

## **Roles & Responsibilities**

### **University of Rochester Principal Investigator**

The Principal Investigator is the primary individual in charge of a research grant, cooperative agreement, training or public service project, contract, or other sponsored project. The Principal Investigator reports to a Chair, Unit Chief or Director (or other designated official) and is responsible for adequately communicating to his/her Department/Unit Head and Department Administrative Staff on all aspects of his/her sponsored programs portfolio.

### **PROPOSAL PREPARATION AND SUBMISSION**

#### **General**

The Principal Investigator confirms that the entire proposal meets requirements outlined in the Program Announcement, Request for Application, Request for Proposal, or other application instructions. Requirement examples include dollar limits, page limitations, font or electronic file type and size, deadlines, and mailing addresses. The Principal Investigator may delegate this responsibility to Departmental Administrative Staff. If the Principal Investigator's unit lacks Departmental Administrative Staff for proposal preparation or other sponsored programs administration requirements, he/she assumes these responsibilities or seeks support from the respective Department/Unit Head or Dean.

#### **Technical Proposal**

The Principal Investigator:

- prepares the technical proposal and may collaborate with others in its preparation.
- identifies the need for subrecipient agreements.
- if on- or off-campus space in addition to that already assigned to the Principal Investigator is needed, the Principal Investigator identifies the need and requests it from her or his supervisor and other appropriate University manager.
- is responsible for keeping his/her CV or biosketch updated, with the assistance of departmental administrative staff.
- procedures used are consistent with sound research design and do not unnecessarily expose subjects to risk/harm.
- design is appropriate to the proposed question.
- reasonably expected to result in important knowledge.

## **Proposal Budget**

The Principal Investigator:

- prepares or directly supervises the preparation of the budget and its justification.
- selects the appropriate facilities and administrative rate from the negotiated and clinical trial rates, under guidance from ORPA and/or the Dean's Office.
- obtains a facilities and administrative cost waiver from the Dean's Office, if appropriate;
- requests matching funds or identifies in-kind contributions from appropriate University officials, when necessary or appropriate.
- proposes cost sharing through contributed effort or other approved mechanisms and seeks approval from appropriate University officials.
- identifies shared facilities and administration cost recovery if faculty from other schools/colleges are significantly involved and seeks approval from appropriate University officials.
- identifies all available financial resources in direct support of this or other research endeavors (other support) either at proposal submission or "Just In Time" in accordance with sponsor requirements.
- identifies anticipated program income.

## **Regulatory Requirements**

The Principal Investigator:

- prepares the appropriate forms (either at proposal submission time or "Just In Time" in accordance with sponsor requirements) from the Research Subjects Review Board (RSRB) or the Western Institutional Review Board (WIRB) or UR Privacy Board, the University Committee on Animal Resources (UCAR), the Radiation Safety Office and/or the Office of Environmental Health and Safety (EH&S), if the proposal involves:
  - human subjects;
  - live animals as subjects;
  - recombinant DNA, infectious agents, narcotics or biological toxins;
  - human blood or body fluids;
  - radioactive materials and/or ionizing or nonionizing radiation-producing equipment; or
  - hazardous materials
- Protected Health Information (PHI).
- if necessary, obtains additional collegiate or departmental approvals, for example Cancer Center Protocol Review or General Clinical Research Center Review.
- completes an Intellectual Property Agreement (IPA) prior to conducting sponsored research.
- if a potentially significant conflict of interest situation exists, the Principal

Investigator prepares a Conflict Disclosure Form and submits it to his/her supervisor and Dean.

- affirms that he/she is not excluded or debarred from receiving Federal funds, and is not delinquent in student loans.
- ensures that other investigators involved in the project sign the University Proposal Sign-Off Form.

### **Proposal Routing Form**

The Principal Investigator:

- prepares, or directly supervises the preparation of, the University Proposal Sign-Off Form. (The Principal Investigator must be the person who checks the boxes on the sign-off; this responsibility may **not** be delegated.)
- if other departments or schools/colleges are involved, the Principal Investigator provides this information, and ensures the appropriate signatures are included in the University Proposal Sign-Off Form approval. The Principal Investigator may delegate responsibility for obtaining other necessary signatures on the Sign-Off Form.
- signs the University Proposal Sign-Off Form. This responsibility cannot be delegated and the signature certifies that each item on the form is filled-out completely and accurately.
- works with Purchasing Services and Departmental Administrative Staff to develop a small business contracting plan, if necessary.

### **ACCEPTANCE OF AWARD**

#### **Preaward**

The Principal Investigator requests contingent GR FAOs, if necessary. The Department/Unit Head will authorize and approve the contingent GR FAO. (Department Administrative Staff should be cognizant of the need/use for contingent GR FAOs to minimize cost transfers and/or reallocations.)

#### **Negotiations with Sponsor**

The Principal Investigator:

- negotiates and approves the project work scope.
- in collaboration with Department Administrative Staff and the Office of Research and Project Administration (ORPA), the Principal Investigator modifies the project budget in line with the award budget provided by the sponsor. (Department Administrative Staff should be involved in any budget modification, as this can impact other budgeting and effort issues on other projects or departmental OP FAOs.)
- notifies the Department/Unit Head and ORPA about the changes in project

- scope and budget.
- notifies the appropriate regulatory office if changes to project scope will affect approved protocols.
- obtains approvals if cost sharing becomes necessary.

