ROLES OF INDIVIDUALS ON A&S SPONSORED PROGRAMS

Principal Investigator

The Principal Investigator is the primary individual in charge of a research grant, cooperative agreement, training or public service project, contract, or other sponsored project. The Principal Investigator reports to a Department Chair or other designated official. Note that while most funding agencies refer to “Principal Investigator”, others may use terms such as “Project Director”, “Program Director”, etc. to describe this individual.

Proposal Preparation and Submission

General

- The Principal Investigator confirms that the entire proposal meets requirements outlined in the Request for Applications, Request for Proposals, or other application instructions. Requirement examples include dollar limits, page limitations, font type and size, deadlines, and mailing addresses. While the Principal Investigator may delegate this responsibility to staff members, the Principal Investigator remains responsible for the final report.
- The Principal Investigator is the person charged with responsibility for decision making on sponsored projects at East Carolina University.
- ALL proposals for sponsored projects MUST be submitted to the East Carolina University Office of Sponsored Programs PRIOR to submission to funding agencies.

Technical Proposal

- The Principal Investigator may collaborate with others in the development of the research plan, but the Principal Investigator maintains overall responsibility for content and preparation of the research plan contained within the proposal.
- The Principal Investigator identifies the need for subcontracts.
- If on- or off-campus space in addition to that already assigned to the Principal Investigator is needed, the Principal Investigator identifies the need and requests it from her or his Department Chair.
- If the on-campus space needs modifications or renovations, the Principal Investigator requests these changes from her/his Department Chair.

Proposal Budget

- The Principal Investigator prepares or directly supervises the preparation of the budget and its justification in compliance with sponsored requirements, as well as East Carolina University, University of North Carolina System, State, and Federal laws and regulations.
- The Principal Investigator identifies the correct Facilities & Administrative (F&A) rate [also called the Indirect Cost Rate (ICR) or overhead rate] from the negotiated rates.
- If the F&A rate for the proposal is less than the approved institutional rate, the Principal Investigator provides justification, and requests reduction in F&A rate via RAMSES;
- In those cases where the sponsor documents the maximum F&A rate is less than the approved institutional rate, the Principal Investigator must attach a copy of this documentation in RAMSES;
ROLES OF INDIVIDUALS

Principal Investigator (continued)

- The Principal Investigator only documents capital equipment items that have a cost of $5,000 or more.
- The Principal Investigator requests an F&A cost waiver, if a requirement of the sponsor.
- The Principal Investigator requests matching funds, if a requirement of the sponsor.
- The Principal Investigator proposes cost sharing through contributed effort, if a requirement of the sponsor.
- The Principal Investigator identifies and specifies all effort of those participating in the project.
- The Principal Investigator identifies all available financial resources in direct support of this or other research endeavors (other support).
- The Principal Investigator identifies subcontractors in accordance with East Carolina University, University of North Carolina System, State, and Federal laws and regulations.
- The Principal Investigator identifies separately any extra compensation to be paid, and provides justification for such amounts in accordance with East Carolina University, University of North Carolina System, State, and Federal laws and regulations.
- The Principal Investigator identifies anticipated program income.
- The Principal Investigator identifies anticipated intellectual property.

Regulatory Requirements

The Principal Investigator prepares the appropriate forms from the Institutional Review Board (IRB), the Institutional Animal Care and Use Committee (IACUC), the Institutional Biosafety Committee or the Department of Safety and Risk Management if the proposal involves:

- human subjects;
- live animals as subjects;
- recombinant DNA, infectious agents, biohazardous agents or biological toxins;
- human blood or body fluids;
- radioactive materials and/or ionizing or nonionizing radiation-producing equipment; or hazardous materials in an off-campus space.

If a potentially significant conflict of interest situation exists, the Principal Investigator prepares a COI Disclosure Form and submits to their Department Chair.

