Sponsored projects at the University are conducted on a best-effort basis. Principal investigators are expected to organize projects according to the time frames agreed upon as part of the grant or contract and to do high-quality work. The University does not accept grant/contract awards that stipulate the achievement of specific research results. Accordingly, it will not accept award provisions that provide for withholding of payment or impose other penalties if the sponsor is not satisfied with project results. Aside from losses arising as a direct result of negligence, the University cannot be held liable to the sponsor for loss or damages suffered by the sponsor either during and as a consequence of the performance of the research, or as a consequence of any actions of the sponsor based upon the results of the research.

10.20 Classified Research

The University does not accept classified research grants, contracts, or agreements. It will not enter into or renew any grant, contract, or agreement that would prohibit it from disclosing the existence of the award document, the identity of any sponsor of the proposed research, or the nature and potential contribution of the proposed research.
10.21 Limited Proposal Submissions

Certain grant programs limit the number of proposals or letters of intent they will accept from an institution. When more researchers want to apply than are allowed, the University must decide which proposals will go forward to the agency.

Identification

OSPA will explore various websites for limited submission opportunities from our primary funding agencies. Once a limited submission opportunity has been identified, OSPA will make every effort to have them posted on our website the same week. However, please be aware that the list is not comprehensive. Any SIUC researcher who wishes to apply to a limited submission opportunity that is not posted on our website should contact OSPA immediately. OSPA will review the guidelines, establish an appropriate internal deadline, and post the opportunity on our website.

Notification:

To facilitate a fair decision process, researchers wanting to apply to a limited-submission program are required to submit a Limited Submission Notification form (located under “Find” on the main OSPA website) and pre-proposal to OSPA at least 60 calendar days before the agency deadline (regardless of whether the deadline is for letters of intent or for full proposals). Exceptions for specific programs, if any, will be announced on our website or in Research Matters.

The pre-proposal should consist of:

- 2-page project description describing the scope of the project, expected/intended outcomes, the personnel involved, and existing resources;
- 1-page budget;
- 2-page curriculum vitae.

Internal Review:

The Office of the Vice Chancellor for Research will establish a committee to oversee proposal selection. OSPA will notify all applicants of the committee’s decision.

If the number of notifications received by the 60-day deadline does NOT exceed the limit, OSPA will take any subsequent notification forms on a first-come, first-accepted basis. When the program limit is reached, no further notifications will be accepted and submissions will be closed.

Withdrawal:

If the selected applicant withdraws his or her proposal, the applicant who received the next highest ranking from the committee will be notified that s/he may submit a proposal.
Proposal submission responsibilities:

It is always the responsibility of the principal investigator to assure that all requirements for submission of the proposal (and any pre-proposal or letter of intent), both internally and to the funding agency, are met.

Submissions without approval:

If a PI submits a proposal without following these procedures and does not get approval to submit, the University reserves the right to withdrawal the application.

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**10.22 Principal Investigator Eligibility and Responsibilities Eligibility: Who Can Serve as a Principal Investigator**

1. In general, principal investigators (PIs) are faculty members appointed at 50% time or greater. They often serve as fiscal officer of the project as well. Faculty may come from tenured, tenure-track, or non-tenure-track ranks. Emeritus faculty may serve as PI if the chair and dean of their former department and college approve, but for legal reasons they may not serve as fiscal officer.

2. A/P research staff (researchers/scientists): Those holding the title "Senior Scientist" may serve as principal investigator. "Assistant Scientists" and "Associate Scientists" may not serve as PI unless their department chair/center director and dean make exceptions for them. "Researchers" may not serve as PIs.

3. A/P non research staff: These staff may serve as PI if their supervisor approves. The primary criterion is the individual’s capability to lead and administratively manage the project. In some cases, a department may decide that the staff member may direct the project but may not serve as the fiscal officer.

4. Postdoctoral fellows, graduate students, and undergraduate students may **not** serve as PI.

**PI Responsibilities**

In administering a project, the PI is representing the University and is responsible for upholding the high standards expected of SIUC projects ("best-effort" performance). The overall scientific and administrative integrity of the project, including design and conduct, validity of results, and preparation of manuscripts, rests w ith the PI.
10.23 Publication Rights and Proprietary Information

In keeping with the principle of academic freedom (see above), it is the University’s general policy that faculty and staff are entitled to full freedom in the publication of research results. In some cases, however, such as industry-sponsored or defense-related research, the University recognizes that certain limited restrictions on the publication or other dissemination of data may be necessary. Where the sponsor of the research supplies proprietary information to the researcher, for example, the award agreement may include reasonable provisions for the sponsor’s review of manuscripts to verify that no such proprietary information is disclosed. (Principal investigators also must take great care to prevent any unauthorized or premature disclosure of proprietary information by the personnel working on their project, since they could be held personally liable for such disclosure.) Other provisions may allow for delay of publication for a limited period of time to protect patent and/or proprietary rights. Any such prior reviews, publication delay provisions, or related restrictions must be negotiated and agreed upon as part of a sponsored project award; they may not be imposed by the sponsor after the fact. In no case will restrictions be agreed to that would constitute a serious threat to academic freedom. The University may turn down an award or request changes in an award agreement if the terms seem unduly far-reaching or if they would hinder the rights of other SIUC faculty to publish freely in a given area. In submitting final research reports to sponsors, researchers may protect their own potentially patentable ideas by labeling the relevant sections of the report as proprietary, or confidential. If this situation will apply, the researcher must alert OSPA before submitting the research report. Reports returned by the sponsor as unacceptable because of material so labeled will be subject to an established on-campus review process.

