RESEARCH ADMINISTRATION AT CALTECH (1/26/2019)

Introduction

The purpose of this document is to provide an overview of the administration of extramurally sponsored projects at Caltech. This document describes the functions of the Office of Research Administration as well as other Caltech offices directly and indirectly responsible for supporting sponsored projects at Caltech.

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Division Administration
All research at Caltech occurs within the six academic divisions; Caltech possesses no schools or colleges, or even traditional academic departments. The six divisions are: Biology & Biological Engineering (BBE); Chemistry & Chemical Engineering (CCE); Engineering & Applied Science (EAS); Geological & Planetary Sciences (GPS); Humanities and Social Sciences (HSS); and Physics, Mathematics & Astronomy (PMA). Each division has a Chair, who is appointed by the Provost from among the faculty of the division; the Chair has the equivalent authority of a dean and the faculty within a division report to its Chair. Each Division Chair reports to the Provost and the Provost reports to the President. Each division also possesses a Division Administrator, who reports to the Chair and who is the business manager for the division. The non-academic personnel for a division generally report up to the Division Administrator (see Caltech Abbreviated Org Chart).

All research at Caltech is conducted under the auspices of professorial faculty and each division is responsible for providing staff support to its faculty; each division also has assigned staff to support sponsored programs management (e.g., proposal development, award management, etc.). And, while some division staff may play a role in sponsored programs administration, they are solely under the authority of their respective division and are not considered part of the sponsored programs organization at Caltech. The individuals within a division who support sponsored programs activities are generically termed “grant managers”; this is a functional label and may not reflect an individual’s sole responsibility or even their formal, payroll title.

Central Administration
The management of sponsored programs at Caltech is supported by four primary central offices (see Responsibility Matrix):

- Office of Sponsored Research (proposal review & submission; award review & negotiation; award acceptance, activation and notification; post-award non-financial transactions)
- Post Award Administration (sponsored programs fiscal management, including external audit coordination)
- Office of Research Compliance (research subjects, conflict of interest, research misconduct, responsible conduct of research, and biosafety)
- Procurement Services (outgoing subaward setup, management & monitoring)

And the following ancillary offices:

- Office of General Counsel (legal advice)
- Office of Export Compliance (export compliance review; application for licenses; issuance and management of technology control plans)
- Office of Technology Transfer & Corporate Partnerships (approval of IP terms; negotiation of CDAs and MTAs)
- Environmental Health & Safety (lab safety, including controlled substances and select agents)
- Audit Services & Institute Compliance (internal testing of controls)
- Vice Provost for Research (research compliance issues that impact faculty; eligibility to be PI)
- Provost (F&A waivers; establishment of and exceptions to academic and research policies)
Relationships
The various offices involved in sponsored programs administration have strong and long-standing working relationships as reflected primarily through the communications that routinely occur between the offices’ respective directors, as well as the committees and working groups on which these individuals sit. Each office is fully aware of its responsibilities and authorities and when it may need to seek advice from another office. Caltech Directors are expected to be responsive to both faculty and staff, and to resolve issues efficiently and to engage with other offices, as necessary.

Sponsored Programs Administration Structure

Office of Sponsored Research (OSR)
OSR is a part of the Office of Research Administration (see ORA Org Chart) and reports to the Associate Vice President for Research Administration, who in turn reports to the Vice President for Administration. OSR possesses 11 FTE comprised of the following positions: Director, Associate Director, Assistant Director, Senior Contract & Grant Officer, Contract & Grant Officer, 3 Contract & Grant Analysts, Contract & Grant Assistant, Data Specialist and Department Assistant.

