Sponsored Programs Roles & Responsibilities

The University of Florida is committed to acting with integrity in the management of sponsored programs. The goals of this document are to provide descriptions of key individuals or units and their responsibilities within the management and oversight of sponsored programs. All individuals involved in research should take personal responsibility for their actions in pursuit of individual and organizational excellence. Each individual should uphold the highest standards of ethical and professional conduct in accordance with University, sponsor, state, and federal policies and regulations.

Given the variety of support structures throughout the University, this document will differentiate responsibilities at the Principal Investigator (PI), Department Administration, Chair, Dean, Division of Sponsored Programs (DSP), and Contracts & Grants Accounting Services (C&G). This document tries to make clear when particular parties are responsible for an action but understand that "department administration" may be sometimes served through lab managers, departmental support, shared service centers, or college administration. We leave the division of duties within each college or major unit to the Dean or Director of each unit.

Sponsored Programs Roles & Responsibilities

Sponsored Programs Roles & Responsibilities

Principal Investigator

Proposal Development & Routing

1. Develop proposal in compliance with University, sponsor, state and federal policies and regulations. The technical description of the work, narratives included in support of that description (e.g., budget justifications) and the ability to execute fall to the PI.
2. Identify key personnel and provide reasonable estimate of the effort required to carry out the statement of work.
3. Identify resources required to complete the proposal including personnel, facilities, subrecipients, costs to charge the sponsor and resources to be committed by the PI, department, college, or University.
4. Identify compliance requirements (i.e. human subjects, animals, safety concerns, export requirements and personal conflicts) required to be managed in performance of the project.
5. Complete all required disclosures of Financial Interests and Outside Activities prior to submission of the proposal.
6. Identify type of work to be undertaken to facilitate proper selection of facilities and administration (F&A) rate types and category or purpose for institutional reporting.
7. Certify to the veracity and integrity of the full and complete proposal including technical and financial commitments.
8. Ensure completion by PI and/or study team of all training required for compliance with University, sponsor, state and federal policy and regulations.
9. Ensure the proposal is completed with sufficient lead time to allow for the full and complete review by the Chair, Dean, and DSP outlined below.
10. Prepare responses to Sponsor inquiries during review process (e.g., Just-In-Time [JIT], revised budgets, revised scope of work, etc.)

Award Acceptance

1. Recognize the University as the recipient of any funds. If the PI receives an award, check, or agreement directly, it should be immediately forwarded to DSP.
2. Certify that PI ultimately will be responsible for the conduct of the work, reporting of the work and compliance with University, sponsor, state and federal policy and regulations.
3. Prepare or coordinate with department administration to allocate the awarded budget with the appropriate breakout of projects according to budgetary restrictions or preferred investigator or department management practices.
4. Determine, in accordance with college, unit or department policies) the appropriate F&A distributions between PI's involved in the project, their respective departments and any centers providing support.

Project Execution

1. Review and understand each award's conditions.
2. Comply with terms of the award including state and federal laws and regulations, University and sponsoring agency policies and procedures, award specific conditions and requirements, and the scope of work.

Sponsored Programs Roles & Responsibilities

3. Oversee the conduct of research in accordance with state and federal laws and regulations and University and sponsoring agency policies and procedures.
4. Oversee the research team to help ensure ethical and compliant conduct in all aspects of the research process including but not limited to the treatment of human subjects and research animals, conflicts of interest, export control, data acquisition, management, sharing and ownership, publication practices, responsible authorship, and collaborative research and reporting.
5. Oversee compliance with technical, progress (including final), and compliance reporting requirements in accordance with University and sponsor policies, and state and federal laws and regulations.
6. Retain project data and materials as required by the award and in compliance with the University of Florida Intellectual Property Policy.
7. Disclose inventions, discoveries, intellectual property, and improvements to the University's Office of Technology Licensing (OTL).

