

Quick Guide for Principal Investigators at Columbia University

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To: Columbia University
Principal Investigators

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This Quick Guide provides answers to common questions and excerpts from important research policies and guidelines published in the Sponsored Projects Handbook, the Faculty Handbook and the Administrative Policy Library. While this Guide is designed to assist you in managing your sponsored projects, it is neither comprehensive nor exhaustive. For specific questions, review the applicable policy in its entirety (policylibrary.columbia.edu), and contact the appropriate offices as needed. Additional information is available at research.columbia.edu.

OVERALL PI RESPONSIBILITIES

“The full administrative, fiscal and scientific responsibility for the management of a sponsored project resides with the principal investigator named in the award.” Faculty Handbook (2008)

- Ensure that all information in the proposal is complete, accurate and developed according to commonly accepted practices.
- Ensure that all required University forms and certifications are completed on time.
- Know and follow the terms and conditions of the award.
- Conduct the work according to the research protocol, statement of work and any subsequent modifications.
- Ensure that all work meets the highest ethical standards and is conducted in accordance with the University’s conflict of interest policies.
- Ensure that all work is conducted in compliance with federal, state and local laws.
- Ensure that the project is managed in compliance with University policies.
- Manage the budget in order to spend correctly, follow sponsor restrictions and avoid overdrafts.
- Ensure that financial records and reports are accurate and auditable.
- Monitor the activities of subrecipients.
- Submit reports on time and according to the sponsor’s requirements.
- Complete the formal closeout of the project.

Faculty Handbook: columbia.edu/cu/vpaa/handbook

Sponsored Projects Handbook: research.columbia.edu/handbooks

PRE-AWARD OBLIGATIONS

“The faculty member who will be designated as the PI will be primarily responsible for developing the proposal and preparing the necessary documentation.” Sponsored Projects Handbook (2016)

- Abide by deadlines.
- Submit your proposals to Sponsored Projects Administration (SPA) at least five (5) business days before the agency’s submission due date.
- Make sure you have received all required sign-offs and clearances before submitting a proposal.
- Obtain the approval of your chair or dean in Rascal.
- Make sure the proposal meets the sponsor’s submission specifications, including length limitations, margins, font size, etc.
- Provide SPA a copy of the solicitation guidelines.
- Obtain a scope of work, budget, and endorsement letter from any collaborating institutions.
- Make sure the proposal has been entered and approved in Rascal before submitting your proposal to SPA.

- Complete any training required by the University and obtain the necessary University approvals.
- Make sure annual Conflict of Interest (COI) disclosures are up to date.
- Disclose any scientific, budgetary or effort overlap.

Sponsored Projects Administration: spa.columbia.edu

FINANCIAL MANAGEMENT

“[A]lthough the principal investigator may delegate responsibility for day to day financial management of a grant or contract to others..., the investigator must exercise appropriate oversight of the overall finances of the project.” Principal Investigator Responsibilities for Financial Oversight of Grants and Contracts (2012)

Costs charged to sponsored projects must be:

- Allocable (i.e., charged in proportion to their benefit to a particular project or on other equitable terms).
- Allowable (e.g., certain costs, such as entertainment or alcoholic beverages may never be charged to a federal grant).
- Reasonable (i.e., goods or services acquired and the amounts involved should reflect actions of a “prudent person”).
- Consistently treated (i.e., a particular type of cost must always be treated similarly—as either a direct or an indirect cost—under like circumstances).
- Specifically related to the project.
- Permissible according to the terms and conditions of the project.
- Costs may be incurred up to 90 days prior to the start of a project if pre-award costs are permitted and any necessary sponsor approvals obtained.

Costs charged to sponsored projects must NOT:

- Include costs normally included in the F&A rate charged to a federal grant (e.g., administrative staff or office supplies).
- Be assigned solely based on funds availability, award expiration date or other inappropriate criteria.
- Exceed overall project award.
- Include salary related to non-sponsored activities (e.g., writing competitive grant applications).

Ongoing Monitoring

- Review expenditures on all active awards quarterly.

At the end of a project:

- You may generally carry over unexpended funds at the end of a non-competitive project segment, and from one competitive segment of a project to the next.
 - Check with SPA to determine whether unexpended funds will carry over automatically or if sponsor approval is required.
 - All requests to sponsors must be countersigned by SPA.

- You may not “spend down” remaining funds by charging expenses that are not otherwise appropriately charged to the project.
- Complete all financial reconciliations and reporting required by the University’s policy on closeouts.
- Any remaining overdraft at the end of a project must be covered from non-sponsored sources (i.e., departmental or gift funds).
- You may not attempt to cover an overdraft on a sponsored project by shifting expenses to another sponsored project.

Cost Transfers

- Process cost transfers within 90 days of the original charge; exceptions to the policy are rare.
 - Document the reason for needing a cost transfer.
- Cost transfers onto sponsored projects may not be used to accomplish any objective other than to properly assign costs.
- Cost transfers to remove incorrect charges from a sponsored project must always be processed regardless of when they are discovered.

CU Policy on Financial Reporting and Closeout of Sponsored Projects

CU Policy on Sponsored Project Cost Transfers

Sponsored Projects Finance: finance.columbia.edu/content/spf-about-us

COMPENSATION AND EFFORT REPORTING

“Federal regulations require charges to Federal awards for salaries and wages to be reasonable in relation to the work performed.”