OSR is organized into teams, each of which serves one or more academic divisions. In general, this allows each team to provide consistent support to a particular division from proposal development to award closeout, regardless of sponsor; it also provides a natural mechanism by which team members can back one another up. This hierarchical structure supports training of team members and provides a career path. Each team is comprised of at least one Analyst and one Officer, with the supervisor having primary responsibility for training of direct reports. For the most part a team member who reviews and submits a proposal will be the one who reviews and accepts the award. This allows individual team members to become familiar with the project from cradle to grave. In terms of proposal and award transactions, each level: analyst, officer, director reviews transactions of an increasingly higher level of complexity/difficulty.

Post Award Administration (PAA)
PAA is a part of Caltech Finance (see PAA Org Chart) and reports to the Associate Vice President for Finance and Treasurer, who in turn reports to the Vice President for Administration. Caltech currently supports 17 full time positions and one part time position in the area of Sponsored Programs Fiscal Management. Management of Post Award Administration (PAA) is assigned to a Senior Director and an Assistant Director. Invoicing and fiscal reporting of sponsored awards is managed by 8.5 accountants; cash draws and cash management by 2 accountants; fiscal compliance by 1.5 employees; audit management by 2 audit coordinators; and JPL fiscal invoicing, reporting, and draws by 2.5 accountants. Miscellaneous tasks are assigned to an accounting assistant and a part time position (typically a student employee).

Procurement Subawards Group (PSG)
PSG is a part of Procurement Services which is a part of Caltech Finance (see Procurement Subawards page); Procurement Services reports to the Associate Vice President for Finance and Treasurer, who in turn reports to the Vice President for Administration. PSG possesses 5 FTE comprised of the following
positions: Subcontracting Team Lead, 3 Senior Subcontracting Officers, and a Subcontracting Officer. The primary distinction between positions is in the level and years of experience.

Office of Research Compliance (ORC)
ORC reports to the Vice Provost for Research, who in turn reports to the Provost (see ORC Org Chart). ORC possesses 5 FTE comprised of the following positions: Director of Research Compliance, Director of Laboratory Animal Resources (Chief Veterinarian), and 3 Research Compliance Administrators.

Division Grant Managers (GM)
As mentioned previously, the division Grant Managers are not considered by Caltech to be a part of the sponsored programs organization at Caltech, as many of them have other responsibilities within their divisions. However, from the PI’s perspective and from that of central administrative units whose primary responsibility is sponsored programs administration, the Grant Managers play an integral role in sponsored programs administration. The GMs work directly with their PIs on proposal development and day-to-day award management. Furthermore, the GMs and Division Administrators are the primary means by which central administrative departments communicate with PIs on a mass distribution basis.

Sponsored Programs Operations
(see Proposal-Award Lifecycle)

Research/Proposal Development
There is no single Caltech office with exclusive responsibility for assisting faculty with identifying funding opportunities. Rather, Caltech faculty are hired with the understanding that they are responsible for finding funding for their labs, and they are hired, in part, due to their demonstrated success in doing so. Caltech’s Development and Institute Relations Office does provide some assistance in this area for the proposals they manage, but this assistance is targeted to family foundations and donors for whom the relationship must be carefully managed; at Caltech these transactions do not fall within the purview of sponsored programs.

Only professorial faculty may head sponsored projects as Principal Investigators. All other individuals acting as PI or co-PI must work under the auspices of a professorial faculty member and must be approved in that role by the division Chair and the VP for Research.

All aspects of proposal development are managed by the divisions, normally by grant managers who directly support their faculty with budget preparation, construction of the proposal within the appropriate sponsor system, and routing of proposals for Caltech internal review. OSR plays a secondary role, acting as an advisor/interpreter to PIs and division personnel on proposal guidelines, as well as sponsor and Caltech policies. Often times, OSR will be asked to pre-review drafts of proposals, particularly when complex situations arise.

Caltech subscribes to Cayuse424 as its software application for preparation and submission of proposals to Grants.gov, but otherwise uses the respective agency systems (e.g., NSF FastLane; NASA NSPIRES, etc.). Both division grant managers and OSR staff are fully versed in Cayuse and the agency systems.

