

Grant Management: Responsibilities of Principal Investigators

Externally-funded projects – that is, contracts and grants – always have a “Principal Investigator” (PI), sometimes called, by the Sponsor, the “Project Director.” This individual is responsible, on behalf of the University (the grantee or contractor), for both technical and fiscal management of the project in accordance with Sponsor guidelines, applicable laws, and regulations. In fulfilling these responsibilities, the PI is assisted by various University Departments.

The Division of Research (DOR) will assist with all sponsored research (pre-award and post-award) needs. Additionally, each Department has administrators to help. However, because the PI bears the primary managerial responsibility for the projects with which he/she has been entrusted by the University and the sponsor, it is crucial that the PI be familiar with and adhere to all Sponsor guidelines, federal and state laws, and regulations for those projects.

Ongoing Responsibilities:

- Attend and ensure project staff attends training sessions offered by the DOR, to ensure up-to-date information on project administration requirements.
- Become a member of RSCH-L and review DOR messages to be aware of updated advisories on project administration.

Pre-Award Responsibilities

- Review and follow sponsor guidelines and Request for Proposal (RFP)/Program Announcement (PA) requirements.
- Notify DOR if a project to which PI wishes to submit a proposal has a limit of proposals per institution so that DOR may conduct an internal competition, if necessary. This should be done in a timely fashion to allow for the review of the competing proposals and preparation of the selected proposal for submission to sponsor.
- Prepare proposal, including budget, in accordance with sponsor guidelines and applicable laws and regulations, including 2CFR 220 (formerly OMB Circular A-21). Complete pre-award routing forms (forms on-line).
- Complete Institutional Contribution Statement (form on-line), if cost-sharing is involved. The stated percentage of effort where no or proportionally less salary is being claimed constitutes cost-sharing and an Institutional Contribution Statement must be prepared.
- Identify any special needs for compliance; for example, the use of human or animal subjects, diving and boating, and hazardous materials all involve special permissions and additional application forms.
- Seek guidance from DOR or other University resources, including EH&S, the Travel Desk etc., as appropriate, when preparing proposal.
- Identify any potential conflict of interest and/or Intellectual Property issues with the proposed project on the Internal Forms.

- Notify the Office of Technology Transfer if your proposal contains proprietary information that may result in an invention or other protected material (www.fau.edu/research/ott for more information).
- Obtain collaboration letters from any collaborator or consultant, on the proposed project.
- Obtain scope of work and budget from subcontractors (if applicable).
- Identify restrictions imposed by the Sponsor, especially on publication, disclosure, dissemination, or foreign nationals. If yes to any of these complete and attach the *Export Control* checklist.
<http://www.fau.edu/research/osr/files/exportcontrol.pdf>.
- Route to the appropriate University personnel for approval prior to submission to DOR, with enough time to allow each person adequate review and analysis of the proposal (this includes all Co-PIs and their chairs, center directors and/or deans).
- Submit to DOR, at least **five** (5) days prior to the submission deadline. Please be aware that electronic submission may take more time.
- Once PI receives notification/approval from DOR, Pre-Award, he/she may forward the complete proposal to the Sponsor. Alternatively, if DOR is to submit proposal, confirm “ready for submission”.

Post-Award Responsibilities

- Notify DOR if PI receives award notification from the Sponsor and forward the award document to DOR for processing.
- If a PI submits the same proposal to more than one sponsor and it is awarded by one of those sponsors then it is the PI’s responsibility to withdraw the proposals submitted to the other sponsors.
- Review Sponsor’s award document for technical and administrative requirements and ensure that the same are appropriate for completion of the project, including budgetary restrictions and timing requirements. If not, contact DOR for negotiation and revision of award document.
- Ensure that IRB, and IACUC approval is obtained, if needed, prior to commencement of project and that all policies and procedures relating to human or animal subject research or research involving recombinant DNA, as applicable, are followed.
- Ensure that Boating and Diving Compliance is met, if applicable.
- Ensure that environmental health and safety requirements are followed and prior approvals are obtained, as required, for hazardous substances purchases, and that labs are maintained in accordance with environmental health and safety standards.
- Contact DOR and provide needed information, to ensure that subcontracts and consulting agreements are in accord with regulations and requirements. Review all subcontracts and agreements.
- Review subcontractor’s and/or consultant’s invoices and analyze whether subcontractor and/or consultant has adequately performed duties such that they should be paid. If not, contact DOR for further action, as needed.
- Ensure that all sponsor prior approvals are obtained and documented before

- making any restricted purchases, such as foreign travel or equipment purchases.
- Ensure that travel expenditures are properly approved and appropriate and allowable.
 - Ensure that permanent equipment purchased is properly tagged and tracked. At the conclusion of the project, the PI must ensure that the permanent equipment is retained by the University or returned to the Sponsor (as applicable). Work with property department on disposition etc.
 - Initiate and process personnel hiring for the project through University channels.
 - Ensure that expenditures are processed in a timely manner through the University channels; i.e., that requisitions are prepared and processed and that purchases on sponsored project IDs are allowable and allocable.
 - Prepare timely documentation and forward to DOR should there be a need for a no cost extension, budget transfer or cost transfer. Ensure these are allowable transactions under sponsor guidelines.
 - Ensure that the University's effort reporting and certification procedures, as set forth in sponsor policies and procedures are followed.
 - Ensure that all mandatory and voluntary committed cost sharing is properly processed, tracked and documented.
 - Disclose promptly all inventions to the Office of Technology Transfer for processing.
 - Meet periodically with DOR to review budget, as necessary, to ensure that any issues are timely addressed and corrected, as needed.
 - Ensure that expenditures on grants are made in a timely manner. Sponsors often question whether a project is progressing if expenditures are behind schedule and they may reduce the original award amount.
 - Ensure that the project's technical requirements are properly met and accepted by the sponsor and that the fiscal administration of the project is done in accordance with the budget approved by the sponsor at the time of award and is not exceeded. Submit progress reports to sponsor, cc DOR.
 - Meet with DOR toward the end of the project period, preferably not later than 90 days prior to project end date, to review the budget and expenditures posted so that any issues may be timely addressed.
 - Assist in project close-out in accordance with requirements of sponsor and DOR. Submit all final reports to sponsor, with copies to DOR.