

NORTH CAROLINA CENTRAL UNIVERSITY

Procedures for Principal Investigator Eligibility Requirements on Sponsored Projects

Responsible Offices: Division of Graduate Education and Research
Office of the Provost/Academic Affairs
Office of Sponsored Research and Programs
Contracts and Grants Office
Office of Research Compliance

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Overview

When North Carolina Central University submits a proposal to a sponsoring agency and subsequently, accepts an award to support a sponsored project, the University assumes significant financial and legal obligations because the formal award is made in the name of the University. The primary concern of the sponsoring agency is that the personnel identified in the proposal are capable of completing the project as described in the application. In most instances, the quality of the principal investigator selected can be crucial to the success of a sponsored

project's proposal. With the general oversight and authority of the University, the principal investigator of a sponsored program is the individual who bears primary responsibility for completion and technical compliance of the proposed scope of work, fiscal stewardship of the sponsor funds, and fulfillment of the administrative requirements of the sponsored program.

Scope

These guidelines apply to all proposals submitted to sponsoring agencies seeking monetary or non-monetary support of a sponsored project, which if awarded to the University will be governed by a contract, grant, cooperative agreement or other binding agreement.

These guidelines do not apply to consultant agreements or the procurement of goods or services from vendors.

Purpose

The University must ensure that individuals serving in the capacity of Principal Investigator have appropriate technical competence and administrative capabilities, and have a reasonable prospect of long-term commitment to the University. These guidelines

- define the requirements that must be met by those who serve in the capacity of principal investigator on externally sponsored programs at the University; and
- ensure that sponsored projects are conducted by those who have the requisite training, skill, commitment, availability, and resources as well as appropriate relationship to the University.

Policy Statement

As a condition of its acceptance of sponsored project awards from sponsoring agencies, the University is obligated in its role as the recipient of the award to ensure that:

- only individuals meeting the eligibility requirements of these guidelines are listed as a principal investigator, co-principal investigator, project director, program director on sponsored project proposals/applications;
- all proposals are reviewed, approved and submitted by an authorized individual acting on behalf of the University; and
- all proposals submitted meet the requirements of the sponsoring agency. If the sponsor's requirements are less restrictive than the University's policy, the University's policy shall take precedence.

Definitions

Cooperative Agreement – An agreement where the sponsor has substantial involvement in the project and the work is conducted by both the sponsor’s employees and the principle investigator.

Contract – An agreement with specific obligations for both the sponsor and the recipient where the sponsor is seeking to procure a product or service, has more involvement, and uses the project to achieve a specific outcome or deliverable. In general, contracts contain a more precisely stated expectation than grants of a definable work product or service on some set schedule as a condition of payment and can be terminated for convenience.

Grant – A pledge of support where the sponsor has little involvement in conducting the project and generally is given to the University with a purpose to support instruction, research or public service.

Co-Principal Investigator – A University employee with an eligible appointment who is responsible for a portion of the design, scientific, technical, or administrative conduct or reporting of a research, training, or service project supported by extramural funding sources.

Sponsor or Sponsoring Agency – The organization that funds a project via a contract, grant or cooperative agreement, or other award agreement.

Sponsored Project or Sponsored Program – An activity that is supported by funding from a governmental agency, corporation, or private foundation to carry out a specific purpose and that is governed by specific terms and conditions.

Sponsored Project Award – Funding from an external entity such as a governmental agency, corporation, or private foundation for an activity with a defined scope and purpose undertaken by the University with the expectation of an outcome or something of value that directly benefits the sponsor.

Principal Investigator (also project administrator, project director, program administrator, or program director) - The employee or student of the University who has been designated by the University and approved by a sponsoring agency to direct a project funded by an external sponsor. A principal investigator must personally participate in the project to a significant degree. A principal investigator is directly responsible and accountable to the University and the sponsoring agency for the proper programmatic, scientific, or technical conduct of the project, and its financial and day-to-day management, and reporting.

The principal investigator is a critical member of the sponsored project team responsible for ensuring compliance with the financial and administrative aspects of the award. The principal investigator works closely with appropriate administrators within the University to create and maintain necessary documentation, including both technical and administrative reports; prepares budget justifications; appropriately acknowledges external support of research findings in publications, announcements, news programs, and other media; and ensures compliance with other Federal and organizational requirements. It is expected that the Principal investigator will maintain contact with the appropriate sponsor representative with respect to the scientific aspects of the project and the business and administrative aspects of the award.

