




Florida Agricultural and Mechanical University
Division of Research
Office of Sponsored Programs

INTERNAL OPERATING MEMORANDUM

Memorandum No. 16A.011

Subject:	Principal Investigator Eligibility	
Authority:	Sections 1004.22, Florida Statutes, FAMU Rule 6c3-1.019 entitled "University Code of Conduct"	Date <i>12/8/2015</i>
Related References	FAMU Division of Research Procedures and BOT Policies	
Purpose	The purpose of this procedure is to provide guidance to University faculty and administrative staff requesting project support from either Federal, state or private sources.	
Signature of Approving Authority		

1.0 GENERAL INFORMATION

Full-time or tenure earning faculty are eligible to serve as Principal Investigators/Project Directors on sponsored projects. Any exceptions must be approved by the vice president for research. The request must be made by the department chair and received by the Division of Research five working days prior to any required submission date for the affected proposal. The Office of the Vice President for Research will notify the administering department/center regarding the approval or denial of the request via email.

2.0 RESPONSIBILITIES

2.1 Principal Investigator/Program Director (PI/PD) is responsible for full compliance with institutional policies and procedures, Florida Statutes, Uniform Guidance, funding agencies guidelines, and award terms and conditions. This includes determining the need for goods, equipment and service costs to meet the requirements of the sponsored project. PI/PD is also responsible for submitting and approving the request to encumber funds; monthly review and reconciliation of expenditures; identifying any unallowable costs; ensuring that all requests are in compliance; and routed through the appropriate institutional financial systems for processing by the Office of Sponsored Programs (OSP) for review. The PI/PD is responsible for ensuring that the reporting requirements are fulfilled and will be held accountable for any reporting lapses.

2.2 Department/Division/College/School dean and/or designee is responsible for reviewing and approving faculty/staff members to serve as a principal investigator (PI) for sponsored projects. The department administrator is also responsible for the oversight of sponsored projects submission and awards within their respective units to ensure compliance with the sponsoring agency's guidelines, state and university rules, regulations and laws.

2.3 Office of Sponsored Programs (OSP) is responsible for the review and approval of the proposed budget to ensure compliance with the sponsoring agency's guidelines, state and university rules, regulations and laws. The OSP is also responsible for ensuring proper management and retention of proposal and award documents.

- 2.4 **Office of Contracts and Grants (OCG)** is responsible for invoicing the sponsoring agency for all expenditure costs on sponsored projects, preparation of fiscal reports and ensuring proper management and retention of fiscal documents.
- 2.5 **Office of Organizational Development and Training (OODT)** is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the review and approval of costs charged to sponsored projects, including but not limited to PIs, OSP, OCG and grant administrators.

3.0 GENERAL PROCEDURES

3.1. **Principal Investigator/Program Director (PI/PD)**

The PI/PD is responsible for proposal development and submission to the OSP to meet agency deadline requirements. Responsibilities include, but are not limited to, managing sponsored program, project expenditures, objectives, and reporting requirements upon receipt of award.

- **Pre-Award Process**

1. Identify funding opportunities related to area of expertise.
2. Review sponsor solicitation guidelines.
3. Prepare all internal forms for submission to the OSP.
4. Submit required registration form(s) to OSP for NSF, NIH and any other agency as required, timely.
5. Complete all required training (FCOI, EXPORT, RCR, etc.).
6. Complete required assurances for proposal submission (IACUC, IRB, Biohazards, etc.).
7. Develop the proposal budget and justification.
8. Prepare proposals for submission and routing through College/School utilizing the Proposal Review Transmittal Form (PRTF).
9. Identify cost share requirements and obtain department and provost approvals on the PRTF.
10. Develop proposal to ensure institution policies and procedures are followed.
11. Review proposal for assurance, accuracy, and compliance prior to submission.
12. Identify consultants, collaborators, and subcontracts and provide supporting documentation and FCOI Subaward Disclosure Form(s).
13. Identify equipment needs and provide required quotes. PI should refer to Office of Procurement Services procedures regarding the number of quotes required based on dollar amount requested.
14. Obtain required department/institution approvals prior to submission to the OSP.
15. Ensure timely proposal submission to the OSP for electronic or paper submission.

