Award Management: Role & Responsibilities of a Principal Investigator at the University of Maine

The role of the principal investigator is to direct the performance of sponsored research, instructional activities, and programs in compliance with the terms of the sponsor agreement, University policies and procedures, and applicable laws and regulations. While project related tasks may be delegated by the principal investigator to co-investigators, professional staff, students, and other personnel associated with the project, the responsibilities detailed below rest solely with the principal investigator.

PHASE OF GRANT	PRINCIPAL INVESTIGATOR/DEPARTMENT		OFFICE OF RESEARCH ADMINISTRATION	
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Compliance *The compliance requirements listed in this section apply to all phases of the project.*	**COMPLY** with all University of Maine System, University of Maine & governmental policies and procedures related to project management including, but not limited to: All UMS APL and OMB Uniform Guidance and Circulars A-21, A-110, and A-133 (PDF), as applicable	Throughout the life of the grant it is expected that the P.I. will execute the project as outlined in the funded proposal.	Provide guidance and interpretation of award terms and conditions, UMS Administrative practice Letters, University of Maine policies and procedures, OMB Uniform Guidance and Circulars etc.	
	IMMEDIATELY REPORT instances of waste, fraud and abuse of funds relating to the sponsored award to the ORA Director or the Vice President for Research and Dean of the Graduate School	Refer to UMS APL IV-J	Take immediate action to resolve the problem or report the allegation to the appropriate party	Refer to UMS APL IV-J

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	FOLLOW all University of Maine System and University of Maine policies and procedures with regard to human subjects, recombinant DNA and infectious agents, animal care, and radiation safety	The P.I. has the responsibility to notify the appropriate committee or governing body if changes to the project affect required protocols.		
Compliance (continued)	**ADHERE** to the Intellectual Property Policy and the Conflict of Interest Policy (PDF) of the University of Maine	Per the University's Intellectual Property Policy, the P.I. must initiate materials transfer agreements if the project requires biological materials from a source external to UMaine. Initiate the disclosure process through the Department of Industrial Cooperation (for Intellectual Property) and ORA (for Financial Conflict of Interest).		
	COMPLY with Export Control Regulations including Deemed Export Attestation Requirements (PDF)			
Project Start-Up	**REVIEW** and **APPROVE** award agreement	Contact ORA with questions related to the timely implementation of a sponsored award	Receive & log award, negotiate terms, reconcile discrepancies in terms of agreement	Timing is dependent upon award and amount of negotiation/revision needed, if any
	REVIEW and **APPROVE** subawards	As soon as possible	Draw up subawards	Usually, it takes about 2 weeks to create subcontract after the project number is issued.

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	REQUEST an Advance Project - See Advance Project Policy & Procedure (OPAS)	As needed, if a need exists to begin incurring project expenses prior to institutional acceptance of an award	Review Advance Project Requests (OPAS)	As needed
	ADHERE to the certifications and statement made by P.I. at time of PARS submission	Throughout the life of the project	Create project accounts and load budget into PeopleSoft	Can take up to a week from the date the award is 'fully executed'
Award Management	**KNOW** and **COMPLY** with the terms and conditions of award	Confer regularly with the sponsor's program officer and financial administrator, and share all written communications with ORA	Interpretation of terms and conditions of awards	As needed
	Hiring: **FOLLOW** appropriate **HIRING** procedures outlined by the Office of Equal Opportunity and Office of Human Resources	Train, oversee, and evaluate project staff/students subject to the plan contained in the funded proposal and the Office of Human Resources policies and procedures.		
	ENSURE all federal, state, local government, and University safety policies and procedures are enforced and communicated effectively to project personnel **AND** that all personnel supported by and assigned to the project conduct themselves in a professional manner, with respect for the rights of others with whom they interact	The *primary* responsibility of the principal investigator is to ensure the *safety* of personnel and the environment. If training is necessary, it is the principal investigator's responsibility to arrange for training and to properly document that training has occurred at the intervals prescribed by the University's Department of Safety and Environmental Management.		

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	Purchasing: •COMPLY with UMS Purchasing Policies including the Procurement Standards of Conduct (Administrative Practice Letter VII-B, found under 'Procurement' on the UMS Administrative Practice Letters website.) •DON'T move, lend, lease or sell grant/university property prior to obtaining clearance from the Directors of Purchasing & ORA •COMPLY with the applicable OMB Procurement Standards OMB Uniform Guidance, 2 CFR Subpart D, Sections 200.318-200.326		•Provide general guidance on purchasing policies	
Award Management (continued)	**SPEND** according to allowable cost guidelines See UMS APL VIII-C and UMS APL IV-I	Maintain an accurate record of project related expenses and retain documents that provide details on the goods & services procured to execute the project.	•Provide assistance in determining allowable vs. unallowable costs	As needed
	IDENTIFY all program income, propose the allocation of program income, monitor the receipt of program income, and review program income reported by ORA to the project sponsor	Refer to UMS APL VIII-G	•Provide general coordination and guidance, in conjunction with the System Accounting Department, on proper accounting for program income •Report program income as required by Sponsor	Refer to UMS APL VIII-G

