

Principal Investigator Award Management Roles & Responsibilities

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Agenda



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- PI Definition and Eligibility
- PreAward Roles & Responsibilities
- Budgeting & Subcontracting
- Research Contracting
- PostAward and Closeout
- Wrap-up, Q&A

Context



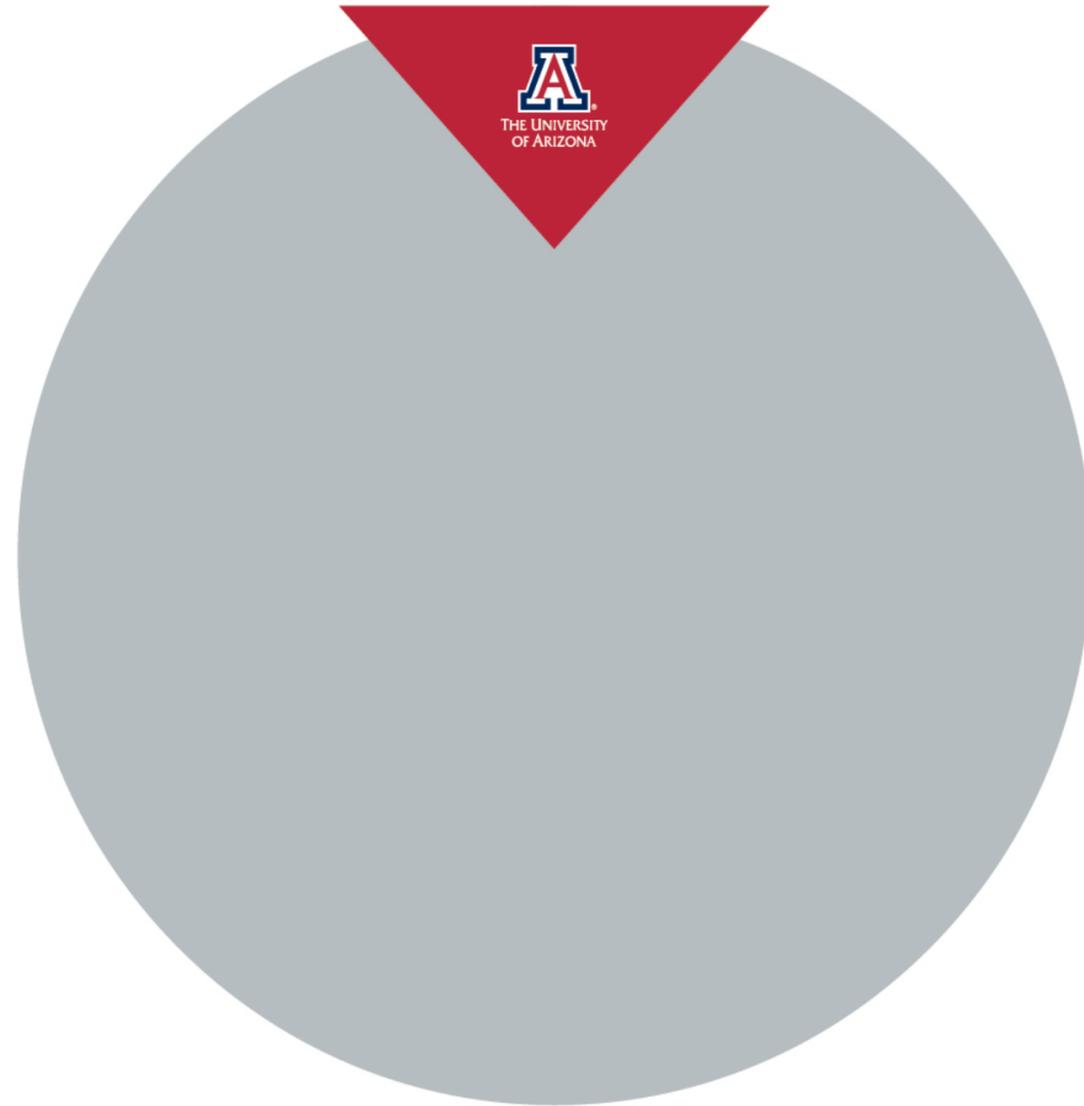
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Sponsor



