**Principal Investigator/Project Director**

**Description of Responsibilities and Eligibility Status Guidance**

# **DEFINITIONS**

*Note: the roles of Principal Investigator, Project Director, Co-Principal Investigator, and Co-Project Director are assigned at the time of proposal development. After award notification, these roles cannot be re-assigned or delegated without prior approval from the sponsor.*

# What is a Principal Investigator (PI)?

A person taking on the role of PI on a sponsored project assumes fiscal and legal responsibilities for the purposes of assuring that the terms of the award are met, and the policies of the campus are followed. PIs are responsible for directing and overseeing the project from the proposal development stage to award closeout, and are accountable for proper program conduct including the submission of all required reports. Throughout the life of the project, the Office of Sponsored Programs & Research Compliance (SPRC) provides support and guidance PIs to ensure that all responsibilities on the project are being met.

# What is a Project Director (PD)?

A PD carries all the same responsibilities as a PI. This term is generally utilized for service-related projects, while the term “PI” generally is used for projects that conduct scientific research. For the purposes of this document, the term “PI” is interchangeable with the term “PD”.

# What is a Co-PI/Co-PD?

A Co-PI/Co-PD shares leadership responsibilities for a project with the PI, and is expected to contribute substantively to the development, direction, and execution of the project. The Co-PI shares responsibility with the PI for ensuring that milestones are achieved and contracted deliverables are completed on time. The PI remains the lead of the project and serves as the main point of contact with the sponsor. The presence of more than one identified PI on a project does not diminish the responsibility or the accountability of any individual PI/PD.

# **PI/PD RESPONSIBILITIES**

# Pre-Award Responsibilities

PI/PDs and Co-PI/Co-PDs are primarily responsible for developing proposals that are compliant with institutional and sponsor financial and administrative policies and regulations.

## Detailed Description of Pre-Award Responsibilities (click arrow to expand)

* + Notifying SPRC, department leadership, and any collaborating departments’ leadership of intent to submit with ample lead time prior to deadline.
  + Thoroughly reviewing all sponsor program requirements.
  + Preparing all components of the technical proposal (narratives, budget justifications, biosketches/CVs, etc).
  + Working with SPRC in developing and finalizing budgets, including identifying matching funds (if required), and obtaining all necessary institutional approvals.
  + Disclosing all potentially significant conflict of interest situations (SPRC will provide an electronic form to be completed).
  + Ensuring that a proposal package is complete and responsive to all sponsor requirements prior to proposal submission.\*

*\*Proposals are submitted by the appropriate Authorized Organizational Representative (AOR) in SPRC, after all necessary institutional approvals have been obtained. Proposals submitted without institutional approval may be withdrawn or declined.*

# Award Notification and Account Establishment Responsibilities

At the time of award notification, PI/PDs should contact SPRC as soon as possible to begin the award establishment process. PI/PDs should thoroughly review all award notifications, agreement documents, and sponsor requests for additional information. PI/PDs must also be prepared to make adjustments to the scope of work or budget if requested by the sponsor or if dictated by award terms and conditions. Project activity must not begin until an award account is established.

## Detailed Description of Award Notification and Account Establishment Responsibilities (click arrow to expand)

* + Providing assurance that the project is achievable within the parameters of the funding and terms and conditions, and will abide by all applicable laws, regulations and institutional policies, procedures and directives for the proper administration of sponsored projects.\*\*
  + Prior to the start of any project activity, obtaining appropriate institutional approvals from HREB, AUCC or the Biosafety Committee if the project involves human subjects, live animal research, or hazardous materials.\*\*
  + Also prior to the start of any project activity, completing and/or maintaining any mandated trainings that may be required as part of the sponsor’s terms and conditions or campus policies (e.g., CITI PHS Conflict of Interest Training module).\*\*

*\*\*SPRC will provide forms and info for the PI/PD to meet these requirements, and also will establish award accounts for the project once all requirements have been met. Project activity should not begin until an award account is established, to ensure compliance with all applicable federal, state, and university policies, procedures, and laws*.