Fiscal Administration of Project Execution
1. Understand and apply the cost principles, effort fundamentals and other fiduciary obligations that are agreed to in the acceptance of sponsored funds.
2. Direct the posting of project expenses to the appropriate project in accordance with University and sponsor policies, and state and federal laws and regulations.
3. Coordinate with department administration for a regular (monthly) review of project expenditures to ensure allocability, reasonableness, and necessity of costs.
4. Authorize cost transfers in a timely manner in accordance with University and sponsor policies and state and federal laws and regulations.
5. Coordinate department administration to identify and authorize cost sharing obligations and expenditures, if applicable.
6. Provide oversight for re-budgeting, cost transfers, and carry forwards. Coordinate with department to initiate resolution to any cost overruns.
7. Prepare continuation proposals or technical progress reports in a timely manner.

Subrecipient Monitoring
1. Maintain regular contact with the subrecipient's PI. Monitor subrecipient's technical and programmatic activities.
2. Collect, review and retain subrecipient's technical/performance reports as required by the terms of the subaward.
3. Verify the subrecipient work is conducted in a timely manner and that the results delivered are in line with the statement of work.
4. Review and approve subrecipient invoices to ensure the charges are allowable, allocable, reasonable, and within the period of performance. Approve the final invoice only when all required reports have been obtained.
5. Maintain documentation of monitoring.
6. Promptly contact C&G with concerns about subrecipient expenditures or DSP with any indication that the subrecipient is not fulfilling its obligations under the subaward.

Sponsored Programs Roles & Responsibilities

Effort Reporting

1. Expend effort throughout the life of the project.
2. Provide timely information to departmental personnel to facilitate payroll distribution and changes to distributions. Review charges throughout the life of the project to ensure accuracy.
3. Ensure that PI effort and effort of other individuals working on the project is certified accurately and in a timely manner.
4. Comply with sponsor requirements regarding any significant reductions (normally >25%) in effort commitments on funded sponsored activities.
5. Support and endorse cooperation with University compliance and monitoring efforts related to effort reporting.

Department Administration

Note that in the context of this document, department administration is not intended to imply an individual employed by or responsible to the department chair. Many structures exist in support of sponsored project proposals and award management. With the end in mind, these functions must exist at some level within the support structure of the unit. Clarity on where the responsibility lies is delegated to the Dean of each college or the Director of each major unit.

Proposal Development & Routing

In coordination with and support of the PI,

1. Develop a budget with:
    a. Costing in accordance with University, sponsor, state and federal policy and regulations including only allowable costs.
    b. Complete and accurate listing of all key personnel and all effort commitments for such personnel and appropriate salaries and fringes are charged for all personnel.
    c. Correct F&A determination and calculation. If the F&A rate deviates from the federally negotiated rate, PIs with the support of department administration should confirm that the F&A conforms to University policy. Any questions should be sent to DSP in advance of completing the budget and routing the proposal.
    d. Clear identification of any cost sharing—voluntary or mandatory—provided by University.
    e. All necessary supporting documentation (e.g., letters of support from representatives authorized to bind the subrecipients, budgets from subrecipients, quotes for equipment).
2. Ensure proposal meets sponsor guidelines for items such as page limits, cost limits, and forms required.
3. Provide DSP a copy of the proposal guidelines (especially those with special requirements) in advance of the submission deadline for review.
    a. Contractual exceptions and reps & certs must be handled by DSP and completed prior to submission day.
    b. Small Business Subcontracting Plans, if applicable, will be coordinated between the Department Administration, DSP and Small Business and Vendor Diversity Relations. Note that completion of these plans takes significant time. Should the proposal require a Small Business Subcontracting Plan, the department administration and PI should notify DSP at least two weeks prior to the proposal deadline.