Institution



Sponsor



Institution



Sponsor



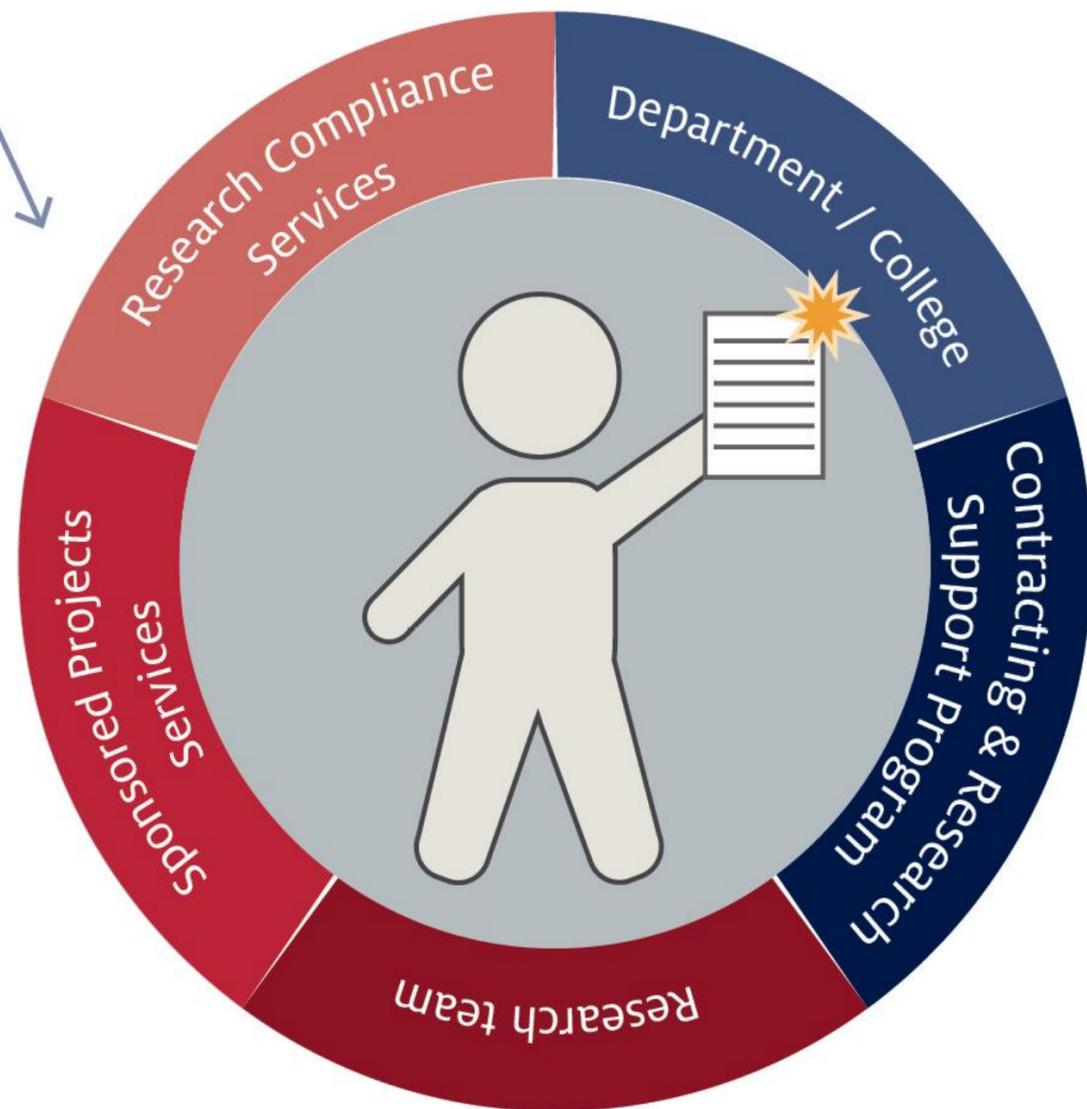
Institution



Sponsor



Institution



Why Focus on Roles & Responsibilities?