Approved principal investigators serve at-will and may be removed at any time from this role at the recommendation of their dean or administrative department head, area Vice Chancellor and/or the Vice Chancellor for Graduate Education and Research and/or decision of the Chancellor.

A principal investigator is a steward of Federal funds and is subject to Federal, State, and local criminal and civil laws and regulations.

Eligibility Requirements

A. Eligibility Requirements for Faculty as Principal investigator

In order for a faculty member to be a principal investigator, the individual must:

- be a full-time employee of the University;
- hold a fixed term faculty rank with title designations “lecturer,” “artist-in-residence,” “writer-in-residence,” and any faculty rank of instructor, professor, associate professor, assistant professor with the pre-fix qualifier “clinical,” “research,” or “visiting;” or director of a formally-approved institute or center at the University; and
- have the requisite training, skill, commitment, availability, and expertise.

B. Eligibility Requirements for Administrator/Staff as Principal investigator

In order for a staff member to be a principal investigator, the individual must:

- be a full-time employee of the University;
- have the requisite training, skill, commitment, availability, and expertise;
- seek approval from the Vice Chancellor for Graduate Education and Research

through appropriate departmental channels.

C. Eligibility Requirements for Students

A student cannot, in general, be appointed principal investigator on a sponsored project.

D. Exceptions to Eligibility Requirements

1. Exceptions to the Principal Investigator Eligibility Requirements

Exceptions to the aforementioned eligibility requirements require the approval of the Vice Chancellor for Graduate Education and Research. Exceptions may be made but are not limited to the following personnel: associate research scientist/scholar, post-doctoral fellows, lecturers, instructors, emeritus faculty, and other non full-time appointments.

2. Conflicts with Sponsoring Agencies

In some cases, a sponsoring agency may have more stringent restrictions on the qualifications for the principal investigator on a particular project than are mandated by University guidelines. In these situations, the sponsor's restrictions will prevail over the policies, procedures or guidelines of the University for that particular sponsored project. In the situation where a sponsor may require or expect an individual to serve as a principal investigator but that individual is ineligible to be appointed under these guidelines, then the individual must seek the approval of the Vice Chancellor for Graduate Education and Research through appropriate departmental channels for a co-principal investigator. Once an appointment for a co-principal investigator has been approved by the Vice Chancellor for Graduate Education and Research, that appointee shall serve as co-principal investigator for internal purposes and shall assume responsibility for compliance with sponsor and institutional requirements. Fellowships or other training awards are examples where sponsor and institutional requirements may conflict.

3. Student-Initiated Projects

Certain sponsored programs have as their purpose the support of graduate education or research through student-initiated projects (i.e., fellowships, etc.). For these sponsored programs, the following conditions apply:

- a. A full-time faculty member or equivalent, as identified in these guidelines, must serve as Faculty Advisor.
- b. The Faculty Advisor shall retain the responsibilities of a principal investigator under these guidelines.
- c. The student shall be responsible for the intellectual conduct of the project with the oversight of the Faculty Advisor.

The sponsored project proposal to the sponsoring agency shall name the student as

“Key Personnel” as long as the Faculty Advisor is named as the responsible individual. The proposal should acknowledge the student’s authorship of the proposal, as appropriate. Sponsor required reports shall acknowledge the student’s authorship of the report, as appropriate.

Roles and Responsibilities of the Principal Investigator

Principal Investigators are stewards of sponsored project award performance and funds. In that capacity, Principal Investigators are responsible for the overall proposal preparation and administrative, technical, and fiscal management of sponsored projects. These obligations include, but are not limited to the management of the sponsored project within funding limitations, adherence to reporting requirements and ensuring that the sponsoring agency is notified regarding a change in project status or significant conditions that may affect the sponsored project. The Division of Graduate Education and Research shall outline through its various policies, procedures and guidelines specific responsibility requirements of Principal Investigators, which shall be enforced by the Division. See Appendices A and B. Generally, Principal Investigators shall:

1. Manage the day-to-day operation of sponsored project financial transactions by authorizing direct charges to the sponsored project award;
2. Manage the property acquired with sponsored project funds to ensure proper labeling, inventorying, disposition, and reporting;
3. Ensure that proposed budget items and award expenditures are allowable, reasonable, allocable, and consistently treated as imposed by 2 C.F.R. part 220, the Federal Cost Accounting Standards (CAS) Board, and sponsoring agency guidelines;
4. Conform sponsored award terms and conditions, including limitations and exclusions;
5. Implement and adhere to compliance and internal control requirements provided for in OMB Circular A-133;
6. Review and comply with University and sponsor policies regarding ethical conduct in research including but not limited to the humane use of animals, protection of human subjects, procurement and use of chemicals and radioactive materials, export controls, **conflicts of interest** including but not limited to financial disclosures, and intellectual property;
7. Comply with reporting requirements and additional requests related to sponsor notifications and prior approvals;
8. Maintain and retain records and documentation to support sponsored project activities, including but not limited to performance data, financial transactions; and personnel effort (Appendix C); and
9. Oversee the proper close out of sponsored projects, including the submission of all required final reports.

Principal Investigators are not authorized to:

1. Accept or indicate acceptance of a sponsored project award verbally or in writing;

2. Enter into legal agreements including but not limited to grants, cooperative agreements, contracts, subawards, subcontracts, memoranda of understanding, material transfer agreements.
3. Reallocate sponsored funds budgeted for both undergraduate and graduate students for other purposes, including but not limited to, employ of senior, clerical or technical personnel.

Sponsored project award and legal agreements related to sponsored project administration must be signed by the Vice Chancellor for Graduate Education and Research or designee.

Mandatory Training Required

New Faculty/Principal Investigators shall attend a mandatory PI training course on managing sponsored projects during the University orientation or their initial appointment. Upon receipt of a sponsored project award, the Principal Investigator must meet with the Office of Sponsored Programs to participate in a “start-work” meeting to include representatives from Contracts and Grants, Human Resources, and Purchasing within fifteen (15) business days of receipt of the award. At the “start-work” meeting the Principal Investigator will be provided project specific information that will enable an expeditious and earnest beginning of their research project including update of conflict of interest disclosure.

All Principal Investigators, who conduct sponsored research and members of their laboratory, must complete Responsible Conduct of Research (RCR), laboratory safety, and conflict of interest and/or commitment training within one (1) year of appointment and participate in annual refresher courses.

Relationships between Principal Investigator, University and Sponsoring Agency

A. Sponsored Project Awarded to the University

Sponsored project awards are awarded to the University. In the event a Principal Investigator is no longer able or approved to serve as the Principal Investigator of an approved sponsored project prior to the completion of the sponsored project, the future of that sponsored project shall be governed by the terms and conditions of the sponsored project agreement (i.e., notice of grant award (NGA), notice of contract award (NCA), etc.), the wishes of the sponsor, and the University as deemed appropriate. In appropriate situations, the area Vice Chancellor, with the approval of the Vice Chancellor for Graduate Education and Research, must identify a substitute, eligible principal investigator who must agree to assume responsibility for the awarded sponsored program, and who, at a minimum, would bring the sponsored project to a close with the assistance of the Contracts and Grants Office, Office of Sponsored Research and Programs, and other university departments as appropriate.

B. Relationship of Principal Investigator to University

The Principal Investigator's relationship to the University is governed by the University's personnel policies and procedures. The approval of individuals as Principal Investigator in no way affects the rights, claims and duties of such individual as may be specified in University policies and procedures. In particular, responsibilities as Principal Investigator do not imply any commitment on the part of the University to any subsequent appointment.

Proposal Approval Requirements

All proposals/applications for sponsored projects must indicate the approval of the appropriate department chair, dean, area vice chancellor, the Provost (as appropriate) or Chancellor (as appropriate), indicating assurance to provide the resources (including space) necessary to carry out the sponsored project for the length of the specific project. The proposal and required internal assurances must be submitted, in advance of the submission deadline, to the Office of Sponsored Research and Programs, in accordance with established pre-award submission procedures.

Non-Compliance

Failure to comply with these guidelines may result in missed submission deadlines. Fabrication, falsification or plagiarism in a funding proposal or failure to comply with applicable research protocols is considered to be research/scientific misconduct. In those instances, the principal investigator is subject to disciplinary action as outlined in the University's Misconduct in Research Policy. Disciplinary and/or corrective action may include one or more of the following: Termination of PI from the sponsored project; termination of the PI from the University; suspension or termination of research; referral for misconduct proceedings; suspension of access to sponsored project funds; return of funds to the sponsoring agency; and reporting to state and federal regulatory and/or sponsoring agencies.