With regard to opportunities that limit the number of proposals that may be submitted, OSR will identify these to the Provost’s Office. The Provost’s Office will then establish an internal deadline/content requirement, notify the Division Chairs, and appoint a review committee (usually made up of the Vice
Provost for Research and the relevant division Chairs); Division Chairs are responsible for disseminating within their divisions as they see fit. Once the internal process is complete, the Provost’s Office will notify the relevant individuals, including OSR, and OSR will enforce the selection in the event that it receives too many proposals for submission to the opportunity.

**Proposal Review and Submission**

Caltech uses the Division Approval Form (DAF) as its mechanism for routing and approval of proposals. The DAF summarizes data about a proposal including applicable compliance issues. All proposals for extramural support must be approved by the respective division Chair; this addresses issues such as available space, and disclosure of financial interests, as required prior to submission. Additional approvals may be needed prior to submission depending on the policy or compliance issues involved. OSR is not permitted to submit proposals that do not have approval of the division Chair. Even with division Chair approval, Caltech will not submit a proposal without confirmation from the PI or his/her grant manager that the PI has finished editing the proposal.

All proposals for extramural support must be approved and submitted by OSR. While most federal systems help enforce this concept, in situations where a PI might submit directly to a sponsor prior to approval by OSR, no award will be accepted/executed without first obtaining full Caltech review and approval of those elements that should have received approval prior to submission.

Caltech does not impose a review deadline for proposals. Rather, OSR offers a service guarantee – for a fully completed proposal forwarded to OSR at least 3 days prior to its submission deadline, OSR will perform a full review against the sponsor’s guidelines. Proposals provided to OSR with less than 3 days will receive a level of review as determined by OSR and based primarily on Caltech policy requirements, timing and workload. For proposals forwarded to OSR with insufficient time to perform even a minimal review, OSR will perform a post-submission review on key elements, such as: correct F&A rate, PI eligibility, use of research subjects, etc. If the post-submission review identifies serious problems with the proposal, OSR will consult with the Division Chair and may need to withdraw the proposal.

Caltech does not yet possess an electronic routing and approval system for proposals. All proposals are routed manually; for most proposals this means e-mail routing of documents. Each division manages routing within the division, and is responsible for obtaining other approvals, such as from the VP for Research or the Provost and forwarding these to OSR. To the extent that OSR identifies issues with a proposal not addressed prior to OSR’s receipt of the proposal, OSR will coordinate with the appropriate office to obtain the necessary review/approval.

**Award Review and Negotiation**

OSR is the Caltech office authorized to review and negotiate sponsored awards. OSR personnel are fully cognizant of the latitude within which they are allowed to negotiate and will seek guidance from upper management or other offices, as appropriate. To the extent that OSR seeks input from other offices, OSR will normally act as the clearinghouse for all negotiation issues and interactions between Caltech and the sponsor. At times an issue (such as IP) may be so complex that it makes more sense for the cognizant Caltech office to discuss the issue directly with the sponsor.

There are often compliance issues identified at the proposal stage that don’t need to be resolved until acceptance of the award; OSR validates all such issues prior to award acceptance. This may require coordination with several different offices, including Research Compliance, Provost, Export Compliance, OGC, etc. In some cases, sponsors may make awards conditionally (e.g., “no work may begin until
animal use is approved"). OSR will hold up award activation until the conditions have been met. The primary tool OSR uses to track compliance approvals is the aforementioned Proposal-Award Checklist. When printed, the front side of the form represents the proposal and the back side represents the award.

To the extent that sponsored agreements arrive in another office (e.g., OTT, OGC, Development, etc.), those offices know to forward the agreements to OSR, or at least to check with us to work through identifying the Caltech office with purview. In cases where PIs or other division personnel are not sure where to send a particular agreement, OSR has been designated as the “clearinghouse” to review an agreement and route to the office with purview.

