University of Wisconsin Whitewater | Office of Research and Sponsored Programs

ROLES AND RESPONSIBILITIES FOR RESEARCH AND SPONSORED PROGRAMS

1. PURPOSE

Several University of Wisconsin–Whitewater (UWW) units and individuals are involved in activities related to research and sponsored programs administration, which encompasses application preparation and submission, award management, compliance, and project administration. The Office of Research and Sponsored Programs (ORSP) has developed this document establishing the roles and responsibilities of the Principal Investigator (PI), College/Department, ORSP, and Financial Services (Finance and Administration Affairs Division) throughout the lifecycle of externally funded grants, contracts, cooperative agreements, and other sponsored projects.

Research and sponsored programs at UWW are conducted in accordance with sponsor terms and conditions, federal and state regulations, UW System policies, and UW-Whitewater policies and procedures. The purpose of this document is to ensure effective support to researchers, stewardship of sponsored funds, compliance with sponsor requirements, adherence to federal and state regulations, and alignment with UW-Whitewater policies and procedures.

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1. PRINCIPAL INVESTIGATOR (PI)

The Principal Investigator (PI) has primary responsibility for the scientific, scholarly, technical, programmatic, ethical conduct and budgetary execution of sponsored projects. The PI shares responsibility for submitting required project reports, and acts as the primary contact with program staff at the funding agency.

Proposal Development and Submission. The PI is responsible for:

- Identifying funding opportunities relevant to their scholarly, research, or creative activities,
- Submitting an "*Intent to Submit*" form to ORSP and initiate proposal development/ preparation.
- Identifying a "*Contact PI*" when multiple investigators are involved.
- Serving as the lead author for proposal narratives and technical sections, including developing project goals, objectives, methodology, work plans, and evaluation strategies.
- Coordinating proposal development with collaborators and subrecipients (subawardees).
- Collaborating with ORSP in developing project budgets and budget justifications – including identifying cost-sharing requirements (as applicable), personnel, equipment, travel, participant support, and other project costs.

- Preparing and submitting to ORSP for review of sponsor-required proposal documents and supplementary materials, including biosketches, current and pending (other) support disclosures, data management and sharing plans, evaluation plans, and multi-PI leadership plans, as applicable.
- Coordinating proposal development with collaborators and subrecipients, and obtaining required letters of support and collaboration, as applicable.
- Collaborating with ORSP in completing Subrecipient Risk Assessment for an entity that performs a substantive portion of a sponsored project, using sponsored funds to carry out programmatic work.
- Securing necessary departmental approvals and obtaining required institutional commitments and documentation from collaborators, subrecipients, and other project partners, as applicable.
- Completing all required PI(s) certifications in applicable institutional and sponsor systems and verify that all individuals named in the application have satisfied applicable training, certification, and compliance requirements prior to proposal submission.
- Submitting complete proposal materials to ORSP for campus approval, allowing sufficient time for review before submission to meet the sponsor's deadline. **All proposals should be sent to ORSP at least two weeks (ten (10) business days) before the submission due date**.

Pre-Award and Award Negotiation. The PI is responsible for:

- Responding to sponsor requests for technical, scientific, or programmatic clarifications and providing revised proposal information, documentation, or other materials required during the proposal review, negotiation, or award process.
- Preparing and providing updated proposal information and documentation, including revised budgets, scopes of work, and Just-in-Time (JIT) materials, for ORSP review and submission to the sponsor, as applicable.
- Assisting ORSP during award negotiations, as appropriate.

Post-Award Administration. The PI is responsible for:

- Sending award notification, if received directly from sponsor.
- Participating in a project kickoff meeting – with Financial Services and ORSP.
- Providing overall leadership and oversight of project implementation and ensuring that project activities, personnel, and deliverables are aligned with the approved scope of work and sponsor requirements.
- Managing and supervising project personnel, including faculty, staff, students, and other project participants, and ensuring that assigned responsibilities are carried out in accordance with project objectives, sponsor requirements, and institutional policies.
- Requesting, and sharing with ORSP, technical reports from the subrecipient.
- Monitoring project progress, performance, and deliverables, and managing subrecipient performance to ensure completion of project objectives and compliance with sponsor, regulatory, and institutional requirements.