Sponsored Programs Roles & Responsibilities

4. If proposal is electronically submitted, facilitate the upload of all proposal documents to appropriate electronic system.
5. Complete the appropriate University routing forms (currently PeopleSoft Workflow or DSP-1; effective March 2015, must be through UFIRST).
6. Attach all proposal related documents to the University routing form (into PeopleSoft, attached to the email transmitting the DSP-1 or effective March 2015 into UFIRST. Pertinent documents include:
    a. The Solicitation
    b. Full and complete proposal
    c. Cost sharing or matching approvals
    d. Disclosure of Financial Interests forms, as required
7. Facilitate all signatures and approvals to University routing forms (currently PeopleSoft Workflow or DSP-1; effective March 2015, must be through UFIRST). If cost sharing or any key personnel from units outside of the primary submitting department are included, facilitate proper departmental and college approvals from each department and college as required by University policy.
8. Ensure compliance with all College and Department concerns and policies.
9. Assist PI with preparation of responses to Sponsor inquiries during review process (e.g., JIT, revised budgets, revised scope of work, etc.). Transmit these responses to DSP will review and coordinate appropriate response to the Sponsor.

Award Acceptance
1. Facilitate coordination of responses necessary for DSP to negotiate an agreement or execute an award and transmission of that information to DSP.
2. Facilitate the completion and provision of all non-fiscal compliance information to DSP for review prior to award set up. This includes:
    a.   Human Subjects (IRB)
    b.   Animal Use (IACUC)
    c.   SFI Forms
    d.   Export Control
3. Assist PI with allocation of the awarded budget with the appropriate breakout of projects according to budgetary restrictions, investigator preference or department management practices. Enter allocated budgets with totals matching the categorical amounts of the award into the institutional award data collection system.
4. Complete and provide commitment form to C&G
5. Enter F&A distributions in F&A Manager.

Project Execution
1. Review the NOA, including the award or agreement attached, and facilitate identification of and adherence to all terms and conditions (especially those unique to the award), deliverable requirements, reports.
2. Distribute the NOA to all parties needing to be informed of a new project.
3. Assist PI in conducting the research ethically and in accordance with University and sponsor policies, and state and federal laws and regulations.
4. Assist PI with monitoring completion of technical, progress (including final), and compliance reporting requirements in accordance with University and sponsor policies, and state and federal laws and regulations. Manage coordination between the PI and DSP or C&G to respond to all delinquent reporting.

Sponsored Programs Roles & Responsibilities

Fiscal Administration of Project Execution

1. Coordinate with the PI to initiate expenses and payroll distributions necessary to start work on the project.
2. Assist the PI to verify the authenticity and accuracy of expended funds.
3. Review and approve charges on projects to verify that costs are reasonable and transactions represent an appropriate allocation of costs in accordance with University and sponsor policies, and state and federal laws and regulations. Process those transactions in the University's financial systems.
4. Assist with department maintenance of necessary documentation for purchases. Maintain records that will permit ready auditing by internal or external auditors.
5. Review and analyze sponsored projects financial reports.
6. Coordinate with PI for a regular (monthly) review of project expenditures to ensure allocability, reasonableness, and necessity of costs.
7. Cooperate with University compliance and monitoring efforts related to financial management and reports instances of noncompliance to the appropriate compliance office.
8. Coordinate with the PI to prepare and seek PI, Chair, Dean and DSP approval on prior approval requests such as no-cost extensions, authorizations for pre-award spending, re-budgeting requests, changes in key personnel, and more.
9. Review and authorize cost transfers a timely manner in accordance with University and sponsor policies, and state and federal policies and regulations.
10. Provide timely non-payroll cost-sharing documentation to C&G.
11. Coordinate with PI to resolve any cost overruns, if applicable.
12. Assist PI and C&G with providing support and documentation as required in any institutional, internal, sponsor or project audit requests.
13. Assist PI with submission of accurate and timely closeout documents.

Subrecipient Monitoring

1. Assist the PI in all areas of subrecipient monitoring responsibilities, including review of subrecipient invoices to ensure invoices are within the parameters of the subaward budget and questioning expenditures if necessary.
2. Ensure subrecipient invoices are approved by the PI and returned to C&G on a timely basis.
3. Request clarification from the subrecipient regarding any unusual or excessive charges invoiced by the subrecipient.

Effort Reporting

1. Validate that effort commitments are accurately entered into the University effort system.
2. Coordinate with the unit effort coordinator in ensuring the PI reviews and certifies all effort reports accurately.
3. Work with the PI to resolve any effort commitment or salary cost issues arising during the review of the effort report.