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	CONSULT with ORA when budget changes are necessary **Budget Modification** **Budget Reallocation** See UMS APL VIII-I	As needed	•Provide general coordination and guidance on revision of budget and program plans, •Document requests, and subsequent action taken, of approvals for budget and program plan revisions received from P.I.s •Submit requests for revision of budget, when required, to sponsor	As needed
	Review of project account: •**RECONCILE** account •Take immediate action to **RESOLVE** errors/discrepancies, •**REVIEW** all expenses posted to **ENSURE** they are accurate and allowable. •**MAINTAIN** record of review See UMS APL VIII-B	The project account should be reconciled on a *monthly* basis. If auditors or ORA disallow an unauthorized expenditure, the P.I. is responsible for clearing the expenditure either by transferring the charge to another allowable account (e.g. the closing account).	•Has authority to request documentation in support of questioned charges •Monitor project activity as needed •Coordinate periodic financial reviews •Provide general guidance re: budget review & GL Inquiry	As needed
Award Management (continued)	Cost Transfers: Cost Transfers: • **PREPARE** Project Adjustment Form or Labor Distribution Adjustment if necessary • **MAINTAIN** supporting documentation for cost transfers subject to audit See UMS APL VIII-K and Policy & Procedure for Sponsored Project Cost Transfers (PDF)	Requests should be prepared and submitted as soon as the discrepancy is noted; and MUST be submitted within 90 days of the month-end of the originally posted charge.	•Provide general coordination and guidance regarding cost transfers •Approve/deny cost transfer requests •Forward request to Office of Budget & Business Services for processing if approved	As needed

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	Subrecipient monitoring: •**ENSURE** they are fulfilling their obligations •**VERIFY** expenses •**APPROVE** invoices •**MAINTAIN** a record of all correspondence See UMS APL VIII-D	Monthly	• Review levels of risk • Prepare, negotiate, issue and distribute subward agreement • Collect, maintain, & report FFATA data • Activate/encumber subaward funds in PeopleSoft/Marketplace • Request & review annual audit reports • Verify corrective action plans are implemented, if necessary • Receive, track & pay invoices with PI approval • Prepare, negotiate, issue & distribute amendments • Modify subaward encumbrances in financial system • Complete closeout • Help resolve problems that arise during performance	On going
	Progress Reports: **PREPARE** and **SUBMIT** technical reports to sponsor	As described in award terms & conditions	Prepare and submit financial reports to sponsor See UMS APL VIII-J	As described in award terms & conditions
	Effort Certification: **REVIEW** for accuracy **APPROVE** **RETURN** to ORA See UMS APL VIII-E	Within 30 days of receipt	Generate, distribute, collect, record and file Effort Certification reports	Three times per year: Spring, Summer, Fall

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Award Management (continued)	**Sponsor Invoicing:** •**APPROVE** project expenses in a timely manner •**KNOW** sponsor guidelines, only incur allowable expenses •**USE** accurate chartfield combinations (particularly account and fund codes) See UMS APL VIII-C	ASAP after incurred	Sponsor invoicing APL VIII-J	Per terms of agreement
	Modification of awards: **ALERT** ORA if an award needs to be modified (Including but not limited to: Change in scope of project, P.I. &/or key personnel, level of effort, or transfer of work See UMS APL VIII-I	P.I. should report any employee change of status resulting from termination, transfer, death and illness, or anticipated sabbatical leave.	•Provide general coordination and guidance on program plan revision • Document requests, and subsequent action taken, of approvals for program plan revisions received from P.I.s • Submit requests for revision of program plans, when required, to sponsor	As needed
Award Closeout	**APPLY** for No-Cost extension if needed (requested via PARS)	If needed, request extension prior to award end date. **Refer to award terms**. *Generally* a minimum of 30 days prior to end date for **first time requests**. Allow an additional week for processing (By ORA).	Review No-Cost extension requests and submit to sponsor if approved	Allow a week for ORA to review and process request
	OBTAIN from ORA a list of documents necessary to close-out the project (e.g. patents and equipment lists) See UMS APL VIII-L	Prior to award end date	Provide general guidance & technical assistance to P.I./Department re: Close-Out procedures	Ongoing/As needed
	REVIEW expenditures; **RESOLVE** any discrepancies	Prior to award end date		

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Award Closeout (continued)	**CHANGE** employee pay source (or verify stop date on employee data sheet)	Prior to award end date		
	REMOVE/STOP any recurring charges	Prior to award end date		
	REMIND sub-recipient to submit final invoices and reports as described in subaward terms and conditions	Prior to award end date	Sub-recipient close out: Final invoices from sub-recipient, final report etc.	First 30 days after award end date
	COMPLETE final review of project account, look for charges posted after the project end date (and remove)	First 30 days after award end date	Final sponsor invoicing	30-60 days after end date
	Deficit **RESOLUTION**	First 30 days after award end date	•Assist P.I. with deficit resolution •Charge designated closing account if deficit still remains	30-60 days after end date
	ASSISTANCE in award close-out (may be asked to prepare Equipment List, Patent list etc.)	30-60 days after end date	Inform P.I./Dept. of documents needed for close-out	30-60 days after end date
	SUBMIT final technical report to sponsor with **COPY** to ORA	30-60 days after end date	Submit final financial report to sponsor	30-90 days after end date
			Reconcile and close account	30-90 days after end date
			Return remaining funds to sponsor, if applicable	30-90 days after end date
	RETAIN records for 7 years See UMS APL IV-D	It is the P.I.'s responsibility to assure the integrity and security of project notebooks and other records of scientific data generated-by and related-to the project.	Retain records for 7 years See UMS APL IV-D	

Quick Links

- 2 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) https://www.gpo.gov/fdsys/granule/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200/content-detail.html
- Office of Management & Budget Circular A-21 (PDF)
- Office of Management & Budget Circular A-110 (PDF)
- Office of Management & Budget Circular A-133 (PDF)

- UMS Administrative Practice Letter Index: http://www.maine.edu/about-the-system/system-office/finances/administrative-practice-letters/
- Office of Research Administration: http://umaine.edu/ora/