- The Principal Investigator ensures approval of all forms is secured prior to the award date, depending on requirements of agency sponsor.
- The Principal Investigator must obtain IRB, IACUC and/or IBC approval prior to project start date. The Principal Investigator is responsible for uploading their approvals in RAMSES.
- The Principal Investigator is responsible for adhering to all federal compliance regulations when conducting research.
- The Principal Investigator is responsible for any research conducted by one of their students.
- The Principal Investigator is responsible for renewing yearly protocols and notifying the IRB, IACUC and/or IBC of amendments, modifications or adverse events.
Proposal Approvals

- The Principal Investigator prepares, or directly supervises the preparation of, RAMSES.
- The Principal Investigator reads and understands relevant policies and certifications identified in RAMSES.
- The Principal Investigator has responsibility for ensuring that answers are provided to ALL questions in RAMSES.
- If other departments and colleges are involved, the Principal Investigator provides this information, and ensures they are included in the approval routing chain.
- The Principal Investigator signs/certifies the proposal in RAMSES. *This responsibility cannot be delegated* and electronic signature certifies that each item in RAMSES is filled-out completely and accurately.

Acceptance of the Award

Pre-award

- As appropriate, the Principal Investigator reviews and approves the Notice of Grant Award (NOGA), which contains the terms and conditions of the award.
- If the NOGA is sent directly from the funding agency to the Principal Investigator, she or he must submit it to the Office of Sponsored Programs within 7 calendar days in order to establish an account.
- If approved budget differs from proposed budget, the Principal Investigator is obligated to provide the Office of Sponsored Programs a revised budget within 7 calendar days in order to establish an account.
- The Principal Investigator obtains approvals if cost sharing becomes necessary.
- The Principal Investigator obtains compliance approvals as required.

Pre-award Account and Advance Accounts Requests

- Obtains Financial Guarantee, if needed.

Negotiations with Sponsor

- The Principal Investigator negotiates and approves the project scope.
- The Principal Investigator in collaboration with the Office of Sponsored Programs modifies the project budget in line with the award budget provided by the sponsor.
- The Principal Investigator notifies the Office of Research and the Office of Sponsored Programs about the changes in project scope and budget.
- The Principal Investigator notifies the appropriate regulatory office if changes to project scope will affect approved protocols.
Principal Investigator (continued)

**Conduct and Management of the Project**

**Conduct of the Research**
- The Principal Investigator ensures his/her students and other research personnel maintain the highest ethical standards in the use of project resources and the overall conduct of research;
- The Principal Investigator is responsible for all actions required to manage and complete the programmatic aspects of the sponsored project.
- The Principal Investigator initiates programmatic changes to the project.
- The Principal Investigator initiates the hiring or assignment process and approves the selection or appointment of individuals to the project.
- The Principal Investigator ensures the integrity and safeguarding of notebooks and data.
- The Principal Investigator ensures the completion, accuracy and timeliness of interim programmatic (technical) reports.
- The Principal Investigator initiates and approves subcontract agreements prepared by Office of Sponsored Programs.
- The Principal Investigator ensures the quality, timeliness, and programmatic (technical) performance of subcontracts.
- The Principal Investigator is responsible for attending required and appropriate training related to their project.
- The Principal Investigator is responsible for obtaining appropriate training certification for human subjects, animal subjects, research ethics and biosafety.
- The Principal Investigator is responsible for reporting adverse events and research misconduct.
- If using biological materials from another source, the Principal Investigator initiates a materials transfer agreement.

**Budget Management**
- The Principal Investigator initiates purchases.
- At the time expenditures are requested, the Principal Investigator determines the allowability and reasonableness of all expenditures.
- The Principal Investigator initiates the process of documenting required cost sharing and/or matching.
- The Principal Investigator initiates requests for rebudgeting as the sponsor requires.
- The Principal Investigator initiates cost transfer requests.
- The Principal Investigator identifies and proposes a resolution of any overspending.
- The Principal Investigator approves payments of subcontractor invoices.
- The Principal Investigator utilizes financial system reports for monitoring expenditures and identifies and resolves errors on the account in a timely manner.
Principal Investigator (continued)

- The Principal Investigator is responsible for providing interim financial reports as requested.
- The Principal Investigator reviews the financial system reports each month for appropriateness, correctness, and completeness.
- If appropriate at budget period end, the Principal Investigator requests that remaining balances be carried forward or no-cost extensions.

Program Income
- The Principal Investigator identifies all program income generated.
- The Principal Investigator initiates the processes and proposes the allocation of program income.
- The Principal Investigator monitors receipt of program income.
- The Principal Investigator reviews program income reported to the sponsor by Office of Grants and Contracts.

