

UWM

Office of Research

Handbook

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Welcome to the University of Wisconsin-Milwaukee (UWM) Office of Research Handbook. This resource is designed to provide helpful guidance and detailed information about research-related processes, services, and support available at the university. While it aims to clarify key topics and answer common questions, please note that it is not intended to serve as a formal policy manual or procedural guide. For official policies, procedures, and detailed instructions, we encourage you to consult the relevant university offices and resources directly. This handbook is intended to complement, not replace, those official documents by offering practical insights for navigating the research landscape at UWM.

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Roles and Responsibilities in Developing and Managing Extramural and Selected Intramural Sponsored Projects

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 processing documents, checklists, and other tools to manage sponsored funds. If you have any questions, contact the Director, Office of Sponsored Programs.

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 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.
- Any proposal, award, or contract document requiring an official signature must be signed by an authorized representative of 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.

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 cost- reimbursed 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 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:

- **Business and Financial Services** 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.
- **Graduate School** 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.
- **Legal Affairs** 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.
- **University Information Technology Services** for data security and storage, access to high-performance computing, electronic survey tools, purchase of hardware and software, web page development, and email access.
- **University Safety and Assurances** 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 **Human Research Protection Program** 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 **Animal Care Program** 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 **Environmental Protection Program** 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** promote safety, compliance, and environmental health 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.

- **UWM Foundation** for the development and management of philanthropic gifts to the University.
- **UWM Libraries Data Services** for training and consultation for data management and data management plans.
- **UWM Real Estate Foundation** for the management of buildings at Innovation Campus, including the Accelerator.
- **UWM Research Foundation** for technology transfer (e.g., patents and licensing).

Roles and Responsibilities Matrix

1. Proposal Development, Review, and Submission				
	<i>Responsibility¹</i>			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources
<i>Narrative Development</i>				
Advise on the best approach to proposal development and application process		X		
Help interpret program announcement for draft development		X		
Develop timeline for proposal development and submission to meet sponsor and internal deadlines	X			
If multiple PIs, identify a contact PI	X			
Develop and draft the proposal narrative with members of project team, as applicable	X			
Obtain internal scientific/content review, as applicable	X			
Obtain external scientific review by content scientific experts, as applicable	X			
Revise proposal based on reviews, as applicable	X			
Review proposal drafts for adherence to formatting and other sponsor requirements	X	X		
Edit proposal drafts	X			
Proofread final proposal draft	X			RDS
<i>Budget Development</i>				
Develop project budget and budget justification appropriate to the scope of work	X			
Request and obtain from subrecipients their institutional letters of commitment, scope of work, and budget/budget justification	X			
Document in record approval of F&A split arrangements from all UWM divisions for proposals that involve multiple UWM investigators, as applicable	X			
Provide documentation of approval of cost-share/matching	X			

1. Proposal Development, Review, and Submission

Task	Responsibility ¹			UWM Resources
	PI/Division/ Dept. ²	OSP	Other	
Identify costs involved with leasing space and facilities, as applicable	X			CPM & UWMREF
Confirm F&A rate	X			
Include program income, as applicable	X			
Verify budget items are in accordance with UG, including cost accounting standards		X		
Compliance				
Complete Financial Conflict of Interest (FCOI)	X			
Complete Outside Activities Report (OAR)	X			
Complete Payroll Confirmation Reporting	X			
Disclose human subjects research	X			IRB
Communicate with IRB to identify need for single IRB, if relevant	X		IRB	
Disclose animal research	X			IACUC
Disclose export control involvement	X			OSP and OLA
Identify intellectual property disclosures	X		UWMRF	
Disclose any known restrictions regarding open research	X			OR and OLA
Disclose use of materials, biological agents, or other assurances	X			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).	X	X		
Full Application Development, Review and Submission				
Inform OSP Pre-Award of intent to submit application to external sponsor within 30 days of submission deadline	X			
Initiate record for external submission (by the contact PI)	X			

