PI Responsibilities

✓ **NASA Award**

NASA awards are restricted from being used to "participate, collaborate or coordinate bilaterally in any way with China or any Chinese-owned company" and also "Chinese national personnel. This restriction is valid starting February 2012.

✓ **NSF Award**

- o All individuals working on NSF projects are required to complete a brief exercise every 5 years regarding [Misconduct in Research and Scholarship](#)
- o [Misconduct In Research and Scholarship policy No. 4007](#)
- o NSF [Responsible Conduct of Research (RCR) Training](#) is required from all undergraduates; graduate students and postdoctoral researchers involved in NSF funded projects.
- o NSF limits salary compensation for senior project personnel to no more than two months of their regular salary in any one year. This limit includes salary received from all NSF funded grants. Please review [Senior Project Personnel Salaries Policy](#)

✓ **NSF Award - ARRA**

- o ARRA – NSF awards are subject to the [ARRA Terms and Conditions](#)
- o [Quarterly reporting requirements of Section 1512 of the Recovery Act](#)

✓ **NIH**

Review detailed information on [NIH Notice of Salary Limitation on Grants, Cooperative Agreements, and Contracts](#).

✓ **NIH Award - ARRA**

- o [NIH Award Terms](#) and Additional Information for Recipients Receiving Recovery Act Grant Funding
- o [Quarterly reporting requirements of Section 1512 of the Recovery Act](#)

✓ **Firm Fixed Price (FFP) Policy**

- o Fixed price agreements have a degree of risk as deliverables must be met even if costs incurred exceed the funded amount. The Principal Investigator (PI) and their academic unit are responsible for covering any costs incurred in excess of the funded amount. If the funding exceeds the costs incurred, the residual balance will be transferred to the PI pool org (account) after the appropriate overhead charge has been assessed.
- o [Firm Fixed Price (FFP) agreements Policy No. 4013](#)

✓ **Cost Share**

- o If your award includes cost share/matching funds, use the appropriate non-sponsored organization number with the cost share activity code to charge and track cost shared expenses for the award.
- o For questions contact*:* Patrick Miller, Financial Compliance Manager at 3-2979 or pmiller5@gmu.edu

- ✓ **Department of Justice (DOJ)**
    - o No OJP funding can be used to purchase food and/or beverages for any meeting, conference, training, or other event.
    - o Exceptions:

      Exceptions to this restriction may be made only in cases where such sustenance is not otherwise available (i.e., extremely remote areas), or where a special presentation at a conference requires a plenary address where there is no other time for sustenance to be attained. Such an exception would require prior approval from OJP.

The Award and Expending Funds

- ✓ **Review and Reconciliations**
    - o PI Responsibilities:
        - ▪ As a PI, you are responsible for all expenditures charged to this project.
        - ▪ It is your responsibility to ensure all expenditures are appropriate, authorized, charged correctly (using the right account code), and consistent with George Mason University and Sponsor fiscal policies.
        - ▪ All discrepancies must be resolved within 30 days of the required reconciliation review.
    - o [Reconciling Departmental and Sponsored Fund Accounting Records Policy No. 2114](#)

- ✓ **Reconciling Federally Funded Projects**
    - o Cost transfers must comply with the [University Cost Transfer Policy No 4005](#). Transfers over 120 days will only be approved if there are extenuating circumstances.
    - o A-21 Cost Accounting Standards: Costs generally considered F&A costs (administrative salaries, local phone, office supplies such as pens, paper, toner cartridges, etc.) are generally unallowable unless there are clear exceptional circumstances and prior approval was granted by the University and the Sponsor. For more information, please see [OMB Circular A-21](#)
    - o A-110 Uniform Administrative Requirements: Establishes the rules on which most sponsor and university policies and procedures are based including rebudgeting, prior approvals, extensions, equipment procurement, and reporting requirements. For more information, please see [OMB Circular A-110](#)

