



Policy

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Title	Principal Investigator Responsibilities in Fulfilling Requirements Associated with Receipt of American Recovery and Reinvestment Act Funding
Policy No.	MURC-002
Effective Date	September 30, 2009
Last Revision Date	N/A

Summary

Grants provided with funding from the American Recovery and Reinvestment Act (ARRA) have special, stringent reporting requirements:

Quarterly reports with very specific requirements, especially employment figures and progress reports, must come from the Principal Investigator (PI).

Additional requirements apply to supplemental awards, when the Marshall University Research Corporation (MURC) is a sub-recipient and when there are payments to vendors exceeding \$25,000.

1 - Introduction

The ARRA presents tremendous opportunities for Marshall University to increase its research base and improve its research infrastructure. With these opportunities come additional reporting responsibilities for both the MURC and the PI. These new reporting requirements must be executed in a timely fashion in order for MURC and Marshall University to remain in good standing with the federal government.

2 - Purpose

This policy establishes guidelines to help PIs understand their responsibilities with regard to fulfilling ARRA reporting requirements.

Each PI will be provided with a copy of this policy before he/she submits a proposal for ARRA funding and will be asked to sign an Authorization to Submit (ATS) form to indicate acceptance of all ARRA reporting requirements. A new ATS form, revised to account for the ARRA requirements, is available on the MURC website at www.marshall.edu/murc.

For PIs who have already received ARRA-funded awards or have submissions pending, the policy and applicable worksheet will be explained in person.

3 - Reporting Requirements - Principal Investigator Responsibility

Starting with the quarter ending September 30, 2009—with the first report due on October 10, 2009—MURC is required to submit quarterly reports for all ARRA funding.

To help MURC fulfill its reporting requirements, all PIs must submit specific information (referred to as “data elements” in the federal regulations) to MURC on a quarterly basis using the following schedule:

- For the quarter ending September 30, 2009 - PI report due October 5, 2009
- For the quarter ending December 31, 2009 - PI report due January 5, 2010
- For the quarter ending March 31, 2010 - PI report due April 5, 2010
- For the quarter ending June 30, 2010 - PI report due July 5, 2010
- (Schedule will repeat for succeeding years of ARRA reports)

Note: For ARRA funds that directly benefit a student where such student is the named PI on the proposal, the designated faculty mentor shall ultimately be responsible for ensuring that the required information is both completed and submitted on time to the MURC compliance contact identified during award set-up.

The data elements to be submitted to MURC by PIs for all ARRA awards are:

- Final Report (Y/N) (Check Y or N.)
- Quarterly Progress Report to Include:
 - Overall Purpose
 - Expected Outputs and Outcomes
 - Includes First Tier Sub-Awardees
 - Significant Deliverables
- Project Status (Enter one choice below.)
 - Not Started
 - Less than 50% Complete
 - Completed 50% or More
 - Fully Completed
- Number of Jobs [See spreadsheet, “Principal Investigator Information Page,” for definitions.]
 - Measured as Full-Time Equivalents (Total Hours Worked/Total Hours in a Regular Full-Time Work Week)
 - New Positions Created and Filled
 - Existing Positions Retained
 - Number Created or Retained by Sub-Recipients and Vendors
- Description of Jobs Created
 - Focus on Jobs Created and Retained
 - Can be Classified by Job Title, Broader Labor Categories, etc.
- Infrastructure Purpose and Rationale (Applicable only to construction grants.)

The spreadsheet “Principal Investigator Information Page” should be used to transmit the data via electronic mail to the MURC compliance contact identified during award set-up. The spreadsheet also is available on the MURC website at www.marshall.edu/murc.

Questions about the required data elements should be addressed to Heather Spence at spenceh@marshall.edu or (304) 696-3792.

4 - Other Requirements for PIs

a - ARRA Supplemental Awards

Supplemental awards made to existing projects with ARRA funds are subject to different reporting requirements than the non-ARRA parent grant.

- ARRA supplements must be tracked separately from the parent award.
- Unobligated ARRA funds may not carry over to the parent award.
- Re-budgeting between ARRA supplements and the parent award is not permitted.
- Non-ARRA parent award funds cannot be commingled with ARRA supplement funds.

b - If \$25,000 or More in Purchases are Made from Vendors

Recipients of ARRA funds must disclose specific information regarding vendors from which \$25,000 or more in purchases are made. The following information must be reported, with the bold fields provided by the PI:

- Award or Subaward Number. Responsibility: MURC
- Vendor DUNS Number. Responsibility: MURC
- **Vendor Headquarters Zip Code + 4. Responsibility: PI**
- **Vendor Name. Responsibility: PI**
- **Product and Service Description. Responsibility: PI**
- **Payment Amount. Responsibility: PI**

PIs will be required to send a form (available on the MURC website at www.marshall.edu/murc) to applicable vendors, specifically defining vendor requirements for ARRA-funded projects. This form is to be made part of any ensuing purchase agreement for goods or services >\$25,000 and must be sent to the vendor by the PI when securing quotations.

c - Responsibilities When MURC is a Sub-Recipient of ARRA Funds

PIs should be aware of the above reporting requirements when receiving ARRA funds as a sub-recipient. The PI, in consultation with MURC, should take steps to identify his/her related reporting responsibilities and any associated timelines before entering into an agreement.

d - Project Expenditures

Project costs must be charged to the assigned grant accurately and in a timely manner. After quarterly reports have been submitted, cost transfers can be approved by MURC only in exceptional circumstances.

5 - Enforceability

Federal awards, like most legal contracts, are made with stipulations outlined in the award's term and conditions. Non-compliance with the reporting requirement as established under section 1512 of the ARRA is considered a violation of the award agreement. The award term language is found in the Code of Federal Regulations (CFR) in 2 CFR Part 176.50. The awarding agency may use any customary remedial actions necessary to ensure compliance, including withholding funds, termination, or suspension and debarment, as appropriate.

6 - Changes to This Policy

This policy is subject to change as a result of additional requirements or guidance issued from the federal Office of Budget Management and/or the funding agencies, including, but not limited to, the definition of terms and data elements, and specific instructions for reporting and report formats.