

Principal Investigator Responsibilities

College of Engineering

Principal Investigators (PIs) are ultimately responsible for all aspects of their sponsored projects, including subrecipients, scholarly activity and proper stewardship of awards. In cases where there are multiple investigators or subprojects on campus, both the sponsor and the University must have one individual designated as ultimately responsible for the conduct of the project. Although the CO-PI or other individuals may manage the project, for the purposes of audit, the PI of record is the person listed as PI in the award document.

Proposal Development and Submission

The PI should:

- Work with the unit's administrative manager to develop proposals with sufficient time for review and approval
- Meet unit, school and sponsor due dates
- Determine that the level of effort required for a proposed project can be met relative to other effort commitments
- Recognize that the PI's electronic signature in myUFL and the signature on submitted proposal documents demonstrates that the PI will accept responsibility for project performance and reports if the award is made
- Disclose to the University any conflict of interest and pursue review and management of the COI
- Disclose international exchanges of information, items, and/or activities for review

Award Documentation

The PI should:

- Recognize that the PI shares responsibility with the unit's administrative staff for ongoing administrative management of sponsored projects
- Not sign an award or agreement except where PI acknowledgment is required. OER will sign as the authorized official for UF
- Review the award terms and conditions to confirm project deliverables and reports as well as any restrictions on expenditures or project changes (i.e. no faculty Salary, reduced fringe, approval from agency prior to rebudgeting F&A)
- Identify significant dates and activities, such as report due dates, timeline for completion of milestones, and requirements for award renewal

Project Management

The PI should:

- Oversee conduct of the project, including work of collaborators and subrecipients

- Ensure that project staff have completed any training and certification required by the university, by Federal or State regulation, or by the sponsor
- Seek and maintain approvals for human subjects, animal use, pathogens, select agents, rDNA or other research requiring committee and/or other approvals
- Ensure TCP is followed for export controlled projects
- Maintain program-related records
- Submit all required program reports
- Prepare and submit results for publication
- Report inventions to the Office of Technology Licensing (OTL)

Account management

The PI should:

- Coordinate with the unit's administrative manager to ensure that personnel and other expenditure records are maintained accurately
- Determine that any expenditure charged to an award, whether for personnel, supplies, equipment, travel, or other types of expenses, is allocable to the project as well as allowable and reasonable.
 - This includes providing an explanation on how the expense directly benefits the project.
 - Purchase orders submitted within 120 days of the end of a grant for the acquisition of equipment (\$5000 or greater) will require justification, review and approval by Contracts & Grants prior to purchase.
- Review award expenditures regularly (best practice = monthly) to ensure that expenditures are correct and appropriate
 - Including maintaining a reasonable and consistent rate of spending (many agencies are using data analytics and sample awards that have excessive spending pattern for an external audit)
- Monitor effort commitments to ensure that the PI and key personnel are meeting the effort commitments agreed to when the award was accepted, and update effort distribution as changes become known
 - Including communicating any change of effort above or below 25% especially if the PI anticipates prolonged absences >90 days
- Certify effort each semester, and when required, certify effort of project personnel each semester
 - If effort report certification is not completed 150 days after the certification process was opened, C&G will suspend spending on all active projects and remove salary charges on federal programs affected by the delinquent effort reports.
- Review and approve cost transfer requests including providing documentation to support transfer. Per University policy:
 - Outside of extraordinary circumstances, any such labor cost transfer requested after effort certification will not be approved.

- Outside of extraordinary circumstances, any such non-labor cost transfer requested 90 days after the charge was originally posted will not be approved.
- Review and approve subrecipient invoices for payment (PI is ultimately responsible for any misconduct by the subrecipient)
- Review and approve other project changes, some of which may require sponsor approval (such as a change to the scope of work, or significant change in a PI's effort on the project)
- Ensure all cost sharing associated with the project is met in a timely manner. If the cost sharing includes contributions from third parties, such as school districts, non-profit agencies, state agencies, and/or private individuals, the PI must obtain written documentation and submit it to their grants specialist or DFO. Cost sharing must be documented as it occurs – the PI should not wait until the project is ending to start documenting cost sharing.

Award Closeout

Before the project ends (best practice = 3 months prior to the end date), the PI should:

- Review the project's financial status with the unit's administrative manager
- Assure that subrecipients have submitted or will submit all required deliverables, reports and invoices.
- Plan for updates and changes to payroll, transitioning either to a renewal period or to award expiration
- Request preaward spending for a renewal or continuation period when appropriate
- Request a no-cost extension when allowable and appropriate

When a project expires or is terminated, the PI should:

- Meet sponsor's deadline(s) for final reports
- Submit any required final project report
- Submit any required final invention report
- Close out IRB and IACUC protocols
- Retain the project records for as long as they are useful, but for at least 3 years after submission of the final report (if any) or award termination, whichever is later.

Required Training

In order to enhance the University's good practices in sponsored project accounting operations and to further appropriate stewardship of contracts and grants to all of our Sponsors, the University of Florida has the following training requirements:

- **Training for investigators, department chairs, deans, and center/institute directors:** Two courses are now required: Effort Fundamentals (RSH220) and Cost Principles (RSH260). Investigators who have not successfully completed the course will have Notice of Award actions on their sponsored projects withheld until the training courses are completed.
- **Training for staff:** Access to grants transactions and information within myUFL and to reporting tools like myinvestiGator will be removed if the training is not completed.

- All UF employees who facilitate the development of sponsored project budgets, charging of costs, distribution or allocation of payroll, reporting, or any other fiscal activity for sponsored funds will be required to complete RSH260: Cost Principles.
- All grant management staff including those who facilitate the development of sponsored project budgets, distribution or allocation of payroll, reporting, or effort reporting for sponsored funds will be required to complete RSH220: Effort Fundamentals and RSH230: Effort Management.

Note that all courses can be found online by navigating in myUFL to Main Menu > My Self Service > Training and Development > Request Training Enrollment. Search by the course numbers (RSH220, RSH230, or RSH260) to enroll.