

Roles & Responsibilities

University of Rochester Principal Investigator (PI)

The Principal Investigator (PI) is responsible for the successful completion of activities pertaining to sponsored and unfunded research projects. The Principal Investigator reports to a Chair, Unit Chief or Director (or other designated official) and is responsible for adequate communication to his/her Department/Unit Head and Department Administrative Staff on all aspects of his/her sponsored programs portfolio.

PROPOSAL PREPARATION AND SUBMISSION

General

Keeping all internal deadlines in mind, the PI is responsible for funding proposals submitted through the [Integrated Online Research Administration \(IORA\)](#) system that comply with the requirements outlined in the sponsor's funding opportunity and applicable application instructions. The PI may delegate some preparatory tasks, including IORA entry, to CLASP certified Departmental Administrative Staff. The PI may not, however, delegate their required proposal certification in the IORA system. If the PI's department/unit lacks administrative support for proposal preparation or other sponsored programs administration requirements, he/she retains these tasks or seeks support from the respective department/unit head or Dean.

Technical Proposal

The PI:

- prepares the technical proposal adhering to sponsor requirements and may collaborate with others in its preparation;
- identifies the need for and initiates communications with planned subrecipients;
- determines if additional/new space, facilities, renovations or modifications to space or IT systems are needed, and communicates needs to the Dean's office months prior to proposal submission;
- is responsible for keeping his/her CV or biosketch, and Other/Current and Pending Support updated, with the assistance of Departmental Administrative Staff as necessary;
- ensures that procedures are consistent with sound research design and do not unnecessarily expose subjects/vertebrate animals to risk/harm;
- ensures that study design is appropriate to the proposed hypotheses;
- reasonably expects the research to result in important knowledge.

Proposal Budget:

The PI:

- prepares or directly supervises the preparation of an appropriate budget in IORA and ensures the budget justification mirrors the requested budget;
- determines the applicable Facilities and Administrative (F & A) rate with guidance from the Office of Research and Project Administration (ORPA) and/or the appropriate Dean's Office if necessary;
- obtains an F & A cost waiver from the appropriate Dean's Office via an IORA Ancillary Review, if required;
- requests matching funds or identifies in-kind contributions from appropriate University officials, when necessary or appropriate;
- proposes cost sharing through contributed effort ensuring the cost sharing budget is accurately included in the IORA Funding Proposal;
- seeks approval for all cost sharing, matching or in-kind contributions from appropriate University officials via an IORA Ancillary Review;
- identifies shared F& A cost recovery when faculty from other schools/colleges are significantly involved and seeks approval from appropriate University officials via an IORA Ancillary Review;
- identifies and certifies to the accuracy of 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;
- identifies anticipated program income;

Regulatory Requirements:

The PI:

- prepares the appropriate forms (either at proposal submission or "Just In Time" in accordance with sponsor requirements) required by the Research Subjects Review Board (RSRB) or the Western Institutional Review Board (WIRB), Institutional Biosafety Committee, UR Privacy Board, the University Committee on Animal Resources (UCAR), the Radiation Safety Office and/or the Office of Environmental Health and Safety (EH&S), if the proposal involves:
 - human subjects;
 - live animals as subjects;
 - recombinant DNA, infectious agents, narcotics or biological toxins;
 - human blood or body fluids;
 - radioactive materials and/or ionizing or nonionizing radiation-producing equipment; or
 - hazardous materials
- Protected Health Information (PHI).
- obtains additional collegiate or departmental approvals if necessary, (i.e. the

- Cancer Center Protocol Review or Clinical Research Center (CRC) Review);
- completes an [Intellectual Property Agreement \(IPA\)](#) prior to conducting sponsored research;
- If applicable, [discloses potential conflict of interest](#) to his/her supervisor, Dean and ORPA for appropriate management of the conflict;
- certifies and affirms that he/she is not excluded or debarred from receiving Federal funds, and is not delinquent in student loans;
- identifies potential [Export Control Related Concerns](#) and if applicable provides notification to export@rochester.edu;
- enlists the assistance of [University Procurement](#) and Departmental Administrative Staff to develop a small business subcontracting (MWBE) plan if necessary;
- seeks approval from the [Office of Global Engagement](#) for projects which will establish a research program based outside of the US;
- develops procedure and policy to ensure safe and inclusive working environments for off site research and training in conjunction with appropriate Dean's office(s) if required.

Proposal Routing

The PI:

- prepares, or directly supervises the preparation of the IORA Funding Proposal smartforms;
- reviews and responds to the compliance related fields in the smartforms (this responsibility may **not** be delegated);
- provides certification of the Funding Proposal in IORA confirming all smartform fields are completed accurately (this responsibility cannot be delegated);
- ensures that any NIH defined Multiple Principal Investigators involved in the project complete the [NIH PI Assurance Certification Form](#), and that the form is uploaded into the IORA Funding Proposal;

Post Submission Materials

The PI:

- prepares allowable post submission materials pursuant to the sponsor's policy and provides materials along with submission instructions to ORPA for submission

ACCEPTANCE OF AWARD

Preaward

The PI:

- prepares or obtains documents required by sponsor post peer review (“Just in Time”) and uploads them into the sponsor’s system for ORPA submission;
- determines the need for an Advance Account and collaborates with Departmental Administrative Staff to prepare a [Request for Advance Account Form](#) in IORA;
- determines if any planned sharing of University or intellectual property information with an external party requires protection under a Confidential Disclosure Agreement (CDA) or Data Use Agreement (DUA) and makes the appropriate Agreement request in IORA.