Sponsored Programs Roles & Responsibilities

Chair

Proposal Development & Routing

1. Establish departmental procedures supporting University policies and procedures for reviewing proposal development and routing.
2. Provide necessary resources for faculty to complete research under the auspices of the department's mission.
3. Oversee PI and department administration in the preparation and submission of the proposal budget in accordance with University and sponsor policies, and state and federal laws and regulations.
4. Certify that any proposal submitted by the department contains all costs necessary to complete the proposal activities and that any costs not identified and committed as cost sharing or simply not included will be borne by the department. Department will bear any errors in calculations resulting in less than sufficient funds.
5. Review indirect costs requested and ensure the rate conforms to the University's F&A Cost Policy.
6. Review and approve the PI eligibility of a non-tenure track faculty member to serve as PI on University submissions, if applicable.
7. Review and, if applicable, approve any cost sharing committed in the proposal.

Award Acceptance

1. Establish departmental procedures supporting University policies and procedures for reviewing award terms and conditions.
2. Review all major budget revisions to ensure compliance with all fiscal requirements as outlined in the original proposal development.

Project Execution

1. Establish departmental procedures supporting University policies and procedures for reviewing execution of all sponsored projects.
2. Provide direction, resources, and oversight to help ensure that research is conducted and project funds are managed in accordance with University and sponsor policies, and state and federal laws and regulations.
3. Oversee the department to assure ethical and compliant conduct in all aspects of the research process including but not limited to the treatment of human subjects and research animals, conflicts of interest, export control, data acquisition, management, sharing and ownership, publication practices, responsible authorship, and collaborative research and reporting.

Fiscal Administration of Project Execution

1. Establish departmental procedures supporting University policies and procedures for managing sponsored project expenditures.
2. Provide direction, resources, and oversight for cost sharing obligations and expenditures

Sponsored Programs Roles & Responsibilities

3. Provide direction for re-budgeting and cost transfer activities in accordance with state and federal regulations and University and sponsoring agency policies and procedures.
4. Assist DSP, Division of Research Compliance, and C&G in ensuring compliance with University and sponsor policies, and state and federal laws and regulations, such as mandatory training in effort fundamentals and cost principles, proper stewardship of funds, response to audit inquiries, and any other questions related to the management of funds or conduct of research. The department will be held responsible for all cost overruns and disallowances.

Effort Reporting
1. Establish departmental procedures supporting University policies and procedures for proposing, expending and certifying effort.

Dean, College Administration, or Institute/Center Director

Proposal Development & Routing
1. Establish college/unit procedures supporting University policies and procedures for reviewing proposal development and routing.
2. Clearly delineate the college/unit expectations in meeting the department administration responsibilities for proposal development and routing.
3. Provide direction, resources, and oversight to ensure that the college administers sponsored programs in accordance with University and sponsor policies, and state and federal laws and regulations.
4. Certify that any proposal submitted within the college contains all costs necessary to complete the proposal activities.
5. Validate that indirect costs requested conform to the University's F&A Cost Policy.
6. Review and, if applicable, approve any cost sharing committed in the proposal.
7. If applicable, review and approve the PI eligibility of a non-tenure track faculty member to serve as PI on University submissions.

Award Acceptance
1. Establish college/unit procedures supporting University policies and procedures for reviewing award terms and conditions.
2. Clearly delineate the college/unit expectations in meeting the department administration responsibilities for award acceptance.
3. Review all major budget revisions to ensure compliance with all fiscal requirements as outlined in the original proposal development.

Project Execution
1. Establish college/unit procedures supporting University policies and procedures for reviewing execution of all sponsored projects.
2. Clearly delineate the college/unit expectations in meeting the department administration responsibilities for project execution.

Sponsored Programs Roles & Responsibilities

3. Provide direction, resources, and oversight to help ensure that research is conducted and the funds are managed in accordance with University and sponsor policies, and state and federal laws and regulations.
4. Promote ethical and compliant conduct in all aspects of the research process including but not limited to the treatment of human subjects and research animals, conflicts of interest, export control, data acquisition, management, sharing and ownership, publication practices, responsible authorship, and collaborative research and reporting.
5. Provide PIs with the information necessary to fulfill their fiduciary and sponsored project management responsibilities.