- **Post-Award Process**

1. Assure regulatory compliance with IACUC, IRB, Biohazards, etc.
2. Review and approve personnel documents on sponsored projects.
3. Review and approve expenditure documents on sponsored projects.
4. Review and approve consultants and subcontract invoices.
5. Monitor expenses and reconcile grant expenditures.
6. Review and approve cost transfers.
7. Prepare and initiate budget modification in line with sponsored guidelines.
8. Submit modification to the OSP for review and approval.
9. Prepare all required programmatic and scientific progress reports.
10. Prepare final technical report.
11. Report any inventions or disclosures.
12. Work closely with the OSP and OCG to ensure project close-out.

13. Maintain proposal and other data documents in accordance with required record retention.

3.2. Department/Division/College/School

Department administrator is responsible for, but not limited to, the following:

- Understanding sponsor solicitation guidelines.
- Assisting with the submission of required registration form(s) to OSP for NSF, NIH and any other agency as required.
- Assisting with the development of the proposal budget and justification.
- Assisting with the preparation of proposals for submission.
- Reviewing and obtaining required department/institution approvals.
- Reviewing budget and proposal for cost share requirements.
- Reviewing proposal so that institution policies and procedures are followed.
- Reviewing proposal for assurance, accuracy, and compliance.
- Assisting with the submission of proposal to the OSP for electronic or paper submission.
- Processing personnel documents through FAMU financial system.
- Providing assistance with request for cost transfers.
- Providing assistance with request for budget modification.
- Providing assistance with project closeout.
- Maintaining proposal and sponsored project documents according to record retention.

3.3. Office of Sponsored Programs (OSP)

The OSP provides oversight and assistance to PI/PI in the acquisition and management of external funds. This includes, but is not limited to, the following:

- Providing administrative review of proposals prior to submission to funding agencies;
- Assisting with the development of proposals for potential sponsoring agencies;
- Serving as a liaison between faculty and other administrative units within the University and between faculty and funding agencies;
- Negotiating awards and preparing subcontracts to other institutions and organizations; and assuring compliance with federal, state and university regulations.
- **Pre-Award**
 1. Review PI eligibility.
 2. Identify funding opportunities and disseminate same via email to colleges and schools.
 3. Understanding sponsor solicitation guidelines.
 4. Review internal forms for compliance.
 5. Register PI's for NSF, NIH and any other agency as required.
 6. Verify completion of required training (FCOI, EXPORT, RCR, etc.).
 7. Verify assurances for proposal submission (IACUC, IRB, Biohazards, etc.).
 8. Review proposal budget and justification.
 9. Identify any cost share requirements and obtain supporting documentation.
 10. Review proposal to ensure institutional policies and procedures are followed.
 11. Review proposal for assurance, accuracy, and compliance prior to submission.
 12. Review consultants, collaborators, and subcontractors' information and ensure appropriate supporting documentation is obtained including Visual Compliance, Risk Assessment, and Subrecipient Certification Form.
 13. Review equipment requests and quotes for documentation.
 14. Review application for required department/institution approvals.
 15. Ensure timely proposal submission to agency for electronic or paper submission.

Post-Award

1. Set-up project according to Notice of Grant Award.

2. Assure regulatory compliance with IACUC, IRB, Biohazards, etc.
3. Review and process personnel documents on sponsored projects.
4. Review and process expenditure documents on sponsored projects.
5. Initiate and execute subcontract(s).
6. Review and approve subcontract invoices and monitoring.
7. Ensure subcontractors' payment and closeouts are completed.
8. Review and process consultant invoices.
9. Monitor sponsored project expenditures according to terms and conditions of award.
10. Review and approve cost transfers.
11. Review and approve budget modification in line with sponsored guidelines and obtain Visual Compliance, Risk Assessment, and Subrecipient Certification Form, as applicable.
12. Work with PI to ensure required programmatic and scientific progresses are submitted.
13. Work closely with PI to ensure institution closeout.
14. Maintain proposal documents in accordance with required record retention.

3.4 Office of Contracts and Grants (OCG)

- Invoice sponsoring agency for all expenditures charged on sponsored projects.
- Prepare fiscal reports.
- Maintain financial reporting information for proper management and retention.

3.5 Office of Organizational Development and Training

- Advancement and coordination of training on regulatory requirements for all individuals with responsibilities in the review and approval of cost charged to sponsored projects, including but not limited to PIs, OSP staff, OCG staff and grant administrators.

4.0 RECORDS

- The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.