# Post-Award Responsibilities

The PD/PI has primary responsibility for conducting, managing and achieving the technical success of the project, while complying with all award terms and conditions, as well as all applicable federal, state, and university policies, procedures, and laws.

### Detailed Descriptions of Post-Award Responsibilities (click arrow to expand)

#### Budget Management

* + Authorizing only those expenditures which are reasonable and necessary to accomplish the project goals, will be used during the project period, and are consistent with the sponsor’s terms and conditions.
  + Spending no more than amounts authorized by the sponsor within budget categories and the project period.
  + Charging project costs to the appropriate project account(s).
  + Documenting institutional and/or other cost share commitments.
  + Certifying project employee effort and hourly timesheets, and ensuring that personnel time charged to the project accurately reflects employees’ time worked on the project during the period.
  + Ensuring payments to Independent Contractors are made in a timely manner.
  + Certifying all subrecipient expenses.
  + Following all authorization procedures for equipment, business travel, supplies and other OTPS expenses.
  + Collaborating with SPRC in completing financial reports in a timely manner, requesting sponsor approval for extensions or budget modifications, and submitting any other necessary project reports as per the terms and conditions of the award.
  + Accepting fiscal responsibility on behalf of the PI/PD’s department, administrative unit, and/or campus in the case the project is over-extended or an unauthorized expenditure is disallowed by the sponsor or auditors (in such cases the academic unit must cover the cost).

#### Research or Project Conduct

* + Ensuring that the project is completed in an ethical and professional manner.
  + Identifying, assigning and supervising all project personnel.
  + Working with RF Personnel Services Manager to ensure project personnel paperwork (new hire forms, etc.) are fully processed prior to employees beginning work on the project.
  + Communicating staff changes in a timely manner to SPRC, RF Personnel Services and the sponsor.
  + Ensuring the integrity of project data, and safeguarding any sensitive data as per the project Data Management Plan.
  + Ensuring the completion, accuracy and timeliness of programmatic (technical) reports.
  + Ensuring the quality, timeliness, and programmatic (technical) performance of subrecipients.

#### Regulatory Compliance

* + Adhering to record retention policies for all financial and scientific/technical documentation.
  + Compliance with internal or external program audits.
  + Understanding and complying with all institutional and sponsor policies, practices, and procedures.
  + Adhering to safety requirements, and notifying the appropriate office if accidents occur.
  + Maintaining compliance with all HREB, AUCC and Biosafety rules and requirements, and notifying the appropriate committee if changes are made to protocols.
  + Disclosing all changes in conflict of interest status within 30 days of the status change.

#### Project Closeout

* + Providing final review and certification for final financial reports, assuring that all expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the award.
  + Preparing and submitting the final programmatic (technical) narrative report, which may include contributions by subrecipients or collaborators.

# **PI/PD ELIGIBILITY**

# How does one qualify for PI Status? i.e., Who can be a PI?

SUNY New Paltz currently defines PI Status as “the eligibility to submit proposals for research, training, or public service contracts or grants to external sponsors.” The College requires an individual to have active PI Status prior to the Office of Sponsored Programs & Research Compliance (SPRC) being permitted to commence effort on a proposal for external funding.

Anyone seeking to hold the role of PI, PD, Co-PI, or Co-PD must have PI status through one of the means described below.

## **Tenure-track academic faculty and professional faculty**

at budget titles of SL 3 and above are conveyed PI Status by virtue of their appointment.

## **Contingent faculty**

must request PI Status, as their obligation to the College does not extend beyond their employment term and their work obligations do not include conducting research that is unrelated to their term teaching obligation.

## **Retired faculty with Emeritus Status**

SUNY New Paltz requires that faculty with Emeritus status request approval for PI Status for each individual project. Emeritus faculty should formally request approval for PI Status via an email to the Provost prior to developing or submitting proposals.

## **Individuals with no active working relationship with the College**

must establish an official relationship (such as a Visiting Scholar/Researcher appointment) before they would be eligible to request PI status.