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# Office of Sponsored Programs and Foundation Relations

**POST-AWARD RESPONSIBILITIES AGREEMENT**

# *Approved April 2019; updated June 2021, September 2021*

*Next review: Fall 2023*

The Primary Investigator (PI)/Project Director (PD) is ultimately responsible for all aspects of the sponsored project, including programmatic and financial oversight. In this document, PI will refer to both PIs and PDs.

The Office of Sponsored Programs and Foundation Relations (OSPFR) will support the PI in all non-financial aspects of sponsored project management and reporting. The Business Office will support the PI in all financial aspects of sponsored program management and reporting.

The primary responsibilities of the PI include Project Management, Budget Management, Personnel Management, Reporting, and Subaward Management (if applicable). In addition to complying with the terms explained in the notice of award, it is the responsibility of the PI to meet any additional requirements depending on the funding source and type of award.

This document provides an overview of the PI’s post-award responsibilities.

**PROJECT MANAGEMENT**

**Important Dates**

* Note the beginning and end dates of the award, as well as the programmatic/technical reporting and deliverable requirements, and human or animal protection protocol renewals.

**Terms & Conditions**

* Review and comply with the terms and conditions of the sponsor and the specific grant.

**Project Implementation**

* Start the project promptly.
* Ensure that the project stays within the scope and objectives of the original proposal. If the scope or objectives need to be revised, contact the OSPFR.
* Keep the program officer, OSPFR, and the Business Office informed of your progress and any difficulties you may encounter.

**Reports**

* Ensure all work conducted and reported is free of falsification, plagiarism, fabrication or other non-scholarly conduct.
* The PI is responsible for the timely submission of all reports in accordance with the terms of the grant and requirements of the sponsor.
* With the PI’s input, the Business Office will prepare any financial reports for submission to the sponsor; a financial report completed by the PI is not an official institutional report of expenditures.
* One week prior to submitting narrative reports to the granting agency, present a draft to the OSPFR for review and approval.
* Copies of all narrative reports and correspondence related to the grant should be forwarded to the OSPFR.

**PERSONNEL MANAGEMENT**

**Personnel Oversight**

* Ensure that personnel are fulfilling programmatic requirements and completing deliverables.
* Keep salary and benefit information for your grant team confidential.

**Effort Certification**

* Track your own effort on the grant project and submit the appropriate documentation (Personnel Activity Reports or PARs) to the Business Office.
* Certify effort of all personnel (PI’s dean certifies the PI’s report).
* Immediately alert the Business Office of any changes or errors made in effort certification.

**Subaward Monitoring (if applicable)**

* Manage subawardee(s) in accordance with the sponsor’s policy and University procedure, which may include site visits, budget management, and progress monitoring. Progress monitoring may include both programmatic/technical and financial progress.

**BUDGET MANAGEMENT**

**Review Allowable Costs**

* All expenses charged to a grant must be necessary to achieve the objectives of the approved grant, allocable to that particular project, and allowable under the terms of the grant. The activities of the program should follow how the budget is being expended.
* Allowable costs will be identified in the notice of award (NOA), the Uniform Guidance (for Federal grants), and/or in office, agency, and institutional guidelines. Consult with OSPFR and the Business Office to review allowable and unallowable direct costs if necessary.

**Make purchases**

* Contact the University’s purchasing office if you are planning to purchase supplies or equipment.
* Complete Payment Request Form to pay for grant project expenses. The form must be submitted to the Business Office.

**Monitor Expenditures**

* Use Banner and consult with the Business Office to monitor your grant expenses on a monthly basis, ensuring that you do not overspend.
* Manage the grant budget and paperwork (orders, forms, invoices, quotes, etc.), identifying the grant fund number on all paperwork.

**Alert the OSPFR and Business Office if formal budget revisions will be needed.**

* Notify the OSPFR and Business Office of any major changes, including changes in personnel, costs and scope of project, as soon as these changes are anticipated or identified.
* Plan ahead if budget changes or an extension of the project period is needed, including if all funds will not be spent within the correct time frame. Sponsors often have deadlines for accepting these if prior approval is required.
* A post-award budget amendment form may need to be completed. Consult the OSPFR and the Business Office for instructions.