10.24 Subaward (Subrecipient) Monitoring Guidelines

OSPA has formulated these guidelines for the programmatic and financial monitoring of sponsored project subaward recipients. Principal investigators who have made subawards from their prime award also should read the section on subawards in section 7 of this guide entitled Grant Management. A subrecipient is a third-party organization performing a portion of an SIUC sponsored project. The terms of the relationship are documented in a subaward (subgrant/subcontract or consortium agreement). These guidelines are intended to assist responsible faculty and staff in ensuring (1) that the subrecipient is conducting its portion of the research in compliance with applicable laws and regulations and with the terms of the award and subaward, and (2) that the subrecipient’s portion of the project costs is reasonable and allowable. Subrecipient monitoring is required by the federal government for federally funded subawards.

Roles and Responsibilities

1. Principal investigators (PIs) or their departmental grant administrators have primary responsibility for the monitoring of subrecipients to ensure compliance with federal regulations and with the terms and conditions of both the prime award and the subaward.
2. The Office of Research Development and Administration (OSPA) has responsibility for ensuring that subaward agreements contain appropriate federal and other applicable regulations consistent with sound business practices and for collection of subrecipient federal audits, if necessary.

3. Accounting Services' Grant & Contract Accounting division has responsibility for assisting PIs in reviewing invoices from subrecipients, questioning expenditures if necessary, and general cost allowability issues.

4. Resolution of complex subrecipient monitoring issues or the determination of courses of action will be done jointly by the PI, Grant & Contract Accounting, OSPA, and other administrative officials as appropriate.

Federal Regulations

The federal regulations that describe subrecipient monitoring are general, but contain the following core elements of compliance:

- The routine receipt and review of technical performance reports. The routine review of expenses vs. budget. The option to periodically perform on-site visits, if necessary.
- The option to perform "audits," if necessary.

It is also important to note that there may be additional sponsor-specific or program-specific requirements that mandate collection and documentation of other kinds of assurances (e.g., on lab animals, human subjects, biohazards, etc.) during the course of a project.

SIUC's Subrecipient Monitoring Guidelines

Certain subrecipient monitoring requirements imposed upon federally funded subawards are set forth in OMB circular A-133. Verification of the subrecipient's annual audit must be obtained from each subrecipient whose federal funding level exceeds $500,000. This is handled by OSPA. Additional monitoring activity includes the following: Collection of Technical Performance Reports - Technical Performance Reports should be reviewed and evaluated on a timely basis by the PI, unusual or unforeseen items should be investigated, and reports should be retained on file in the department for ready access by regulators. In some cases, subaward terms may require specified deliverables in addition to, or in lieu of, technical reports. Review of Invoices and Expenses-to-Budget - For cost-reimbursement subawards, the subrecipient's invoices showing both current period and cumulative expenses-to-budget are generally required. PIs (or their departmental grant administrator) should compare the subrecipient's invoices to the established subaward budgets. Evidence of the regular review of invoices should be in place and retained on file. "Evidence" can be in the form of PI initials or an authorizing signature on invoices, e-mail communications, etc. Clarification of Invoiced Charges - PIs (or their departmental grant administrator) should request explanations for any "unusual," "miscellaneous," "other," or apparently excessive charges invoiced by the subrecipient. If the explanations received are not sufficient to render a prudent judgment on the allowability of the cost, PIs may request detailed justifications from subrecipients. Examples of detailed justifications that may be requested from subrecipients are:
• Payroll records/data. Copies of paid invoices showing the cost of items purchased, and Vendor Justification Forms, if required by federal contract. Descriptions of services rendered by consultants, including hourly rates and time reports.
• Detail of travel charges incurred, stating the purpose, airfare, meals, ground transportation, unallowables, etc.

Costs determined to be unallowable or unreasonable should be disallowed. PIs should work with Grant & Contract Accounting to make such determinations. In extreme circumstances where questionable costs remain unresolved, it may be necessary to have an audit conducted. In such situations, PIs should contact Grant & Contract Accounting and OSPA (see Audits, below). On-site Visits - On-site visits are a discretionary monitoring procedure. On-site visits conducted by the PI to evaluate both compliance with the scientific objectives of the project and the appropriateness of the subrecipient’s administrative systems, processes, and charges should be documented via correspondence, meeting notes, trip reports, etc., and retained on file. Audits - Discretionary audits of subrecipients are an acceptable monitoring procedure under federal regulations, and all of SIUC’s cost-reimbursement subaward agreements contain "right-to-audit" clauses. Formal audits are performed very infrequently, however, and departments should contact Grant & Contract Accounting and OSPA before proceeding.

10.25 Supervision and Reporting of Research

As a general rule, sponsored research at the University is conducted independently, in accordance with the principle of academic freedom. Technical direction or joint supervision of research is accepted only with the concurrence of the principal investigator. The PI must provide research reports to the sponsor at times specified in the award agreement.

10.26 Use of University Name

Industry sponsors may not use the University's name in publicity or advertising of any kind unless: (1) prior written approval has been obtained from the SIUC chancellor, or (2) the award agreement contains provisions governing the use of the University’s name by the sponsor, in which case the sponsor must comply with all stipulations. University employees engaged in non-University business may not use the University name or their title in connection with those activities unless they have prior approval. See SIUC's conflict of interest policy.