- ✓ **Personnel**
    - o Personnel funding changes must be processed no later than one month after the start of the project.
    - o If this award includes funds to support you, and/or other personnel working on the grant, please work with your department administrator to charge current Mason employees to the project.
    - o If you need to hire new employees, go to [HR / Payroll Employment website](#) or call 703-993-2600.
    - o PIs should ensure that all personnel forms (hiring, funding change, and timesheets) on the project are submitted in a timely manner. Failure to do so could result in disallowed salary and wage transfers resulting in effort being charged to a non-sponsored funding source.
    - o State and Federal law requires that all personnel selections comply with the Mason Affirmative Action program. To be eligible for employment, new personnel must complete an I-9 form, verify citizenship status and have the appropriate work authorization papers.

- ✓ **Payroll Certification**
  - o Payroll Expense Reports will be generated 60 days after the last day of the month for the project anniversary date or project end date, whichever is sooner.
  - o PIs should use the Payroll Expense Reports annually to certify that salary charges are reasonable in relation to work performed. Wages are verified by the approval of submitted timesheets.
- ✓ **Absence of the PI or other Key Personnel**
  - o Most sponsors require notification if there will be a change in key personnel or if there will be an extended absence of the PI.
  - o If there will be changes in key personnel, you must contact OSP Research administrator to discuss requirements for informing the sponsor and requesting necessary approvals.
  - o If you plan to leave the University during the period of your award, you must contact OSP to discuss how your project will be handled.

Other Direct Expenditures

- ✓ **Subcontracts**
  - o PIs are responsible for monitoring the subcontractor's performance and approving invoices for payment. For additional Information on Subrecipient, review the [Subrecipient Monitoring Policy No. 4009](#)
- ✓ **Consultants**
  - o Consultants must be hired <u>prior</u> to working on the project. Instructions for hiring a consultant can be found at [Consulting Services Instructions](#)
- ✓ **Travel**
  - o All Mason employees traveling on project funds <u>must</u> follow the state travel guidelines at [Fiscal Services Travel Office](#)
  - o All travel supported by federal funds must comply with the Fly America Act using U.S. Air Carriers unless appropriate extenuating circumstances apply. Please review the [Fly America Act](#).
- ✓ **Rebudgeting**
  - o Please review the terms and conditions of your award for more details on transferring certain percentage of funds between budget line items.
  - o If rebudgeting requires sponsor approval, please contact the OSP Research Administrator.
- ✓ **No-Cost Extensions**
  - o Requesting a no-cost extension:
    - ▪ Send the extension request, a justification and a new end date to the OSP Research administrator.
    - ▪ Most sponsors require the request at least 90 days prior to the end date of your project.
    - ▪ The sponsor may or may not approve the carryover of unexpended funds to the next year.
- ✓ **Overspent Funds**
  - o If the project is overspent at the end of the project, all over-expenditures will need to be moved to a non-sponsored source of funding.
  - o If a PI does not have sufficient funds to cover the over-expenditures, the overspent amount will be the responsibility of the academic unit, school, or college.

- ✓ **Regulatory Compliance**
  - o Mason is obligated, by law, to assure that all research activities are conducted in accordance with state and federal rules and regulations. These include regulations for research with:
    - ▪ Human Subjects
    - ▪ Care and Use of Animals
    - ▪ Export Controls
    - ▪ Biological Safety (including recombinant DNA)
    - ▪ Use of Toxic Chemicals and Management of Hazardous Waste
    - ▪ Radiation Safety
  - o Research must also follow procedures for:
    - ▪ Affirmative Action
    - ▪ Sexual Harassment
    - ▪ Misconduct in Research
    - ▪ Financial Conflict of Interest
    - ▪ Maintenance of a Drug Free Workplace
  - o If you have any questions regarding your responsibilities under these regulations, contact the Office of Research Integrity & Assurance , or call 703-993-9590.
  - o If you have any questions regarding Biological safety, Use of toxic chemicals, and Radiation safety contact the Environmental Health & Safety Office , or call 703-993-8448.