Removal of a Principal Investigator

Approved principal investigators serve at-will and may be removed at any time from this role at the recommendation of their dean or administrative department head, area Vice Chancellor and/or the Vice Chancellor for Graduate Education and Research and/or decision of the Chancellor.

All requests for removal of a Principal Investigator must be approved, in advance of the effective date of the removal, by the Vice Chancellor for Graduate Education and Research. Removal shall be "for cause." "For cause" occurs when a principal investigator fails to properly execute his or her duties with respect to the sponsored project or program.

Prior to removal, the principal investigator shall be given written notice of the intent to take such action. That notice shall include an explanation of the basis for the proposed action. The principal investigator shall be given at least five (5) working days from receipt of notice of the proposed action to respond and reach a satisfactory written resolution with the dean or

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administrative department head. If the principal investigator fails to reach a satisfactory resolution with the dean or administrative department head, the principal investigator may request, within five working days, that his or her proposed removal be reviewed by the area Vice Chancellor.

The area Vice Chancellor shall investigate the matter and, within thirty (30) calendar days provide his or her recommendation to the Vice Chancellor of Graduate Education and Research. The Vice Chancellor for Graduate Education and Research shall provide his or her recommendation to the Chancellor within thirty (30) calendar days after receiving the request for a review. The Chancellor shall render a final decision on the removal of the principal investigator within five (5) working days after receiving the recommendation from the Vice Chancellor for Graduate Education and Research. The Chancellor's decision shall not be appealable.

Related Information

NCCU Faculty Handbook

NCCU Mandatory Prior Approval Guidelines

NCCU Federally Mandated Committees,
<http://www.nccu.edu/research/osrp/committees.cfm>

NCCU Institutional Animal Care and Use Committee (IACUC) Policy and Procedures

NCCU Institutional Review Board (IRB) Policy and Procedures

NCCU Radiation Safety Committee Policy and Procedures

NCCU Intellectual Property Policy,
<http://www.nccu.edu/research/osrp/IntellectualPropertyPolicy.pdf>

Collaborative Institutional Training Initiative, www.citiprogram.org

Misconduct in Science Policy and Procedures

Technology Transfer Guidelines,
<http://www.nccu.edu/Research/osrp/TechTransferBrochure.pdf>

NIH Grants Policy Statement, http://grants.nih.gov/grants/policy/nihgps_2003/

NSF Proposal and Award Policies and Procedures Guide,
http://www.nsf.gov/publications/pub_summ.jsp?ods_key=papp

Contact Information

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Office of the Vice Chancellor for Graduate Education	919-530-6893
Office of the Provost/Vice Chancellor for Academic Affairs	919-530-6240
Office of Sponsored Research and Programs	919-530-7331
Contracts and Grants Office	919-530-5309
Office of Research Compliance	919-530-5140

Appendix A

ROLES AND RESPONSIBILITIES OF PRINCIPAL INVESTIGATORS

A Principal Investigator is a steward of sponsored project award funds.

What must a Principal Investigator do?

1. Comply with applicable Federal statutes, regulations, and guidelines on Federal grant administration, program administrative regulations and guidelines, grant award terms and conditions;
2. Comply with University policies and procedures, including student privacy rights (i.e., GEPA and FERPA), and research compliance, conflict of interest and commitment, and intellectual property policies;
3. Ensure that expenditures of sponsored project funds are allocable, reasonable, allowable, consistently treated and necessary under the applicable OMB Cost Principles;
4. Direct, administer and supervise the sponsored project;
5. Ensure prior approvals for expenditures and activities are obtained when required. Requests for prior approvals should contain adequate justification to determine the impact of the request on the technical aspects of the project as well as its reasonableness in terms of costs;
6. Ensure compliance with cost sharing commitments on sponsored projects;
7. Establish internal procedures to ensure the timely processing of personnel actions and retroactive payroll adjustment which affect sponsored project awards;
8. Ensure the conscientious completion, certification, and timely return of effort reports.
9. Prevent budget overdrafts;
10. Ensure all adjustments to expenditures are performed timely;
11. Review subcontractor costs for reasonableness and compliance with prior approval and costs sharing requirements before processing invoices for payment;
12. Perform monthly reviews of charges to sponsored project awards appearing in

Banner (i.e., FGIBAVL, FGROPNE, FGIBDST/FGITRND, FRIGITD);

