UNIVERSITY OF MIAMI  
SPONSORED PROGRAMS POLICIES AND PROCEDURES

Section C:  Non-Financial Compliance Issues
Policy  C9: Responsibilities of Principal Investigators and University for Sponsored Projects

Approval: April 22, 1996
Reviewed: December 2006

PURPOSE:

To establish the responsibilities, as it relates to sponsored programs, for:

- the university to the sponsor;
- the university to the principal investigator (PI); and
- the PI to the university and the sponsor.

DEFINITIONS:

Sponsored Programs:  Projects supported by funds obtained in the following categories:

- grants, contracts, or agreements (referred to as awards) extended to the university and funded externally to carry out a specified project (see Sponsored Programs Policy/Procedure A1, “Accepted Award Types”);
- institutional grants (referred to as awards); and
- Multi-investigator grants or contracts (referred to as awards) administered by either a single academic division or a combination of divisions.

Sponsored programs include those programs the university accounts for and budgets separately, including training grants, college work study programs, educational service agreements, institutional grants, university grants, and organized research.

Educational Service Agreements:  Any grant or contract financed by the sponsor on a cost-reimbursement basis that provides for all, or an agreed portion, of the costs which the university incurs for training or other educational services.  Education service agreements cover summer institutes, special training programs for selected participants, professional or technical service to cooperating countries, the development and introduction of new or expanded courses, and similar institutionally oriented undertakings.

Institutional Grants:  Grant funds the university obtains from external sources and allocates to the departments conducting the programs.

University Grants:  Departmental programs for specific projects funded by the university.

Principal Investigator/Project Director:  The individual, usually a faculty member, whom the university designates to direct a sponsored program.

Training Grant or Contract:  A grant or contract awarded to the university to support the training of students in a particular discipline, career field, or specialized area.
Research Grant or Contract: A grant or contract awarded to the university to support the cost of a designated research project.

**POLICY:**

The following are the responsibilities as they pertain to the indicated parties:

*The university’s responsibilities to the sponsor:*

In accepting an award for a sponsored program, the university assumes all obligations specified or referred to in the award document. In addition, the university assumes the following general obligations to the sponsor:

- the university will maintain a staff to provide adequate control over expenditures of award funds and property. This staff will also prepare and submit necessary fiscal reports as required by the sponsor.
- the university will not discriminate in its policies and administrative controls between its own funds and those obtained from a sponsor. These policies and controls will include, but will not be limited to): maintenance of records and fiscal controls; purchasing procedures; provision for facilities; and property control.
- the university will ensure that personnel compensation and employee benefits paid from extramural funds will conform to university rates and standards and to the policies of the sponsor.
- the university will establish and maintain administrative mechanisms for compliance with specific sponsor and university requirements, such as those involving nondiscrimination in employment, the protection of human subjects in research, safety, and animal care.
- the university will provide, as committed to in an application for a sponsored program, such items as facilities, space, professional assistance, and/or an appropriate portion of personnel. The university will not cancel or withdraw any such commitments unless it has been discussed with the PI and, where advisable or required, with the sponsor.

*The university’s responsibilities to the PI:*

Once the PI’s proposal to undertake a sponsored program has been approved by the department head and the Academic Dean or Director and has been signed by an officer of the university, the university will assume the following general and specific obligations to the PI:

- the university will make an appropriate and reasonable adjustment in teaching requirements, when permitted by circumstance, to allow the PI to carry out a sponsored program.
- the university will provide all administrative assistance available to aid PI’s in the conduct of approved sponsored programs. This includes, but is not limited to, assistance with proposals, negotiations with sponsors, maintenance of adequate fiscal and property records and controls, purchasing services, and submission of administrative and financial reports as required.
the university will ensure that the PI’s rights as a faculty member (i.e., contracted salary, advancement, promotion, and tenure privileges) will not be adversely affected by reason of involvement in sponsored programs.

The university has the right to terminate or to refuse to accept or renew a research award. However, PI’s on individual research awards with only one PI, will not be replaced during the term of the grant unless required by the conditions of the award or requested by the PI. The PI, who basically serves as an administrator of an award and is not significantly involved with research tasks or the direct execution of the research, may not be changed without first being informed and upon written consent of the academic officials whose approval was required when submitting the proposal. Appeals to this action are to be referred to the Research Council for recommendation to the president of the university.

Questions or complaints relating to the failure of the university to meet obligations to either the sponsor or PI may be initiated by the PI through the appropriate academic channels (i.e., department head and Dean) and then through the Research Council and its designated channels to the president of the university. If, upon written agreement of the academic officials whose approval was required for submitting the award applications, it is determined the conditions specified to the sponsor for acceptance of the award are not being met, the university may re-evaluate its responsibility to continue the project under university sponsorship.

The PI’s responsibilities to the university and the sponsor:

PI’s of approved sponsored programs will comply with the provisions of this policy statement and accept the following specific responsibilities and obligations:

- The proposed project will be carried out within the framework of an established department or division of the university or through the cooperation of several departments or divisions. Student projects will be directed by a member of the teaching or research faculty.
- A proposal for sponsored programs will have the administrative approval of the appropriate department head(s) indicating the proposal has been examined and meets the following qualifications:
  - the proposed sponsored project has academic merit;
  - the proposed sponsored project is consistent with the overall academic interests of the department(s);
  - the department has adequate facilities which have been approved and will be available for the successful conduct of the proposed project; and
  - there is reasonable assurance the technical or student assistance specified in the proposal will be available and the time requirement of the PI is acceptable.
- The project proposal will have the approval of the appropriate Dean(s), Director(s), or their designees.
- The budget for the proposed program will be adequate for the work proposed, including allowances for contingencies and salary increases. Any university contribution, in the form of either direct or indirect expenses, will be specifically identified as to source at the time the proposal is submitted and must be approved by appropriate university officials.
- The proposed award will comply fully with university administrative regulations or academic policies, such as those regarding employment and employee relations, safety, safeguards to human subjects in research, fiscal and purchasing procedures, and animal care.
- The award will not interfere with academic freedom and responsibilities or with the normal prerogative to publish the results of properly conducted investigations.
- The acceptance of funds to support a project will be construed as evidence the PI has agreed to comply with all policies or requirements of the supporting agency which are pertinent to the project, including the timely preparation of all necessary reports and publications.
- The PI will not contract for or commit the utilization of university facilities, resources, or personnel without going through the prescribed university channels as detailed above.
- The PI who accepts funds from a sponsor in support of research will comply with the university’s policy on “Conflict of Interest” (Sponsored Programs Policy/Procedure C8).

**REFERENCES:**

*University of Miami Faculty Member*
*OMB Circular A-21*

**PROCEDURES:**

In order to properly fulfill the responsibilities to the sponsor, the university and the principal investigator will comply with the university’s policies and procedures concerning sponsored programs as detailed in the Sponsored Programs Policies and Procedures.