Effort Reporting
- The Principal Investigator complies with effort reporting policy by assuring the accurate completion and timely return of effort reports to the Office of Grants and Contracts.

Inventions
- The Principal Investigator adheres to the principles and policies outlined in the Intellectual Property Policy and the Conflict of Interest Policy.
- The Principal Investigator initiates the disclosure process and completes the Invention Disclosure Form in order to notify Technology Transfer Office and the Department Chair.
- The Principal Investigator assists in preparing patent applications.
- The Principal Investigator initiates the processing of copyrights.
- The Principal Investigator assists in processing licensing agreements.

Research Regulatory Compliance
- The Principal Investigator is responsible for any research conducted by one of their students.
- If a potential conflict of interest situation exists, the Principal Investigator discloses that to her/his Department Chair.
- The Principal Investigator adheres to animal and human subjects’ protocols and policies, and notifies the appropriate office if changes are made to protocols.
- The Principal Investigator meets continuing protocol review requirements and assists with inspections.
- The Principal Investigator adheres to protocol review, requirements for research using recombinant DNA, infectious agents, select agents, biohazardous agents, or biological toxins.
- The Principal Investigator adheres to chemical, biological, physical and radiation safety requirements, and notifies the appropriate office if any adverse events or accidents occur.
Principal Investigator (continued)

Project Closure
- The Principal Investigator prepares the final technical narrative report and provides a paper or electronic copy to the Office of Sponsored Programs or in RAMSES.
- The Principal Investigator provides information such as cost share and matching documentation for preparation of final financial report.
- The Principal Investigator provides information on other closing reports, such as for patents and on equipment.
- The Principal Investigator retains the data on behalf of East Carolina University.

Co-Principal Investigators, Co-Directors and Co-Investigators

Co-Principal Investigators and Co-Directors
- In some cases, more than one individual is considered as being responsible for the administrative and fiscal conduct of the project.
- Each person can be named in the proposal and on project documentation as a co-Principal Investigator or Co-Director, provided this role is accepted by the sponsor.
- These individuals must be assigned their role in RAMSES (certification is optional, but strongly recommended). (Note that some sponsors, (e.g., NIH) do not allow co-Principal Investigators to be named on projects.)
- Although the project may have several co-Principal Investigators, one person must be designated as the project leader or Lead Principal Investigator. This person bears overall fiscal and administrative responsibility for conducting the project, for meeting the terms and conditions of the award, and for representing the project to the sponsor. This person will be listed first on the proposal and will be listed in RAMSES as the Lead Principal Investigator.

Co-Investigators
- In some cases, several individuals conduct the research portion of the project. One of these investigators is also given fiscal and administrative responsibility over the project. This individual is designated as the Principal Investigator while the other investigators will be considered as Co-Investigators, provided the sponsor accepts the role of Co-Investigator.
- If Co-Investigators are named in the proposal, they all must be listed in RAMSES (certification is optional, but strongly recommended).
- Although some tasks may be delegated, the Principal Investigator continues to bear overall fiscal and administrative responsibility for conducting the project, for meeting the terms and conditions of the award, and for representing the project to the sponsor.

Student and Post-Doctoral Researchers

Undergraduate Students
As Research Staff:
Undergraduate students are usually appointed as research assistants on sponsored projects.
ROLES OF INDIVIDUALS

Principal Investigator (continued)

As Investigators:
Undergraduate students cannot serve as Principal Investigators or co-Investigators on sponsored projects.

Graduate Students
As Research Staff:
Graduate students can be appointed to a number of research staff positions on sponsored projects.

As Investigators:
Some sponsors accept proposals submitted by faculty members on behalf of graduate students. In these cases, the faculty member serves as the Lead Principal Investigator on paper, but in a mentorship role for the student, in day-to-day activities, and the student acts as a co-investigator on the project. As a co-investigator, the graduate student must fulfill the responsibilities listed in the section on Co-Investigators.

Individuals holding Graduate Assistant appointments are eligible to serve as Principal Investigators on sponsored projects/fellowships that the funding agency has specified as programs for which graduate students are eligible. A faculty member must serve as Co-Investigator. In these cases, these individuals must fulfill the responsibilities outlined in the section on Principal Investigators. The Department Chair will require agreement of advisors if graduate students serve as Principal Investigators.