**Award Acceptance, Activation and Notification**

All sponsored awards are accepted/executed by OSR. Once accepted, OSR will contact the relevant division grant manager to determine the appropriate account structure. OSR will establish the account within the financial system, and then populate the obligated funds and applicable terms and conditions into the account. Once this is accomplished, OSR will formally notify the PI and other individuals on campus about the award.

OSR activates all sponsored award accounts. OSR populates various award elements when activating a sponsored account (e.g., sponsor name, begin date/end date, PI name, project title, obligated amount by budget category, applicable F&A rate, etc.). Additionally, OSR enters various flags and associated details having to do with award terms, such as prior approval requirements, committed cost sharing, committed effort, in whom title to equipment vests, names of sponsor-approved subrecipients, etc.

Notification of an award to campus takes the form of an e-mail addressed to the PI. To the e-mail is attached: 1) an Award Summary generated from the financial system; 2) a copy of the sponsor’s award documents, and 3) additional documents that may be related to special approvals/issues associated with the account set-up (e.g., cost sharing, F&A waivers, equipment fabrication approvals, etc.). The notification will be copied to the PI’s division grant manager, to the division office and to Post Award Administration. Depending on the issues involved, the notification may also be copied to: Research Compliance, Export Compliance, Tech Transfer, Procurement Services, Corporate Partnerships, Foundation Relations, Property Services, etc.

The Award Summary identifies the sponsored award, including many elements entered during the award activation process described above. The Award Summary will also include comments from OSR about award requirements that OSR considers unusual or important for various offices to note. For example, OSR will point out if invoicing or financial reports require coordination with the PI relative to project progress and sources of committed cost sharing.

Since the majority of data elements in the financial system most directly impact Post Award Administration processes, upon notification of an award PAA will review the award documentation and account parameters established by OSR to ensure they are consistent with PAA’s understanding of the award terms. If PAA questions any of OSR’s entries, they will contact the OSR individual who activated the account to resolve the questions.
Outgoing Subaward Setup, Management and Monitoring

**Issue:** The Subawards Group within Procurement Services is responsible for outgoing subawards. The process starts with the division initiating a purchase requisition (PR) within Caltech’s e-procurement system (TechMart). The PR will include the relevant information from the division about the subaward transaction, e.g., the subrecipient’s sponsor-approved budget and SOW. Receipt of the PR informs the Caltech Contracting Officer to begin the process of issuing a subaward. The Contracting Officer will validate that the sponsored award is active within the financial system and that the OSR-issued Award Summary indicates that the sponsor has approved issuance of a subaward to the entity identified in the PR. In the event that sponsor approval does not yet appear to exist, the Contracting Officer will seek further guidance from the division and/or OSR.

The Contracting Officer performs a risk assessment of the subrecipient prior to issuing a subaward; Caltech utilizes the FDP Risk Assessment Tool. If the Contracting Officer determines the subrecipient to be high risk, then the Contracting Officer may include additional terms and conditions, as recommended by the Uniform Guidance. Most subawards issued by Caltech are under federal grants, therefore the Contracting Officer will use the FDP Subaward Template as the basis of the subaward. For situations where the FDP Subaward Template is not appropriate (e.g., because the subrecipient is high risk or the prime award is not a federal grant), the Contracting Officer will utilize a Caltech-developed subaward template. Caltech participates in the FDP Expanded Clearinghouse project and the Contracting Officer will utilize the Clearinghouse during the risk assessment process if the Subrecipient also participates.

Caltech issues subawards via a Purchase Order, however the PO is used simply as a mechanism by which Caltech effects encumbrance of funds in the financial system and payment of invoices. Caltech does not utilize its standard PO terms and conditions in this situation, rather the subaward document constitutes the terms and conditions of the PO. The Contracting Officer may seek guidance from the PI, OGC, ORC or OSR, as necessary, if issues or questions arise during the issuance or management of a subaward.