**Request No-Cost Extension**

* A no-cost extension extends the project period beyond the original project end date. It must be prepared by the PI and endorsed and submitted by the Business Office.
* A no-cost extension may be requested from the sponsor when all three of the following conditions are met: the end of the project period is approaching, there is a programmatic need to continue the research, AND there are sufficient funds remaining to cover the extended effort. An extension may not be requested for the sole purpose of spending remaining funds.
* A no-cost extension must be requested no less than 45 days before the end of the project period in order to give the Business Office enough time to process the request and submit it to the sponsor.

**COMPLIANCE**

**Compensation Training**

* The PI must complete CITI Grant Compensation Training within 30 days of the start of award.

**Conflict of Interest (COI) Training and Financial Conflict of Interest (FCOI) Disclosure**

* The PI must complete or renew COI training every 4 years as well as making periodic disclosures of any Significant Financial Interests (SFI).

**Responsible Conduct of Research**

* It is the PI’s responsibility to ensure that students complete RCR training if required by the granting agency.

**IRB/IACUC** **Approval**

* If IRB/IACUC approval is necessary, submit approval letter to OSPFR
* Ensure that IRB/IACUC approval remains valid through the full grant period.
* For grants that offer general research opportunities for students, it is important to alert the funder (NIH or NSF) if students choose to work on projects that require IRB/IACUC approval. Federal approval is required prior to commencing the research project.

**Sexual Harassment Guidance**

* Any PI or co-PI on a federal grant through Fisher must meet with the Title IX officer to learn how to comply with NSF, NIH, and NOAA policy and guidance.

**NIH Assurance**

* In lieu of a signature, the NIH requires that Fisher secure and retain a written assurance from the PI or PD prior to submitting an application, a progress report, or a prior approval request.

**Property Management**

* At the end of the period of performance, but no later than the closeout period, the PI must report on property using the property forms (SF-428/SF-429 forms) located at <https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html#sortby=1>. Such property shall include real property, federally owned and exempt property, equipment acquired with grant funds, and residual inventory of unused supplies exceeding $5,000 in total aggregate value.
* Follow Property Management Standards and Procedures for federally funded equipment by labeling and tracking all equipment (>$5,000 value) purchased with grant funds.
* If the PI wants to dispose of grant-funded property with a value of >$5,000, property disposition instructions must be requested from the funder.

**Other Support**

* Do not submit additional proposals to secure funding for the current project.

**Dissemination/Publications**

* Compliance with any applicable public access policy is required, including but not limited to publications resulting from research supported by the National Institutes of Health (NIH), the National Science Foundation (NSF), and the National Oceanic and Atmospheric Administration (NOAA). The NIH, NSF, and NOAA require that an electronic version of their final manuscript be made publically available in a designated repository within 12 months after the official date of publication; more details can be found on the NSF, NIH, and NOAA websites.
* Federal funding sources should be acknowledged in all publications related to the grant project, with the identification of the grant program and award number.

**Intellectual Property**

* It is the responsibility of the PI to comply with the University’s [Policy on Intellectual Property](https://www.sjfc.edu/media/about/leadership/provost/documents/IntellectualPropertyPolicy.pdf).

**Records Management and Retention**

* It is the responsibility of the PI to comply with the federal guidelines at [2 CFR 200.333](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1333&rgn=div8) for recording, maintaining, and retaining research records collected or generated during the grant period and make those records available for grant monitoring and auditing purposes to the University.
* Research records include research data, materials, documents and information that relate to the administrative, financial, human resource management, reporting of research results, sponsored award applications, cost or pricing, or other management information that has been gathered or used in research activity.
* Records should be retained for three years from the date of submission of the final expenditure report or as required by the sponsor. Exceptions, including records for property and equipment acquired with Federal funds, can be found in the Uniform Guidance at [2 CFR 200.333](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1333&rgn=div8).

**Foreign Influences**

* It is the responsibility of the PI and Co-PIs to disclose any foreign influences connected to their research to the Office of Sponsored Programs and Foundation Relations. This may include foreign research grants; international employment arrangements; and affiliations with researchers, students and employees of foreign entities.

**I agree to the responsibilities described in this document. I understand that I may not be able to access grant funds unless I am in compliance with all policies and procedures.**

**PI/PD Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Funder/Agency \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

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