

Office of Research

ROLES AND RESPONSIBILITIES IN DEVELOPING AND MANAGING EXTRAMURAL AND SELECTED INTRAMURAL SPONSORED PROJECTS

APRIL 8, 2021

INTRODUCTION

Research administration, which encompasses application submission, award management, compliance, and project administration of sponsored projects, involves many UWM units and employees across the institution. To help UWM researchers and their units understand the specific roles and responsibilities across the lifecycle of a sponsored project, the Office of Sponsored Programs (OSP) has developed the following matrices for each phase of a sponsored project. Each matrix identifies the specific tasks to be conducted and the primary persons and/or units responsible for each task. These matrices differentiate between tasks for which OSP is responsible and tasks for which the PI/Division/Department are responsible, as well as highlight the role of other supporting units as applicable.

1. Proposal Development, Review, and Submission

- Narrative Development
- Budget Development
- Compliance
- Full Application Development, Review, and Submission

2. Award Negotiation and Acceptance

- Post-Submission, Pre-Award Response/Revisions
- Award Negotiation
- Compliance Review
- Award Acceptance and Project/Account Setup

3. Post-Award: Non-Financial Project Management

- Regulatory Committees
- Personnel Actions
- Data Management
- Non-financial Reporting

4. Post-Award: Financial Project Management

- Subawards/Subcontracts
- Effort Reporting
- Interim Financial Reporting
- Invoicing

5. Project End/Close-Out

- Posting Final Expenses
- Final Financial and Non-financial Reporting
- Contract/Project/Award Records Closeout

The tasks listed in each matrix are based on current best practices in research administration. Each school/college/division/unit needs to determine the processes, roles, and responsibilities to best meet its needs, and OSP can assist in this process. This can form the basis for process documents, checklists, and other tools to manage sponsored funds. If you have any questions, contact Kate Mollen, Director, Office of Sponsored Programs at mollen@uwm.edu.

Definitions of Investigator and Institutional Responsibilities on Sponsored Projects

DESIGNATED LEGAL AUTHORITY

The legal applicant for extramural proposals and awards is the Board of Regents of the University of Wisconsin System (Regent Policy Document 13-1). Applications are submitted by the Board of Regents on behalf of the University of Wisconsin-Milwaukee (UWM), with specific individuals having delegated signature authority. All applications and awards (grants and contracts) from external sponsors must be signed, accepted, or submitted by an authorized institutional representative of the institution. Deans, department chairs, and/or Principal Investigators are not authorized to bind the institution to grants and contracts.

Many of the roles and responsibilities for extramural sponsored projects also apply to intramural projects supported with UWM funds and thus must comply with many of the same University of Wisconsin System (UWS) and UWM policies and regulations.

OVERVIEW OF ROLES AND RESPONSIBILITIES

1. OFFICE OF RESEARCH (OR)

- The Office of Research facilitates the creation of new knowledge and the development of innovative solutions by supporting research across the sciences, arts, and humanities that enhances the mission of the UWM and spurs economic growth.
- The Office of Research is responsible for the administration of research activity, oversight of research policy, and compliance with federal and state mandates at UWM.
- The Office of Research provides pre-award and post-award administrative support for sponsored projects, encourages the transfer of technology to the marketplace, and develops policies that protect investigators, subjects, and the institution.

2. OFFICE OF SPONSORED PROGRAMS (OSP)

- OSP is a unit of the Office of Research. The functional units of OSP are Research Development Services, Pre-Award Administration, Post-Award Administration, Compliance, and Contracting.
- The UWM Chancellor has granted OSP signature authority to submit proposals and contracts for
 extramural funding, sign certification statements, and to accept awards and agreements on behalf of
 Principal Investigators at UWM. This authority is delegated from the Board of Regents through the
 UWS to the UWM Chancellor.
- All requests to submit applications for sponsored projects must be approved by OSP and the
 designated School/College/Division representative prior to submission and routed through <u>WISPER</u>
 when applicable.
- Any proposal, award, or contract document requiring an official signature must be signed by an authorized representative in OSP.
- OSP oversees institutional policies and procedures governing the submission of funding applications, award acceptance, and financial management of awards.
- OSP maintains institutional accounts with sponsor electronic proposal submission systems (e.g., Grants.gov, Research.gov/FastLane).
- OSP maintains the effort certification database and reporting system.

