

Project Director/Principal Investigator Responsibilities at Northeastern Illinois University

This document outlines the Program Director/Principal Investigator's (PD/PI's) responsibilities as a steward of external funding on behalf of the University. The Office of Research and Sponsored Projects (ORSP), the College of Graduate Studies and Research (CGSR), and the Grants Accounting Office work together with the PD/PI to ensure that all of these responsibilities are met and the project is successful. However, final responsibility for compliance in these areas lies with the PD/PI.

What is the definition of Program Director/Principal Investigator (PD/PI)?¹

A Program Director/Principal Investigator (PD/PI) is defined as the individual(s) judged by the applicant organization to have the appropriate level of authority and responsibility to direct a project supported by a grant. PI(s) are responsible for directing the project, intellectually and logistically. Each PD/PI is responsible and accountable for the proper conduct of the project or program including the submission of all required reports. The presence of more than one identified PI on a project neither diminishes the responsibility nor the accountability of any individual PD/PI.

The designated PD/PI may not be altered or delegated without prior approval from the funder.

Pre-Award:

PD/PI Proposal Development Responsibilities The Program Director/Principal Investigator (PD/PI) has primary responsibility for adhering to financial and administrative policies and regulations during the proposal development and submission process under guidance from the Office of Research and Sponsored Projects (ORSP).

Technical Proposal, including:

- Preparing the technical proposal and collaborating with others in its preparation as needed.
- Identifying the need for subrecipient agreements.
- Determining whether on- or off-campus space in addition to that already assigned to the PD/PI is needed. (PD/PI identifies the need, and requests it.)
- Taking responsibility for keeping his/her CV or biosketch updated.
- Ensuring that procedures used are consistent with sound research design and do not unnecessarily expose subjects to risk/harm.

Proposal Budget, including:

- Preparing or directly supervising the preparation of the budget and its justification.
- Selecting the appropriate facilities and administrative or indirect cost rate from the negotiated rates, under guidance from Office of Research and Sponsored Projects (ORSP).
- Obtaining approval for necessary faculty course release time from the Department Chair and School Dean.
- Requesting matching funds from University officials or identifying in-kind contributions from appropriate sources, when necessary.
- Proposing cost sharing through contributed effort or other approved mechanisms and seeking approval from appropriate University officials.
- Identifying 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 and ORSP.

Regulatory Requirements, including:

- Preparing the appropriate forms (either at proposal submission time or "Just In Time" in accordance with sponsor requirements and ORSP) for the University IRB, or the IACUC if the proposal involves:
 - human subjects;
 - live animals as subjects;
 - Protected Health Information (PHI).

¹ National Institutes of Health. (2011). *Frequently Asked Questions: Multiple Principal Investigators*.
http://grants.nih.gov/grants/multi_pi/faq.htm#2965

- Disclosing all potentially significant conflict of interest situations, and preparing a Conflict Disclosure Form and submitting it to ORSP.

Post-Award:

Acceptance of Award When the PD/PI receives an award; contact ORSP for scheduling a post-award conference to review the approved budget and the terms and conditions of the award. The PD/PI assumes responsibility to read, understand, and comply with all of the award terms and conditions, and is responsible for abiding by University and sponsor policies, procedures and directives for the proper administration of sponsored projects.

PD/PI Project Administration Responsibilities The PD/PI has primary responsibility for achieving the technical success of the project, while complying with financial and administrative policies and regulations.

Overall Management of the Budget, including

- Understanding and complying with the sponsor's general policies and specific terms and conditions covering the agreement.
- Authorizing only those expenditures which are reasonable and necessary to accomplish the project goals and are consistent with the sponsor's terms and conditions.
- Spending no more than the amount authorized by the sponsor for the project period.
- Adhering to sponsor limitations on the amount of money that may be spent in any single budget category.
- Incurring costs only for goods or services that will be used or received during the project period.
- Spending grant funds in a timely manner (reflecting sponsor-approved project plans).
- Charging project costs directly to the appropriate project account.
- Avoiding cost transfers because they are highly suspect during audit.
- Documenting institutional and/or other cost share commitment(s).
- Invoicing.
- Hiring and Payroll Actions.
- Complying with purchasing regulations.
- Following travel authorization and expenditure procedures.
- Reporting.
- Complying with indirect costs, property management, and project extension and termination policies.
- Using Banner for financial monitoring, identifying and resolving errors in the account in a timely manner; certifying or documenting a monthly review of ledgers. If appropriate and required at budget period end, requesting through ORSP that remaining balances are carried forward.

Conduct of the Research, including:

- Ensuring ethical conduct of research and creative activity.
- Responsibility for all actions required to manage and complete the scientific and programmatic aspects of the project.
- Initiating programmatic changes to the project and seeking approval from the sponsor via request to ORSP.
- Hiring or assigning individuals to the project, and responsibility for communicating staff changes to ORSP and Grants Accounting (GA).
- Ensuring the integrity and safeguarding of notebooks and scientific data.
- Ensuring the completion, accuracy and timeliness of programmatic (technical) reports.
- Initiating requests for and monitoring subrecipient agreements.
- Ensuring the quality, timeliness, and programmatic (technical) performance of subrecipients.
- Prepares a Conflict Disclosure Form in order to notify ORSP if a potential conflict of interest exists and makes additional disclosures in a timely manner if a conflict of interest arises.

Regulatory Compliance, including:

- Preparing a Conflict Disclosure Form in order to notify ORSP if a potential conflict of interest exists and makes additional disclosures in a timely manner if a conflict of interest arises.
- Adhering to all educational and training requirements as the University requires.
- Adhering to policies for research subjects, and notifying the IRB/IACUC if changes are made to protocols.
- Meeting continuing IRB/IACUC protocol review requirements and assisting with inspections.
- Adhering to safety requirements, and notifying the appropriate office if accidents occur.
- Taking responsibility for adherence to record retention policy for all financial and scientific documentation.

- Taking responsibility for cooperating in the audit process, whether internal or external audit staff is involved.
- Taking responsibility for understanding and complying with all institutional and sponsor policies, practices, and procedures.

Project Closure, including:

- Preparing the final programmatic (technical) narrative report, which may include contributions by subrecipients or collaborators.
- Submitting any close out documentation needed in order for GA to submit financial status reports on a timely basis.
- Prepares the final programmatic (technical) narrative report, which may include contributions by subrecipients or collaborators.
- Providing information on other close out reports, such as for equipment (to Property and Inventory Control).
- Retaining the scientific data in accordance with the University's Policy on Access and Retention of Data.