CU Policy on Charging and Documentation of Personnel Costs Charged to Sponsored Projects (2016)

- PIs and all self-certifiers must complete Compensation and Effort Reporting training in Rascal.
- Salary charges proposed and charged on sponsored projects must be based on the individual’s IBS rate and must not exceed the proportionate share of IBS for the period worked on the award.
- At least quarterly, monitor your effort and salary, and that of your project staff, and make adjustments as necessary.
- During the certification period, review and confirm that your effort and salary, and that of your research staff, are reasonable in relation to the work performed.
- The proportion of salary charged to a project may not exceed the amount of effort expended; however, the amount of effort expended on a project may exceed the proportion of salary charged. (You can’t overcharge the sponsor, but the sponsor can receive more effort than it pays for.)
- Significant reduction in actual effort compared to committed effort of key personnel may require sponsor notification.

- Short-term fluctuations of effort, such as month-to-month variations, do not require salary adjustment or sponsor notification.
- Non-sponsored effort, such as teaching, administration, and writing new funding proposals, may not be charged to a sponsored project.
- All necessary adjustments to salary charged to sponsored projects must be made so the final amount charged to the project reasonably reflects the effort expended, and thus is accurate, allowable, and properly allocated.

CU Policy on Charging and Documentation of Personnel Costs Charged to Sponsored Projects

Effort Reporting: effortreporting.columbia.edu

ECRT: ecrt.columbia.edu

CONFLICTS OF INTEREST

“[C]onflicts of interest have the potential to create real or apparent bias in research. Conflicts of interest may affect research integrity and may place human research subjects at additional risk. Conflicts of interest, and even the appearance of conflict of interest, may reduce public confidence in the research enterprise.”

CU Policy on Financial Conflicts of Interest and Research (2012)

- Disclose to the public any outside financial interest (including those of family members) that relates to your research, in publications, presentations, and other reports of your research.
 - For example consulting fees, equity interests and board memberships.
- Complete an Annual Financial Interest Report in Rascal each year.
- Update your Annual Report whenever your financial interests change.
- Up-to-date Annual Financial Interest Reports for all individuals involved in the design, conduct or reporting of a sponsored project must be on file prior to submission of the sponsored project proposal and prior to award set-up.
 - Department Administrators (DAs) can monitor disclosure filing status for department personnel.
- An additional, protocol-specific Financial Interest Report is required for human subjects research and must be filed in Rascal by the PI and each individual who participates in the design, conduct or reporting of the research.
- If there is any doubt about whether a particular financial interest or commitment warrants disclosure, it is best to err on the side of transparency and disclose it.
- PHS researchers have additional FCOI reporting and training responsibilities.

CU Policy on Financial Conflicts of Interest and Research

Office of Research Compliance and Training: researchcompliance.columbia.edu

Rascal: www.rascal.columbia.edu/coi

RESEARCH INVOLVING HUMAN SUBJECTS

“Research involving human subjects... must always take into account the well-being and rights of the individuals who serve as research subjects.” Faculty Handbook (2008)

- All human subjects research must be reviewed by the Institutional Review Board (IRB) and conducted in accordance with its requirements.
 - Awareness of the regulatory definitions of “research” and “human subject” will facilitate understanding of what activities require IRB review.
 - Investigative activities with humans that include only surveys, observation or other non-invasive research methods must still be approved by the IRB if the definitions of research and human subject are met.
 - The determination of whether human subjects research is exempt from IRB review can only be made by the IRB.
- Human subjects research trainings are completed through Rascal and can include:
 - Human Subjects Protection (biomedical or social-behavioral)
 - HIPAA Privacy
 - Good Clinical Practice

Clinical Research Handbook: research.columbia.edu/handbooks

Human Research Protection Program/IRB: research.columbia.edu/irb

RESEARCH WITH ANIMALS

“[T]he University...is committed to providing the highest level of ethical and humane care for the animals that are part of its research programs.” Faculty Handbook (2008).

- All animal research must be approved by the Institutional Animal Care and Use Committee (IACUC) and be conducted with the highest level of ethical and humane care, and in accordance with all federal and state laws and regulations, and institutional guidelines.
- Training for Animal Researchers:
 - Attendance at the IACUC Lab Animal Regulatory Lecture is required for all new lab animal users.
 - Species-specific online Rascal courses are required for all research personnel.
 - Rodent wet lab is required for individuals working with rodents.

Animal Research Handbook: research.columbia.edu/content/research-policies-and-handbooks

IACUC: research.columbia.edu/iacuc

ICM: vesta.cumc.columbia.edu/icm/

CULTURE OF SAFETY

“The PI has overall responsibility for safety and compliance in his or her laboratory.” CU Health and Safety Manual (2017)

The PI is responsible for ensuring that:

- Laboratory personnel have read, understand and adhere to all University, school, departmental and laboratory policies and procedures.
- Personnel are advised of applicable safety procedures when introducing new hazardous materials, equipment and procedures.
- Appropriate personal protective equipment (PPE) is available and used.

CU Health and Safety Manual: research.columbia.edu/content/health-and-safety-manual

Research Radiation Safety Handbook: research.columbia.edu/handbooks

Environmental Health and Safety: ehs.columbia.edu

TRAINING

“The University believes that all personnel involved in research conducted at Columbia should have a certain base knowledge of the regulations and policies governing the conduct of research.” Sponsored Projects Handbook (2016)

- Principal Investigators are responsible for ensuring that individuals on their research projects have completed and maintain currency with required trainings based on their research responsibilities and involvement, including, e.g., research with:
 - Human subjects (clinical, non-clinical, social-behavioral)
 - Animals
 - Hazardous materials and laboratory safety
- DAs can provide reports of training data about individuals in the department.
- The Research Compliance Training Finder can help identify which trainings may be required.

Rascal Training Center: www.rascal.columbia.edu/TC

Training Finder: research.columbia.edu/trainingfinder

Research Compliance Training: research.columbia.edu/content/compliance-training