1. Proposal Development, Review, and Submission

Task	Responsibility ¹			UWM Resources
	PI/Division/ Dept. ²	OSP	Other	
Complete checklist of requirements per the funding agency guidelines (NIH, NSF, foundations, other)	X			
Obtain agreement for on or off campus space needed in addition to that already assigned to the PI or MPIs	X			CPM & UWMREF
Obtain approvals from division/dept for non-budget components, as required	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)	X			OR (for internal proposals)
PI signs the record and routes to Division for approval	X			
Route and submit record to OSP	X			
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		X		
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 . Troubleshoot issues as it relates to application submissions within 2 business days of routing application package to OSP. Make revisions and corrections to the administrative components within 1 business day . Finalize scientific & programmatic components 1 business day in advance of deadline for applications that are submitted to sponsor by OSP.	X			
		X		
	X	X		
	X			
Confirm record is complete and approved by all UWM departments and divisions involved		X		
Submit the application to sponsors that require institutional authorization by the sponsor deadline and sponsor submission method OR after OSP approval, submit the application		X		

1. Proposal Development, Review, and Submission

	Responsibility ¹			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources
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	X			
Update record to reflect final proposal submission		X		

- 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

2. Award Negotiation and Acceptance

	Responsibility¹			
Task	PI/Division/ Dept.²	OSP	Other	UWM Resources
Post-Submission, Pre-Award Response/Revisions				
Respond to sponsor's questions regarding scientific/program matters	X			
Respond to sponsor's questions regarding administrative/contractual matters		X		
Revise application materials (e.g., proposal narrative, budget, budget justification, scope of work, and other Just-in-Time requested information) as requested for review	X			
Review and approve all updated/revised materials prior to submission		X		
Submit updated/revised application materials to sponsors that require institutional certification or endorsement OR after OSP approval, submit updated/revised application materials to the sponsors that <i>do not</i> require institutional endorsement or certification		X		
Inform appropriate parties, including OSP, if application is withdrawn or not funded	X			
Send award notice to OSP, if received by PI directly	X			
Award Negotiation				
Negotiate award terms and conditions, if necessary		X		
Keep PI/Unit/others informed of the status of negotiations in a timely manner		X		
Obtain PI/Unit/other approvals, as necessary		X		
Compliance Review (applies to PI and all personnel listed on the Notice of Award)				
Confirm Financial Conflict of Interest (FCOI) Training and SFID complete (if applicable)		X		
Confirm Outside Activities Report is completed		X		
Confirm Effort Reporting is completed		X		
Confirm IRB compliance, if applicable		X		
Confirm IACUC compliance, if applicable		X		
Confirm export control involvement, if applicable		X		

2. Award Negotiation and Acceptance

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

3. Post Award: Non-Financial Project Management

	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)				
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)	X			
Renew compliance requirements (e.g., IRB, IACUC) in a timely manner	X			IRB, IACUC, Biosafety, etc.
Develop authorship/publication agreements if project involves a team	X			
Select and hire project personnel	X			HR
Train project personnel	X			HR
Provide project personnel with adequate time, resources, and supervision	X			HR
Manage project personnel in accordance with HR policies	X			HR
Provide oversight and mentoring of students and trainees	X			GS/HR
Assure that letters for Research Assistant appointments specify the required components	X			GS/HR
Request additional on- or off-campus space needed	X			CPM & UWMREF
Create project web page or other media, if appropriate	X			UITs
Arrange for access for non-UWM team members	X			UITs
Maintain project-related records (source documents) in a manner to document the validity and integrity of the project while protecting confidentiality and privacy	X			
Initiate data use agreements, if appropriate	X	X		
Store and handle data according to university policy	X			UITs

3. Post Award: Non-Financial Project Management

Task	Responsibility ¹			UWM Resources
	PI/Division/ Dept. ²	OSP	Other	
Initiate request for programmatic changes to project, if required	X			
Review and process programmatic changes, if required		X		
Develop conflict resolution strategies for the project team	X			HR
Complete interim progress and technical reports according to sponsor's schedule	X			
If OSP is submitting the interim progress/technical report, comply with sponsor submission method and submit to OSP 2 business days before sponsor deadline OR after OSP approval, if PI is submitting the interim progress /technical report, comply with sponsor submission method and deadline	X			
	X			
If sponsor requires interim progress/technical report to be submitted by an authorized official, submit interim progress/technical report		X		
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		

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

4. Post-Award: Financial Project Management

	Responsibility ¹			
Task	PI/Division/ Dept. ²	OSP	Other	UWM Resources
PI has primary responsibility that is shared with Division/Department to manage the financial aspects of the project.				
OSP is accountable for ensuring the project is managed appropriately.				
Prepare financial transactions against the project account	X			
Monitor budget vs expenditures	X			
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	X			Purchasing
Assure appropriateness, reasonableness, and allowability of expenditures	X	X		
Assure expenditures are charged to the correct grant account in a timely manner	X			
Manage expenditures to not exceed available award balance	X			
Ensure expenditures are aligned with SOW and budget	X			
Review expenditures in certain restricted budget categories	X	X		
Review and monitor cost transfers	X	X		
Initiate requests for internal rebudgeting and internal cost transfer	X			
Approve substantive modifications and rebudgeting		X		
Resolve overdrafts and revenue shortfalls in a timely manner	X			BFS
Initiate requests with OSP that require prior approval from sponsors, like no-cost extensions and rebudgeting required by the award terms and conditions	X			
Review and submit no-cost extension requests to sponsors		X		

