

**Roles and Responsibilities Matrix for Managing Sponsored Funding in FAS & SEAS**

Last Updated: 11/22/2019

Responsibility		PI	FAS/ SEAS Dept. or Unit	FAS RAS	OSP	NOTES
<b>Section 1: Identification of Funding Opportunities</b>						R=responsible A=assist
1.1	Monitor and disseminate limited submission funding opportunities			R		-OVPR (Office of the Vice Provost for Research) coordinates centrally
1.2	Provide strategic advice on proposal funding strategies and perform advanced funding searches in one-on-one consultations with faculty			R		
1.3	Provide one-on-one training for faculty in use of funding databases such as SPIN, Pivot, and Foundation Directory Online (FDO) <sup>1</sup>			R		
<b>Section 2: Proposal Preparation</b>						R=responsible A=assist
2.1	Departments, RAS, and OSP will work together to ensure the PI receives the most accurate guidance and interpretation of sponsor guidelines during the proposal process. As each situation can differ, all three offices may be involved. In a situation where final interpretations and decisions must be made, OSP will be the formal authority.		A	A	R	
2.2	Develop scientific/technical components of proposal (Statement of Work, Project Narrative, Project Abstract, etc.)	R				
2.3	Develop non-technical/administrative components (e.g. Biosketches/CVs, Budget & Justification, Current & Pending Support/Other Support, Face Page, etc.)	R	A			
2.4	Collect subcontractors' documentation (statement of work, budget and justification, institutional approvals, etc.) and any other elements required by sponsor	A	R			
2.5	Enter proposal request in GMAS, flag required approvals (e.g. human subjects, cost sharing, foreign component, admin salaries, etc.), enter research team, and lock and route for approval	A	R			

<sup>1</sup> Links to funding databases may be found on the RAS website at <https://research.fas.harvard.edu/funding-databases>

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2.6	Verify Financial Conflict of Interest disclosures for required individuals are on file and have been updated at least once in the past year; include subrecipient PIs with PHS investigator status on GMAS Research Team		R	A		-For all required non-FAS Harvard affiliated participants, subrecipients, and non-subrecipient PHS investigators (e.g., collaborator), RAS will take the lead and may request assistance from departments
<b>Section 3: FAS and University Proposal Review and Approval</b>						<b>R=responsible A=assist</b>
3.1	Review and approve proposal at Department, Center, or Area level		R			
3.2	Lock and Route proposal to OSP and RAS (if applicable) <sup>2</sup> at least 5 full business days before sponsor deadline <sup>3</sup>		R			-When a Dept. "Locks & Routes" a proposal in GMAS, all administrative sections should be complete and ready for review. Final scientific and technical documents (SOW, project narrative, etc.) must be submitted for review at least 3 business days prior to sponsor deadline
3.3	Review proposal for internal approvals (human subjects, animals, COMS, human embryonic stem cells, cost sharing, conflict of interest, multiple schools, space, etc.)		A	R*	R	
3.4	Review and approve budget and budget justification for accuracy			R*	R	
3.5	Review and approve inclusion of administrative or clerical Staff			A	R	
3.6	Review and provide feedback on proposed effort commitments	R	A	A*	A	- The PI has primary responsibility for determining how much personnel time is needed to complete each of their sponsored projects
3.7	Review and provide feedback on Current & Pending Support and Other Support documents	R	A	A*	A	- The PI is the only person who can confirm the totality of his or her support since support may be awarded through non-Harvard institutions
3.8	Review proposal for Provost criteria and vet through Provost approval process		A	A	R	

<sup>2</sup> Please consult the [RAS Review Criteria](#) webpage to determine whether a specific proposal will require RAS review

<sup>3</sup> Please consult the [Submission Timeline](#) webpage for details about the FAS & SEAS 5-Day Proposal Submission Policy