13. Monitor and maintain the committed level of effort on sponsored projects;
14. Diligently work to accomplish the objectives of the approved sponsored project;
15. Use sound fiscal internal control and accounting procedures to ensure proper disbursement of sponsored project funds;
16. Ensure compliance with property standards related to grant administration, including maintaining an inventory of equipment funded or owned by a sponsoring agency;
17. Ensure compliance with Federal and State procurement standards;
18. Submit all technical, programmatic, and financial reports on a timely basis; and
19. Timely respond to notices from University offices related to account close out;
20. Obtain and retain appropriate support documentation for all grant-related transactions.
21. Maintain proper retention of records sufficient to establish an audit trail. When in doubt, keep it!

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Appendix B

Roles and Responsibilities Matrix

The University has overall responsibility for all sponsored project proposal submission, administration and reporting. The University has adopted an institutional oversight model for sponsored projects. The following Sponsoring Project Roles and Responsibilities Matrix was developed to facilitate the timely and responsible sponsored project administration.

RESERVED FOR MATRIX

Appendix C

Recordkeeping Requirements
“Preparation for Audit Readiness”

- Statute Authorizing the Sponsored Project
- Program Regulations and/or Guidelines
- Program Announcement
- Application Package
- Agency Application Guidelines
- Applicable Administrative Regulations
- Applicable Cost Principles
- Notice of Grant or Contract Award, including Terms and Conditions
- Written Policies and Procedures. If there are policies and procedures by which your sponsored project operates, please have these written policies and procedures on file in your office, as well as the Office of Contracts and Grants.
- Approved Sponsored Project Award, including Budget, Objectives, Scope of Work, Implementation Strategies, and Timetables, etc.
- Institutionalization Plans. Written plans to continue personnel (permanent and temporary) after sponsored project funding is no longer available.
- Assessment data that will support accomplishment of objectives
- Evaluation Plans
- Copies of any agendas and minutes of meetings held by your Activity
- Any additional documentation to support achievement of objectives
- Written Job Descriptions, including and an explanation of how the Title III personnel fit into your program.
- Project Organizational Chart, with Title, EPA/SPA Designation and Position Number
- Position/Personnel Log, including a numbered list of the positions and individuals participating in the approved sponsored project by award year, fund number and account code. Please have on file each person’s resume (for EPA personnel) or State Application (for SPA personnel). This includes Graduate Assistants, Tutors, Work-Aid, and other student workers.
- Employment Forms, such as copies of all employment forms, supporting the establishment of each position, the recruitment and selection process, and the employment of the personnel (i.e., Requests to Establish EPA Position, Position Description Questionnaire (CB-102’s), Requests to Establish Temporary EPA Position, EPA Designation Forms, Requests for Classification Review, Requests to Advertise, Ads, Form 6’s, Form 6T’s, E-recommends, Appointment/Reappointment Letters, Dual Employment paperwork, Career Banding forms, Form 50’s), and all supporting documentation for each transaction.
- Time & Effort Reports and Effort Reports.
- Financial Records. Summary of expenditures by sponsored project fund number and account code, including program income records of deposit slips and expenditures.

- Purchasing Records. Requisitions, purchase orders, invoices for all purchases made under the sponsored project as well as budget transfers, check requests, etc.
- Travel Log and Records. Copies of all travel authorizations, travel reimbursements and receipts, and travel reports. A list of sponsored project-related travel taken by award period. Please include name of traveler, conference/training/seminar, location, date, and significance of attending as it relates to particular objectives in your sponsored project plan.
- Equipment Log. An inventory of equipment purchased/leased with grant funds should be on file in your office, as well as in the Office of Sponsored Research and Programs and Office of Contracts and Grants. **Equipment should be labeled indicating that the equipment was purchased using Federal funds, in accordance with the property standards for federally funded equipment.**
- Contracts and Agreements. A copy of any contracts between the agency and any other entity, consultants, personnel, maintenance, rental, etc. should be on file in your office as well as the Contracts and Grants Office.
- Communications. Copies of press releases, bid solicitations, program announcements, informational materials, brochures, manuals, etc. produced by the project(s) should be on file in your office, as well as in the Office of Contracts and Grants. **Communications should comply with the disclosure requirements for public announcements.**
- Reports. Copies of all technical, programmatic, and financial reports submitted to the sponsoring agency, the University or other constituents.