Office of Grant and Contract Services

SUMMARY OF PI RESPONSIBILITIES

POST-AWARD CONDUCT AND MANAGEMENT OF THE SPONSORED PROJECT

General

Principal Investigators (PI) are responsible for the overall programmatic and administrative conduct of sponsored projects at UT Arlington. The Office of Grant and Contract Services, Office of Regulatory Services, Grant Accounting, Department Administrators and other offices are available to assist with this responsibility. The PI should read and understand the award document and any other referenced terms and conditions. This document is a summary of post award requirements but individual awards may differ. PIs should reference the Office of Research web site: (https://www.uta.edu/research/administration) or contact appropriate university offices for additional information or questions pertaining to rules and requirements governing sponsored funding. Principal Investigators are responsible for knowing what actions require sponsor approval. In the event sponsor approval is required the PI should contact the appropriate Research Administration office. Please note, this document is intended to be used as a summary document. UT Arlington relevant policies and procedures can be found on our webpage.

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 and administrative changes to the project, when required by federal or sponsor specific regulations, and seek approval from the sponsor via request to the appropriate Research Administration office. Sponsor prior approval requirements include but are not limited to the following:
    - Change in PI or Project Director (PD)
    - Change in named Key Personnel of the award (NIH)

- o Reduction of PI/PD time devoted to the project of more than 3 months or 25% or more reduction in time (based on # of person months/% of Institutional Base Salary listed in the award budget)
  - o Change in scope of work
  - o Adverse events or administrative actions that may significantly impact the scope of work or use of research data
  - o Rebudgeting funds out of Participant Support
  - o Some agencies have specific rebudgeting requirements for moving funds to or from IDC or change of 10% or more from original budget categories
  - o Subawards not included in the proposal
  - o Requests for no cost extensions
- Initiates the hiring or appointment process and approves the selection or appointment of individuals to the project, and is responsible for communicating staff or appointment changes to departmental staff.
- Ensures the integrity and safeguarding of notebooks and scientific data.
- Ensures the completion, accuracy and timeliness of programmatic (technical) reports.
- Monitors subrecipient invoices and progress reports to ensure appropriate programmatic and financial progress and performance within the terms of the subrecipient agreements prepared by Post-Award. UTA's Subrecipient Monitoring and Management Procedure contains additional information on this topic.
- Ensures the quality, timeliness, and programmatic (technical) performance of subrecipients.
- Initiates a material transfer agreement with the Office of Technology Management when using or providing materials to or from another source.
- Discloses inventions resulting from the research to the **Office of Innovation and Commercialization** as early as possible, identifying the use of grant funds and the funding source, so as to allow timely reporting of the invention to the funding agency and evaluation of the invention.
- Takes responsibility for adherence to record retention policy and procedure for all financial and scientific documentation.
- Takes responsibility for understanding and compliance with all institutional and sponsor policies, practices for clinical research.

Financial Management:

The Principal Investigator retains primary responsibility for financial accountability. The University Office of Accounting and Business Services is responsible for account management at the University level and responsible for all payments, invoices, financial reporting, etc. to the sponsoring agency.

The Principal Investigator:

- Initiates purchases.
- At the time expenditures are initiated, determines that expenditures are allowable, allocable, and reasonable; approves them; and provides scientific justification for the transaction, if necessary. In charging of expenses, the Principal Investigator adheres to

[UTA policy](#) and the Uniform Guidance (or other award terms and conditions as applicable), such as consistency in allocating costs.

