GM04.1 Procedures and Responsibilities for Principal Investigators on Grants and Contracts

Overview

The following outlines procedures and responsibilities for researchers serving as Principal Investigators (PI) on grants and contracts at the Santa Fe Institute.

1. Statement

The Principal Investigator develops and prepares a proposal in accordance with prescribed agency and SFI policies with sufficient time to ensure that all internal review deadlines will be met. The President, Chair of Faculty, and/or Science Steering Committee are responsible for reviewing and approving proposal ideas prior to proposal submission through SFI.

Subcontracts—obtains an official proposal from the institution or agency expected to conduct a portion of the research or technical effort of the project and includes it with proposal package.

President, Chair of Faculty and Scientific Steering Committee are responsible for reviewing proposals.

2. Post-award Responsibilities

It is reasonable and appropriate for the PI to rely on administrative staff for assistance in carrying out responsibilities under a Sponsored Project. However, it is expected that the PI will:

a. Be knowledgeable about appropriate agency and SFI guidelines and restrictions relative to the budgeting of both direct and indirect costs, proposal preparation, the conduct of organized research and other sponsored activities, and be willing to comply with such guidelines and restrictions;

b. Secure appropriate federal and local approvals such as New Drug Applications (NDA), Investigational Device Exceptions (IDE), human and animal subject approvals (IRB), and approval to use biohazardous materials and/or recombinant DNA;

c. Comply with the specific terms and conditions of each Award as stated in the Contract, Grant, Cooperative Agreement, or Subaward documents and with all administrative requirements, as set forth by the federal government, sponsoring agency, and SFI policy statements, as applicable;

d. Adhere to specific budget restrictions, ensuring that activities do not begin and expenditures are not incurred prior to the receipt of a fully-executed Award unless necessary and authorized advanced approvals have been obtained, and that expenditures do not exceed the total amount of funds obligated;

e. Certify that all costs charged to a Sponsored Project are accurate and specifically benefit the project being charged including the certification of salaries charged to federal Awards;

f. Provide justification and documentation of costs being transferred, if after-the-fact adjustments in the allocation of certified costs become necessary;

g. Comply with the reporting requirements as stated in the Contract, Grant, Cooperative Agreement, or Subaward documents, including the submission of periodic and final programmatic reports, financial reports, invention reports, and inventory and equipment reports; and
h. Ensure that any subrecipients comply with the terms and conditions of each Award as stated in the Subaward documents and with all administrative requirements, as set forth by the federal government and sponsoring agency, as appropriate.

In the event there is a project-based need to incur costs prior to receipt of an award or prior to start date of the award (allowable in the case of some federal grants), the PI will complete the Request for Authorization to Spend form, obtained from the Sponsored Research Director, including a justification of the need of pre-spend.

PIs will be expected to participate in periodic post-award meetings with Director of Accounting and the Sponsored Research Director to monitor budget and plan expenditures.

3. **Transfer of Grant**

In the event a PI leaves their appointment at SFI making it appropriate to transfer a grant to their destination institution, the PI should contact the Sponsored Research Director in order to effect this transfer.

Any questions concerning these procedures and responsibilities may be directed to the Sponsored Research Director.

4. **Related Policies and Procedures**

- FN12 Allowable & Unallowable Costs
- FN21 Disbursement Policy
- FN03 Time and Effort Reporting for Employees
- FN10 Eligibility of Costs under Cost Sharing Arrangements
- GM02 Principal Investigator Eligibility Policy
- GM02.1 Procedure for Approval and Submission of Contract and Grant Proposals
- GM03 Management of Sponsored Projects Policy
- GM04 Policy and Procedure for Expenditure or Commitment of Funds Against Grants and Contracts Prior to Receipt of an Executed Award
- GM05 Subrecipient Monitoring Policy and Procedure
- GM06 Tuition and Fee Remission for Graduate Students Paid Under Contracts and Grants Policy
- GM07.1 Procedures for Committing Funds and Approving Expenditures for Principal Investigators on Grants and Contracts
- AD03 Intellectual Property Policy
- AD04 Misconduct in Scientific Research and Creativity Activity Policy
- AD05 Qualifications, Obligations, and Rights of SFI Researchers