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- Applying for and managing research funding requires cohesive teamwork across department and central offices
- When everyone understands their respective roles and responsibilities, it increases the likelihood that grant management goes smoothly
- A cohesive team is made up of people who understand and are able to execute their respective roles and responsibilities

Consequences of Noncompliance



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- More scrutiny by Federal auditors and increased administrative costs
- Audit findings and cost disallowance
- Loss of flexibility: e.g., automatic carryover and no cost extension
- Withholding of future awards
- Multi-million dollars to settle lawsuits
- Criminal/civil/administrative penalties
- Negative publicity and damage to the University's and Pls' reputation

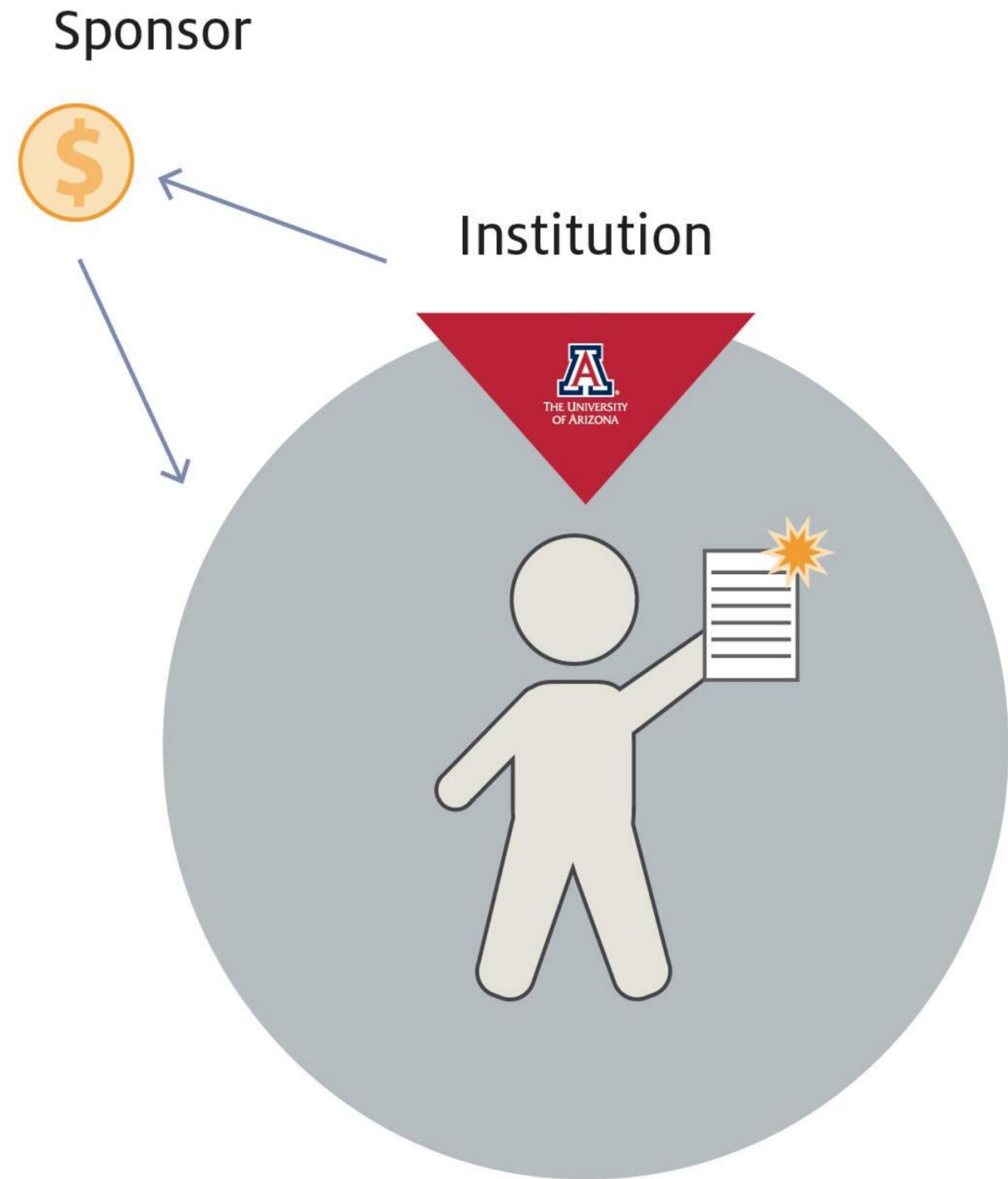
Violations of Federal Cost Principles can lead to serious penalties!



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- July 16, Columbia University, \$9.5 million
- Nov. 15, University of Florida, \$19.9 million
- Oct. 14, Columbia University, \$9 million
- Aug. 13, Emory University, \$1.5 million
- July 13, Northwestern University, \$3 million
- Dec. 08, Yale University, \$7.6 million
- April 06, Clark Atlanta University, \$5 million
- Jan. 06, University of Connecticut, \$2.5 million

Who Qualifies as a Principal Investigator?



