

Eligibility and Responsibility of Principal Investigators

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Purpose & Scope

To outline who is eligible to serve as a Principal Investigator (PI) or Project Director (PD) on grants, contracts, and cooperative agreements under sponsored program awards to Colorado Mesa University (CMU) and to outline related responsibilities under this role. This policy applies to all individuals designated as the PI on a sponsored award across all CMU campuses.

Definitions

- *Office of Sponsored Programs (OSP)*: the department nested under Academic Affairs that is responsible for the proper administration and compliance of all sponsored awards and programs at CMU. The PI and OSP will work closely with one another, starting in the proposal process through the official closure of the award. OSP is a resource for potential, current and past PIs, and all other individuals interested in applying for funding for research or program.
- *Principal Investigator (PI)*: an employee as designated by the University named on a sponsored program who bears the primary responsibility for: (1) the ethical conduct and administration of sponsor-approved research, programs, services, and activities, (2) financial/budgetary management and oversight of sponsor funds, and (3) compliance with all terms, conditions, and reporting requirements of the sponsor, as well as any applicable state and federal laws and regulations, and University policies and procedures. The PI can also be referred to as a PD and these terms can be used interchangeably
- *Project Officer (PO)*: typically, the main point of contact after a proposal is approved. Any prior approval and/or budget modification requests must be submitted to and approved by this individual unless otherwise noted in the terms and conditions of the award.
- *Reimbursement Facilitator*: a designated individual whose responsibilities consist of validating expense and indirect costs totals provided by OSP, drawing down

federal sponsored award dollars from the appropriate online payment management portals, and creating the receivable in Banner.

Eligibility

The following University personnel may serve as a PI/PD on externally funded projects:

- Professional staff and faculty holding at least a .5 FTE
- Emeritus faculty (on a case-by-case basis and approved by the Provost (f.k.a. Vice President of Academic Affairs)).
- Other individuals, associated with the University, who do not meet the criteria listed above may be assessed on a case-by-case basis and approved by the Provost.

In most cases, students may not be designated as a PI. When a funding agency's program guidelines require the student to be listed as the PI on the proposal application, the student's faculty advisor/mentor shall be named the PI on record on the University's proposal certification form and will be responsible to CMU for the conduct and oversight of the project.

When a funding agency has restrictions on who may serve as PI, the Sponsor's requirements will take precedence over institutional policy for that project. In the case where a funding agency may require, allow, or expect an individual to serve as a PI who, under University policy would otherwise be ineligible, the individual must identify an eligible faculty or staff to serve as a Co-PI.

Responsibilities

Pre-Award and Proposals

- In conjunction with the Pre-Award Specialist, locate the funding opportunity.
- Originate, develop, and prepare the proposal.
- Read and interpret the proposal's guidelines and instructions.
- Draft, revise, and finalize the project's budget.
- Identify any subcontractors and/or collaborators.
- Review any cost-sharing commitments and if required, secure funding source.
- Initiate IRB and/or IACUC protocol approvals if necessary.
- Understand the concept of Effort Reporting if applicable to the award.

- Assist OSP in finalizing additional requirements (paperwork, signatures, IHE info, etc.) upon request.

Post-Award

Though successful proposals are awarded to CMU, the PI is responsible for and held accountable to the fiscal and project management, technical execution, and completion of the project, including submission of all progress and technical reports to sponsors. The institution is legally responsible to the sponsoring agency for the performance of the funded activity and the proper use of funds. Without the full cooperation and vigilance of the PI, the University cannot perform its stewardship role. The following list includes a non-exhaustive outline of PI responsibilities on sponsored program awards:

- Assess whether the awarded budget differs from the proposed budget to determine if rebudgeting is necessary.
 - Create a spending and purchasing plan for the awarded funds.
- Maintain a knowledge and understanding of the funding agency and comply with terms and conditions set forth by the sponsor, including any changes to terms and conditions, reporting requirements, contact changes, etc.
- Comply with policies, procedures, and regulations related to the conduct of the award set forth by the funding agency, CMU, the State of Colorado, and the federal government.
- Maintain a professional and communicative relationship with the award's PO or any contacts provided through the award.
- As needed, be available to OSP during the negotiations with subrecipients.
- Conduct the work supported by the funding agency in a timely and professional manner.
- Assure that expenditures made prior to the receipt of a fully executed award are incurred only after obtaining Sponsor approval through OSP.
- Ensure that all costs charged to the award specifically benefit the project and are allowable, reasonable, allocable, and necessary per the terms and conditions of the sponsored award.
- Maintain an intimate understanding of the award's budget through monthly monitoring of the 'budget to actual' statement and other financial reports supplied by OSP.

- Should a discrepancy be noted during this routine monitoring process, immediate action must be taken to resolve errors.
 - Monitor the spend rate for each line item to determine if obtaining approval for rebudgeting and/or carry-forward request needs to occur.
 - If an award is over-expended, or if an unauthorized expenditure is disallowed by the University, the funding agency, or auditors, the PI is responsible for clearing the expenditure either through transferring the charge to another allowable University account or by personally reimbursing CMU.
 - Review and certify all effort reported to the sponsored award twice per year.
- Ensure that all cost sharing and/or matching fund commitments set forth in the award are met and documented.
- Comply with the reporting requirements of each award, which may include, but is not limited to:
 - Periodic and annual technical progress reports
 - Reports of inventions
 - Reports of publications generated
 - Various financial reporting
 - Though OSP and the Reimbursement Facilitator are responsible for the preparation and submission of the financial report, the PI must review and approve the financial report.
- Identify and address any programmatic changes to the project and notify OSP. This could include key personnel, program objectives, scope of work, available effort, etc.
- If applicable, ensure subrecipients and/or subcontractors comply with the terms and conditions of each subaward and/or subcontract and with the reporting requirements passed down to them.
 - Confirm the completion of the subcontractor's work, receipt of final invoice and cost-share commitment.
- Acknowledge sponsor funding in any related publications and presentations.
- Review and understand the award's property terms and conditions.
 - Identify the need for equipment and notify OSP to obtain prior approval.

- Identify the space where the piece of equipment will be located and work with Facilities to accommodate the new equipment. OSP must be notified of the location of the equipment and any subsequent changes to the location.
 - Complete sole source justification as needed.
 - Continually monitor the location and functionality of any equipment purchased with award funding.
 - Request disposal of CMU titled equipment as necessary.
- In accordance with Policy 207, Sponsored Awards Records Retention, keep and maintain, on campus and/or through CMU technology resources, all research, or programmatic records, including human subjects research consent forms, lab records, primary data, correspondence, notes, reports, samples, specimens, computer programs, and publications. Should the audit retention clause specified in the award be stricter than CMU's Policy 207, the institution and PI will abide by this clause.
- Supervise all persons working on the project, including visiting scientists, trainees, postdoctoral assistants, students, and other staff to ensure that they follow proper laboratory and research procedures, understand, and comply with all applicable rules and regulations, and adhere to high ethical standards in carrying out the project.
- If the PI's specific award is selected for audit, work in conjunction with OSP and CMU officials to promptly respond to all audit requests and meet with auditors as requested.