- Promptly notifying ORSP of significant project changes, including changes in key personnel, substantial changes in scope, effort commitments, project timelines, or other modifications that may require sponsor approval or institutional review.
- Initiate requests with ORSP that require prior approval from sponsors, such as no cost extensions and rebudgeting required by the terms and conditions of the award.
- Disclosing inventions, discoveries, and other intellectual property arising from sponsored activities in accordance with applicable sponsor requirements and University policies and procedures.
- Maintaining project records and supporting documentation in accordance with sponsor and institutional requirements, including reports, correspondence, approvals, and requests for revisions, extensions, or renewals.

Compliance. The PI is responsible for:

- Completing and maintaining all required disclosures, certifications, and reporting obligations, including *Financial Conflict of Interest (FCOI)* disclosures and *Outside Activities Reports*, in accordance with sponsor and University requirements.
- Notifying ORSP of any proposed research involving human subjects, vertebrate animals, biological agents, export-controlled information or materials, research security considerations, or other activities requiring regulatory or compliance review.
- Obtaining and maintaining all required compliance approvals and submitting applications, modifications, continuing reviews, renewals, and other required documentation related to human subjects research, animal research, biosafety, export control, research security, and other applicable compliance requirements.
- Maintaining documentation of current compliance approvals and ensuring that project activities are conducted within the scope of approved protocols and authorizations.
- Complying with all applicable *Institutional Review Board (IRB)*, *Institutional Animal Care and Use Committee (IACUC)*, *Biosafety Committee*, *Export Control*, *Research Security*, and other regulatory and institutional requirements.
- Ensuring that all project personnel complete required training, certifications, and compliance requirements prior to and throughout their participation in project activities.
- Assisting with University inventory, asset management, and audit processes related to equipment and other property acquired through sponsored project funds.
- Promptly reporting suspected research misconduct, noncompliance, conflicts of interest, or other compliance concerns in accordance with University policies and procedures.

Financial Management. The PI is responsible for:

- Regularly reviewing project expenditures and financial activity to ensure alignment with project objectives, award requirements, and approved budgets.
- Ensuring that project expenditures are reasonable, allocable, allowable, necessary, and consistently documented in accordance with sponsor requirements and University policies.
- Monitoring project spending and financial commitments to ensure expenditure remains within approved budget limits and available funding.

- Reviewing, and submitting to ORSP, subrecipient invoices verifying that charges reflect completion of activities, and are accurate, allowable, and consistent with the approved scope of work.
- Initiating requests for rebudgeting, no-cost extensions, prior approvals, and other sponsor-required administrative actions when necessary to support project objectives and compliance with award requirements.
- Cooperating with internal, external, sponsor, and governmental audits, reviews, site visits, and monitoring activities by providing timely access to project records, supporting documentation, and other requested information.

Project Closeout. The PI is responsible for:

- Verifying that project objectives, milestones, deliverables, and other award requirements have been satisfactorily completed.
- Preparing and submitting to ORSP final technical, scientific, programmatic, and other sponsor-required reports in accordance with award terms and conditions.
- Completing and submitting required invention, intellectual property, and other sponsor-required disclosure reports arising from project activities.
- Assisting with equipment disposition, inventory verification, records retention, and other award closeout requirements in accordance with sponsor and University policies and procedures.

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2. DEPARTMENT and COLLEGE ADMINISTRATION

The Department Chair and Dean provide unit-level oversight of sponsored activities and are responsible for

- Supporting Principal Investigators in securing on-campus space, facilities, and other institutional resources required for project activities that are not already assigned or available.
- Supporting Principal Investigators in securing off-campus space and facilities required for project activities, as applicable.
- Reviewing proposed projects to ensure that the nature, scope, and objectives of the work are appropriate and consistent with departmental, college, and University missions, priorities, available resources, and strategic goals.
- Reviewing and approving proposals in RAMP, including project budgets, budget justifications, cost sharing, matching commitments, and other unit-level resource commitments.
- Supporting the payroll and compensation-related compliance requirements associated with sponsored projects prior to finalizing a proposal, including reviewing, and approving requested course buyouts, overload appointments, summer salary, and other personnel compensation arrangements.