Who Is A Principal Investigator?



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Major federal sponsors (USDA, NSF, NIH, NASA, others) say that a PI is/must be:

- Designated by the proposer/awardee (the institution)
- Responsible for direction, management, performance
- Have appropriate level of authority to direct the project and resources

What does this mean for the University's PI eligibility policy?

UA Policy – Who Qualifies?



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PI Eligibility: <http://rgw.arizona.edu/administration/getting-started/Principal-Investigator-Eligibility>

Sponsors expect:

- Awardee (institution) to designate the PI
- Use of Resources (space, equipment, personnel) as proposed and identified in scope of work
- Budget and reporting responsibilities

UA Policy – Who Qualifies?



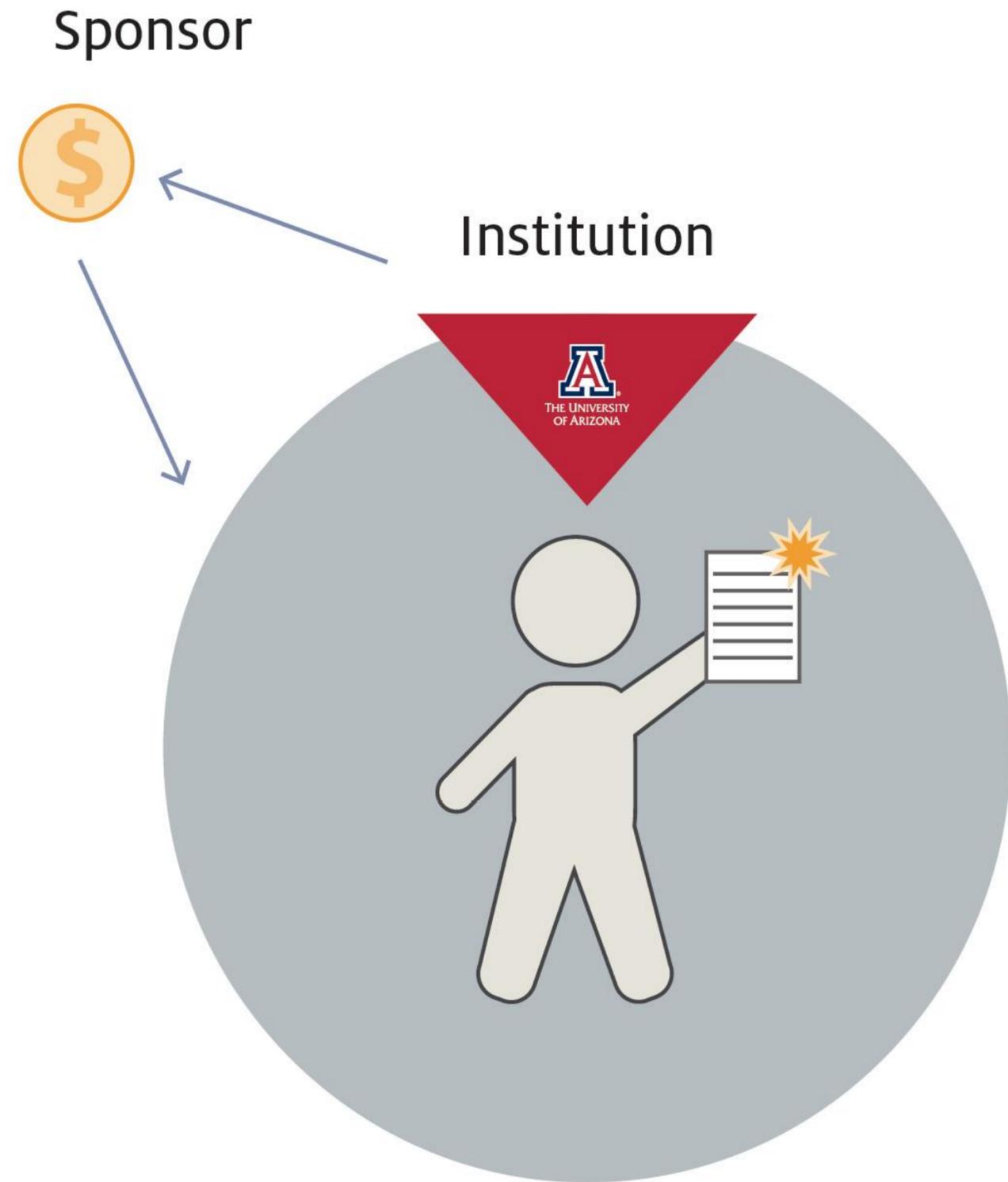
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All PI definitions imply a degree of oversight by the Institution, which means the Institution must have policies to:

- Assign authority over resources (personnel, space, equipment) – not all employees supervise or have control over space/operations
- Allow access to systems for management (must have a relationship with the institution for security reasons)
- Define who will be allowed to be a PI

Proposal Stage



Proposal Stage PI Responsibilities



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Ensure eligibility to apply

- University
- Principal Investigator

Note:

*Sponsored Projects Review
focuses on financial compliance*

Application content and format

- Page limits
- File names
- Attachment layout and content (scope of work, biosketches...)
- Etc.

Budget requirements, limits and restrictions

Routing and Approvals



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Work with your dept/college to start routing process as soon as possible.

UAccess Research (UAR) routes electronically for proposal approvals

- Approvals from Investigators, Departments, Colleges,
- Special approvals (exceptions, F&A waivers...)

Offers without authorization can cause award negotiation problems

- Reduced rates (Facilities and Administrative (F&A))
- Cost Sharing without confirmed sources
- Payment timing

Proposal Approval in UAccess Research



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Proposal Development Document ?

Doc Nbr:	452254	Status:	Approval Pending
Initiator:	jpierson	Created:	10:49 AM 06/08/2015
Sponsor/S2S:	University of Arkansas/None	PI:	Timothy W Secomb

Proposal Summary ◀

[expand all](#) [collapse all](#)

* required field

Proposal Summary	▶ show
Budget Summary	▶ show
Key Personnel (1)	▶ show
Custom Data Information	▶ show
Questions	▶ show
Attachments	▶ show

Approval indicates that information in the online proposal and application is true, complete and accurate to the best of your knowledge. Approval confirms any cost sharing commitments, space arrangements, and resources for the proposed project. The PI, Co-PI, and others involved in the sponsored activity are not currently debarred, proposed for debarment, suspended, declared ineligible, or voluntarily excluded from transactions by a federal agency. If awarded, the PI, Co-PI, and lead unit agree to accept responsibility for the fiscal and scientific conduct of the project and provide progress reports as required by Federal or State Law, sponsor regulations, terms of the award, and university policy. The PI agrees to maintain a complete copy of the submitted proposal which may be accessed by the Office for Research and Discovery.

[approve](#) [terminate](#) [return for edit](#)

In particular:

