

## Montana State University-Northern (MSUN) PD/PI Subaward Responsibilities

MSUN has designated the Project Director (PD)/Principal Investigator (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 PD/PI may be shared with departmental administrators or other MSUN employees; however, in no event may such monitoring and compliance obligations be delegated to a non-MSUN employee. As part of MSUN's monitoring responsibilities, the duties of the PD/PI during the life of the subaward are as follows:

1. The PD/PI ensures that Subrecipient's invoices:
  - a. are prepared in accordance with subaward requirements and with the approved budget or permissible re-budgeting.
  - b. were incurred within the approved period of performance.
  - c. are aligned in terms of cost and type of expense with the scientific progress reported to date.
  - d. include only costs that are allowable, allocable and reasonable as they relate to the terms and conditions imposed by the sponsor and the subaward issued by MSUN.
2. The PD/PI reviews and approves the final invoice.
3. The PD/PI ensures appropriate and sufficient level of detail exists in each invoice. 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 PD/PI is responsible for questioning the Subrecipient's expenditures or requesting further documentation or explanation prior to approving an invoice. The PD/PI provides copies of all such documentation and the ultimate outcome of the investigation to Business Services. Business Services retains this documentation in the project file.
4. The PD/PI monitors 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 PD/PI is responsible for contacting the Subrecipient to address these issues. If continued performance is not satisfactory, the PD/PI should contact the Office of Sponsored Programs and Business Services to discuss appropriate remedial actions or termination of the subaward.
5. The PD/PI verifies that the Subrecipient is adequately meeting any cost-sharing commitments made for the subaward.
6. The PD/PI verifies 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 PD/PI is responsible for immediately notifying the Office of Sponsored Programs. Costs incurred by a Subrecipient during a period of lapse may not be charged to a subaward.
7. The PD/PI is the primary point of contact for the Subrecipient during the performance of the subaward. The PD/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 MSUN employee; however, such delegation may not be made to a contractor or temporary employee working at MSUN.

8. The PD/PI ascertains whether the subaward Statement of Work or Budget, or both, require modification to add funding, time, or other considerations, and to notify the Office of Sponsored Programs and Business Services in a timely manner so a Modification may be prepared.
9. The PD/PI plans 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 MSUN no later than 45 days after the end of the Subaward period of performance or as otherwise stated in the subaward terms and condition.
10. The PD/PI assists the Office of Sponsored Programs and Business Services, 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.

Up to date: November 19, 2024

Source: MSU OSP Subaward info: Revised for MSUN