3. DIVISION/DEPARTMENT (DEPT)

 The Division/Department includes administrative positions, activities, and/or functions in individual Schools/Colleges, including the Associate Dean of Research. Staff support includes effort coordinators and other research administrators, information technology, financial management, and others involved in the review and approval of proposals, awards, non-financial agreements, and other research-related documents on behalf of the Division and/or Department. (Integrated Shared Services may assume some Division/Department functions as these hubs are implemented, particularly the post-award components.) School/College/Division deans, department chairs, administrative staff, and Principal Investigators do
not have signature authority to bind UWM to grants and contracts for sponsored projects.

4. PRINCIPAL INVESTIGATOR (PI)

- The Principal Investigator is the intellectual and administrative leader of a project, accepting overall
 responsibility for research/program direction and implementation, financial oversight of award funds,
 and compliance with relevant UWS and UWM policies, federal regulations, and sponsor terms and
 conditions of an award. Award types include research grants, cooperative agreements, and costreimbursed or fixed-term contracts.
- Tenured and tenure-track faculty are eligible to serve as Principal Investigators on sponsored projects by virtue of their position.
- Only faculty and those academic staff with probationary or indefinite status may serve as a Principal Investigator (PI or Co-PI) on a sponsored project. Others may serve as a PI or Co-PI only with permission from both the dean/division head and the Director of the Office of Sponsored Programs. The request should include a Request for Limited PI Status Form and a current curriculum vitae or résumé.
- Principal Investigators do not have signature authority and thus cannot legally bind UWM to grants and contracts.
- If there is a Multiple Principal Investigator model (MPI), a contact PI must be identified and a leadership plan in place that differentiates roles for each PI.

5. OTHER

This category represents other units at UWM that may have specific roles and responsibilities for sponsored awards, including but not limited to:

- <u>Business and Financial Services</u> for grant-related services including Accounting, Accounts Payable
 for Travel Cards, Purchasing Cards, payments to research subjects; Purchasing, Pre-audit; Travel,
 and Payment Card Compliance. Some of these services may be assigned to the Integrated Support
 Services (ISS) hubs.
- Campus Management and Planning for the allocation of space, including leasing.
- Center for International Education for international students or travel-related issues.
- <u>Graduate School</u> for policies and procedures regarding graduate research assistants and graduate students paid hourly on grants.
- Human Resources and Integrated Support Services for new project personnel and student employment.
- <u>Legal Affairs</u> for contracts and agreements, such as confidentiality, data use, and intellectual property.
- Office of Research for internal grant programs, selection of limited submission applicants, and general oversight for open research.
- <u>University Information Technology Services</u> for data security and storage, access to highperformance computing, electronic survey tools, purchase of hardware and software, web page development, and email access.
- <u>University Safety and Assurances</u> is responsible for providing essential environmental health, safety, human subjects protection, animal care and risk management services to UWM faculty, students, and staff. USA comprises the following programs at UWM:
 - The <u>Human Research Protection Program</u> is responsible for the Institutional Review Board (IRB) for the protection of human subjects. The IRB ensures the adequacy of proposed research

- plans to minimize risks and to maximize the potential for benefit for human subjects who participate in research.
- The <u>Animal Care Program</u> is responsible for the care, health and well-being of animals used for research and education at UWM and to observe all legal and ethical standards pertaining to the use of animals for research and education. This includes oversight of the UWM Institutional Animal Care and Use Committee (IACUC).
- The <u>Environmental Protection Program</u> manages institutional chemical recycling and waste management, hazardous materials management, underground storage tank monitoring, and local chemical emergency planning and response at UWM.
- Safety and Health Programs promotes safety, compliance, and environmental health in order to facilitate education and research at UWM. Includes Art, Studio, and Shop Safety; Biological Safety; Chemical Safety; Emergency Preparedness; General Safety; Laboratory Safety; Occupational Safety; and Radiation Safety.
- <u>UWM Foundation</u> for the development and management of philanthropic gifts to the University.
- <u>UWM Libraries Data Services</u> for training and consultation for data management and data management plans.
- <u>UWM Real Estate Foundation</u> for the management of buildings at Innovation Campus, including the Accelerator.
- <u>UWM Research Foundation</u> for technology transfer (e.g., patents and licensing).