4. Post-Award: Financial Project Management

Task	Responsibility ¹			UWM Resources
	PI/Division/ Dept. ²	OSP	Other	
Obtain prior approval from sponsors for transactions that require prior approval (e.g., adding/removing senior/key personnel, adding/removing subrecipients)		X		
Review and reconcile sponsored project accounts monthly using the official system of record (WISDM) and notify OSP of any issues	X			
Review sponsored project account reconciliation	X	X		
Monitor project accounts to verify costs are allowable, reasonable, and necessary for conducting the project	X	X		
Prepare financial reports for submission to the sponsor		X		
Use financial reports/invoices to audit project expenses.		X		
Monitor compliance with federal, state, sponsor, UW System, and UWM regulations and policies, including effort reporting, FCOI, COI, OAR, etc.		X		
Troubleshoot issues with sponsor as it relates to award management		X		
Troubleshoot issues with internal electronic systems for award management		X		
Prepare/submit invoices, LOC draw reports, and financial reports to sponsors		X		
Produce and record a letter of credit draw request (federal awards)		X		
Monitor and pursue collections of overdue payments from sponsors		X		
Subawards/Subcontracts				
At the time of award, complete the Outgoing Subaward Request Form to OSP	X			
Send questionnaire to subrecipients; review completed questionnaire in compliance with UWM procedures		X		
Draft official subaward agreement		X		

4. Post-Award: Financial Project Management

Task	Responsibility ¹			UWM Resources
	PI/Division/ Dept. ²	OSP	Other	
Review and approve draft subaward agreement	X			
Negotiate subaward agreement		X		
Execute the subaward on behalf of UWM		X		
Prepare encumbrance request		X		
Submit signed encumbrance request to BFS		X		
Complete institutional reporting requirements		X		
Monitor subrecipient performance during the project; notify OSP immediately of any changes to the subrecipient's performance	X			
Submit subrecipient invoice to PI for review and approval		X		
Approve subrecipient invoice for payment based on the approved scope of work, budget, and progress completed to date	X			
Submit approved invoice to BFS for payment		X		
Update PO		X		
Payroll Confirmation Reporting				
Monitor commitments for sponsored project	X			
Resolve problems or follow up on reports not submitted		RI		
Complete necessary adjustments to award charges and/or payroll distribution		RI		
Ensure accuracy of completed reports	X			
Certify on project for self and others as appropriate	X			
Ensure that project personnel certify, as appropriate	X			

5. Project End/Close-Out

Task	Responsibility ¹			UWM Resources
	PI/Division/ Dept. ²	OSP	Other	
Identify project closeout timeframe and required documentation		X		
Ensure all expenditures have been posted to the project accounts	X			
Prepare final financial invoice/report		X		
Resolve issues related to unreconciled accounts	X			BFS
Prepare the final technical/progress report for the project	X			
Prepare final invention report	X	X		UWMRF
Manage reporting of any patents from the project to the sponsor	X		UWMRF	
Determine disposition of equipment, computers, furniture, other non-consumables purchased with project funds	X	X		BFS
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 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	X			
	X			
If final report requires authorized official signoff, submission of final report		X		
Inactivate the project account in SFS		X		
Retain project-related records for audit or inspection according to university or sponsor requirements.	X			
Maintain financial and project records for four years following project closeout (or in accordance with the terms and conditions of the award)	X	X		
Make provision for appropriate transfer of data/record retention if the PI leaves UWM	X	X		

New to UWM

Welcome to the University of Wisconsin-Milwaukee! The Office of Research supports the diverse scholarly and creative pursuits of UWM faculty and staff, including basic and applied research, outreach, community engagement, instruction, public service, community and business development, and entrepreneurship. In the Office of Sponsored Programs (OSP), we provide a wide range of proposal development, pre-award, and post-award services to help you successfully develop, submit, and manage your sponsored projects.