Intellectual Property

- ✓ **Copyrights**
  - o All treatment of copyrighted works resulting from sponsored projects varies from project to project.
  - o All agreements will reserve the right for faculty to publish scholarly and academic works; however, provisions covering the use and distribution of reports and software will vary from agreement to agreement.
  - o Please review the terms and conditions of your award for more details.
  - o If you have questions, please contact the Office of Technology Transfer

- ✓ **Patent**
  - o Most sponsored research projects include regulations that govern the disposition of patentable inventions discovered during the course of the research.
  - o PIs **must** contact the Office of Technology Transfer (OTT) at 703-993-8933 to disclose new inventions and fell out the Disclosure forms that can be found at OTT Forms

- ✓ **Research Record-Keeping**
  - o During the research project, PIs and others engaged in the project should keep a detailed account of the research process: the data generated, the experimental results, and the timing of events. This account can be very important in establishing the legal framework for determining inventorship of any patentable discoveries related to the research.
  - o Visit the Office of Technology Transfer (OTT) for more information

Reporting

✓ **Technical Reporting**
  - o Most sponsors require technical progress and final reports to be submitted within 90 days of the end date of the award.
  - o For auditing purposes, PIs must keep copies of all reports submitted.

✓ **Financial Reporting**
  - o Most sponsors require interim financial reports and a final financial report within 90 days of the end of the award.
  - o OSP generally prepares and submits the reports using expenditures charged to the project fund in Banner.
  - o If there are questions regarding project expenses, OSP will contact you for clarification prior to report submission.
  - o Please review the terms and conditions of your award since Financial Reporting requirements may vary based on award.

✓ **Records/Data**
  - o The University will maintain contractual and fiscal records of sponsored activity for a minimum of five years after the expiration of a project.
  - o It is the responsibility of the PI to maintain the records of research or educational activities.
  - o It is required that these records be maintained in appropriate data books or other filing systems that are signed and dated by the investigator and witnessed by another responsible individual.
  - o These records are to be kept accessible to permit inspection by authorized representatives.
  - o If the PI leaves the University prior to the completion of this five-year period, the PI is authorized to take photocopies of the data. However, the original data will remain at the University unless the University is guaranteed access to the data through mutual agreement.

✓ **Privileged Information**
  - o It may be necessary to have access to confidential or proprietary information owned by the University or the sponsor. Often separate nondisclosure agreements (NDAs) are executed to specify restrictions on confidential information between the University and another party.
  - o Funding agreements require that all parties use the same reasonable efforts to protect their own confidential or proprietary information. Only those directly participating in the project activities are allowed access to such information, and only after agreeing to abide by the terms of the funding agreement.
  - o PI is responsible to ensure that all participants of a sponsored project understand and agree to terms relating to confidential or proprietary information.
  - o In some cases, confidentiality clauses or agreements may influence reporting requirements.
  - o Please review the terms and conditions of your award for more details.

✓ **Recovered F&A (Indirect) Costs**
  - o As PI, you will receive a percentage of the recovered F&A charged to your project as identified on the Proposal Routing Form. *Review the attached example of Routing form.
  - o An Indirect ORG will be established for you and your portion of recovered F&A will be transferred to that ORG twice a month for charges made to the project.
  - o Spending must comply with state spending rules and must be used in support of research.
  - o Recovered indirect funds may not be used to increase the salary of the PI.

* Example of the Proposal Routing form that indicates the PI percentage of the recovred F&A expences.

FACILITIES & ADMINISTRATIVE (F&A) COST RECOVERY DISTRIBUTION		
Rate charged to sponsor: **15%** of MODIFIED TOTAL DIRECT COSTS – SPONSOR LIMITS TO **15%**		
Distribution of 100% F&A costs recovered is as follows: 30% University, 35 Provost Remaining F&A costs recovered will be distributed as follows:		
Principal Investigators	**Department/Center**	**School/College/Institute**
Alan Abramson 10.5%	**PIA 7%**	**CHSS 17.5%**
Total 10.5%	Total 7%	Total 17.5%