UWM Office Of Sponsored Programs

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	Res	sponsibility	1	
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources
Narrative Development				
Advise on the best approach to proposal development and application process		Х		1
Help interpret program announcement for draft development		Х		
Develop timeline for proposal development and submission to meet sponsor and internal deadlines	Х			
If multiple PIs, identify a contact PI	Х			
Develop and draft the proposal narrative with members of project team, as applicable	Х			
Obtain internal scientific/content review, as applicable	Х			
Obtain external scientific review by content scientific experts, as applicable	Х			
Revise proposal based on reviews, as applicable	Х			
Review proposal drafts for adherence to formatting and other sponsor requirements	Х	Х		
Edit proposal drafts	Х			
Proofread final proposal draft	Х			<u>RDS</u>
Budget Development				
Develop project budget and budget justification appropriate to the scope of work	Х			
Request and obtain from subrecipients their institutional letters of commitment, scope of work, and budget/budget justification	Х			
Document in WISPER approval of F&A split arrangements from all UWM divisions for proposals that involve multiple UWM investigators, as applicable	Х			
Provide documentation of approval of cost-share/matching	Х			

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	Re			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources
Identify costs involved with leasing space and facilities, as applicable	X			<u>CPM</u> and <u>UWMREF</u>
Confirm F&A rate	Х			
Include program income, as applicable	Х			
Verify budget items are in accordance with Uniform Guidance, including cost accounting standards		Х		
Compliance				
Complete Financial Conflict of Interest (FCOI)	Х			
Complete Outside Activities Report (OAR)	Х			
Complete effort reporting	Х			
Disclose human subjects research	Х			<u>IRB</u>
Communicate with IRB to identify need for single IRB, if relevant	Х		<u>IRB</u>	
Disclose animal research	Х			<u>IACUC</u>
Disclose export control involvement	X			OSP and OLA
Identify intellectual property disclosures	X		<u>UWMRF</u>	
Disclose any known restrictions regarding open research	X			OR and OLA
Disclose use of materials, biological agents, or other that may require review and assurances	Х			SHP and EPP
Ensure all project personnel have satisfied all compliance requirements as applicable (e.g., Responsible Conduct of Research, effort reporting, OAR, and/or FCOI).	Х	Х		
Full Application Development, Review and Submission				
Inform OSP Pre-Award of intent to submit application to external sponsor within 30 days of submission deadline	Х			
Initiate WISPER record for external submission (by the contact PI)	Х			
Complete checklist of requirements per the funding agency guidelines (NIH, NSF, foundations, other)	Х			
Obtain agreement for on or off campus space needed in addition to that already assigned to the PI or MPIs	Х			<u>CPM</u> and <u>UWMREF</u>

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1. Proposal Development, Review, and Submission

	Responsibility¹			Responsibility ¹		
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources		
Obtain approvals from division/dept for non-budget components, as required, via WISPER or other means as appropriate	X					
Complete components of the application not included in the proposal narrative, budget, and budget justification as required by sponsor (e.g., biosketch, list of current and pending grants, data management plan, letters of collaboration, multiple PI plan)	Х			OR (for internal proposals)		
PI signs the WISPER record and routes to Division for approval	Х					
Route and submit WISPER record to OSP	Х					
Confirm the application package meets all sponsor formatting requirements (e.g., page length, font, margins) and that all necessary commitments with subrecipient institutions have been secured		Х				
Route complete application package to be submitted electronically through grants.gov (workspace), other federal agency or other sponsor to OSP five business days in advance of deadline	х					
Troubleshoot issues with sponsor or internal electronic systems as it relates to application submissions within 2 business days of routing application package to OSP.		Х				
Make revisions and corrections to the administrative components within 1 business day.	Х	X				
Finalize non-administrative (scientific/programmatic) components (e.g., proposal narrative) 1 business day in advance of deadline for applications that are submitted to sponsor by OSP	Х					
Confirm WISPER record is complete and approved by all UWM departments and divisions involved in the project		Х				
Submit the application to sponsors that require institutional authorization by the sponsor deadline and sponsor submission method		Х				
OR						
After OSP approval, submit the application to sponsors that <i>do not</i> require institutional authorization by the sponsor deadline and sponsor submission method	X					
Provide final proposal documents as submitted, if submission is not completed by OSP	Х					
Update WISPER to reflect final proposal submission		X				