Fiscal Administration of Project Execution
1. Establish college/unit procedures supporting University policies and procedures for managing sponsored project expenditures.
2. Clearly delineate the college/unit expectations in meeting the department administration responsibilities for fiscal administration of sponsored projects.

Effort Reporting
1. Establish college/unit procedures supporting University policies and procedures for proposing, expending and certifying effort.
2. Clearly delineate the college/unit expectations in meeting the department administration responsibilities for all areas of effort management.

Division of Sponsored Programs

Proposal Development & Routing
1. Develop institutional policies and procedures and direct institutional systems and trainings to ensure efficient and effective proposal management practices. In the area of proposal management, this includes but is not limited to, proposing effort and other direct costs, cost sharing, F&A costs, PI eligibility, and proposal signature requirements.
2. Provide institutional data systems for managing proposal routing and collecting institutional proposal data. Provide policies, procedures, and training for use of these systems.
3. As provided by PI and study team and as time allows, review any proposal solicitation provided either in advance or in conjunction with the submission for contractual exceptions, representations and certifications, and other common institutional requirements. Communicate common pitfalls or unusual requirements to the PI and Department Administration.
4. As provided by PI and study team and as time allows, perform the final review of the proposal before submission to the sponsor. As time allows, DSP will:
   a. Confirm the institutional data presented
   b. Confirm the appropriate F&A rate and any justification for deviations from the federal negotiated rate are included
   c. Confirm the proper fringe benefit rates are included
   d. Confirm that the proposal meets the solicitation requirements for page limitations, cost limitations and other proposal limitations
5. Act as institutional signatory on all proposal and proposal related documents under Power of Attorney designated by the President of the University.

Sponsored Programs Roles & Responsibilities

6. Register the University in sponsor electronic research administration systems and provide guidance to campus on account requirements for those systems. Provide overall institutional leadership for electronic research administration planning and implementation.

Award Acceptance

1. Develop institutional policies and procedures and direct institutional systems and trainings to ensure compliant and efficient acceptance of awards.
2. Work with and on behalf of the PI to negotiate all research-related agreements and any modifications. Act as institutional signatory under Power of Attorney designated by the President of the University.
3. Coordinate with OTL, General Counsel, Risk Management and other institutional offices in the review and negotiation for all research-related agreements.
4. Ensure that all fiscal and non-fiscal compliance requirements necessary to initiate work (including management of conflicts of interest, review of export control, and human and animal use) have been established prior to release of funds for expenditure.
5. Provide institutional data systems for managing award acceptance and institutional award reporting.
6. Review project budgets as entered by department administration for compliance with University requirements for minimum effort information, adherence to sponsor budget categories, and any award fiscal restrictions.
7. Review each award and document the terms and conditions required for management in the institutional award management system.
8. In a timely manner, prepare the official institutional acceptance of award (including terms, budget and other demographic information) and distribute such acceptance to the PI, department administration, C&G and Asset Management.

Project Execution

1. In coordination with other core offices with responsibilities in the management of sponsored programs, develop institutional policies and procedures and direct institutional systems and trainings to ensure compliant project execution.
2. Assist in the development of training and educational materials related to compliance with University and sponsor policies, and state and federal laws and regulations.
3. Facilitate review of prior approval requests such as no-cost extensions, authorizations for pre-award spending, re-budgeting requests, changes in key personnel, and more. Provide institutional authorization for such requests, submit to sponsor, and coordinate any follow-up or award modification resulting from a positive response.

Fiscal Administration

1. In coordination with other core offices with responsibilities in the management of sponsored programs, develop institutional policies and procedures and direct institutional systems and trainings to ensure compliant management of sponsored project expenditures.
2. Facilitate review of prior approval requests such as no-cost extensions, authorizations for pre-award spending, re-budgeting requests, changes in key personnel, and more. Provide institutional authorization for such requests, submit to sponsor, and coordinate any follow-up or award modification resulting from a positive response.

