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 submitting “just in time” materials whenever requested by a sponsor.

VCU School of Medicine expenses on sponsored projects must comply with federal regulations, which are codified in a single guidance document known as the “Uniform Guidance” or 2 CFR 200 that must be used by all federal agencies. The Uniform Guidance (UG) provides standards to determine whether costs can be charged to federal grants and how those costs should be distributed between direct costs and facilities and administration (F&A) costs. These principles are rigorously applied to all federal grants and generally adhered to in administering non-federal awards. Each federal agency has or will issue more detailed guidelines as to how UG applies to its grants and cooperative agreements.

The standards established in the UG require that all sponsored project expenses must be (1) reasonable, (2) allocable to the project, (3) given consistent treatment, and (4) conform to any limitations or exclusions set forth in the UG or the award requirements.

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 administration of these sponsored programs.

Sponsors may request VCU and Principal Investigators provide additional materials after a proposal has been submitted (and often just before an award will be issued) to facilitate the sponsor’s review of the funding request. These requests may be sent directly to the PI or to both VCU and the PI simultaneously (in the case of the National Institutes of Health and the Department of Defense).

PROCEDURE

The PI or Office of Sponsored Programs (OSP) will receive notification from the sponsor requesting specific materials after the submission of a proposal and, often, prior to issuance of an award. For Federal sponsors, this is called the “just in time” process or JIT.

NOTE: Requests from a sponsor for additional materials do not guarantee that an award will be made.

For all sponsors, work with OSP to gather the requested materials and submit them to the sponsor. Most sponsors require that these materials come from OSP and not the individual PI.
RESPONSIBILITY

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

- Gathering the requested and required JIT materials and ensuring they are transmitted to the sponsor
- For NIH applications, the PI is responsible for uploading the materials to the JIT module in eRA Commons and ensuring they are submitted to NIH by OSP

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

- Assisting the PI with reviewing any requested and required JIT materials and ensuring they are transmitted to the sponsor

Office of Sponsored Programs (OSP) OSP is responsible for reviewing, signing (if needed) and submitting JIT materials to the sponsor when submission is required by the sponsored programs office or Authorized Organization Representative.