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ACRONYM LIST

CPM Campus Planning and Management

IACUC Institutional Animal Care and Use Committee

EPP Environmental Protection Program

IRB Institutional Review Board
OLA Office of Legal Affairs
OR Office of Research

OSP Office of Sponsored Programs
SHP Safety and Health Programs

RDS Research Development Services
UWMREF UWM Real Estate Foundation
UWMRF UWM Research Foundation

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2. Award Negotiation and Acceptance				
	Re			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources
Post-Submission, Pre-Award Response/Revisions				
Respond to sponsor's questions regarding scientific/research/program matters	Х			
Respond to sponsor's questions regarding administrative/ contractual matters		Χ		
Revise application materials (e.g., proposal narrative, budget, budget justification, scope of work, and other Just-in-Time requested information) as requested for review	Х			
Review and approve all updated/revised application materials prior to submission		Х		
Submit updated/revised application materials to sponsors that require institutional certification or endorsement		Х		
OR				
After OSP approval, submit updated/revised application materials to the sponsors that do not require institutional endorsement or certification	Х			
Inform appropriate parties, including OSP, if application is withdrawn or not funded	Х			
Send award notice to OSP, if received by PI directly	X			
Award Negotiation				
Negotiate award terms and conditions, if necessary		Х		
Keep PI/Unit/others informed of the status of negotiations in a timely manner		Х		
Obtain PI/Unit/other approvals, as necessary		Х		
Compliance Review (applies to PI and all personnel listed on the Notice of A	Award)			
Confirm Financial Conflict of Interest (FCOI) Training and SFID complete (if applicable)		Х		
Confirm Outside Activities Report is completed		Х		
Confirm Effort Reporting is completed		Х		
Confirm IRB compliance, if applicable		Х		

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2. Award Negotiation and Acceptance

	Responsibility ¹			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources
Confirm IACUC compliance, if applicable	-	Х		
Confirm export control involvement, if applicable		Χ		
Confirm Intellectual Property disclosures, if applicable		Х		
Verify resolution to any known restrictions (e.g., r/t open research)			X (<u>OR</u> *)	
Confirm review and assurances of any use of hazardous materials, biological agents, or other substances/agents		Х		
Confirm all necessary approvals and documentation are complete in WISPER		Χ		
Verify award documentation for compliance with federal regulations and UWM/UW System policy, including award terms and conditions, budget, indirect costs, etc.		Х		
Confirm that personnel have completed required training as applicable (e.g., RCR)	Х	Χ		
Award Acceptance and Project/Account Setup				
Review terms of award	Х	Х		
PI acknowledges terms of award in WISPER	Х			
Division acknowledges terms of the award in WISPER	Х			
Accept and execute award on behalf of the University		Х		
Confirm all PI, division, regulatory, and compliance-related approvals have been received in WISPER		Х		
Enter all appropriate project data into SFS, including effort commitments, cost-share commitments, Indirect Cost (IDC) splits etc., as applicable		Х		
Establish a project account in SFS for charging expenses		Χ		
Request advance account, if applicable	Х			
Approve advance account, if applicable		Χ		

