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| <p>Name of Policy: <u>Principal investigator/project director responsibilities on sponsored projects</u></p> <p>Policy Number: 3364-70-22</p> <p>Approving Officer: President</p> <p>Responsible Agent: Senior Director for Research Administration</p> <p>Scope: All University of Toledo Campuses</p> |  <p>Original effective date: May 28, 2009</p> |
| <input checked="" type="checkbox"/> New policy proposal | <input type="checkbox"/> Minor/technical revision of existing policy <input type="checkbox"/> Major revision of existing policy <input type="checkbox"/> Reaffirmation of existing policy |

(A) Policy statement

The process of managing sponsored research awards is a shared responsibility between the principal investigator (“PI”) or project director (“PD”), the staff of the office of research and sponsored programs (“RSP”) and the PI/PD’s department head. Each has unique areas of primary responsibility. The University of Toledo recognizes that the principal investigator PI/PD is the primary individual in charge of a research grant, cooperative agreement, training or public service project, contract or other sponsored project for which the university is the grantee organization or the contractor.

(B) Purpose of policy

The purpose of this policy is to outline the specific responsibilities of PIs and to present an overview of project management with special emphasis on the PI’s role in sponsored projects management.

(C) Eligibility

- (1) Each project must have a PI/PD, authorized by the university, who will execute the project as outlined in the funded proposal, using sound management techniques. The PI/PD must have the skills, knowledge and resources necessary to carry out the proposed research.
- (2) Salaried university faculty members or other qualified salaried university contract employees may serve as PI/PDs on sponsored programs agreements. The PI/PD must be in a position to provide direct, personal, day-to-day oversight of activities and personnel associated with the sponsored program. University-designated emeritus faculty may serve as PI/PDs on sponsored program agreements.
- (3) Research assistant professors, research associate professors, and research professors are entitled to submit proposals as PI or co-PI for the support of

research that may include the faculty member's own salary. These research positions are described in the "Non-Tenure Track Research Faculty" policy.

(D) PI/PD responsibility

The university is, ultimately, legally and financially responsible and accountable to the sponsor for the performance of the activity funded and the proper use of funds. However, without the full cooperation and vigilance of the PI, the university would fail its stewardship role. In the truest sense, therefore, the sponsored programs process is a joint effort between the PI and the university; both must do their part well in order to achieve success. The PI's responsibilities may be divided into two related but distinctly different sets of activities: those activities involving the management of the work of the project, and responsible spending of project funds. While the work of the project should drive the financial activities, sound management practices in both arenas are required. The financial stewardship of sponsored research funds is a shared responsibility with other areas of the university, among them the RSP office, and the PI/PD's department.

- (1) The PI/PD is responsible for all actions required to manage and complete the scientific and programmatic aspects of the sponsored project.
- (2) The PI/PD must comply with all the terms and conditions of a sponsor's award and see that project funds are managed efficiently and effectively within approved budgets.
- (3) The PI/PD initiates hiring or assignment processes and approves the selection or appointment of individuals to the project consistent with the statement of work (or other proposed research plan) and budget of the project.
- (4) When necessary, the PI/PD initiates programmatic changes to the project in consultation with all faculty investigators, and, working with RSP office obtains sponsor approval, as required.
- (5) The PI/PD ensures the integrity of lab notebooks and scientific data.
- (6) The PI/PD ensures the completion, accuracy and timeliness of interim programmatic (technical) reports.
- (7) The PI/PD initiates and approves outgoing subcontract agreements with collaborators at non-UT entities. Subcontract document(s) must be prepared and approved by the RSP office.
- (8) The PI/PD ensures the quality, timeliness, and programmatic (technical) performance of subcontracts.

- (9) The PI/PD agrees to abide by current UT policies on the use of human subjects/vertebrate animals in research, recombinant DNA, infectious agents, radioactive materials and hazardous materials.
 - (10) The PI/PD is responsible for the initial and annual filings of financial disclosure form (RSP 102) for all participants on the project as defined in Code of Federal Regulations Title 42 Part 50, Subpart F. The PI/PD is responsible for notification of his/her department head when there are changes in the status of his/her financial conflict of interest.
 - (11) The PI/PD adheres to research subject protocols and policies, and notifies the appropriate office if changes are made to protocols.
 - (12) The PI/PD meets continuing protocol review requirements and assists with inspections.
 - (13) The PI/PD prepares all final programmatic (technical) narrative and patent reports.
- (E) Multiple PI/PD or Co-PI/PD grants (hereinafter PI/PD), contracts and proposals.

Some funding agencies allow the submission of proposals with multiple PIs/PDs or Co-PI/PDs. The decision to apply for a single PI/PD or multiple PI/PD grant is the responsibility of the investigators and UT, and should be determined by the scope and scientific goals of the project. Multiple PI/PDs (including PI(PD) and co-PIs (co-PDs), if so designated) on a project share the authority and responsibility for leading and directing the project, intellectually and logistically. Each PI/PD is responsible and accountable to the grantee organization, or, as appropriate, to a collaborating organization, for the proper conduct of the project or program, including the preparation and submission of required reports and insuring that expenditures are made consistent with the planned budget. All PI/PDs should be fully engaged in any decisions to change budget priorities and personnel. While UT recognizes the shared responsibilities of multi-PIs/PDs, the first PI/PD listed on the proposal will be considered “primus inter pares” (first among equals).

- (1) Multiple PI/PD leadership plan
 - (a) Some funding agencies require that for applications designating multiple PI/PDs, a “Multiple PI/PD Leadership Plan” should be included at the time of submission. Alternatively, upon funding by the agency a leadership plan will be required prior to activation of the grant. A rationale for choosing a multiple PD/PI approach should be described in the plan. The governance and organizational structure of the leadership team and the research project should be described, including communication plans, process for making decisions on scientific direction, budgetary decisions and procedures for resolving conflicts. The roles and administrative, technical, and scientific

responsibilities for the project or program should be delineated for the PI/PDs and other collaborators. The leadership plan should be signed by the investigators and submitted to the RSP office.

- (b) It is strongly recommended that a leadership plan should be created for any proposal that names multiple investigators.
- (c) In the event that the PI/PDs cannot resolve conflicts over an administrative issue such as described in (E) above, the issue will be presented to the senior director of research administration or his/her designee who will rule on the issue after receiving input from all sides. The senior director of research administration may refer the issue to an appropriate board such as an ad hoc conflicts management committee.
- (d) Any appeals will be resolved by the provost.

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| <p>Approved by:</p> <p><u>/s/ laj</u> Lloyd A Jacobs, M.D. President</p> <p><u>May 28, 2009</u> Date</p> <p><i>Review/Revision Completed by: Senior Director for Research Administration</i></p> | <p>Policies Superseded by This Policy:</p> <ul style="list-style-type: none"> • <i>none</i> <p>Initial effective date: May 28, 2009 Review/Revision Date: Next review date: May 28, 2012</p> |
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