\*When RAS proposal review is required

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3.9	Review proposed cost sharing for compliance with sponsor terms and conditions and school and university policies			R	R	-RAS checks for school compliance/approval; OSP checks for compliance with University-wide policy
3.10	Review and approve cost-sharing commitments	R	R	R	R	
3.11	Review and approve use of non-standard F&A (indirect cost) rate and On/Off campus designation			R		-FAS & SEAS Deans have final authority on IDC waiver requests
3.12	Review and approve A-21 activity classification (Organized Research, Other Sponsored Activities, etc.) in GMAS				R	
3.13	Review proposal budgets for correct usage of fringe benefits rates			R*	R	*When RAS proposal review is required
3.14	Review subcontractors' proposals and check for their institutional approval		R	A	R	
3.15	Negotiate terms of subcontract, as needed, or reserve the right to negotiate the terms post-submission				R	
3.16	Make revisions and corrections to proposal in response to internal reviewer comments	A	R			
3.17	Approve proposal request in GMAS for submission at PI, Dept school and university levels after concurrent review	R	R	R	R	
<b>Section 4: Proposal Submission to Sponsors</b>						R=responsible A=assist
4.1	Submit proposals to sponsors and record proposal information for tracking in GMAS				R	

<b>Section 5: Notice of Award Review and Acceptance</b>						R=responsible A=assist
5.1	Determine whether funding is gift or sponsored			A	R	
5.2	Review terms and conditions in award document and inform PI, Dept., and RAS of terms that need to be negotiated; negotiate as necessary	A	A		R	
5.3	Compare proposed budget to awarded budget and communicate with Dept/Center/Area Administrators and PI, as needed		A		R	
5.4	Prepare revised budget and, when necessary, revised scope of work to comply with awarded budget if amount differs from proposal	A	R			
5.5	Approve revised budget and scope when sponsor requires a 25% or greater reduction to proposed budget			R	R	
5.6	Approve revised budget and scope for budget reductions less than 25%				R	
5.7	Verify that all pending approvals (e.g. human/animal subjects, cost sharing, financial conflict of interest, etc.) indicated in GMAS have been completed, marked as done, and are current before award is set up	R	R	A	R	-Human/animal subjects approval must be within valid date; COI disclosure date must be within 1 year

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5.8	Follow up as necessary on all pending approvals	R	R			
5.9	Accept terms and conditions of the award on behalf of the University				R	
<b>Section 6: Award Setup</b>						R=responsible A=assist
6.1	Review, update, and confirm Research Team in GMAS	A	R			
6.2	Request At-risk Account if necessary	R	R			
6.3	Prepare, approve, and submit At-risk requests to OSP via GMAS		R			
6.4	Advise and sign off on At-Risk requests and activate At-risk Accounts				R	
6.5	Review and update, if necessary, proposal-stage cost sharing form and set up cost share companion account with Local Chart Admin		R			
6.6	Develop, document, and notify sponsor about financial conflict of interest plan, if necessary, prior to award activation and set-up	A		R		
6.7	Verify, prepare, send out, and, if necessary, negotiate, outgoing subawards				R	
6.8	Provide subactivity account allocations. (e.g. subawards, part-of accounts, program income etc.) to OSP for account set-up		R			
6.9	Activate account string, approve and set up account allocations, issue Action Memo to Dept/Center/Area and PI				R	
6.10	Compare Action Memo to Award Notice and immediately notify PI and OSP of any discrepancies		R			
6.11	Upload award budget to general ledger		R			
6.12	Request Pre-Award spending		R			-This is separate from requesting an At-Risk. If expenses occur before award start date, pre-award spending must be requested after project is awarded.
6.13	Approve Pre-Award request and obtain sponsor approval for pre-award spending as necessary				R	
6.14	Note special terms and reporting requirements in Action Memo as necessary				R	
<b>Section 7: Award Maintenance</b>						R=responsible A=assist
7.1	Perform e-verification (E-Verify) for all employees working on all applicable federal contracts		R	A	A	
7.2	Discuss any issues arising during award term with appropriate OSP contact person. If required, OSP will reach out to the sponsor for consultation or to request prior approval	R	R		R	
7.3	Initiate in GMAS re-budgeting requests requiring sponsor prior approval		R			
7.4	Review and approve re-budgeting requests requiring sponsor prior approval. Submit prior approval requests to the sponsor		A	R*	R	- RAS approval required for re-budgets that impact overhead recovery