**Research Compliance:** Depending on the requirements of the sponsor as well as the activities in which the subrecipient will engage, the Contracting Officer will obtain the appropriate assurances, including for use of humans or animals, as well as conflict of interest. If the subrecipient does not have a compliant COI program, they must come under Caltech’s program. If this is the case, the Contracting Officer will inform the subrecipient and engage with ORC to enroll them in Caltech’s COI process.

**Monitoring:** The Contracting Officer works closely with the PI and division to ensure that the subrecipient is in full compliance with the requirements of the subaward, including technical and financial reporting and cost sharing commitments. During the course of the subaward the Contracting Officer will review subrecipient audit reports, verify that corrective action plans are implemented and followed, review risk levels and, if necessary, modify the subaward as appropriate.

**Invoicing:** Subrecipient invoices arrive in Payment Services (part of Procurement Services) and are forwarded to the appropriate PI. A division approval (PI or delegate) is required in order for a subaward invoice to be paid; the division signature demonstrates review and approval of the costs included on the invoice, as well as continued and acceptable performance by the subrecipient. Once approved, Payment Services will issue payment.

**Closeout:** Closeout of a subaward begins 90 days prior to the end date, at which point the division will send a notice to the subrecipient to confirm the status of the subaward; the division is responsible for ensuring receipt of all reports and deliverables, receipt of the final invoice, and for approving the final
invoice only once all end-of-project issues have been resolved with the subrecipient. The Contracting Officer will review the subrecipient’s release forms, review and process the final invoice for payment, release any remaining encumbrance in the financial system, and finalize any residual equipment issues.

**FFATA:** At the time of issuance of a subaward, or a financial amendment, the Contracting Officer will upload the appropriate data to the Federal Subaward Reporting System as required by the Federal Funding Accountability and Transparency Act.

**Sponsored Programs Fiscal Management**

Post Award Administration is responsible for overall fiscal compliance of sponsored awards.

**Award review:** PAA receives notice of new awards and modifications from OSR through an Award Summary, which includes copies of sponsor award documents. PAA accountants review the award account established by OSR in the financial system (Oracle) and makes note of invoicing, draw, and reporting requirements.

**Review of costs:** The charging of allowable costs is managed in Oracle by the use of Allowability Schedules that act as filters to permit only certain types of expenditures to be charged to an account. Allowability Schedules applied to federal accounts are reflective of the types of costs allowed on federal awards; these Schedules specifically exclude costs such as honoraria, and entertainment. PAA staff also review higher risk costs (foreign travel, dues, food, administrative salaries) on a regular basis (monthly in most cases).

**Application of F&A and other rates:** Oracle is designed such that the application of various rates or burden (e.g., F&A, fringe benefits, tuition remission, etc.) is accomplished by means of a Burden Schedule applied to an account. Standard Burden Schedules, for example to support Caltech’s negotiated F&A rates or for common waived rates (e.g., 0.0%), are established each year; these Schedules will also include that year’s fringe benefits rate and tuition remission rate). Specialized Burden Schedules are established at the request of OSR when customized rates are negotiated for specific awards. A Burden Schedule is applied by OSR at the time it establishes an award account. Application of various rates within a Burden Schedule to particular expense types is also managed by a Burden Schedule (e.g., tuition remission rate is only applied to student salaries; F&A is not applied to capital equipment, tuition remission, or participant support costs).

**Invoicing:** Sponsored award invoicing is managed by PAA accountants typically on a monthly basis, although there are also quarterly and manual invoices. Accountants are usually assigned to particular Caltech divisions but there are deviations where all awards provided by one sponsor are assigned to one accountant to maintain efficient billing. Invoices are typically generated from cost information in Oracle and reviewed by accountants for accuracy before submission to sponsors for payment.

**Draws:** Caltech has been permitted by several federal agencies to draw funds via Letter of Credit. The agencies are NIH, NSF, NASA, and DOE. Draws are typically made on a weekly basis by a combination of PAA accountants and cash management team members and overseen by the Senior Director of PAA.