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3. OFFICE OF RESEARCH AND SPONSORED PROGRAMS (ORSP)

ORSP serves as the University's designated office for research administration and sponsored programs and is responsible for coordinating institutional pre-award administration, some post-award administration, research compliance administration, and related UWW policy implementation.

Proposal Development and Submission. ORSP is responsible for:

- Monitoring and identifying external funding opportunities relevant to the University’s research, scholarly, creative, and sponsored program activities.
- Communicating funding opportunities and sponsor announcements to colleges, departments, faculty, staff, and students.
- Interpreting sponsor guidelines, solicitation requirements, and applicable regulatory and institutional requirements.
- Administering limited-submission (*when sponsor indicates that only one application per institution must be submitted*) funding opportunities, including coordinating institutional review and selection processes, as applicable.
- Engaging with Principal Investigators (PIs) who submit an *Intent to Submit* form and providing them guidance regarding proposal development and submission requirements.
- Initiating proposal records in RAMP – assigning proposal numbers and framework for proposal documentation and application materials.
- Coordinating proposal development timelines to support institutional review, approvals, and timely sponsor submission.
- Providing proposal development assistance to investigators, including budget development, budget justification preparation, and guidance on sponsor requirements.
- Reviewing subrecipient (subaward) budgets, budget justifications, scopes of work, and other required proposal documentation, including conducting risk assessment.
- Confirming the application of appropriate institutional indirect cost rates and reviewing requests for indirect cost waivers or reductions, as applicable.
- Reviewing proposed cost-sharing, matching, and other institutional commitments for compliance with sponsor and University requirements.
- Reviewing program income requirements and budget implications, as applicable.
- Sharing and coordinating with Financial Services regarding budget development, financial review, and other fiscal considerations, as applicable.
- Reviewing proposals for completeness and compliance with sponsor, regulatory, and institutional requirements.
- Managing proposal routing, institutional review, and approval processes within RAMP.
- Facilitating institutional approvals and obtaining authorized organizational representative signatures or certifications, as applicable.
- Submitting proposals to sponsors on behalf of the University.

- Confirming submission with investigator(s) and other University entities, including Deans, Departments, Financial Services, and Provost Office.

Pre-Award and Award Negotiation. ORSP is responsible for:

- Serving as the University's official administrative point of contact with sponsors and coordinating institutional communications related to proposal review, award negotiation, and award administration.
- Receiving and coordinating sponsor inquiries, requests for additional information, revisions, Just-in-Time (JIT) materials, and other pre-award communications.
- Preparing and coordinating responses to sponsor requests in consultation with Principal Investigators (PIs), Financial Services, and other institutional stakeholders, as appropriate.
- Reviewing and submitting revised proposal materials, application packages, and other sponsor-requested documentation, as applicable.
- Reviewing and coordinating acceptance of award terms and conditions to ensure compliance with sponsor requirements and University policies.
- Facilitating legal, contractual, and administrative review and negotiations of award agreements and other sponsored project documents, including coordination with the Provost's Office and the Office of General Counsel (OGC), as applicable.
- Communicating funding decisions, award notifications, and award terms and conditions to Principal Investigators, colleges, departments, Financial Services, and other relevant institutional stakeholders.

Post-Award Administration. ORSP is responsible for:

- Facilitating award acceptance and activation on behalf of the University by initiating award account setup in RAMP and coordinating Financial Services review and approval.
- Verifying completion of applicable compliance requirements prior to award activation, including Responsible Conduct of Research (RCR) training, IRB and IACUC approvals, biosafety reviews, export control reviews, and other regulatory or sponsor-required approvals, as applicable.
- Maintaining official award documentation, including award notices, agreements, terms and conditions, sponsor correspondence, and other administrative records, and ensuring appropriate distribution to Financial Services and other institutional stakeholders.
- Coordinating and administering award modifications, amendments, and prior approval requests in collaboration with Financial Services, including sponsor-required approvals related to significant budgetary, programmatic, personnel, and other project changes.
- Supporting PI(s) in the administration and oversight of subawards, including monitoring progress, reporting requirements, and sponsor compliance obligations.
- Coordinating technical reporting requirements, reviewing Principal Investigator-prepared reports for completeness and compliance, and submitting reports to sponsors when institutional submission is required.
- Providing guidance and support to PI(s), departments, colleges, and other stakeholders regarding sponsored project administration throughout the project lifecycle.