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7.5	Initiate no-cost extensions via GMAS		R			
7.6	Approve no-cost extensions via GMAS	R	R		R	
7.7	Process award changes in GMAS				R	
7.8	Track and reconcile cost sharing using companion account when appropriate		R			
7.9	Ensure complete and accurate documentation for any key personnel changes that arise	R	R			
7.10	Review and obtain sponsor approval for key personnel and PI changes				R	
7.11	Subrecipient monitoring (Department level): Review and approve subaward invoices, monitor subrecipients' programmatic progress, review and report on the status of each subaward to the FAS/SEAS Subrecipient Monitoring Committee on a quarterly basis	R	R			
7.12	Subrecipient monitoring (School level): Perform quarterly review of reports provided by departments, escalate issues to the University Subrecipient Monitoring Committee			R		
7.13	Subrecipient monitoring (Central level): Complete and update risk assessments on new and existing subrecipient organizations, review problematic subawards as identified by FAS/SEAS Subrecipient Monitoring Committee, establish additional monitoring criteria if needed for certain subrecipient organizations				R	-OSP runs the University Subrecipient Monitoring Committee meetings
7.14	Prepare NIH trainee appointment forms on relevant awards		R			
7.15	Review and submit trainee appointment forms				R	
7.16	Review and approve expenditures for allowability and allocability	R	A	A		
7.17	Review and approve pending transactions appearing on the GMAS Transaction Monitoring Dashboard on a regular basis		R			
7.18	Retain documentation to support allocation of expenditures	A	R			
7.19	Provide guidance and make final determination on allowability and allocability of questionable expenditures when questions arise from departments/units/areas			A	R	
7.20	Reconcile accounts on a monthly basis		R			
7.21	Review and update GMAS Research Team on a regular basis throughout the life of each award	A	R			
7.22	Confirm award receipt for continuations, verify continuation award dates/dollars, etc.		A		R	
7.23	Update/activate continuation account string after acceptance of award				R	
7.24	Run and review the Invalid Code Combination Report monthly and resolve any issues as necessary		R			

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7.25	Prepare and submit any cost transfers necessary throughout award life cycle		R	A	A	-Under 90 Day CTs (Dept and OSP Approval needed)  -Over 90 Day CTs (Dept, RAS and OSP Approval needed)
7.26	Identify and bill, if necessary, program income (i.e. income earned on a project) and post to appropriate subactivity	R	R			
7.27	Submit required modifications, amendments, and renewals of internal approvals (human subjects, vertebrate animals, embryonic stem cells, etc.) to the relevant oversight entities (CUHS <sup>4</sup> , FAS IACUC Administration <sup>5</sup> , ESCRO Committee <sup>6</sup> , etc.) as required throughout the life of the award	R	A			
7.28	Submit to FAS IACUC copies of renewals of external IACUC approvals as required throughout the life of the award	R	A			
<b>Section 8: Sponsor Invoicing and Billing</b>						R=responsible A=assist
8.1	Identify the need to bill & create invoices				R	
8.2	Provide institutional approval				R	
8.3	Track submission of invoices				R	
8.4	Department approval and signoff on final invoice		R			
8.5	Accounts Receivable management				R	
8.6	Manage cash (handling of checks, etc.)		A		R	- Contact OSP if check for sponsored funding is sent directly to a department/unit by a sponsor
8.7	Produce and record a letter of credit draw request for a specific funding agency				R	
8.8	Monitor and pursue the collections of overdue payments from sponsors		A		R	
<b>Section 9: Preparation and Submission of Financial Reports</b>						R=responsible A=assist
9.1	Identify the need for submission of financial reports				R	
9.2	Notify departments of financial reports that are nearing the due date				R	
9.3	Prepare financial reports				R	
9.4	Obtain agreement from PI/Dept. on final figure for final invoicing and reporting	R	R			
9.5	Submit financial status reports to sponsors				R	

<sup>4</sup> Committee on Use of Human Subjects website: <https://cuhs.harvard.edu/>

<sup>5</sup> FAS IACUC Administration website: <https://research.fas.harvard.edu/iacuc>

<sup>6</sup> ESCRO committee (stem cells) website: <https://hwpi.harvard.edu/escro>