**Accounts receivable/cash management:** PAA maintains a cash management team which is in charge of draws, applying payments received to invoices, and quarterly Federal Cash Transaction Reports. The team also manages deposits of checks, documentation of wires deposited to PAA’s bank account, and resolution of unidentified payments. The team is also responsible for preparing monthly GL
reconciliations for PAA Accounts Receivable and Cash Holding account; such reconciliations are reviewed and approved by the Assistant Director. Collection requests for aging invoices are managed by PAA accountants and monitored on a monthly basis by the Senior Director.

**Financial reporting:** PAA accountants prepare financial reports as required by sponsors; such reports are reviewed and authorized by the Senior Director; financial reports may require the assistance of division grant managers if programmatic details related to expenditures are required.

**Compliance:** PAA accountants review awards for various financial compliance issues including administrative salaries, higher risk costs, NIH salary cap, program income, and cost sharing. With the exception of reviews for higher risk costs, these compliance reviews occur semi-annually. PAA accountants work with division grant managers to ensure Caltech is in compliance with sponsor requirements. PAA also maintains the cost transfer system and the Payroll Distribution Confirmation (PDC) system for Caltech. Cost transfers are reviewed by two levels of PAA staff; all transfers older than 90 days are reviewed and, if appropriately justified, authorized by the Senior Director. Payroll Distribution Confirmations occur twice annually; PAA maintains the system for PDCs and follows up on confirmations to ensure there are no late submissions.

**Audit:** PAA is also responsible for managing the annual single audit required by the Uniform Guidance. PAA’s Assistant Director is tasked with oversight and coordination of audit requests. PAA also coordinates the annual Labor Floor Check required by the Defense Contract Audit Agency to support the annual forward pricing proposal for Caltech’s F&A rates. Sponsor audits are also coordinated by PAA.

**Closeout:** 90 days prior to the end of a sponsored award, PAA forwards a notice to division grant managers asking for confirmation of award closing. The notice also reminds grant managers to complete all project cost charging; release any remaining commitments; review labor charges; prepare any needed cost transfers; and manage any sponsor compliance or other requirement impacting financial reporting.

Upon notification by the division that the award may be closed, the PAA accountant prepares a closeout package that includes a checklist, the final report (if any); the final invoice information from Oracle; an award worksheet; documentation that compliance requirements have been met; any sponsor draw information; and an effort commitment report indicating whether effort commitments have been met. Once the closeout package is received from the division grant manager and approved by the PAA Senior Director, the PAA accountant closes the award in Oracle. The PAA accounting assistant manages the transfer of the award file to storage and documents in PAA systems when disposal may occur. If there are issues with closeout, the Senior Director will instruct the PAA accountant to review and work with the Division and/or the sponsor to resolve the issues.

**Sponsored Programs Administrative Management**
The sponsored programs function at Caltech follows a standard model in higher education of a pre-award/post-award non-financial office (Office of Sponsored Research), and a post award financial office (Post Award Administration); the outlier is subaward issuance and subrecipient monitoring (Procurement Services).

Responsibility for the preparation and submission of reports required under sponsored awards is distributed across several offices. These offices are notified of their obligations via distribution of the Award Summary and/or through reports generated out of the financial system.
Technical Progress and Reporting: At Caltech the PI is solely responsible for ensuring project goals are met and technical reports are submitted. The PI may choose to manage the process in a number of ways, which may include support from the Division. OSR will provide assistance to the PI or division grant manager if requested, for example for those reports that may require sign-off by an authorized official, interpretation of reporting requirements, requesting extensions of reporting deadlines (e.g., no cost extension), etc.

