

Principal Investigator/Project Director Assurances

Assurances made by the Principal Investigator (PI) or Project Director (PD) when submitting a proposal to an external sponsor (extended list tied to the Sponsored Projects Approval Form)

Background

When a proposal is submitted to an agency for support of research, training, or other sponsored activities, the official authorized to sign the proposal on behalf of the institution is often asked to verify to the sponsor that the University is in compliance with applicable laws and regulations. Further, the authorized institutional representative must ensure that University policies and procedures were followed in the preparation and submission of the proposal.

In certifying this document (and signing the Sponsored Projects Approval Form), the PI/PD certifies that they are or will be in compliance with University and sponsor policies as they relate to the proposal being submitted and to a subsequent award. These certifications/assurances are listed below. Additional certifications/assurances may also be required at the time an award is accepted. Many of the following certifications are federal in origin, and the principles behind them may apply to all sponsored activities, regardless of sponsor, in accordance with CSUSM and CSUSM Corporation policies and procedures.

The PI/PD certifies to all of the following:

1. That the information submitted within the proposal/application is true, complete, and accurate to the best of their knowledge;
2. That any false, fictitious, or fraudulent statements or claims within the proposal/application may subject them personally to criminal, civil, or administrative penalties;
3. That the PI/PD agrees to accept responsibility for the conduct of the project and to provide the required progress reports to the sponsor if a grant is awarded as a result of the proposal/application;
4. That PI/PD is eligible to be a PI/PD in compliance with University policy;
5. That if the sponsor follows Public Health Service Financial Conflict of Interest (FCOI) regulations (see agencies that follow these regulations [here](#)), the PI/PD has completed the financial interest disclosure. Further, in the event of an award, the PI/PD will complete financial conflict of interest training through CITI.
6. That if the proposal is submitted to a non-governmental organization (and one that that is not on the financial disclosure exemption list), the PI/PD has completed the state financial disclosure form (Form 700-U) and, in the event of an award, the PI/PD will complete the required Conflict of Interest Training;
7. That the PI/PD will disclose to Grants and Contracts Development (pre-award stage) or Office of Sponsored Projects (post-award stage) when there is potential for conflict of interest related to the employment of a relative on a sponsored project.
8. That the PI/PD has, where relevant, disclosed all support following NSF guidance on what to include in the Current and Pending Support Form. Current and pending support information must be provided for "ongoing projects and for any proposals currently under consideration from whatever source, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual." The PI/PD will disclose all support following NIH guidance at the Just-In-Time stage. The PI/PD confirms that support from foreign entities has and will be disclosed. .
9. The reasonableness of the kinds and levels of resources proposed and overall funding for the budget included for any subawardee(s)/subcontractor(s) listed in the proposal;

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10. If PI/PD has any budgeted overload/additional employment, that they are aware they may not exceed 125% to effort in all appointments combined, including the proposed sponsored project. Before accepting work, the PI/PD will not exceed that combined total (CSU Unit 3 Collective Bargaining Agreement, Section 36.4);
11. That the PI/PD has examined the proposal for completeness and accuracy (including the truthfulness of the scientific claims made, biographical data, and budget estimates);
12. That the PI/PD has read and will abide by the University policy on *Misconduct in Scholarship and Research* (<https://www.csusm.edu/policies/active/documents/misconduct-in-scholarship-and-research.html>);
13. That if the proposal is submitted to a federal agency either directly or indirectly through another organization, neither the PI/PD, nor any person who will receive compensation under the anticipated award, is currently debarred, suspended, nor proposed for debarment from receiving Federal support for research. Further, he/she will notify Sponsored Programs if any person who will receive or is receiving compensation under the subject award is debarred or suspended from receiving Federal funds prior to the project's expiration date;
14. That if the proposal is submitted to a federal agency either directly or indirectly through another organization, and if the PI/PD or anyone funded by the project have engaged in any lobbying efforts for this project, he/she/they have done so on their own time and at their own expense and have not used any federal funds for this purpose. Further, if lobbying activities related to this project have been paid from a non-federal source, the PI/PD will complete and submit Standard Form LLL, Disclosure of Lobbying Activities;
15. That if this project involves human subjects or laboratory animals, the PI/PD has read and will abide by and will ensure that those working on this project abide by applicable University and federal policy on the protection of human subjects and on the care of laboratory animals;
16. That if this project involves one of the following conditions, the appropriate committees have been notified and permissions and authorizations have been sought: 1. nonexempt use of recombinant DNA molecules, the PI/PD will ensure that the research will be approved by the relevant campus biosafety committee; 2. that if the proposed research involves the taking, importation, or use of protected marine mammals, or any endangered or threatened species, the PI/PD will comply with the applicable federal and/or state regulations and obtain the necessary permits and authorizations; 3. that the PI/PD will comply with all applicable Campus policies for the conduct of research involving biohazards, carcinogens, hazardous or toxic wastes, or controlled substances;
17. That if the PI/PD has been notified that this project will require Responsible and Ethical Conduct of Research Training for students, staff, or faculty, that the PI/PD will ensure individuals employed by or involved with the project receive training in compliance with *CSUSM's Institutional Training Plan for the Responsible Conduct of Research* (<https://www.csusm.edu/gsr/faculty/documents/rcr-plan.pdf>);
18. That the PI/PD will comply with all applicable Campus policies regarding nondiscrimination and harassment; and, where relevant, the PI understands that the institution will comply with NSF (<https://ncesdata.nsf.gov/webcaspar/>) and NIH (<https://www.nih.gov/anti-sexual-harassment/nih-awardee-organizations-those-who-work-there>) terms and conditions on sexual harassment, other harassment, and sexual assault.
19. That if this proposal contains any information that needs to be kept confidential by federal or other reviewers and administrators, the PI/PD has marked such information appropriately;
20. That if this project will involve patient records, the PI/PD will keep such records confidential and secure;
21. That the PI/PD has considered space needs of the project and sought department and college-level support for the allocation or use of space as proposed;
22. That either applicable federally-negotiated indirect (F&A) cost rates have been used or an approved waiver is currently on file or has been requested for the F&A rate used in calculating the budget;