- Initiates the process of documenting cost sharing and/or matching in UTShare and, if from a 3rd party sponsor, for ensuring that cost sharing obligations are met from allowable and verifiable sources, if included in approved budget.
- When necessary, initiates prior approval request to the Post Award office for rebudgeting when the sponsor requires.
- Initiates [cost transfer](#) requests. When salary transfer requests are made, ensures these requests are based on actual work/time spent on the project and not solely because it was included on the sponsor awarded and approved budget.
- Identifies and proposes a resolution of any award deficit.
- Reviews subrecipient invoices for appropriateness, monitor progress of the work, and approves payment of subrecipient invoices.
- Uses UTShare for financial monitoring, identifies and resolves errors in the account in a timely manner; certifies or documents a monthly review of account statements. If appropriate and required at budget period end, the Principal Investigator requests that remaining balances are carried forward.
- Participates in the annual cost sharing certification (if applicable), as well as the periodic space and equipment survey.
- The Principal Investigator is responsible for purchasing equipment or fabricating equipment per the sponsor approved Awarded budget. If an unanticipated equipment need arises, the PI should contact Post Award. The PI is responsible for following all University policies on equipment and for notifying Inventory Management when a fabricated piece of equipment is completed and put into service. PI's should rarely purchase equipment near the end of the project. Project justification for the purchase will be required.

Program Income:

Program Income is gross revenue generated from activities associated with or generated as a result of a federally-sponsored Award. Federal regulations define Program Income ([2 CFR 200.1](#)) as gross income earned that is generated directly by a federally supported activity (e.g., conference fees) or earned as a result of the federal Award during the life of the Award (e.g., fees for services performed). Program Income is subject to all federal requirements as stipulated in [2 CFR 200.307](#).

Program Income Examples on Federal Awards

- Conference fees charged when the Award funds the conference.
- Fees earned from services performed under the Award, such as laboratory tests.
- Funds generated from sales of commodities and research materials, such as tissue cultures, cell lines and research animals developed or acquired under the Award.
- Income from registration fees, consulting, and sales of educational materials developed or acquired under the Award.

- Sale, rental, or usage fees, such as fees charged for the use of computing or laboratory equipment purchased with Award funds.
- Funds generated from the sale of software, tapes, or publications.

Please note, Program Income does not include license fees and royalties, which are monitored and reported by OTM.

The Principal Investigator:

- When applicable, is required to understand the definition of program income.
- Identifies all program income and notifies the Office of Grant and Contract Services when program income is anticipated/received.
- Initiates the processes and proposes the allocation of program income.
- Monitors receipt of program income.

Payroll Confirmation:

To ensure compliance with the After the Fact Review of Compensation Charges to Sponsored Projects Policy, Principal Investigators confirm payroll for themselves, other investigators, staff and students on their grants in accordance with the University's Payroll Confirmation Procedure, designed in compliance with 2 CFR 200.

Project Transfer:

All awards are made to the University and not to the individual investigator. In the event a PI leaves the University, he/she must notify Co-PIs, Faculty Participants, the department head and dean of such departure as soon as practicable (but not less than 60 days prior to the termination date) and seek appropriate next step instructions from the department head, dean, and OGCS.

External Audit/Desk Review:

Infrequently, awards are selected for audit. An External Audit is a periodic or specific purpose audit conducted by external staff. The PI is expected to assist and be available to work with OGCS in the successful conduct of the audit. If a PI is contacted for this purpose please obtain the following information: name of auditing agency, auditor name and contact information, specific area of audit and grant name and number. Do not provide any information, responses will be coordinated through one point of contact. If you are contacted by an agency for an external audit or desk review, please contact sarah.panepinto@uta.edu.

Project Closure:

The Principal Investigator:

- Prepares the final programmatic (technical) narrative report, which may include contributions by subrecipients or collaborators.
- Provides information on other close out reports, such as for patents and on equipment.

Who to contact:

For questions related to regulatory issues (Human subjects, animal subjects, export control, biosafety, responsible conduct of research, etc.) contact the Office of Regulatory Services: regulatoryservices@uta.edu.

For questions related to technology management (invention disclosure, patents, licensing, royalties, etc.) contact the Office of Innovation and Commercialization: innovation@uta.edu. For questions related to grant accounting (invoicing, financial reporting, account balances, account close outs, status of budget transfers and non-payroll expense transfers, etc.) contact Grant Accounting: gca@uta.edu.

For questions related to post award issues (prior approval requests, expense transfer requests, etc.) contact Post-Award: postaward@uta.edu.

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