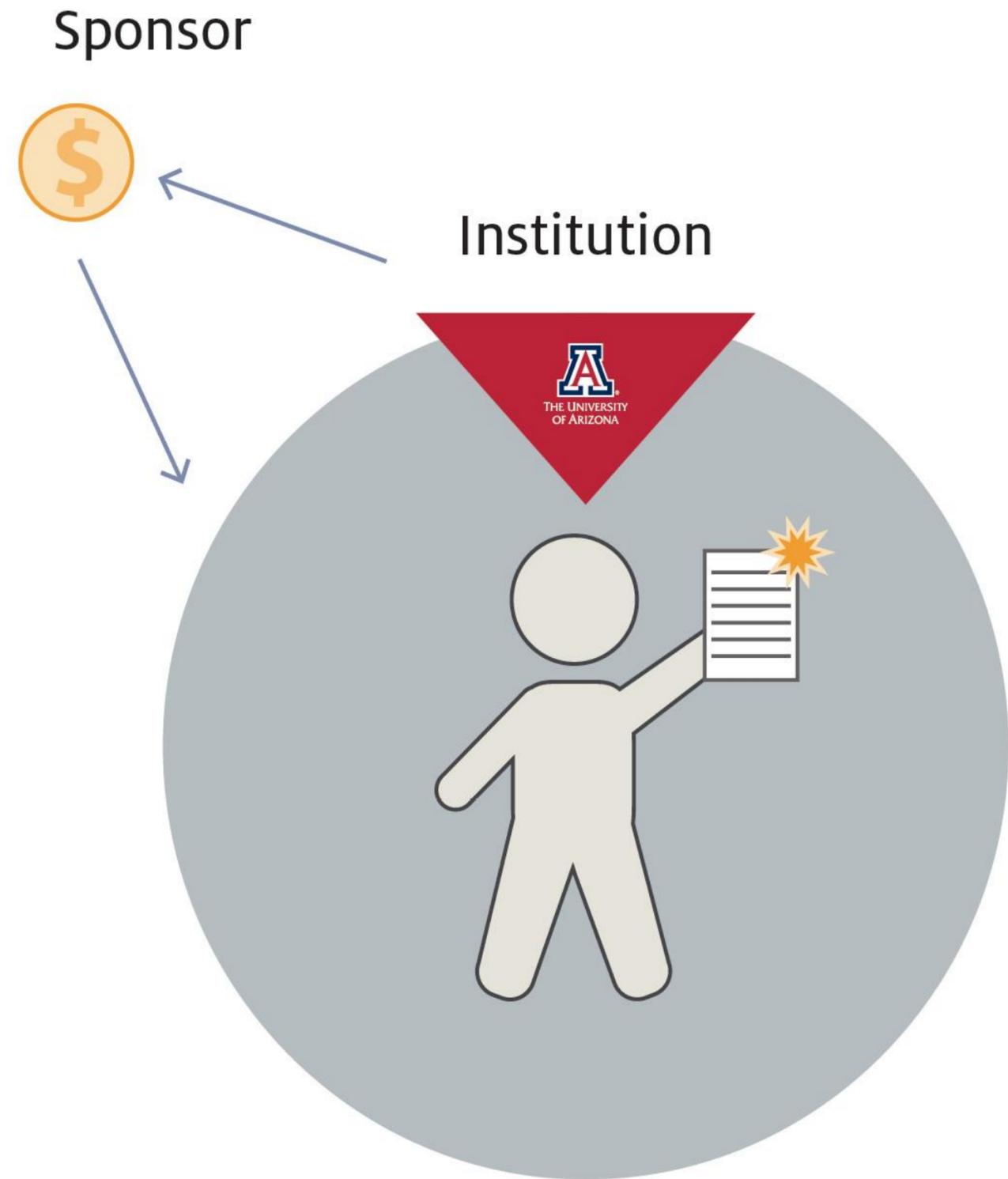


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Budgeting & Subawards



Key Budget Items to Understand



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F&A calculation exclusions

- Capital equipment (\$5K)
- Participant support cost: if the budget category is provided by Request for Proposal (RFP)
 - Invited speakers are not participants
- Subawards: only the first \$25K is subject to F&A cost
 - UA employees are not Consultants
 - Subawards should involve shared programmatic decision-making

These budget items require additional justification



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- Administrative and clerical salaries and wages
- Computer costs
- NSF 2-month restriction

