

Montana State University PI Subaward Responsibility

MSU has designated the PI as the individual primarily responsible for monitoring the programmatic and financial performance and progress of a subaward. Except as noted below, the subaward monitoring and compliance obligations of the PI may be shared with departmental administrators or other MSU employees; however, in no event may such monitoring and compliance obligations be delegated to a non-MSU employee.

As part of MSU's monitoring responsibilities, the duties of the PI during the life of the subaward are as follows:

- 1 To insure that Subrecipient's invoices are prepared in accordance with subaward requirements; with the approved budget, permissible rebudgeting; were incurred within the approved period of performance; are aligned in terms of cost and type of expense with the scientific progress reported to date; and that the costs are allowable, allocable and reasonable as they relate to the terms and conditions imposed by the sponsor and the subaward issued by MSU. The final invoice must be reviewed and approved by the PI and not a designated authority
- 2 In the event the level of detail included on an invoice is not sufficient to fully understand the costs, or if it appears that some costs may be excessive or understated, the PI is responsible for questioning the Subrecipient's expenditures or requesting further documentation or explanation prior to approving an invoice. Copies of all such documentation and the ultimate outcome of the investigation should be retained in the project file
- 3 To monitor the Subrecipient's scientific progress in terms of the Statement of Work and any required milestones. If scientific progress is not satisfactory, or if technical reports required of the Subrecipient are not prepared timely, the PI is responsible for contacting the Subrecipient to address these issues. If continued performance is not satisfactory, PIs should contact OSP to discuss appropriate remedial actions or termination of the subaward
- 4 To verify that the Subrecipient is adequately meeting any cost-sharing commitments made for the subaward
- 5 To verify that any human subject, animal subject, biosafety or other compliance approvals from the Subrecipient's boards or committees are kept current throughout the performance of the subaward. In the event of a lapse in approval, the PI is responsible for immediately notifying MSU's compliance committee and the OSP Subcontract Manager. Costs incurred by a Subrecipient during a period of lapse may not be charged to a subaward
- 6 To be the primary point of contact for the Subrecipient during performance of the subaward. The PI may delegate those responsibilities on a day-to-day basis to another member of the research project, so long as such other member is a full-time, regular MSU employee; however, such delegation may not be made to a contractor or temporary employee working at MSU
- 7 To ascertain whether the subaward Statement of Work or Budget, or both, require modification to add funding, time, or other considerations, and to notify OSP in a timely manner so a Modification may be prepared. Most subaward modifications will also require the PI to submit Modification Request Form to authorize the change
- 8 To plan for efficient completion of performance and close-out of the Subaward. This includes requiring that the Subaward period of performance end no later than the end date of the prime award, and that the Subrecipient's final invoice, final technical report, and any required reports, including those on inventions, be submitted to MSU no later than 45 days after the end of the Subaward period of performance or as otherwise stated in the subaward terms and condition
- 9 To assist OSP, upon request, in obtaining or reviewing reports, complying with additional monitoring responsibilities for high risk auditees, or monitoring a Subrecipient's adherence to corrective action plans