Financial Reports: Post Award Administration (PAA) is responsible for preparation and submission of all financial reports, including managing Limitation of Funds/Limitation of Costs notification requirements. To the extent that a sponsored award requires non-standard financial reports, such as syncing of invoices to project milestones, or projections of expenditures, PAA will coordinate with the PI and/or division grant manager; OSR will notify the respective offices of this requirement via the Award Summary. As part of its review, PAA will compare payments to invoices or draws, and investigate any discrepancies. PAA also reviews sponsor award requirements related to budgets and financial reporting and ensures compliance with them. PAA reviews higher risk costs to ensure unallowable costs are not included in financial reporting. If financial compliance issues apply to the award, PAA will also review such requirements to ensure compliance requirements have been met (NIH Salary Cap, effort commitment, administrative salaries in particular). If compliance issues must be addressed, the PAA accountant works with the division grant manager to correct or update such issues.

Property Reports: Property Services is responsible for preparation and submission all property inventory reports and for requesting final disposition of sponsor-owned property. Property Services works directly with the division to address property tagging and location tracking, and reconciliation of inventory. To the extent that Property Services has questions about award requirements they will seek advice from OSR.

Patent Disclosures: The Office of Technology Transfer (OTT) is responsible for receiving internal disclosures and for preparing/disclosing inventions to sponsors in accordance with award and/or statutory requirements.

Patent Filing: The Office of General Counsel (OGC) performs all patent filing and prosecution for Caltech.

Invention Summary Reports: If an award requires invention summary reports, how the award requires submission of this information will determine which office at Caltech takes responsibility for submission to the sponsor. For example, if a summary of inventions must be submitted as part of a technical report, the PI is responsible for submitting the information since the PI is solely responsible for the content of the technical report; the PI may choose to engage with the Office of Technology Transfer to gather necessary information. If the submission is outside of a technical report, then OSR will take responsibility for submission, for example because submission must occur on a particular form and/or requires signature by an authorized official (e.g. the DD882); in this case OSR will request the information from OTT, complete the report and submit it.

Sponsor Reminders: To the extent that sponsors send notices to or otherwise communicate with OSR regarding reporting requirements, such as reminders of upcoming due dates, late notices and the like, OSR will forward those notices to the responsible office/individual. If the notice is about a report for which the PI is responsible, OSR will also notify the PI and the PI’s grant manager. To the extent that a
notice indicates a technical report is late, OSR will escalate the internal notification first to the Division Chair and then to the VPR, as appropriate.

Prior Approvals/Changes: OSR is the office responsible for interfacing with the sponsor for all types of formal changes to an award, including requests for prior approval. OSR and PAA will provide advice to the PI and other division personnel as to whether prior approval is necessary. To the extent the PI decides to request approval for a particular action, OSR will obtain the necessary information from the PI or grant manager and submit the request to the sponsor. When the response comes back to OSR, OSR will disseminate the information to the PI, to PAA and to other offices that may need to be informed. If the request is approved, and the change impacts the financial system, OSR will enter the change into the financial system, re-issue the Award Summary and notify the appropriate individuals/offices.

Research Compliance
The Office of Research Compliance is tasked with oversight of the overall laboratory research compliance program at the Institute, which includes oversight of the research compliance committees (IACUC, IRB and IBC), Conflicts of Interest, Responsible Conduct of Research and Research Misconduct, Controlled Substances and Chemical Precursors, Stem Cells, and other areas of research regulatory compliance, as needed.

Each Research Compliance Administrator reports directly to the ORC Director and administratively supports a research compliance committee, including the committee’s chair. Committee administrative duties including receipt and coordination of committee research protocols from submission, through review, to approval and post approval monitoring. Administrators coordinate and attend committee meetings and inspections, perform initial protocol review, prepare and distribute of all meeting materials, including meeting agenda, minutes, standard operating procedures and committee communications with investigators. Administrators also maintain committee records, monitor and administer committee email and monitor personnel training and maintain committee webpages. While the primary area of responsibility for each Administrator rests primarily in his/her committee administrative support, each Administrator also assists the ORC Director in coordinating compliance in all areas overseen by the ORC, as needed.