Post-Doctoral Fellows or Associates
As Research Staff:
Post-Doctoral fellows or associates may be appointed a number of research staff positions on sponsored projects.

As Investigators:
Post-doctoral fellows or associates may also serve as Principal Investigators. In such cases, these individuals must fulfill the responsibilities outlined in the section on Principal Investigators. The Department Chair will require agreement of advisors if Post-Doctoral Fellows or Associates serve as Principal Investigators.
ROLES OF INDIVIDUALS

Department Administrator

General
Administrative Staff at the Department and Dean's office levels provide administrative support for one or more sponsored projects. Included in the Administrative Staff category are a wide variety of duties and position titles, including department administrator, grants administrator, accounts manager, accounts specialist, accounts assistant, etc. Department administrators normally are responsible for a broad range of administrative duties on behalf of their chair, faculty and other support staff. For these administrators, sponsored program administration may be an “additional duty” that they fit in with their normal duties. Some larger departments may have a dedicated Grants Administrator whose primary duty is to assist principle investigators with the management of their sponsored programs. Depending on their appointment, they assist principle investigators as appropriate:

- With respect to financial management of sponsored accounts, Department Administrative Staff are either "preparers" or "approvers."
- Preparers complete and process financial, human resource and other electronic and paper transaction documents;
- Designated Approvers approve and monitor documents prepared by others.
- Whereas a department may have many Preparers, the number of Designated Approvers will be fewer.
- Because the Designated Approver monitors documents completed by Preparers, a Designated Approver cannot be the same person as a Preparer.
- Department Administrative Staff report directly to their supervisor(s) in the department (e.g., Department Chair, Department Administrator, Principal Investigator, etc.).

Proposal Preparation and Submission

Proposal Budget
- Depending on their position within the department, Department Administrative Staff may prepare proposal documents, provide information for the budget and its justification, and/or assist the PI with processing a proposal via RAMSES. Some grants administrators may also participate in preparing the proposal budget, all in accordance with East Carolina University, University of North Carolina System, State, and Federal laws and regulations.
- Department Administrative Staff may also assist in processing requests for matching/in-kind funds if a requirement of the sponsor.

Acceptance of the Award

Negotiations with Sponsor
Department Administrative Staff assist the Principal Investigator, as needed, in negotiations with sponsors on project scope and budget.
Department Administrator (continued)

### Conduct and Management of the Project

#### Conduct of the Research
- Department Administrative Staff may gather information on subcontracts and notify the Office of Sponsored Programs of their progress and of any problems that may have arisen.
- Department Administrative Staff may prepare documents and provide information for appointment of individuals to project.

#### Budget Management
- Department Administrative Staff may expedite the documentation of required cost sharing and/or matching/in-kind.
- Department Administrative Staff may prepare documents and provide information for rebudgeting.
- Department Administrative Staff provide information to resolve overdrafts.
- Department Administrative Staff may assist in developing interim financial reports as requested.
- Department Administrative Staff assist with the preparation of documents for cost transfers.
- Department Administrative Staff approve financial transactions.

#### Program Income
- Department Administrative Staff may prepare and process documents and provide information for recording program income;
- Department Administrative Staff verify receipt of program income.

#### Effort Reporting
- Department Administrative Staff assist Principal Investigators in the accurate completion and return of the effort reports.

#### Project Closure
- Department Administrative Staff may provide information for the final financial report.
- Department Administrative Staff may provide information for other closing reports, such as equipment.
ROLES OF INDIVIDUALS

Designated Approver

A Designated Approver is a departmental or collegiate staff person who has been given authority by the Department Chair to review and approve or reject certain financial transactions involving sponsored funds.

Conduct and Management of the Project

General

- The Designated Approver approves or denies financial transactions on sponsored accounts.
- The Designated Approver gathers the information needed to make a well informed decision regarding a transaction.
- For any transaction determined to be unallowable, the Designated Approver communicates and documents the rationale used for making the decision.
- The Designated Approver provides information and guidance on policies and procedures related to sponsored project management.