- Maintaining complete and accurate sponsored project records within RAMP and other institutional tracking and recordkeeping systems.

Compliance. ORSP is responsible for:

- ORSP coordinates institutional research compliance processes and committee administration but does not replace the independent review and approval authority of research compliance committees or designated institutional officials established under applicable regulations.
- Reviewing compliance disclosures and certifications to ensure completeness and compliance with sponsor, regulatory, and institutional requirements.
- Coordinating approval of disclosures and certifications by University authority, as applicable.
- Verifying completion of required training, certifications, and disclosures, including Research Security, Financial Conflict of Interest (FCOI), Responsible Conduct of Research (RCR), and other sponsor- or institution-required requirements, as applicable.
- Coordinating regulatory review and approval processes for research involving human subjects, vertebrate animals, biological agents, and other activities requiring Institutional Review Board (IRB), Institutional Animal Care and Use Committee (IACUC), Biosafety Committee, or other compliance oversight.
- Supporting the review and documentation of export control requirements and other research security obligations, as applicable.
- Maintaining compliance records and documentation, including protocol applications and approvals, training certifications, committee records, agendas, minutes, and related compliance materials.
- Coordinating the review, documentation, and resolution of research compliance concerns, allegations of noncompliance, and other regulatory matters in accordance with University policies and procedures.
- Coordinating institutional responses to sponsor reviews, monitoring activities, and programmatic or compliance audits related to sponsored projects.
- Supporting audit readiness through the maintenance of research administration records, oversight of compliance activities, and coordination of corrective actions resulting from compliance reviews, or monitoring activities.

Financial Management. ORSP is responsible for:

- Reviewing and processing requests for internal rebudgeting, cost transfers, and other award-related budget modifications in coordination with Principal Investigators and Financial Services.
- Collaborating with PI and Deans, and initiating in RAMP/Workday, project personnel effort commitments and certification, course buyouts, and overloads for Financial Services approval and monitoring.
- Coordinating purchasing and procurement requests related to sponsored projects and verifying that proposed expenditures support approved project objectives and comply with award requirements.

- Reviewing subrecipient invoices submitted by PIs to verify that charges reflect completion of activities and charges are reasonable, allowable, and consistent with the approved scope of work, budget, and project progress, and forwarding invoices to Financial Services for review, payment approval, and processing.
- Coordinating the preparation and submission of budget revisions, prior approval requests, rebudgeting requests, and other sponsor-required administrative actions.
- Coordinating with Financial Services on sponsored project financial management, compliance, reporting, award administration, and other post-award activities.
- Supporting compliance with sponsor financial requirements by reviewing award actions, expenditures, and budget modifications for consistency with sponsor terms and conditions, applicable regulations, and University policies and procedures.

Project Closeout. ORSP is responsible for:

- Coordinating award closeout activities, including the submission of final programmatic reports, deliverables, invention disclosures, and other sponsor-required technical closeout documentation.
- Verifying that all applicable compliance requirements, certifications, approvals, and reporting obligations have been satisfied prior to awarding closeout and account closure.
- Maintaining, archiving, and retaining official sponsored project records and documentation in accordance with sponsor requirements, applicable regulations, University records retention policies, and audit requirements.

Research and Sponsored Program Governance. ORSP is responsible for:

- Developing, implementing, maintaining, and periodically updating research administration policies, procedures, and guidance to ensure compliance with sponsor, regulatory, and institutional requirements.
- Providing administrative support for research compliance committees, including committee coordination, meeting administration, recordkeeping, communications, and regulatory reporting.
- Conducting research compliance and administrative risk assessments, including assessments related to subrecipients, sponsored projects, and institutional research activities, as appropriate.
- Developing, coordinating, and delivering research administration, compliance, and professional development programs for faculty, staff, students, and other research personnel.
- Developing and implementing research communication, outreach, and stakeholder engagement strategies to promote awareness of funding opportunities, compliance requirements, and research support services.

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4. FINANCIAL SERVICES (Finance and Administration Affairs Division)

Financial Services serves as the University's designated authority for financial administration, financial stewardship and fiscal compliance of sponsored projects, most post-award administration for grants, contracts and cooperative agreements, financial reporting, internal controls, and related UWW policy implementation.