Whether you are a junior or senior faculty member, scientist, or administrator, you likely have questions about the research process at UWM and our available resources. The following information is commonly requested by new faculty/staff about sponsored projects at UWM.

Transferring a grant from another institution

The transfer process can be lengthy and complicated. OSP helps faculty/staff navigate the sponsor requirements for a smooth transition. To facilitate the transfer, PIs will need to complete a revised budget that reflects UWM's financial data (fringe benefits, tuition remission, etc.). OSP offers the following resources to assist with budget development:

- Contact your Pre-Award Specialist.
- **Budget Development Tool (.xlsx):** A programmed Excel spreadsheet that populates data for UWM's fringe benefit rates, Indirect costs, and tuition remission for graduate research assistants and project assistants.
- **Relevant Budget Data:** Check the UWM rates and other information for developing budgets for sponsored programs.
- Become familiar with the Electronic Routing System. Grant transfers must be routed and approved before the institution will accept the award.

If you have accepted a position at UWM and will be transferring a grant to UWM from another institution, please contact your Pre-Award Specialist prior to your start date at UWM.

Submitting proposals prior to arriving on campus

OSP can help faculty seeking to submit a proposal prior to their official start date at UWM. To facilitate the submission of a proposal prior to your arrival date:

- Contact your Department Chair as soon as possible to confirm whether you have been added to UWM's Human Resources System.
- Become familiar with the Electronic Routing System. Your proposal must be routed and approved via prior to submission to the sponsor.
- Verify that the project start date is on or after your UWM hire date.

If you have questions about the submission of a proposal prior to your start date, please contact your Pre-Award Specialist.

Working with animals on sponsored projects

The UWM Animal Care Program oversees the responsible care and use of animals in research programs. For assistance, contact the UWM Animal Research Center.

Working with human subjects on sponsored projects

The UWM Human Research Protection Program (HRPP) oversees the responsible care and use of human subjects in research programs. The UWM Institutional Review Board (IRB) for the Protection of Human Subjects is managed through HRPP. For assistance contact the IRB office, at irbinfo@uwm.edu or 414-662-3544.

Proposal Submission

The Office of Research provides a wide range of services to support the submission of a research proposal, contract, or other agreement, including:

- Identifying funding opportunities that align with your research, scholarly, outreach, programmatic and entrepreneurial plans.
- Providing proposal development assistance.
- Providing technical assistance with the preparation and submission of grants, contracts, and other agreements.
- Reviewing and accepting awards.

Typical Process

Below is the typical process for developing and submitting proposals at UWM. For additional information, contact the Pre-Award Specialist assigned to your Division/School/College.

Step 1: Identify Potential Funding Opportunity

What should the principal investigator do?

Numerous resources are available to support faculty and staff in the identification of funding opportunities, including funding databases and subscription services.

Who should the principal investigator contact?

Review the Proposal Development page to identify resources available to support grant seeking. Additional assistance is also available from Proposal Development staff.

Step 2: Review the Potential Funding Opportunity

What should the principal investigator do?

After identifying a potential funding opportunity, carefully review the sponsor's guidelines and ask the following:

- Does my project align with the stated goals and objectives of the grant program?
- What is the proposed impact of the project? How is it compelling? How will I be able to demonstrate to the sponsor the need for the project?
- Will I have sufficient time to research and review past submissions to the sponsor and/or program?

- Does my education and experience demonstrate that I (or my team) have sufficient expertise to carry out the proposed project?
- Will I have sufficient time to develop a compelling application? Will I have sufficient time to have the application reviewed by department, division/school/college, and the Office of Sponsored Programs?
- Will I need to identify collaborators for the project? If so, will I be able to provide them with sufficient time to develop their components of the project?
- Is cost-sharing required? If so, will I have sufficient time to request cost-share from my department/division/school/college? Please also review our [Cost-share Frequently Asked Questions](#) for more information and considerations for the inclusion of cost-share in proposals.

Who should the principal investigator contact?

For guidance on a funding opportunity and your grant-seeking plans, suggestions include contacting:

- Your Department Chair.
- Your Dean or Associate Dean for Research.
- The Unit Business Representative of your Division/School/College.
- The Pre-Award Specialist assigned to your Division/School/College.

Step 3: Develop the Proposal and Application

What should the principal investigator do?

If the assessment from Step 2 encourages the submission of a proposal, start developing the various components. Proposals typically include the following sections:

- A project summary.
- A project narrative, which usually includes a description of the project's goals and objectives, significance, methodology, timeline, evaluation, and sustainability.
- A budget and budget justification.
- A description of personnel.
- Subaward documentation, including an institutional letter of commitment, statement of work, and budget/budget justification for each partner.