Budget Management

- The Designated Approver approves financial transactions.
- The Designated Approver reviews allowability and reasonableness and either approves or denies purchases, including expenditures involving travel, goods and services.
- The Designated Approver reviews allowability and reasonableness and either approves or denies cost transfer requests.
ROLES OF INDIVIDUALS

Department Chair

A Department Chair is an academic leader with programmatic, managerial and fiscal responsibilities for a designated area, such as a department, division, school or center.

The Department Chair reports to a Dean.

Proposal Preparation and Submission

General

The Department Chair reviews the proposal for the following elements and either provides approval (via electronic signature in RAMSES) or returns it for issue resolution:

- the Principal Investigator is academically eligible to conduct the project;
- the Principal Investigator can manage the project effectively.

Technical Proposal

- The Department Chair reviews the technical proposal for space-related issues and either provides approval (via electronic signature in RAMSES) or returns it for issue resolution.
- If successful conduct of the project requires additional space, or modification renovation of existing or other space, the Department Chair informs the Dean and negotiates the space.

Proposal Budget

The Department Chair reviews the proposal for the following elements and either provides approval (via electronic signature in RAMSES) or returns it for issue resolution:

- the budget is adequate relative to the project scope and its justification is appropriate;
- if required, cost sharing through contributed effort is appropriate;
- matching hard dollars, if required are available and documented;
- support from other sources is appropriate, documented and fully disclosed.
- The Department Chair reviews indirect cost/F&A rate reduction or waiver requests and either agrees with and expedites the request or returns it for issue resolution.
- The Department Chair reviews and approves any required matching or cost sharing of funds and provides source of such funds.
- The Department Chair reviews and approves effort of all staff committed by Principal Investigator.
- The Department Chair reviews the proposal and ensures Department’s compliance with East Carolina University, University of North Carolina System, State, and Federal laws and regulations as it relates to the proposal and any resultant award (by signing the Proposal Routing Form) or returns it for issue resolution.

Regulatory Requirements

- The Department Chair provides local oversight for research using human and animal subjects, research using recombinant DNA, infectious agents, select agents, biological toxins, or other biohazardous agents, or radioisotopes.
Department Chair (continued)

- The Department Chair signs off on all IRB applications submitted by their faculty, staff or students assuring that the research protocol is complete and is scientifically valid.
- If a potentially significant conflict of interest situation exists in any aspect of sponsored project management, the Department Chair reviews and recommends a resolution to the employee and notifies the Dean, the RGS Compliance Office, and the ECU Legal Counsel.

RAMSES Approvals

- The Department Chair reviews the proposal in RAMSES for completeness and accuracy and either approves or returns (rejects) it for issue resolution.

Conduct and Management of the Project

General

- The Department Chair designates the Designated Department Approver, if needed, for the sponsored account.
- The Department Chair ensures that individuals involved in sponsored project activities have completed appropriate formal training course(s) provided by the Office of Research, Sponsored Programs, Compliance Offices and Grants Administration.
- The Department Chair has University approval to delegate authority for sponsored project management tasks to appropriately trained individuals.
- The Department Chair provides oversight on implementation of East Carolina University, University of North Carolina System, State, and Federal laws and regulations at the departmental level.

Conduct of the Research

- The Department Chair reviews programmatic changes to the project and provides local oversight.
- The Department Chair provides local oversight over appointment of individuals to the project.

Budget Management

- The Department Chair maintains local oversight for the project budget and the allowability and reasonableness of all expenditures.
- The Department Chair reviews proposed resolution of overdrafts and either approves them or returns them for issue resolution.
Department Chair (continued)

- The Department Chair reviews rebudgeting requests and either approves them or returns them for issue resolution. The Department Chair notifies the Dean of rebudgeting in cases in which rebudgeting has an impact on resources in the Department or Dean's office.
- The Department Chair approves some salary cost transfer requests and provides institutional oversight;
- The Department Chair has responsibility for local oversight of the project budget.

Program Income

- The Department Chair has oversight over monitoring program income.

Effort Reporting

- The Department Chair provides local oversight over effort reporting.

Inventions

- The Department Chair reviews Invention Disclosure Forms submitted by faculty, staff or students.

Research Regulatory Compliance

If the project involves the following elements, the Department Chair provides local oversight:
- human subjects;
- live animals as subjects;
- human blood or body fluids;
- radioactive materials and/or ionizing or nonionizing radiation producing equipment;
- recombinant DNA, infectious agents, select agents, hazardous agents or biological toxins.