Proposal Development and Submission. Financial Services is responsible for:

- Verifying proposal budgets for compliance with Uniform Guidance (2 CFR 200), sponsor requirements, and applicable University policies and procedures.
- Reviewing budget assumptions, cost allocations, compensation calculations, and other financial elements to ensure compliance with applicable cost accounting standards and institutional requirements.
- Verifying indirect cost calculations, cost-sharing and matching commitments, and other institutional financial commitments for accuracy and compliance with sponsor and University requirements.

Pre-Award and Award Negotiation. Financial Services is responsible for:

- Reviewing award financial terms and conditions to ensure compliance with sponsor requirements, applicable regulations, and University policies and procedures, as applicable.
- Reviewing revised budgets, budget modifications, and other financial changes to ensure accuracy, allowability, and compliance with award requirements, as applicable.
- Reviewing and approving requests for advance accounts and pre-award spending, as applicable, in accordance with University policies and sponsor requirements.
- Establishing and maintaining appropriate internal financial controls to support effective financial management, stewardship of sponsored funds, and compliance with sponsor and institutional requirements.

Post-Award Administration and Financial Management. Financial Services is responsible for:

- Verifying sponsored project accounts within University financial systems, implementing appropriate internal controls, and authorizing account activation.
- Coordinating project startup meetings with Principal Investigators (PIs), ORSP, and other stakeholders, as appropriate.
- Monitoring financial transactions and expenditures to ensure that charges are recorded accurately, allocated to the appropriate project account, incurred within the approved project period, remain within available funding, and are consistent with the approved budget and scope of work.
- Administering personnel effort commitments, overloads, course buyouts, payroll distributions, salary allocations, and effort certification processes to ensure compliance with sponsor and University requirements.

- Reviewing, approving, and processing purchases, payments, reimbursements, and other financial transactions in accordance with sponsor requirements and University policies and procedures.
- Preparing and processing sponsor invoices, financial drawdowns, and other reimbursement transactions, as applicable.
- Managing accounts receivable activities related to sponsored projects, including monitoring and collecting outstanding sponsor payments.
- Preparing, reviewing, and submitting interim and final financial reports in accordance with sponsor requirements, reporting deadlines, and prescribed formats.
- Maintaining complete and accurate financial records and supporting documentation for sponsored projects in accordance with sponsor, regulatory, and University requirements.
- Collaborating with ORSP regarding significant project changes, including budget revisions, programmatic modifications with financial implications, key personnel changes, and other actions requiring institutional review or sponsor approval.
- Monitoring project balances, expenditures, commitments, and spending rates, and performing regular account reconciliations to ensure financial accuracy and compliance.
- Reviewing, approving, and processing subrecipient invoices for payment – after verifying that charges are reasonable, allowable, and consistent with the approved subaward budget, scope of work, and documented project progress.
- Monitoring sponsored project financial activities to ensure compliance with sponsor requirements, applicable regulations, and University financial policies and procedures.
- Ensuring adherence to applicable federal, state, sponsor, and University financial policies, procedures, and internal control requirements governing the administration of sponsored funds.
- Coordinating financial audits of sponsored projects, including providing financial records, supporting documentation, reconciliations, and other information requested by auditors, sponsors, or governmental agencies.
- Monitoring and implementing corrective actions related to financial audit findings, monitoring activities, and compliance reviews involving sponsored funds.

Project Closeout. Financial Services is responsible for:

- Preparing, reviewing, and submitting final financial reports in accordance with sponsor requirements, reporting deadlines, and prescribed formats.
- Reconciling final expenditures, financial commitments, and project accounts to ensure accuracy, completeness, and compliance with award requirements prior to closeout.
- Processing indirect distribution, based on campus policies.
- Closing sponsored project accounts following completion of all financial, reporting, and closeout requirements.
- Maintaining and retaining sponsored project financial records and supporting documentation in accordance with sponsor requirements, applicable regulations, University records retention policies, and audit requirements.

5. OFFICE OF THE PROVOST

The UW-Whitewater Senior Leadership provides executive oversight and is the final authority for research governance, sponsored programs, and research compliance activities.