### **Acceptance of Award**

The Principal Investigator reviews the internal Notice of Award (NOA) that stipulates the approved budget and the terms and conditions of the award, and further delegates to Departmental Administrative Staff the review of the NOA for accuracy.

## **CONDUCT AND MANAGEMENT OF THE PROJECT**

### **General**

Principal Investigators should reference the Faculty Sponsored Compliance web site (<http://www.rochester.edu/orpa/training/facportal/page00>) or contact appropriate university offices to obtain information about rules and requirements governing sponsored funding. Principal Investigators are responsible for knowing what actions require sponsor approval and for obtaining that approval with involvement from ORPA.

Individual faculty - as principal investigators, research directors, and mentors - encourage their students and other research personnel to participate in educational programs on the responsible conduct of research or research ethics.

### **Implementing a Small Business Plan (if required)**

The Principal Investigator:

- directs purchases that are consistent with the project budget and the approved Small Business Plan (if required).
- or his/her delegate interacts with Purchasing Services staff regarding progress toward achievement of Small Business Plan goals and reviews periodic reports about goals.
- provides an explanation when small business plan goals are not achieved.

### **Conduct of the Research**

The Principal Investigator:

- is responsible for all actions required to manage and complete the scientific and programmatic aspects of the sponsored project.
- initiates programmatic changes to the project and seeks approval from the

- sponsor when required.
- initiates the hiring or assignment process and approves the selection or appointment of individuals to the project, and is responsible for communicating staff changes to Departmental Administrative Staff.
- ensures the integrity and safeguarding of notebooks and scientific data.
- ensures the completion, accuracy and timeliness of interim programmatic (technical) reports.
- initiates and requests subrecipient agreements prepared by ORPA.
- ensures the quality, timeliness, and programmatic (technical) performance of subrecipients.
- if using or providing biological materials to or from another source, initiates a materials transfer agreement with ORPA

**Budget Management (while the Principal Investigator retains primary responsibility for financial accountability, the Principal Investigator or the Department/Unit Head can delegate an authorized representative to act on his or her behalf for account/project management. In any event, accounts must be managed by persons trained in these responsibilities.)**

The Principal Investigator:

- initiates purchases.
- at the time expenditures are requested, determines the allowability and reasonableness of all expenditures, approves them, and provides scientific justification for the transaction, if necessary. In both budgeting and charging of expenses, the Principal Investigator adheres to Cost Accounting Standards, such as consistency in allocating costs.
- initiates the process of documenting cost sharing and/or matching and for ensuring that cost sharing obligations are met, allowable and verifiable, including those by third party collaborators.
- initiates requests for rebudgeting as the sponsor requires.
- initiates cost transfer requests; when salary transfer requests are made these are based on reflected effort and not budget (per Uniform Guidance 2 CFR 200).
- identifies and proposes a resolution of any GR FAO deficit.
- approves payments of subrecipient invoices and reviews invoices for appropriateness within progress of the work scope.
- uses ledger and/or departmentally-prepared reports for financial monitoring, identifies and resolves errors in the GR FAO in a timely manner, and certifies or documents a monthly review of ledgers. (A suggested format is located on the Finance/ORACS web site.)
- if appropriate and required at budget period end, the Principal Investigator requests that remaining balances are carried forward.

## **Program Income**

The Principal Investigator:

- understands the definition of program income.
- identifies all program income and notifies ORPA when program is identified.
- initiates the processes and proposes the allocation of program income.
- monitors receipt of program income.
- reviews program income reported to the sponsor by the Office of Research Accounting and Costing Standards (ORACS).

### **Effort Reporting**

To ensure compliance with the effort reporting (Plan Confirmation) policy, Principal Investigators sign and certify to all personnel action forms (800, 510, 610, 710).

### **Inventions**

The Principal Investigator:

- adheres to the principles and policies outlined in the University's Intellectual Property Policy and the Faculty Conflict of Interest Policy.
- initiates the disclosure process and completes the Invention Disclosure Form in order to notify UR Ventures.
- assists in preparing patent applications.
- assists in the processing of copyright registration or other intellectual property protection.

### **Project Closure**

The Principal Investigator:

- prepares the final programmatic (technical) narrative report, which may include contributions by subrecipients or collaborators.
- reviews final financial statements or reports provided by ORACS or Departmental Administrative Staff and submits, via Departmental Administrative Staff, close out documentation in order for ORACS to submit financial status reports on a timely basis.
- provides information on other close out reports, such as for patents (to ORPA) and on equipment (to Plant Accounting).
- retains the scientific data in accordance with the University's (Interim) Policy on Access and Retention of Data.

### **Regulatory Compliance**

The Principal Investigator:

- if a potentially significant conflict of interest situation exists, prepares a Conflict Disclosure Form in order to notify her or his supervisor and Dean.

- is responsible for adhering to all educational and training requirements of the RSRB and UCAR.
- adheres to research subjects protocols and policies, and notifies the RSRB if changes are made to protocols.
- meets continuing RSRB protocol review requirements and assists with inspections.
- adheres to chemical, biological, physical and radiation safety requirements, and notifies the appropriate office if accidents occur.
- adheres to the policies and procedures for using investigational new drugs and/or devices for clinical research.
- will participate in the annual cost sharing certification (if applicable), the periodic space and equipment survey.
- is responsible for adherence to record retention policy for all financial and scientific documentation.
- is responsible for cooperating in the audit process, whether internal or external audit staff is involved.
- is responsible for accounting of PHI disclosures, as required by HIPAA.
- is responsible for understanding and compliance with all institutional and sponsor policies, practices, and procedures.

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