Other information may be required. Review the funding opportunity guidelines closely.

Who should the principal investigator contact?

For guidance on developing a proposal, suggestions include contacting:

- Your Department Chair.
- Your Associate Dean for Research.
- The Unit Business Representative of your Division/School/College.
- The Pre-Award Specialist assigned to your Division/School/College.
- Research Development Services in the Office of Research.

Additional resources for proposal development information include:

- Frequently Requested Information for proposal submissions
- Forms, Downloads, and Other Resources

Step 4: Create a system Record**What should the principal investigator do?**

Create a record. A proposed budget and project narrative must be attached to the record; draft narratives are encouraged. All proposals must be reviewed and approved by your Department and Division/School/College before the Office of Sponsored Programs will submit the proposal.

Who should the principal investigator contact?

For assistance creating and routing records, contact the Pre-Award Specialist assigned to your Division/School/College.

Step 5: Finalize the Proposal**What should the principal investigator do?**

Work closely with the Pre-Award Specialist assigned to your Division/School/College to finalize and submit the proposal to the sponsor. Perform final checks on the submission, including:

- Are all the necessary components available and included in the application package?
- Is the proposal formatted properly (e.g., margins, page size/length, font)? Would a reviewer be able to easily navigate it?
- Are the components labeled correctly?

- Are the required documents available and included in the proposal package (e.g., letters of collaboration or commitment, financial data)?
- Does the budget align with the project narrative and timeline?

Who should the principal investigator contact?

Contact the Pre-Award Specialist assigned to your Division/School/College.

Step 6: Submit the Proposal

What should the principal investigator do?

Once finalized and approved by all administrators, the Pre-Award Specialist assigned to your Division/School/School will submit the proposal to the sponsor. The Office of Sponsored Programs maintains all necessary institutional electronic research administration accounts for the submission of proposals to sponsors. Work closely with your Pre-Award Specialist to submit the proposal, as additional information, clarification, and/or approval may be needed to finalize and submit the proposal.

Who should the principal investigator contact?

Contact the Pre-Award Specialist assigned to your Division/School/College.

Step 7: Monitor your Email

What should the principal investigator do?

Monitor your email for a submission confirmation; it may come directly to you from the sponsor or from your Pre-Award Specialist. In some instances, the sponsor will request additional materials or information related to your proposal; please monitor your e-mail for further instructions.

Who should the principal investigator contact?

Contact the Pre-Award Specialist assigned to your Division/School/College.

Step 8: Sponsor Review

What should the principal investigator do?

Proposal review varies from sponsor to sponsor. For **federal sponsors**, the review period typically ranges from 6-12 months. For non-federal sponsors, the review period typically ranges from 2-8 months. The program guidelines usually describe the review process and time frame.

Who should the principal investigator contact?

Contact the Pre-Award Specialist assigned to your Division/School/College for additional guidance.

Step 9: Notification

What should the principal investigator do?

The sponsor will provide a notification on the outcome of the review process. If the project was selected for funding, congratulations! You will now move into the award management phase. If your project was not selected for funding, determine whether to revise and resubmit your application or identify a new sponsor.

Who should the principal investigator contact?

If funded, contact the Pre-Award Specialist assigned to your Division/School/School for information on initiating the award management process. If not funded, contact the Pre-Award Specialist assigned to your Division/School/College for information on revising and resubmitting your proposal or identifying a new sponsor.

Budget Development & Approval

University policy requires all project budgets, along with other proposal details, to be reviewed and approved by the Office of Sponsored Programs prior to submission to the sponsor. Below are the information and resources you need to develop budgets that are complete and compliant with federal regulations and University policies. If you have questions or need assistance with developing your budget, contact the Pre-Award Specialist assigned to your Division/School/College.

Budget Tool

Use the updated budget tool.

Contact your Pre-Award Specialist with questions.

This programmed Excel spreadsheet helps you create and manage your sponsored program budget. The Budget Tool includes all the latest rates necessary for a sponsored project:

- Fringe benefit rates for senior/key personnel, graduate research assistants, and hourly students.
- Tuition remission for graduate research assistants and graduate project assistants.
- Indirect Cost Rate (also known as Indirect Cost Rate).
- Calculations are provided for the life of the project (up to six years).

