Standard Practice Guide Policies

Principal Investigator Responsibilities 303.09

Applies to: All units of the Regents of the University of Michigan, including its colleges, schools, departments, centers, and institutes, and all individuals serving in the role of PI on university research and sponsored projects

I. OVERVIEW

Research and sponsored projects grants, contracts, awards, and agreements are proposed by and issued to the University of Michigan, not to individuals. Nevertheless, Principal Investigators (PIs) on sponsored projects are responsible for the overall proposal preparation, administration, technical, and financial management of projects and management of personnel under their direction. This policy defines the requirements and responsibilities of PIs. These requirements are necessary to meet applicable laws and regulations, as well as the university's obligations to sponsors.

II. SCOPE

This policy outlines the research compliance requirements, responsibilities, and expectations for PIs at the university. This policy is applicable to all units of the Regents of the University of Michigan, including its colleges, schools, departments, centers, and institutes, and all individuals serving in the role of PI on university research and sponsored projects. This policy also applies to individuals designated as the PI of record in any university system or by any university unit.

III. PRINCIPAL INVESTIGATOR RESPONSIBILITIES

PIs assume ultimate responsibility for the scientific, technical, and financial integrity and administrative management of projects, including adherence to all existing university policies, standards and guidance, compliance with applicable laws and regulations, award terms and conditions, and ethical principles. The PI remains ultimately responsible for projects as a whole and all members of research teams.

PI responsibility and accountability includes, but is not limited to, the following:

A. Scientific and Technical Integrity:

1. Ethical Conduct: Cultivating a culture of ethical conduct in research and ensuring all research and scholarly activity is conducted with the highest degree of integrity.

2. Conflicts: Ensuring timely reporting and management of all related outside activities/interests and potential conflicts of interest and conflicts of commitment
3. Research Data: Responsibly managing the use, distribution, preservation, and secure storage of data and material produced through university research activities.
4. Intellectual Property: Adhering to university and sponsor disclosure requirements regarding the creation of intellectual property supported directly or indirectly by funds administered by the university.

B. Compliance: Ensuring that projects are conducted in compliance with all applicable sponsor, institutional, and regulatory requirements.

1. Research Subjects: PIs on human or animal subjects studies are responsible for adhering to all applicable regulations and requirements of the University's Human Research Protection Program (HRPP) or the Animal Care and Use Program, respectively.
2. Research Safety: Adhering to all applicable occupational and laboratory safety protocols related to the handling of potentially hazardous substances and equipment.
3. Research Security: Adhering to university policies, standards, and guidance, as well as any sponsor or other institutional requirements.
4. Reviews, Inquiries, and Investigations Related to Sponsored Projects: Cooperating fully with the university on any reviews, inquiries, or investigations related to sponsored projects.

C. Financial Integrity:

1. Ensuring all funds are spent in accordance with university and sponsor guidelines.

D. Administrative Management:

1. Reporting: Timely and accurate completion and submission of programmatic reports required by the sponsor and the university.
2. Resources: Obtain required institution-level approvals prior to utilizing university resources. Ensure university resources are used appropriately.
3. Personnel: Ensure effective supervision and management of personnel and ensure that the PI and all personnel conducting research – including postdocs, faculty, trainees, students, volunteers, and support staff – complete all required sponsor or university training and are proficient in performing the tasks assigned to them.

IV. OVERSIGHT AND ENFORCEMENT

The Office of the Vice President for Research (OVPR) is responsible for the development, implementation, monitoring, and enforcement of the university's research compliance programs. In carrying out these responsibilities, OVPR relies upon and coordinates with other university units and staff who perform essential research compliance functions that contribute to program implementation, including monitoring, enforcement, and sponsor notification, where applicable. University units are responsible for fostering an environment that supports research compliance.

V. VIOLATIONS AND SANCTIONS

Depending upon the severity of non-compliance, the individual may also be subject to criminal sanctions, civil liability, or administrative penalties, under law. In addition, violations of this policy by any member of the university community may result in disciplinary action, up to and including suspension or revocation of computer accounts and access to networks and physical facilities, termination of employment, non-reappointment, discharge, dismissal, and/or legal action. Non-compliant individuals may also be subject to termination of federal awards and contracts, suspension or debarment from eligibility for internal and external research funding, and/or revocation of privileges to participate in university research and sponsored projects.

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Owner:
Office of the Vice President for Research

Primary Contact:
Office of the Vice President for Research

Related Policies:

Conflicts of Interest and Conflicts of Commitment (/policy/201.65-1)
Covered Visitors (/policy/601.42)
Fiscal Responsibilities (/policy/500.01)
Information Security (/policy/601.27)
Insider Threat Program (/policy/601.40)
International Travel Policy (/policy/601.31)
Openness in Research Grants, Contracts, and Agreements (/policy/303.01)

Policy for Research with Human Participants (/policy/303.05)
Policy Statement on the Integrity of Scholarship (/policy/303.03)
Procurement General Policies (/policy/507.01)
Prohibition on Participating in Malign Foreign Talent Recruitment Programs (/policy/303.10)
Research Data Stewardship Policy (/policy/303.06)
Research Security (/policy/303.08)
Research Subject Incentives (/policy/501.07)
Safety, Health and Environmental Policy (/policy/605.01)
Travel and Business Hosting Expense Policy (/policy/507.10-1)
University Policy on Intellectual Property and Commercialization (/policy/303.04)

Related Links:

Statement on Stewardship: Stewardship of Information and Technology Resources (…
(https://hr.umich.edu/about-uhr/statement-stewardship)
Research and Academic Safety Policy (https://ehs.umich.edu/wp-content/uploads/2022/11/Research-and-Academic-Safety-Policy.pdf)