PURPOSE

The purpose of this operating procedure is to clarify and define the roles of the Principal Investigator (PI), Department Administrator (DA), and the Research Administrator (RA), with regard to managing personnel and their efforts on sponsored projects in the School of Medicine.

INTRODUCTION

Grants and contracts for sponsored projects represent a contractual obligation between the grantor and the University for the performance of a specific activity through which the grantor, or sponsor, is entitled to receive some consideration or benefit. The contractual obligation is normally documented by a proposal and award combination, contract, or a written memorandum of agreement. The University assumes full legal responsibility for complying with all requirements imposed by the grantor or sponsor upon acceptance of grants and contracts for sponsored projects, including a requirement for a report of expenditures or a provision for an audit (refer to VCU’s policy Sponsored Programs Award Review, Negotiation, Acceptance and Notification). In turn, the School of Medicine must ensure its investigators and personnel are in compliance with all VCU and sponsor requirements for the charging of personnel effort to sponsored projects.

PROCEDURE

At the Proposal Stage

1. RA will work with PI to budget appropriate staff effort levels for the work to be performed.
   - Consider effort levels for PI, co-investigators, and other key personnel.
     - Remember: Effort is budgeted as a percentage of total Institutional Base Salary (IBS) = VCU + MCVP and does not include any VA salary

2. RA and PI will consider related items that need to be included in the budget, such as:
   - When budgeting effort for postdoctoral fellows, appropriate funds for postdoctoral health insurance should be included in the budget, as well.
   - When budgeting effort for graduate students, appropriate funds for graduate student tuition should be included whenever allowable.

3. The correct fringe benefit rate will be used depending on faculty/classified or hourly staff. Refer to University Controller’s Office website for current approved VCU fringe benefit rates.

4. VCUHS and MCVP-only employees will not be included in the personnel section of the budget. These types of employees should be budgeted as a service (salary + fringe) in the non-personnel portion of the budget.

5. RA and PI will consider any effort that cannot be carried out by VCU personnel: are subawards or contractor agreements necessary?

At the Award Set-Up Stage
1. RA will note all personnel named as “key” on the sponsor’s Notice of Award – for most awards, we must request sponsor permission before adjusting these individuals’ effort levels downwards by more than 25% unless in a No Cost Extension phase.
   - Typically only the PI(s) are named as “key” on the sponsor’s Notice of Award but at times other individuals may be named, as well.

2. RA and PI will review all personnel listed in the original budget and determine if, since the time of proposal submission, any factors have changed.
   - Factors to consider are: Budget cuts from what was originally proposed, new salary cap restrictions, salary or role changes, salary cap cost share level increase/decrease, fringe benefit rate changes, departure or addition of staff.
   - Review personnel effort levels with PI and get confirmation that levels are still appropriate for the work being performed.

3. RA must ensure labor allocations are executed properly in Banner and in a timely manner, ensure cost share is appropriately being applied (if applicable), and verify all award data in our electronic research administration systems (see “SOP 201: New Award Set Up” for more information).
   - Review all information about the new award: the original proposal, the award record in RAMS-SPOT and the new Grant ID and grant/cost share indexes in Banner. Ensure everyone named on the Notice of Award is designated accordingly on the RAMS-SPOT award record.
   - Request any needed cost share indexes from G&C and ensure collaborating VCU departments request cost share indexes from G&C for their personnel on the project
   - Develop a plan to manage effort – who is responsible for what, when things need to be changed or reviewed – and distribute to all parties involved in effort management.
   - Communicate with staff in other departments to ensure their personnel is applied to the new grant and any cost share indexes.
   - Download and use the NIH Salary Cap Calculator from the SOM Office of Research Administration website, if applicable.

**Ongoing Post-Award Management**

1. PI must review staff effort allocations on all grants MONTHLY and certify review of Monthly Expense Reports in the PI Dashboard.

2. RA reviews effort allocations MONTHLY during the monthly reconciliation process.
   - Compare committed vs calculated effort levels in the PI Dashboard.
   - Examine cost share ratios for personnel over the NIH salary cap.
   - Investigate any unexpected differences in either area.
   - Communicate concerns/questions to PI and provide data to support those concerns/questions.

3. RA and PI must maintain an open line of communication. PIs must communicate all personnel effort allocation changes as soon as possible and RA’s must ask questions and provide data/info the ensure PIs are able to make informed decisions regarding effort.

4. RA will use the applicable portlets in the PI and RA Dashboards and Banner to review and manage effort on an on-going basis:
   - Personnel Commitments portlet
   - Active Awards Summary portlet
   - Monthly Expense Report PDFs
   - NBAJOBS form in Banner
5. RA will provide PI with a monthly effort level summary for all personnel currently charged to each sponsored project. The format and timing of this communication may vary between PIs, projects, or departments.

RESPONSIBILITY

Principal Investigator (PI) The PI is primarily responsible for:

- Reviewing all personnel expenses on their sponsored projects on a monthly basis
- Communicating any changes in personnel effort levels to the RA as soon as possible

Research Administrator (RA) The RA is primarily responsible for:

- Reviewing and ensuring effort is appropriately applied to all sponsored project and cost share indexes
- Communicating any unexpected differences to the PI and DA as appropriate
- Providing a monthly effort level summary to the PI for all personnel currently charged to each sponsored project as applicable
- Collaborate with DA on any needed labor distribution changes, particularly when non-grant or non-cost share indexes are impacted

Department Administrator (DA) The DA is primarily responsible for:

- Assisting RA with the oversight of effort on sponsored projects and cost share indexes as applicable
- Informing the RA of any significant upcoming salary or personnel changes that may impact effort management on the award
- Ensuring all cost share indexes are fully funded by the end of each fiscal year.
- Collaborate with DA on any needed labor distribution changes, particularly when non-grant or non-cost share indexes are impacted