^{*}OR: Office of Research

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3. Post Award: Non-Financial Project Management			1				
	F	Responsibility ¹					
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources			
The PI is accountable for most of the tasks in this section, with responsibility shared with the Division or Department identified for research support (e.g., UBR, SOAR)							
Conduct and oversee the execution of the project aims or statement of work	X						
Notify all UWM regulatory offices/committees (e.g., OSP, IRB, IACUC, Risk Management/Safety) of significant project changes (budgetary, programmatic, key personnel)	Х						
Renew compliance requirements (e.g., IRB, IACUC) in a timely manner	Х			IRB, IACUC, Biosafety, etc.			
Develop authorship/publication agreements, if project involves a team	Х						
Select and hire project personnel	Х			<u>HR</u>			
Train project personnel	Х			<u>HR</u>			
Provide project personnel with adequate time, resources, and supervision to safely carry out the project	Х			<u>HR</u>			
Manage project personnel in accordance with HR policies regarding vacation, leave, and performance reviews	Х			HR			
Provide oversight and mentoring of students and trainees	Х			<u>GS/HR</u>			
Assure that letters for Research Assistant appointments specify the required training and compliance components	Х			<u>GS/HR</u>			
Request on- or off-campus space needed in addition to that already assigned to the PI	Х			<u>CPM</u> <u>UWMREF</u>			
Create project web page or other media, if appropriate	Х			UITS			
Arrange for access for non-UWM team members	Х			<u>UITS</u>			

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3. Post Award: Non-Financial Project Management

	F			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources
Maintain project-related records (source documents) in a manner to document the validity and integrity of the project while protecting confidentiality and privacy	Х			
Initiate data use agreements, if appropriate	X	Х		
Store and handle data according to university policy	X			<u>UITS</u>
Initiate request for programmatic changes to project, if required	X			
Review and process programmatic changes, if required		Х		
Develop conflict resolution strategies for the project team	Х			<u>HR</u>
Complete interim progress and technical reports according to sponsor's schedule	Х			
If OSP is submitting the interim progress/technical report, comply with sponsor submission method and submit to OSP 2 business days before sponsor deadline	Х			
OR				
After OSP approval, if PI is submitting the interim progress /technical report, comply with sponsor submission method and deadline	Х			
If sponsor requires interim progress/technical report to be submitted by an authorized official, submit interim progress/technical report		Х		
Obtain technical reports from the subrecipient	X			
Notify OSP of the need to process new amendments to a subaward by submitting a new Outgoing Subaward Request Form	X			
Execute amendments with subrecipients on behalf of the institution		X		

ACRONYMS

CPM Campus Planning and Management

GS Graduate School HR Human Resources

IACUC Institutional Animal Care and Use Committee

IRB Institutional Review Board

UITS University Information Technology Services

UWMREF UWM Real Estate Foundation

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4. Post-Award: Financial Project Management					
	Re	Responsibility¹			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources	
PI has primary responsibility that is shared with Division/Departme OSP is accountable for ensuring the project			cts of the pro	ject.	
Prepare financial transactions against the project account	Х				
Monitor budget vs expenditures	Х				
Work with the UWM Purchasing Department to purchase items that must comply with relevant state and federal procurement policies and are within the allocated budget	Х			<u>Purchasing</u>	
Assure appropriateness, reasonableness, and allowability of expenditures	Х	Х			
Assure expenditures are charged to the correct grant account in a timely manner	Х				
Manage expenditures to not exceed available award balance	Х				
Ensure expenditures are aligned with SOW and budget	Х				
Review expenditures in certain restricted budget categories	Х	Х			
Review and monitor cost transfers	Х	Х			
Initiate requests for internal rebudgeting and internal cost transfer	Х				
Approve substantive modifications and rebudgeting		Х			
Resolve overdrafts and revenue shortfalls in a timely manner	Х			Business & Financial Services	
Initiate requests with OSP that require prior approval from sponsors, such as no-cost extensions and rebudgeting required by the terms and conditions of the award	Х				
Review and submit no-cost extension requests to sponsors		Х			
Obtain prior approval from sponsors for transactions that require prior approval (e.g., adding/removing senior/key personnel, adding/removing subrecipients)		Х			
Review and reconcile sponsored project accounts monthly using the official system of record (WISDM) and notify OSP of any issues	Х				