Subrecipient Monitoring

1. In coordination with other core offices with responsibilities in the management of sponsored

programs, develop institutional policies and procedures and direct institutional systems and trainings to ensure compliance with federal subrecipient management requirements.

2. For those subrecipient's not in Federal Audit Clearinghouse, conducts a risk assessment using the Subrecipient Financial System Certification and Questionnaire.

3. Collect information necessary to complete an outgoing subaward. Prepare the appropriate outgoing subaward agreement and any amendments thereafter, including incorporation of sponsor flow-down provisions, and any other information necessary to ensure compliance with federal regulations.

4. Negotiates the subaward with the University of Florida PI and subrecipient. Serves as the institutional signatory under Power of Attorney from the President of the University of Florida.

5. Distributes fully executed subaward and amendments thereafter to PI, Department Administration and C&G.

6. Works with PI in the event subrecipient performance or programmatic issues arise during the period of performance; works with subrecipient to identify and implement a corrective action plan; notifies sponsor as needed.

Effort Reporting

1. In coordination with other core offices with responsibilities in the management of sponsored programs, develop institutional policies and procedures and direct institutional systems and trainings to ensure compliance with federal effort regulations.

2. Collect budgets in a format that facilitates entry of all key personnel commitments and cost-sharing commitments into institutional effort systems.

Contracts & Grants Accounting Services

Award Acceptance

1. Review award documentation for terms and conditions related to fiscal matters.
2. Review and release budgets establishing spending authority on sponsored programs.
3. Establish cost centers in PeopleSoft ledger for collection of all costs.

Fiscal Administration of Project Execution

1. In coordination with other core offices with responsibilities in the management of sponsored programs, develop institutional policies and procedures and direct institutional systems and trainings to ensure compliant project execution.

2. Review and as appropriate, approve, requests for exceptions to the University's cost accounting standards. Communicate approved exceptions to C&G accounting.

3. Prepare and reconcile financial reports required by sponsors.

4. Manage the sponsored programs revenue cycle from invoicing through collection.

5. Provide institutional leadership for training, systems, and best practices related to cost transfers. Evaluate cost transfers for allowability. Provide final review of cost transfers involving sponsored projects. Review data for opportunities to enhance training and identify business processes for improvement.

6. Review cost sharing expenditures, and if allowable, document those expenditures in the University accounting system.

Sponsored Programs Roles & Responsibilities

7. Provide institutional leadership for reporting systems supporting the management of sponsored project expenditures.
8. Review project expenditures and advise on allowability of those expenditures. If appropriate, direct the transfer of those costs to other cost centers.
9. Perform final fiscal review of all expenditures on projects and fiscally close the project after the completion of project performance.

Subrecipient Monitoring

1. In coordination with other core offices with responsibilities in the management of sponsored programs, develop institutional policies and procedures and direct institutional systems and trainings to ensure compliance with federal subrecipient management requirements.
2. Receive invoices from subrecipients and coordinate with the PI to validate the charges and that work progresses according to the statement of work and in accordance with the terms of the subaward.
3. Assist in the reviews of invoices prior to payment to ensure that all invoices are consistent, with subaward requirements, costs are within the project period, review invoices for unallowable costs and other inconsistencies; and ensure cumulative amount of the invoice does not exceed the total amount of the subaward.
4. Provide assistance to PIs and Department staff in the event budgetary or financial issues that may arise during the period of performance.
5. Review audit reports for Subrecipients or obtains an annual certification from each subrecipient for compliance with federal regulations. Follow up on instances of subrecipient noncompliance with annual certification requirements. Follow up with subrecipients regarding appropriate and timely corrective action on audit findings specifically related to a UF outgoing subaward.
6. Financially close subawards following completion of the subaward activities.

Effort Reporting

1. In coordination with other core offices with responsibilities in the management of sponsored programs, develop institutional policies and procedures and direct institutional systems and trainings to ensure compliance with federal effort regulations.
2. Validate and enter effort and paid and cost-shared commitments into the University's accounting system.
3. Resolve inconsistencies between commitments and certified effort.
4. Resolve issues identified with retroactive salary adjustment to certified effort.