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<b>Section 10: Preparation and Submission of Progress and Non-Financial Reports</b>						R=responsible A=assist
10.1	Prepare, approve, and submit non-competing continuations and progress reports	R	R		R	-OSP approves and submits when institutional signature is required by sponsor
10.2	Analyze award terms and identify the need for submission of non-financial reports		R		R	-OSP does not schedule non-financial reports in GMAS; departments are expected to manage this process as they deem most useful
10.3	Prepare & submit non-financial reports to sponsor	R	A		A*	-OSP involvement may be needed if financial and non-financial reports are required to be sent together to the sponsor
<b>Section 11: Certification of Time and Effort</b>						R=responsible A=assist
11.1	Review salary charges monthly for accuracy and post journals as appropriate	A	R			
11.2	During pre-review period for both quarterly and annual certifications, log into ECRT to ensure effort percentages are correct and ready for PI review; if necessary, perform additional salary adjustments within certification period, prior to PI certification		R			
11.3	Verify accuracy of quarterly and annual effort statements during the certification period and communicate appropriate adjustments to department effort coordinator	R	A			
11.4	Certify quarterly project non-faculty statements and annual faculty effort statements in ECRT by due date	R				
11.5	Monitor department effort certification progress for completeness and ensure statements are certified by the due date		R	A		
<b>Section 12: Closing of Accounts</b>						R=responsible A=assist
12.1	Identify accounts nearing award end date and requiring close-out		R		R	
12.2	Review and approve pending transactions appearing on the GMAS Transaction Monitoring Dashboard		R			
12.3	Identify unresolved close-out related items and communicate to affected parties				R	
12.4	Ensure expenditures and cost transfers have been posted to accounts		R		A	
12.5	Resolve issues related to unreconciled accounts		R		A	
12.6	Oversee the resolution of unreconciled accounts		A		R	
12.7	Ensure that all financial reports have been submitted to sponsor				R	
12.8	Notify PI of reporting deadlines and delinquent non-financial reports		R			

Responsibility		PI	FAS/ SEAS Dept. or Unit	FAS RAS	OSP	NOTES
12.9	Ensure that all technical reports have been submitted to sponsor	R	A			
12.10	Ensure that all final invention reports have been submitted to sponsor	R	A			
12.11	Ensure that all patent reports have been submitted to sponsor	R	A			
12.12	Ensure that all cost sharing obligations have been fulfilled and that cost share expenses have been properly documented		R		A	
12.13	Close out subagreements				R	
12.14	Determine whether a balance exists on a fixed price award at the end of the award period <sup>7</sup>		R		R	
12.15	Complete Fixed Price Award Residual Balance Transfer form as necessary		R			
12.16	Review and sign off on Fixed Price Award Residual Balance Transfer form	R	R	R	R	-OSP performs final review and, if approved, will transfer balance off the award
12.17	Segment close out				R	
12.18	Maintain official award documents for sponsored projects				R	
<b>Section 13: Award Monitoring, Compliance and Audits</b>						R=responsible A=assist
13.1	Comply with Uniform Guidance regulations, sponsor terms & conditions, and Harvard policies when transacting to sponsored awards	R	A			
13.2	Notify OSP, RAS and all other necessary administrative units before communicating with an auditor	R	R			
13.3	Provide support documentation to RAS for audits and reviews	R	R			
13.4	Provide guidance to Dept and PI regarding compliance and sponsor terms & conditions			A	R	
13.5	Comply with IACUC, IRB, HESC-approved protocols of record for the award, or submit amendments as necessary	R				
13.6	Charge only animal-related expenditures applicable to the IACUC protocol associated with award	R	A			
13.7	Advise and support departments undergoing an audit			R	R	
13.8	Coordinate the Uniform Guidance audit for FAS and SEAS			R		
13.9	Coordinate the Uniform Guidance audit for the University				R	
13.10	Disseminate audit results to Departments			R	R	
13.11	Disseminate audit results to PIs		R			
13.12	Generate and perform Quarterly Compliance Reviews to alleviate potential risks associated with sponsored research			R	A	

<sup>7</sup> Please consult the [Guidance on Fixed Price Sponsored Awards](#) page of the OSP website for more information on fixed price awards.



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13.13	Take appropriate actions in response to FAS RAS or auditor recommendations	R	R	A		
<b>Section 14: Equipment</b>						R=responsible A=assist
14.1	For equipment roles and responsibilities, please refer to the "Harvard University Sponsored Equipment Roles and Responsibility Matrix" located on the OSP website <sup>8</sup>	R	R	R	R	

<sup>8</sup> [https://osp.finance.harvard.edu/files/osp/files/equipment\\_rr\\_matrix.pdf](https://osp.finance.harvard.edu/files/osp/files/equipment_rr_matrix.pdf)