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4. Post-Award: Financial Project Management Responsibility¹ PI/Division/ Task **OSP** Other **UWM Resources** Dept.² Х Χ Review sponsored project account reconciliation Monitor project accounts to verify costs are allowable, reasonable, and necessary for Χ Χ conducting the project Χ Prepare financial reports for submission to the sponsor Use financial reports/invoices to audit project expenses. Χ Monitor compliance with federal, state, sponsor, UW System, and UWM regulations and Х policies, including effort reporting, FCOI, COI, OAR, export, etc. Troubleshoot issues with sponsor as it relates to award management Χ Χ Troubleshoot issues with internal electronic systems as it relates to award management Χ Prepare and submit invoices or letters of credit draw reports and/or financial reports to sponsors Produce and record a letter of credit draw request (federal awards) Χ Χ Monitor and pursue collections of overdue payments from sponsors Subawards/Subcontracts At the time of award, complete the Outgoing Subaward Request Form to OSP Χ Send questionnaire to subrecipients; review completed questionnaire in compliance with Χ UWM procedures Draft official subaward agreement Χ Review and approve draft subaward agreement Χ Negotiate subaward agreement Χ Χ Execute the subaward on behalf of UWM Prepare encumbrance request Χ Χ Submit signed encumbrance request to BFS Χ Complete institutional reporting requirements Monitor subrecipient performance during the project; notify OSP immediately of any Χ changes to the subrecipient's performance Submit subrecipient invoice to PI for review and approval Χ Approve subrecipient invoice for payment based on the approved scope of work, budget,

and progress completed to date

Х

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4. Post-Award: Financial Project Management					
	Re	Responsibility ¹			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources	
Submit approved invoice to BFS for payment		X			
Update PO		X			
Effort Reporting					
Monitor effort commitments for sponsored project	Х				
Resolve problems or follow up on certifications not submitted		Х			
Complete necessary adjustments to award charges and/or payroll distribution		Х			
Ensure accuracy of completed effort certification reports	Х				
Certify effort on project for self and others as appropriate	Х				
Ensure that project personnel certify effort, as appropriate	X				

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	Re			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources
Identify project closeout timeframe and required documentation		Х		
Ensure all expenditures have been posted to the project accounts	Х			
Prepare final financial invoice/report		Х		
Resolve issues related to unreconciled accounts	Х			BFS*
Prepare the final technical/progress report for the project	Х			
Prepare final invention report	Х	Х		<u>UWMRF</u> ±
Manage reporting of any patents from the project to the sponsor (including iEdison)	Х		<u>UWMRF</u>	
Determine disposition of equipment, computers, furniture, other non-consumables purchased with project funds	Х	Х		<u>BFS</u>
If OSP is submitting the final financial and progress/ technical report, comply with sponsor submission method and submit to OSP 2 business days before sponsor deadline	х			
OR After OSP approval, if PI is submitting the final financial and progress/ technical report, comply with sponsor submission method and deadline, provide copy to OSP	Х			
If final report requires authorized official signoff, submission of final report		Χ		
Inactivate the project account in SFS		X		
Retain project-related records for audit or inspection according to university or sponsor requirements.	Х			
Maintain financial and project records for four years following project closeout (or in accordance with the terms and conditions of the award)	Х	Х		
Make provision for appropriate transfer of data/record retention if the PI leaves UWM	Х	Х		

^{*}Business & Financial Services

±UWM Research Foundation

^{1.} Many of the roles and responsibilities within this matrix may be delegated to administrative support staff. Contact your Associate Dean of Research (or equivalent) for additional information on the services available to you within your division. In the absence of administrative support staff, responsibility for these tasks falls to the PI.

^{2.} The term "Division/Dept." includes administrative positions, activities, and/or functions in individual schools/colleges, including Associate Dean of Research, Effort Coordinator, information technology staff, financial management staff, and/or other roles involved in the review and approval of proposals, awards, non-financial agreements, etc. on behalf of the division/department.1