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23. That the sponsor or an agent acting on behalf of the sponsor will have access to the facilities where the project is conducted, and be permitted to review technical and financial project records;
24. That PI/PD has the technical ability to conduct the project, and that research space, including any special utilities, transportation requirements, or facilities, is available to conduct the project and necessary approvals have been authorized;
25. That each Co-PI/Co-I/Co-PD and Key Person listed on this project is aware that their names have been included in the proposal and that each is willing to provide support to the project.
26. That all proposed direct charges to the contract or grant directly relate to the activity supported and are reasonable and allowable; that proposed expenditures are consistent with all special terms, conditions, or limitations that apply to expenditures under the particular contract or grant; and that proposed expenditures do not exceed the total funds authorized for a given period under the contract or grant. (In many cases the contract or grant may also specify expenditure limits by budget category or line item);
27. That the PI/PD will be accountable for deficits or disallowances that occur under a contract or grant in accordance with CSUSM and CSUSM Corporation policies and procedures;
28. That the PI/PD understands that all University and CSUSM Corporation purchasing and procurement policies and procedures must be following for expenditures on the award;
29. That the PI/PD understands any budget line items that are E&IT (IT purchases) in a proposal budget are subject to the University's policies regarding the purchase of IT products and services; that the availability of external funding does not permit investigators to make unauthorized IT purchases
(<https://www.csusm.edu/iits/services/accessibility/services/procurement/itpurchasefaq.html>)
30. That the PI/PD will develop a plan to ensure that CSUSM Corporation staff who are named or to-be-hired for work on the project in a position that accrues vacation will either ensure vacation hours are used prior to the end of the project or otherwise provide a backup source of funds to which the accrued vacation that is paid out upon separation can be charged (if accrued vacation has not been budgeted in project budget);
31. That individuals identified as independent contractors in the proposal may only be classified in the award stage as independent contractors if they meet the ABC test, which applies the presumption that all workers are employees unless it can be proven the individual meets three criteria (review CSUSM Corporation Independent Contractors information <https://www.csusm.edu/corp/hr/ics.html>); that in the event of an award, the PI/PD will need to complete the Contractor/Consultant Determination Form for each proposed Independent Contractor, and in the event the individual does not meet the criteria for being classified as an Independent Contractor, the individual will need to be hired as temporary CSUSM Corporation employee with associated fringe benefits; that the way to mitigate the need for a change in where individuals appear in the budget, is to complete the Independent Contractor Determination checklist during the proposal stage and to allow sufficient time for review in advance of submission (20 business days).
32. That the PI/PD will keep adequate records related to the activities on this project and is aware that all such records, including laboratory notebooks, must be made available to the University;
33. That the salaries included in the proposal budget are based on actual University salaries or on the CSUSM Corporation Position Matrix; and that the cost of living adjustments do not exceed recommended levels, or if they do they have been adequately justified; and that anticipated promotion increases are forecasted in the proposal budget;
34. That if there are proposal statements indicating institutionalization of any project activities, that the PI/PD has made those statements known to the unit/dept/college where the project activities will be based.
35. That the PI/PD has an obligation to report inventions developed under federally-funded programs (Bayh-Dole Act Compliance - US Patent Law, 37 CFR 401) to the Dean of Graduate Studies and Research and assign them to the institution; the PI/PD has an obligation to disclose an invention to the federal agency supporting the applicable research program within 2 months after the inventor discloses an invention in writing to the institution;

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36. That the PI/PD is aware that administering a sponsored project requires a significant amount of time spent on administrative duties outside of the proposed aims of the project.
37. That the PI/PD will comply with sponsor and Campus policies, which are subject to change during the award period; and that the PI/PD read, and is, or will be in compliance with and abide by all the items included herein.

PI/PD certifies he/she/they have read and agree to these assurances:

PI/PD NAME	DATE
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