If a potential conflict of interest may occur, the Department Chair reviews the COI Disclosure Statement and with assistance from the Dean and Compliance Office recommends a resolution.

Project Closure

- The Department Chair, in conjunction with the Office of Grants and Contracts assists in resolving issues related to late payment and problems with collection of awarded funds.
- The Department Chair provides local oversight over record retention.
ROLES OF INDIVIDUALS

The Dean

Deans are academic leaders that have programmatic, managerial and fiscal responsibilities for a college or school, and report to the Provost.

The Dean's office, the administrative center for a school or college, may include one or more Associate Deans, who report to the Dean, as well as administrative staff. In the college, the Associate Dean for Research is delegated the authority to act on the Dean’s behalf in matters relating to research.

In the list that follows, reference to the Dean implies the Associate Dean for Research.

Proposal Preparation

General

- When the Principal Investigator is a Department Chair or other individual reporting directly to the Dean, the Dean reviews the proposal with regard to the following criteria and either approves the application (via authorization in RAMSES) or returns it for issue resolution:
  - the Principal Investigator is academically eligible to conduct the project;
  - the Principal Investigator can manage the project effectively.
- When multiple departments or other colleges are involved, the Dean collaborates with other college Deans/Associate Deans to establish how the following items (which may not represent all elements that need to be considered) will be distributed/shared between Departments expected to participate in the activities of the project:
  - award amounts,
  - F&A returns,
  - budgets,
  - authorizations
- The Dean approves any required matching or cost sharing of funds and provides source of such funds.
- In any other case when it is deemed necessary and prudent to do so, the Dean reviews the proposal and either approves it (via authorization in RAMSES) or returns it for issue resolution.

Technical Proposal

- When there is a request for off-campus space or modification of on-campus space, the Dean reviews the proposal and either approves it (via authorization in RAMSES) or returns it for issue resolution.
The Dean (continued)

Proposal Budget
- When any of the following issues are present, the Dean reviews the proposal and either approves it (via authorization in RAMSES) or returns it for issue resolution:
  - there is a request to reduce or waive F&A/indirect cost rates;
  - there is a request to the Dean’s Office to provide the matching funds;
  - there is a request to the Dean’s Office to provide additional resources to support the research.
- The Dean provides local oversight over cost sharing, matching and budget development.
- The Dean, when notified by the Department Chair, reviews support from other sources and attests to its appropriateness.
- The Dean reviews all elements of proposal for compliance with East Carolina University, University of North Carolina System, State and Federal laws and regulations.

Regulatory Requirements
- The Dean approves conflict-of-interest resolutions or requests a proposed Conflict Management Plan from the Principal Investigator. As necessary, refers the matter to the the Office of Research Compliance Administration and/or Legal Counsel, and provides local oversight.

Proposal Routing Form
- As necessary, the Dean reviews the form for specific issues and either approves the document or returns it for issue resolution.

Preaward Account and Advance Account Requests
- The Dean approves requests for the establishment of a Pre-award or Advance Account (Financial Guarantee) via authorization in RAMSES.

Conduct and Management of the Project

Budget Management
- The Dean provides local oversight for:
  - rebudgeting, when appropriate, when notified by the Department Chair;
  - OMB Circular A-21 issues;
  - cost sharing through contributed effort; and
  - expenditures of matching dollars.
- The Dean develops a conflict of interest resolution plan if required.
- The Dean is responsible for authenticating that departments have reconciled their sponsored accounts at least monthly.
Program Income

- The Dean provides local oversight on program income activity.

Inventions

- The Dean reviews Invention Disclosure forms submitted to the Technology Transfer Office.
- The Dean reviews licensing agreements provided by the Director of Technology Transfer.

Regulatory Compliance

- The Dean may delegate authority to the Associate Deans and/or Department Chair to assure:
  - adherence to animal and human research subjects protocols and policies;
  - adherence to chemical, biological, physical, and radiation safety requirements; and
  - adherence to protocol requirements for research using recombinant DNA, infectious agents, select agents, biohazardous agents, or biological toxins.
- If a potential conflict-of-interest situation exists, then the Dean approves the departmental level resolution, or, as necessary, refers to an appropriate committee and provides local oversight.