Special Functions

The Budget Tool allows you to develop a cumulative budget for a program for up to six years. Special calculation tools include:

- Modular budget for applications to the National Institutes of Health.
- Specially formatted budget for industry-sponsored projects.

Budget Tool Instructions

Instructions for using the Budget Tool are included in the Excel workbook. The Budget Tool is updated frequently with the latest rate changes. Download a new Budget Tool each time you create a new project budget.

Although not required, Principal Investigators and research administrators are encouraged to use the Budget Tool for all project budgets to ensure all expenses are included and the rates are accurate and properly calculated. If you need assistance with developing your

budget or using the Budget Tool, contact the [Pre-Award Specialist](#) assigned to your Division/School/College.

Budget Categories

Below is information for the development of sponsored program budgets at UWM. As always, please contact the Pre-Award Specialist assigned to your Division/School/College with questions related to the budget development process.

Faculty and Academic Staff Salaries

Course Releases: For faculty on an academic year contract (nine months), a one course release is equal to 1/8th of the academic year salary (or 12.5% effort).

Summer Salary: One month of summer salary is equal to 1/9th of the academic year salary.

For proposals that involve course releases, summer salary, or other personnel expenditures, contact your Pre-Award Specialist to discuss potential implications of certain funding models. Your Pre-Award Specialist will carefully review the proposed salaries to ensure they align with the University's policies and procedures and with the sponsor's guidelines.

Post-Doc Salaries

Please check with the Pre-Award Specialist to learn the salary ranges for Post-Docs.

Graduate and Undergraduate Student Salaries

Detailed information related to Project Assistants, Research Assistants, and Undergraduate Students salary/stipend rates are maintained by the Graduate School and are built into the Budget Tool.

Project Assistants

Definition

A Project Assistant is a graduate student enrolled in the UW System who is assigned training, administrative responsibilities, or other academic or academic support projects or programs, except regular preparation of instructional materials for courses or manual or clerical assignments.

The Assistant is supervised by a member of the faculty or academic staff and is appointed primarily for the benefit of the University, faculty, academic staff, or granting agency. For Project Assistants hired in Dissertator Status, contact your [Pre-Award Specialist](#) for the appropriate costs.

Tuition

Tuition must be requested from all sponsors unless unallowed by sponsor guidelines.

UWM uses a flat fee to cover tuition remission for Project Assistants. If not covered by the grant, the hiring unit is responsible for tuition costs.

Research Assistants

Definition

A Research Assistant is a graduate student enrolled in the UW System who is assigned to conduct research for the benefit of the student's own learning/research and for the benefit of the University, faculty/academic staff supervisor, or the grant agency. Students who have fellowships, scholarships, or traineeships that are distributed through other titles (e.g., fellow, scholar, or trainee) are NOT considered Research Assistants.

Tuition

Tuition must be requested from all sponsors unless unallowed by sponsor guidelines.

UWM uses a flat fee to cover tuition remission for Research Assistants. If not covered by the grant, the hiring unit is responsible for tuition costs.

Undergraduate Assistants

Definition

Undergraduate Assistants are not eligible for tuition remission. The use of Undergraduate Assistants is relatively rare; consult with your [Pre-Award Specialist](#) for guidance on including Undergraduate Assistants on your project. In exceptional cases, a qualified undergraduate student may be hired to perform a function usually handled by a graduate student **IF** a qualified graduate student is unavailable. This type of appointment may not exceed 50% of the time during the academic year.

Tuition Reference Guide

UWM charges a flat rate for graduate assistant tuition on extramurally funded projects (both federal and non-federal).

Fringe Benefits

Fringe benefit rates include the cost of items such as the employer's contribution to health insurance, Medicare, unemployment, and life insurance. The cost of fringe benefits must be included in the project budget for all UWM faculty, staff, and students participating in the sponsored program.

Equipment

Equipment is defined as a tangible, nonexpendable piece of property with a useful life of **more than one year** and a cost of **\$5,000 or more**.

Travel

Many sponsored programs include funds for travel for project personnel. Here is an overview of travel issues that are common on sponsored programs; go to UW Travel portal for a complete list of all current travel policies and procedures.

Air Travel

Air travel is typically limited to the lowest available coach fare. All air travel must be booked via the travel portal, or it will not be reimbursed. For more information on reimbursable and non-reimbursable expenses, as well as other policy considerations, please review UW System Administrative Policy 410: Purchase & Payment of Business Air Travel for more information.