Negotiations with Sponsor

The PI:

- negotiates and approves the project work scope and budget;
- in collaboration with Department Administrative Staff and ORPA, the PI modifies the internal budget or specific aims to align with the award budget provided by the sponsor;
- notifies the appropriate regulatory office if changes to project scope will affect approved protocols;
- obtains approvals if post-award cost sharing becomes necessary;
- requests additional GR5 accounts for cross departmental/college spending if necessary

Acceptance of Award

The PI reviews the activated award in IORA which provides the approved budget and the terms and conditions of the award. the PI may further delegate review of the IORA award to Departmental Administrative Staff.

CONDUCT AND MANAGEMENT OF THE PROJECT

General

The PI should contact appropriate University offices to obtain information about rules and requirements governing their sponsored funding. PIs are responsible for knowing what actions require sponsor prior approval and for obtaining that approval with direction from ORPA. If required by the funding sponsor, the PI must take responsibility for completing responsible conduct of research training.

Individual faculty, as principal investigators, research directors, and mentors, encourage their students and other research personnel to participate in educational programs on the responsible conduct of research or research ethics.

Implementing a Small Business Plan (if required)

The PI:

- directs purchases that are consistent with the approved project budget and the approved purchasing plans (Small Business or MWBE) as applicable;
- or his/her delegate interacts with UR Procurement staff regarding progress toward achievement of purchasing plan goals and reviews periodic reports about goal;
- provides a justification when purchasing plan goals are not achieved.

Conduct of the Research

The PI:

- is responsible for all actions required to manage and complete the scientific and programmatic aspects of the sponsored project;
- initiates programmatic changes to the project and seeks approval from the Sponsor involving ORPA when required;
- initiates project personnel hiring or appointment and approves the assignment of individuals to the project;
- is responsible for communicating staff changes to Departmental Administrative Staff;
- ensures the integrity and safeguarding of notebooks and scientific data and all technical record;
- ensures the completion, accuracy and timeliness of interim programmatic (technical) reports;
- ensures compliance with sponsor's specific data management and sharing requirements.

- initiates and requests subrecipient agreements through IORA;
- ensures the quality, timeliness, and programmatic (technical) performance of subrecipients;
- if using or providing confidential information, data or research materials to or from another source, initiates an appropriate agreement request for the transfer (MTA, CDA, DUA) in IORA and submits the request via IORA.

Budget Management

The PI is responsible for financial accountability. The PI or the Department/Unit Head may delegate some financial accountability tasks to a CLASP-certified member of the Departmental Administrative Staff to act on his or her behalf for account/project management.

The PI:

- initiates purchases;
- determines the allowability and reasonableness of all expenditures, approves them, and provides scientific justification for the transaction, if necessary;
- adheres to Cost Accounting Standards, such as consistency in allocating costs;
- initiates the process of documenting cost sharing and/or matching and ensures that cost sharing obligations are met, allowable and verifiable, including those by third party collaborators;
- initiates requests for rebudgeting per sponsor requirements;
- initiates cost transfer requests consistent with 2 CFR 200;
- identifies and resolves any financial deficit;
- reviews and approves payments of subrecipient invoices for appropriateness according to scope of work progress;
- utilizes University reports for financial monitoring, identifying and resolving errors in a timely manner;
- reviews interim financial statements or reports and approves submission to allow for timely submission;
- documents a monthly review of expenditures;

Program Income

The PI:

- understands the definition of program income;
- identifies all program income and notifies ORPA when program income is identified;
- monitors receipt of program income;
- ensures program income is expended in support of the project
- reviews program income reported to the sponsor by the Office of Research Accounting and Costing Standards (ORACS).

Effort Reporting

The PI:

- signs and certifies to the accuracy of their individual personnel action forms (800, 510,610, 710).
- ensures that all individuals devoting effort to sponsored projects sign and certify their own individual action forms (800, 510, 610. 710).

Inventions

The PI:

- adheres to the principles and policies outlined in the [University's Intellectual Property Policy](#) and the [Conflict of Interest \(COI\) Policy](#);
- initiates the invention disclosure process and completes the Invention Disclosure Form to provide notification to UR Ventures;
- assists in preparing patent applications;
- assists in the processing of copyright registration or other intellectual property protection.

Regulatory Compliance

The PI:

- submits annual and ad hoc Conflict of Interest disclosure (Report of External Financial Interest) in compliance with University policy;
- is responsible for adhering to all educational and training requirements of the RSRB and UCAR;
- adheres to research subjects' protocols and policies, and notifies the RSRB if changes are made to protocols;
- meets continuing RSRB protocol review requirements and assists with inspections;
- adheres to chemical, biological, physical and radiation safety requirements, and notifies the appropriate office if accidents occur;
- adheres to the policies and procedures for using investigational new drugs and/or devices for clinical research;
- participates in the annual cost sharing certification (if applicable)
- participates in the periodic space and equipment survey;
- is responsible for adherence to record retention policy for all financial and scientific documentation;
- is responsible for cooperating in the audit process, whether internal or external audit staff is involved;
- is responsible for accounting of PHI disclosures, as required by HIPAA;
- is responsible for understanding and compliance with all institutional and sponsor policies, practices, and procedures.

Project Closure

The PI:

- prepares the final programmatic (technical) report, which may include contributions by subrecipients or collaborators;
- reviews final financial statements or reports and approves submission to allow for timely submission;
- provides required information for other close out reports, (i.e. patents, equipment)
- retains scientific data in accordance with the [University's Interim Policy on Access and Retention of Data](#).