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PRINCIPAL INVESTIGATOR RESPONSIBILITIES

Area: Sponsored Programs Number: RSSP-103

Subject: Principal Investigator Responsibilities Issued: 01/05/2013

Applies to: University Revised: n/a

Sources: Office of Research Services & Sponsored Programs, GSU

Research & Service Foundation, Inc., and Business & Finance

Responsible Party: Provost and Vice-President for Academic Affairs Page(s): 1 of 3

I. Purpose

This document stipulates the responsibilities of principal investigators in managing their sponsored projects.

II. Policy Statement

The PI has overall responsibility for the technical and fiscal management of a sponsored project, including staying within funding limits, adhering to reporting requirements, and assuring that the sponsor is notified promptly of significant changes related to project status. While responsibility for day-to-day management of project finances may be delegated to administrative or other staff, the PI is responsible for compliance with Georgia Southern policy and sponsor requirements.

PI responsibilities include:

- 1. authorization of direct charges
- 2. review of project expenditures
- 3. no-cost time extensions and other administrative actions
- 4. charging salaries to projects
- 5. maintaining funds within sponsor limits
- 6. subrecipient monitoring
- 7. deliverables
- 8. project close-out

III. Exclusions - none

IV. Procedures

Authorization of Direct Charges

To authorize expenditure of funds charged directly to sponsored projects, the PI and the department must assure that:

• the estimated charge is reasonable and necessary;

- the expenditure is allowable per the funding source and, if federally funded, per OMB Circular A-21;
- the expenditure is allocable to the project; that is, it benefits the project;
- the funds are available within the authorized award amount and limits;
- the justification for the expenditure is documented;
- allocation of costs is appropriate and documented; and
- the charge has been processed through the appropriate university system.

Review of Project Expenditures

Business Objects reports are a valuable tool for project oversight. They should be reviewed each month by a knowledgeable individual—the PI or designee—so adjustments are timely, and expenditure rates can be monitored to assure availability of funds. Any questionable charges must be brought to the Research Accountant's attention promptly and corrected by an appropriate reallocation (transfer), if necessary. Reallocations should be initiated as soon as possible after a need is identified. Whenever expenses are moved to or between sponsored accounts, the PI must assure that the project that pays is the project that benefited, supported by documentation.

Charging Salaries to Projects

Salary charged to sponsored projects must be supported by documentation of appropriate level of effort. The PI is responsible for ensuring that effort reports for the project are submitted in a timely fashion.

Monitoring Funds within Sponsor Funding Limits

PIs are responsible for ongoing fiscal management of their awarded projects, including regular monitoring against project period budgets. Federal grants policy (OMB Circular A-110) establishes the approved project budget as the financial expression of the project, and sponsors may evaluate the project against the budget at any time. Although sponsors allow certain flexibilities in rebudgeting, unobligated balances, and preaward costs, both they and Georgia Southern expect expenditures to be reasonably consistent with the approved project and budget. Sponsors may question or restrict expenditures that appear inconsistent with the project plan and budget.

The PI is responsible for requesting prior approval when revisions to the project plan or budget indicate a significant change in scope. Indicators include significant expenditures beyond the amount authorized in the award or requests for additional funding.

Overdrafts

Georgia Southern policy holds that a sponsored project will be managed within the established budget. If, as a result of unusual circumstances or unanticipated project expenses, an account is in overdraft at the end of the period of performance, and additional funds have not been received from the sponsor, the PI must identify an appropriate source of funds (e.g., gift, endowment, or departmental funds) to cover the expense. The overdraft must be transferred in time for the university to comply with the original award's financial reporting requirements.

Subrecipient Monitoring

The PI is responsible for monitoring the work effort of subrecipients and consultants. PIs should carefully review invoices submitted by subrecipients to verify that the level of effort and items expensed against the project are appropriate to the quality and quantity of work provided. By approving an invoice, PIs indicate that the charges appear appropriate, and work is progressing as planned. Inappropriate expenses and/or problems with performance should be reported immediately to ORSSP.

No-Cost Time Extensions and Other Administrative Actions

If additional time is needed to complete a project and it has an unexpended balance, the PI may request that the period of performance be extended. In some cases, the ORSSP is authorized to approve no-cost time extensions; in other cases, prior approval from the sponsor is required. The PI should initiate extension requests, and they should be processed in accordance with the terms of the sponsored award; in most cases, the countersignature of an authorized institutional office is required. To ensure compliance with the award's reporting requirements, PIs are urged to submit no-cost time extension requests as soon as the need becomes apparent. If final technical reports must be completed after the project end date, and project funds are available to pay the expenses, the PI should obtain a no-cost extension from the sponsor to produce and distribute the reports. If project funds are not available, then the PI, department, or college must identify unrestricted funds to pay final report costs.

The PI is also responsible for identifying and requesting (through the ORSSP) other administrative actions, such as rebudgeting, changing project personnel, reducing PI effort, and similar actions.

Deliverables

The PI must ensure that all deliverables, including reports, are completed as outlined in the award and submitted as scheduled. If a deliverable or report is not submitted through the sponsor's electronic portal, the PI should provide a copy of the report or the transmittal letter (or email) to the ORSSP grant coordinator, so the university has a record of submission.

Project Close-Out

The PI is responsible for overseeing proper closeout of sponsored projects, including timely submission of all required reports (including final technical reports). While central offices prepare and submit final administrative reports, including financial and property reports, they rely on documentation created in the department or by the PI. PIs must assure that this documentation is adequate and readily available. In addition, PIs are responsible for ensuring that any necessary final financial adjustments and documentation (e.g., final invoices from vendors or subrecipients) are received promptly after the award ends. If invoices or expenses are received after submission of the final financial report, submitting a corrected invoice may not be possible