Cost Share Considerations



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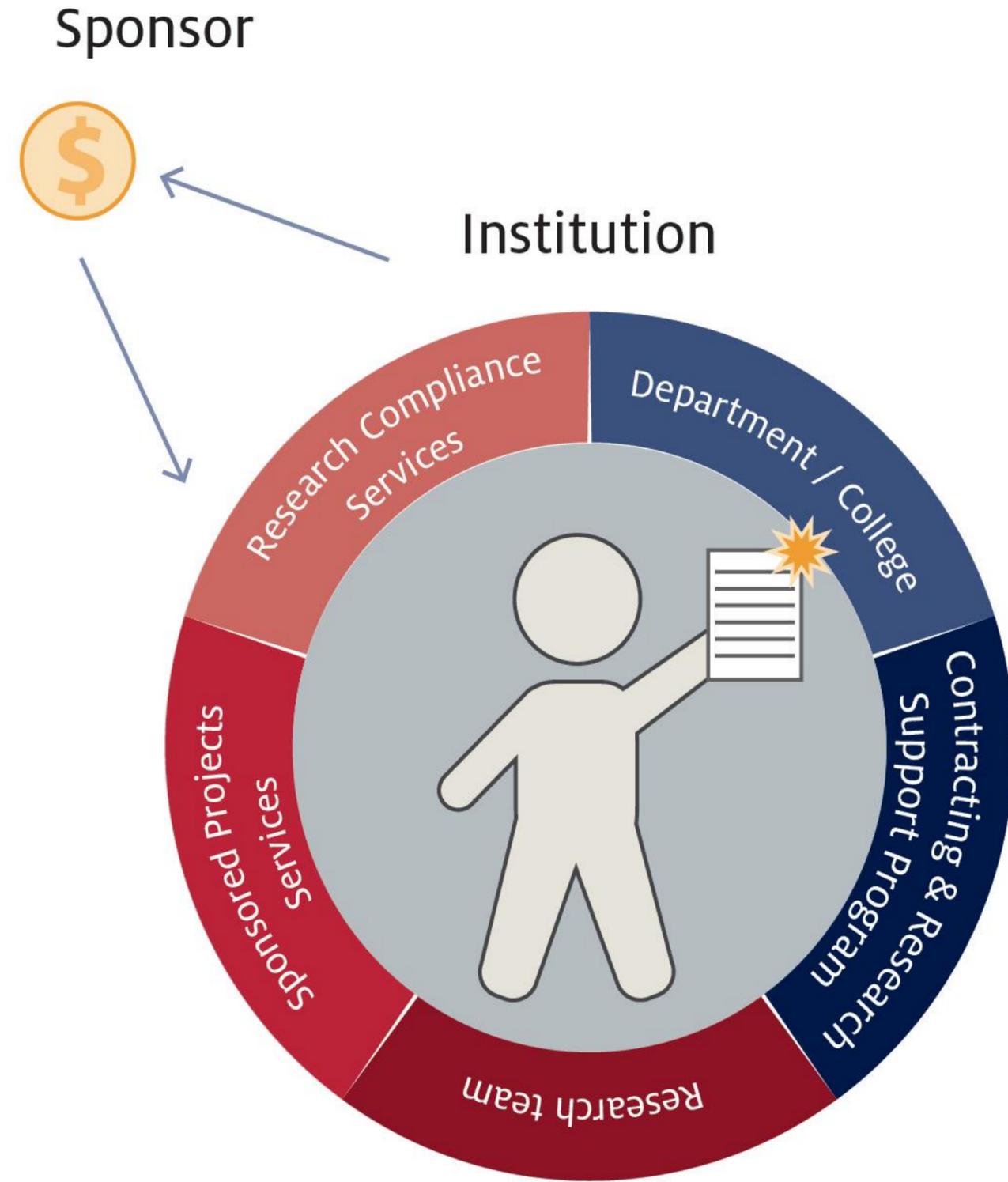
- Is it required?
- Should we provide voluntary cost share?
- If we cost share, will we be able to fulfill the committed contribution?





- Does the potential subrecipient have a good reputation and a clean audit?
- A detailed subaward budget and budget justification are necessary
- F&A rate provided for subrecipient
 - Subrecipient's federally negotiated rate; or
 - 10% de minimis rate

Contracting



Contracting & Research Support Program (CRSP)



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CRSP negotiates contracts and grants on behalf of The University of Arizona (UA). It makes sure that UA does not commit itself to terms/obligations outside of State and/or Federal law and the policy and procedures of the Arizona Board of Regents or UA.

PI Responsibilities in the Contracting Process



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- The PI bears primary responsibility for technical compliance, completion of programmatic work, fiscal stewardship of sponsor funds, and compliance with administrative requirements of the project.
- In general the PI will be the main person who performs the Scope of Work for a project. Though not a party to an Agreement, the PI generally signs the agreement stating that he or she has read and understands the terms of the Agreement.

Typical Contractual Issues



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- Governing Law
- Indemnity
- Publishing Rights
- Confidentiality Marking Requirement
- Intellectual Property
- Required Arizona Statutes
 - Conflict of Interest and Arbitration
- Correct Titles
 - Arizona Board of Regents



Things get messy when...



