Expectations of a Principal Investigator (PI) in the Section of Surgical Sciences

Responsibility for setting the course of research in the Section of Surgical Sciences, lies with the faculty members. A principal investigator (**PI**) also bears responsibility for the intellectual leadership of a project. A Co-Investigator (**CI**) is an individual who collaborates with the PI in the scientific development or execution of a project. A Co-Investigator is considered "key personnel" for a project. The designation of a Co-Investigator does not affect the PI's primary responsibility for directing the research, financial oversight, and compliance responsibilities.

The **PI** accepts overall responsibility for directing the research, financial oversight of the funding, as well as compliance with federal regulations, sponsor terms and conditions of an award, and relevant section and institutional policies. This includes research contracts, grants, cooperative agreements, training or service projects, clinical studies, and other sponsored projects. **PI's** do not have the authority to execute contracts or agreements on behalf of Vanderbilt University Medical Center, but **PIs** do have the responsibility for the following:

Proposal

- 1. Prepares the technical proposal, works with the Section's Grants Managers on the pre-award to develop the budget and related materials and confirms that the proposal meets requirements outlined in the Request for Application (RFA), Request for Proposal (RFP), or other application instructions.
- 2. Identifies subrecipients and consultants
- 3. Prepares or directly supervises the preparation of the budget and its justification
- 4. Requests cost sharing dollars, if required
- Identifies all available financial resources in direct support of this or other research endeavors (other support) at proposal submission or "Just In Time" in accordance with sponsor requirements
- 6. Takes responsibility for keeping his/her CV or bio-sketch updated
- 7. Adheres to regulatory research requirements (i.e. use of human subjects, animals, etc.)
 - Prepares the appropriate forms for the IRB, or the Animal Care IACUC, the Radiation Safety Committee and/or Biosafety Committee
- 8. Ensures the final proposal is properly endorsed and communicates with the Office of Sponsored Programs (OSP) to obtain appropriate approvals prior to submission
- 9. Complies with institutional policies and sponsoring agency requirements regarding the provision of information on other support documents

10. Ensures that every disclosure to an external funding agency of active, pending, or previous sources of support for research and other sponsored activities are true, complete, and accurate to the best of the researcher's knowledge

Research

- 1. Conducts the research, which includes, but is not limited to:
 - a. Overseeing the scope of work
 - b. Overseeing the scientific integrity of the project
 - c. Ensuring all researchers are trained in the responsible conduct of research
 - d. Managing project personnel
 - e. Authorizing payments to consultants and sub recipients
 - f. Communicating any allegations of academic fraud or scientific misconduct to the <u>Office</u> <u>of Compliance & Corporate Integrity</u>.
 - g. Complies with the <u>VUMC Intellectual Property policy</u>.
 - h. Discloses inventions, discoveries, and improvements to <u>Center for Technology Transfer</u> <u>& Commercialization</u>.
 - i. Complies with the <u>Federal Acquisition Regulation (FAR)</u> for combating trafficking in persons

Award and Administrative Oversight

- 1. Reviews and approves, in conjunction with the appropriate VUMC Research Administration staff, the terms and conditions of the award
- 2. Provides financial oversight of the funding
- 3. Certifies the appropriateness of charges to sponsored programs
 - a. Allocability is a test of necessity and benefit of the item to the project.
 - b. Determines that expenditures are allowable, allocable, and reasonable; approves them; and provides scientific justification for the transaction, if necessary.
 - c. The determination of allocability is vested with the PI because of their first-hand knowledge of project scope and deliverables.
- 4. Ensures compliance with relevant VUMC policies, federal regulations, and sponsor terms and conditions of an award
- 5. Maintains adequate documentation to support time worked and paid on the project
- 6. Certifies Personnel Activity Reports and all Effort Reporting
- 7. Assists with interim and final technical reports
- 8. Prepares continuation or renewal proposals
- 9. Retains project data and materials as required

- 10. Discloses annual conflict of interest and prepares a disclosure of Significant Financial Interests, including stipends, living expenses, payments and travel reimbursements received from other organizations
- 11. Discloses financial interests related to your research in all public sharing of research results including journal articles, presentations, and other publications.
 - a. Journals and professional organizations have various, often broader standards for financial interest disclosure than the University. Review those standards for each relevant journal or organization and disclose appropriately.
- 12. Discloses outside professional activities and financial <u>Conflict of Interest Form</u>. Such disclosures must include all work for, or financial interests received from, domestic and international institutions of higher education or the government or quasi-governmental organizations.
- 13. Follows VUMC conflict of interest reporting policies: <u>Conflicts of Interest | Office of Sponsored</u> <u>Programs (vumc.org)</u>
- 14. Regulatory Compliance
 - a. Meets continuing IRB/IACUC protocol review requirements and assists with inspections.
 - b. Takes responsibility for adherence to record retention policy for all financial and scientific documentation.
 - c. Takes responsibility for understanding and compliance with all institutional and sponsor policies, practices, and procedures.
- 15. Promptly alerts departmental leadership and the Export Control/Information Assurance Office in the event that you believe a collaborator or visitor is misusing their access or relationship with VUMC
- 16. Complies with US export control regulations when doing any of the following:
 - a. Accepting publication restrictions in research
 - b. Travelling internationally and attending conferences
 - c. Participating in international collaborations
 - d. Using proprietary information
 - e. Working with international staff and students
 - f. Hosting international visitors
 - g. Shipping materials internationally
 - h. Engaging in any international transactions
- 17. Provides appropriate supervision for all visits and visiting scholars that you host to ensure that they are upholding University policy and are appropriately using VUMC resources
- 18. For Project Closure:
 - a. Prepares the final programmatic narrative report, which may include contributions by subrecipients or collaborators.
 - b. Submits on a timely basis, any close-out documentation needed for VUMC OSP to submit financial status reports.

c. Provides information on other close-out reports, such as for patents and equipment – <u>CTTC</u> (patents).