Air Travel Using Federal Funds

If you are purchasing airfare with federal funds, the Fly America Act restricts your choice of airlines. Generally, researchers must use an airline owned by an American company (i.e., “flag carrier”), regardless of cost or convenience.

Foreign carriers may be used for flights if a U.S. carrier “code-shares” with a foreign airline. A “code-share” occurs when two or more airlines “code” the same flight as if it were their own. For example, Delta and Air France code-share a flight to Paris, France. If the researcher’s boarding pass or e-ticket identifies the flight as a Delta flight, even if “Air France” is shown on the airplane, the researcher has met the requirements of the Fly America Act. However, if the researcher’s boarding pass or e-ticket indicates an Air France flight, the traveler is not in compliance with the Fly America Act and the trip cannot be reimbursed with the federal grant funds.

The U.S. government has entered into several air transport agreements that allow researchers using federal funds to use certain airlines in the European Union, Australia, Switzerland, and Japan. These agreements allow researchers to arrange air travel on foreign carriers in certain circumstances. Researchers who will travel to, from, or within these areas/countries, should contact the [UWM Travel Office](#) to discuss travel within these regions. Please be certain to indicate that the travel is associated with a federal grant or contract.

Exceptions to the Fly America Act

Travelers are not required to use U.S. flag carriers in these circumstances:

- When there is no non-stop or direct service offered by a U.S. carrier.
- When travel outside the U.S. increases the number of plane changes to a destination by more than two.
- When the passenger's total travel time is extended by at least six hours.
- When the connective time at an overseas interchange point is four hours or more.

Appropriate Modes of Transportation

The approving authority has the responsibility to determine the most appropriate and cost-effective means of transportation consistent with the authorized business purpose of the trip, and to consider all associated costs (e.g., employee work time, overnight lodging, meals, mileage). Researchers with disabilities or who require reasonable accommodations should contact the UWM Travel Office to discuss their options. An accommodation request may be needed prior to departure.

Conference/Workshop/Symposium Fees

The cost of attending conferences, workshops, symposiums, or other dissemination venues is eligible for reimbursement. Researchers should keep the receipts or other materials that document the registration fee associated with attendance.

Lodging

The University's maximum lodging rates are based upon the General Service Administration, Departments of State and Defense rates for the location and dates of stay. The maximum rate is for a single/standard sleeping room per person or single occupancy. For lodging associated with an externally designated conference, the maximum lodging rate does not apply if the attendee stays at the venue location. For lodging associated with a UW System-designated conference, the cost may not exceed the maximum rate for the location.

Additional information regarding maximum lodging rates is available in UW System Administrative Policy 415: Purchase & Payment of Lodging. Additionally, faculty and staff may pre-plan their expenses using the Lodging and Meal Per-Diem Calculator.

Meals

When the University traveler is expected to incur costs for meals and incidentals for overnight business travel, the University will reimburse meals and incidental expenses (M&IE) under a per diem allowance. The maximum M&IE per diem allowance will be at the rate established by the General Service Administration, Departments of State and Defense

for the location of each full day's (24 hours) travel. The M&IE per diem allowance will only be paid when the traveler is expected to incur costs for meals and incidentals; business travel requires an overnight stay outside the traveler's headquarters and when the travel is supported by a University business purpose.

For assistance with calculating maximum M&IE, please use the Lodging and Meal Per-Diem Calculator. Additional information related to maximum M&IE rates is available in UW System Administrative Policy 420: Travel & Expense – Meal and Incidental Expense (M&IE) Per Diem Allowance Reimbursements.

Miscellaneous Expenses

Other expenses are permitted if they are necessary, reasonable, and allocable for the conduct of University business, such as photocopying, Internet, fax, or telephone services or charges. Keep receipts to verify charges; additional justification may be necessary for some expenses.

Personal Vehicles

Personal vehicles may be used for activities on your sponsored project. Reimbursement is provided at the University's standard mileage rate for personal vehicles (e.g., cars, trucks, vans). Business mileage will be reimbursed at the IRS authorized mileage rate in effect on the date of travel using the most direct route.

All individuals requesting mileage reimbursement must complete a Vehicle Use Agreement on the State of Wisconsin Enterprise Fleet Management System prior to travel (typically a one-time requirement). Reimbursement is typically limited to standard map mileage/calculations; a justification is required for mileage reimbursement requests that exceed the available map mileage/calculations.

Additional information related to mileage reimbursement is available in UW System Administrative Policy 425: Use of Personal Vehicles, Rental Cars, and Fleet for Business Transportation.

