research
     o Maintains integrity of scientific data
     o Initiates subcontracts
     o Discloses inventions, conflict of interest
     o Submits interim and final technical reports
     o Adheres to research regulations: human & animal subject; biosafety; radiation safety
     o Budget Management:  PI is ultimately responsible for justifying the appropriateness of direct costs charged on awards.  Must insure that costs are in accordance with all applicable regulations.  Requires close familiarity with the programmatic and technical aspects of projects.
   *ii. Role and Responsibilities of the Research Office*
   - Tracks progress of awards
   - Systems should be designed to foster research:
     o Reports:  accurate, detailed, timely
     o Seek positive resolution to gray areas
     o Promote professional attitude and cooperative working relationships
     o Communicate regularly with PI and oversight offices
   *iii. Role and Responsibilities of the Finance Office*
   - Process paperwork for account set-up as necessary
   - Create an efficient environment that assures compliance with regulatory authorities
   - Systems should:
     o Require review of high-risk expenditures
     o Monitor Expenditure Authority
     o PI review/approval of expenses
     o Adequate documentation
     o Limits overdrafts, minimized transfers
   - Monitors Accounts for Activity Requiring Action
     o Provide advance notice of pending termination date; options for extensions
     o Watch for budget deviations; provide options for resolutions
     o Monitor closely during closeout, avoid overdrafts
   *iv. Role and Responsibilities of Sponsored Program Services*
   - Acts as a resource to DA and PI
     o Provides overall guidance on the proper stewardship and administrative responsibilities of awards
     o Provides training
     o Maintains copies of applicable rules and regulations
   - Coordinates compliance activities related to post-award management
     o Reviews selected transactions
     o Reviews/Approves requests under Expanded Authorities

- o Coordinates audits with external agencies
- Provides accounting services to agencies
  - o Sends financial reports
  - o Invoices agencies

### b. At Account Close-out
  i. *Role and Responsibilities of the Finance Office*
  - 3 months prior to close out:
    - o Determine if renewal or extension is planned.  How obtained?
    - o If no extension, work with PI to make a plan for expending funds.  Avoid high-risk transactions.
  ii. *Role and Responsibilities of the Principal Investigator*
  - Prepare technical reports
  - Work with Finance Office to finalize spending
  iii. *Role and Responsibilities of Sponsored Program Services*
  - Final review of expenditures
  - Obtains patent information from PI
  - Prepare final financial reports and invoices sponsor if necessary
  - Closes account

## E. WSU IRB PROCESS/REQUIREMENTS

### 1. WSU Human Subjects/IRB Approval
The WSU IRB must approve all human subjects research before initiating the activity, at the time of grant submission, or within 60 days of grant award.  Check with the funding agency to find out when IRB approval is needed.
- In Spokane and Yakima, submit the IRB forms **electronically to the Grant and Contract Specialist** in the Research Office in Spokane for approval and submission to the WSU IRB.  Signatures on forms are not needed since hard copies will no longer be accepted.
- In Vancouver, check with Ginny Guido for the IRB submission procedure; and in the TriCities, check with Phyllis Morris.
- WSU IRB website for information and forms: http://www.irb.wsu.edu/

### 2. WSU Cooperative Agreements with Spokane Hospitals and DSHS
These Cooperative Agreements are intended to ensure that human research participants are protected while at the same time allowing WSU researchers to submit only one IRB application if research is conducted with Spokane hospitals (Deaconess Medical Center, Holy Family Hospital, Sacred Heart Medical Center, St. Luke's Rehabilitation Institute, and Valley Hospital & Medical Center) or DSHS records or facilities.

- Procedure:
  1. WSU researchers will complete an IRB-Spokane application or a WSIRB application and **submit the application and associated documents to the WSU IRB**. The WSU IRB must keep copies and records of all research conducted by WSU researchers. This is an administrative review and for file copies only.
  2. The WSU IRB Coordinator will forward the application and associated documents to the cooperating IRB.

3. The cooperating IRB will review the application at a convened full-board meeting or conduct an expedited review. Following the review, any requests for changes, amendments, additions, etc. will be coordinated through the cooperating IRB.
4. Copies of all correspondence and approval letters will be sent to the WSU IRB Coordinator from the cooperating IRB.

- Exception:
  WSU IRB policy requires all research conducted by WSU faculty and staff on Native American Reservations, or which target Native Americans as the study population, be reviewed by a convened full board of the WSU IRB with special committee representation in addition to review by the cooperating IRB.

3. **Mandatory Training**

   a. **Responsible Conduct of Research**
   A PI or Co-PI who has been awarded a grant through OGRD must complete the Responsible Conduct of Research Education—Faculty Member and Staff training. Information on this training can be found at:
   http://www.ogrd.wsu.edu/ori/rcr_training.html
   - OGRD and Sponsored programs will not be able to complete account setup processes until all of a projects PIs and Co-PIs have completed the necessary training.
   - Mandatory training on the Responsible Conduct of Research is required of all graduate students, and it is an employment requirement for graduate assistants. Students should take the graduate student training modules as soon as possible, and will need to retake it after a five-year period.
   - Both Faculty and students can access the training modules at http://myresearch.wsu.edu and should login using their usual WSU network ID and password.

   b. **Collaborative IRB Training Initiative (CITI) Training**
   WSU IRB **requires** the **PI** and **encourages all staff involved** in the research to complete CITI training in the ethical use of human participants in research. The PI is ultimately responsible to adequately train all staff listed on the application in the protection of human participants in research. Re-training is required every **five** years.
   - For CITI training options, visit the CITI website at www.citiprogram.org. If you have questions, contact the IRB coordinator at 335-3668 or irb@wsu.edu.

4. **Research Involving Biological Agents or Animals**
   The IRB only approves research activities related to human subjects.  If you are working with biological agents or animals, you will need approval from other committees.  You can find further details on the website for the Office of Research Assurances:
   www.ora.wsu.edu