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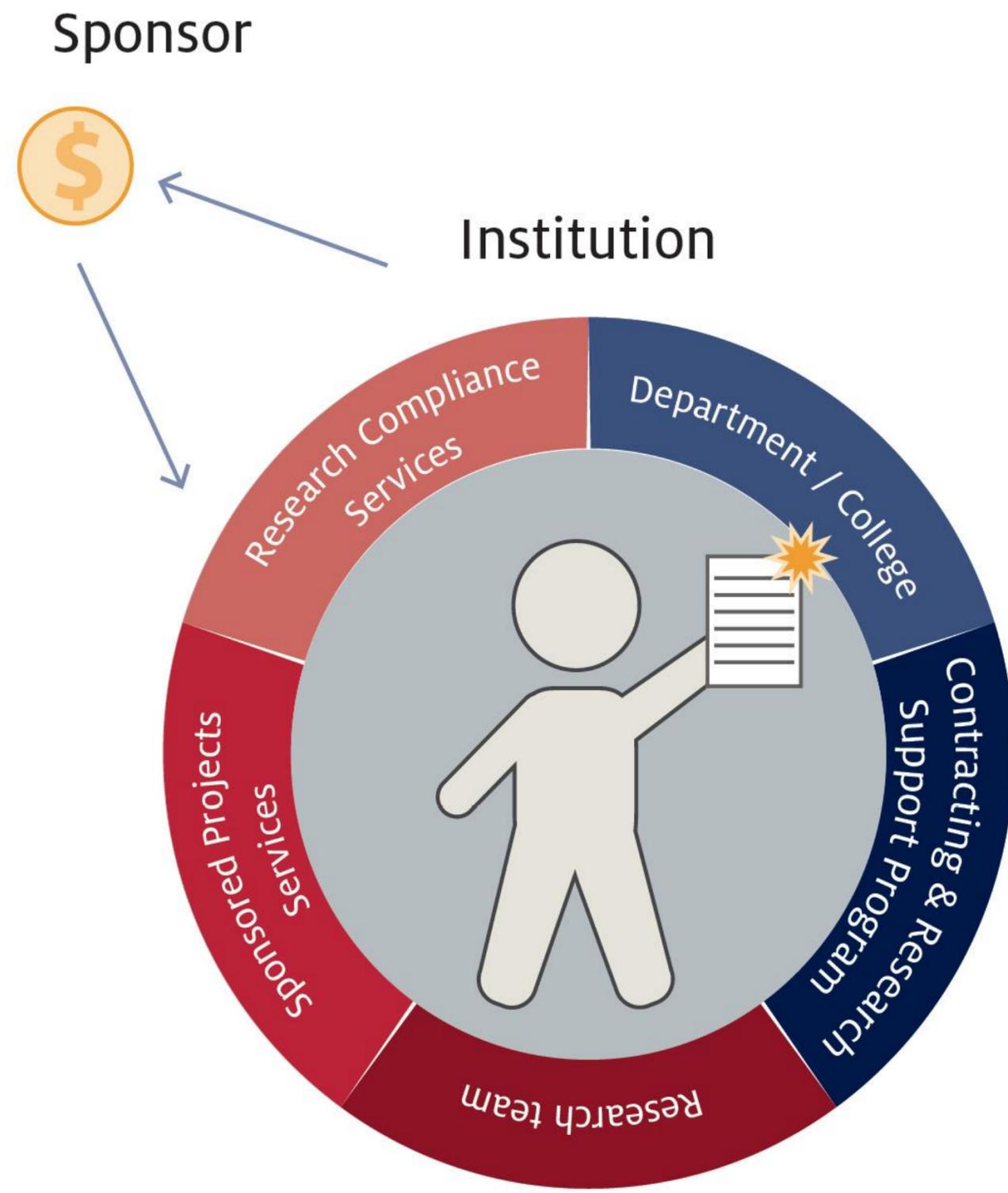
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- Terms are promised without discussion or that cannot be approved
- Sufficient time is not accounted for to negotiate agreement
- Scope of Work and Budget are not provided to CRSP early in process
- A project starts as one type of agreement and switches midway through



- Involve CRSP early in the process
- Provide an approved Scope of Work and Budget as soon as possible
- Work with CRSP and SPS to determine agreement type before discussing with Sponsor
- Allow CRSP to negotiate terms
- Inform Sponsor that negotiations may take weeks to months, depending on the contract complexity

PostAward



Monitoring Effort and Expenditures



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- Justify expenditures on project (how the expense benefited the project)
- Monitor research team effort and approve Effort Reports
- Financial Reporting to Sponsor
 - SPS will prepare and submit report, PI will review and approve

Subrecipient Monitoring



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- Communicate regularly with subrecipient for technical progress
- Approve subcontract payment only when:
 - Technical progress is satisfactory
 - Costs incurred are allowable

Technical Reports



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- Prepare and submit technical reports/deliverables
- Monitor scope of project to ensure that it doesn't change from initial scope of work
 - If there is a change, get prior approval from sponsor



Ensure compliance for PI and everyone on research team

- Institutional Animal Care & Use Committee (IACUC)
- Institutional Review Board (IRB)
- Export Control
- Conflict of Interest
- Research & Laboratory Safety
- Responsible Conduct of Research

Project Closeout



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There is a limited amount of time to close out the research project.

- Post all expenditures, including payments to subrecipients and cost share expenses, to the account before specified deadline.
- File technical reports by deadline.

We run the risk of losing funding if the deadlines are not met for technical and financial reporting!

Research Support Services



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For more information about RDI's support services, visit the Research Gateway!

<http://rgw.arizona.edu/services/home>