Rental Vehicles

Rental vehicles may be used for activities on your sponsored project. UW System has contracts with car rental companies, which must be used if vehicles are available. If traveling domestically, rental car reservations must be made via the UW system.

Rentals are limited to compact/standard/intermediate vehicle classes. Claims for reimbursement beyond standard/intermediate vehicle classes (i.e., trucks, vans, etc.) for

business reasons such as transporting extra passengers, carrying cargo or bulky equipment, etc., must be explained in the expense report.

Additional information related to mileage reimbursement is available in UW System Administrative Policy 425: Use of Personal Vehicles, Rental Cars, and Fleet for Business Transportation.

Taxi, Limousine, and Shuttle Services

Necessary, reasonable, and allocable charges for ground transportation are reimbursable. Whenever possible, use shuttle services offered by lodging facilities and/or conference sites, which are typically free. Receipts are required for all fares that exceed \$25.

Additional information related to taxi, limousine, and shuttle services is available in UW System Administrative Policy 430: Travel & Expense – Purchase & Payment Miscellaneous Travel Expenses.

Travel Calculator

The UW System has a Lodging and Meal Per-Diem Calculator to assist Principal Investigators with developing budget estimates for travel. Use of the Travel Calculator is highly encouraged for those Principal Investigators developing travel estimates for inclusion in federal grant and contract submissions. Under the Uniform Guidance, proposals must now include a detailed breakdown of travel costs (airfare, lodging, meals, conference registration fees, taxi/shuttle services, rental cars, etc.). The Travel Calculator will provide lodging and meal estimates based on location and dates of travel.

Travel by Students, Participants, and Other Personnel

Travel on sponsored programs is typically permitted for students, participants, and other personnel, so long as the travel is necessary, reasonable, and allocable. Travel is usually incorporated into the budget at the proposal stage and approved during the initial award negotiation phase.

The allocation of travel across cost categories may vary across grant programs. For example:

- Travel for undergraduate, graduate, or doctoral students on a **research grant** will likely be charged to the “Travel” budget category; however,
- Travel for undergraduate, graduate, or doctoral students on a **training or education grant** will likely be charged to the “Participant Support” budget category.

In these instances, charges allocated incorrectly may have an impact on other cost categories (e.g., Indirect Costs). Consult with the Grant Accountant assigned to your

Division/School/College to discuss modifications to travel expenses for students, participants, or other personnel.

Participant Support Costs

Participant Support Costs are typically used in training grants or functions, in which the primary purpose of the funding is to provide training for a specific population for their own benefit (e.g., undergraduate/graduate students, in-service teachers, high school students). Costs may include stipends (excluding fringe benefits), travel, housing, meals, and/or books/supplies. In some instances, sponsors and programs may strictly limit the amount requested for Participant Support Costs; please review the guidelines carefully.

- [See Participant Support Costs Guidance](#)

Payments to human subjects are not considered as Participant Support Costs and are allocated to the “Other Direct Costs” category.

Subawards

A subaward is a contractual agreement between the primary award recipient (lead) and a secondary institution. It contains the work specifications, approved budget, and the terms and conditions under which the work is to be accomplished. A subaward is issued when a third-party organization (e.g., collaborator at another university) is needed to perform a scientific or programmatic portion of a UWM sponsored program.

UWM as the Primary (Lead) Institution

If you are a principal investigator and are funding one or more colleagues from another institution from your grant, your colleagues must provide the following information to you prior to proposal submission:

1. A **letter of commitment** or statement of intent to enter into a consortium agreement from their organization(s) signed by an individual authorized to bind the institution to a grant/contract. If cost-sharing is proposed, the letter must include a statement indicating the institution will provide the cost-share amount during the award term.
2. A **statement of work** for the organization’s role in the project.
3. A **budget and budget justification, approved by their organization**, of their share of the project costs (including information related to cost-sharing, if applicable).

Additional documents may be required depending on the requirements of the grant program and sponsor.

Collaborative Linkages

When sponsors and program guidelines allow collaborative applications to be submitted as a simultaneous submission of proposals from different organizations with each organization requesting a separate award, it is assumed that this method will be used.

The benefits of collaborative linkages are significant: in addition to being a collegial way to treat partners, submission of a collaborative proposal from multiple organizations reduces for the lead organization the administrative burden that comes with managing subawards, provides direct and quicker access to funding for the non-lead organization, and has cleaner reporting responsibilities for both.

In the event a Principal Investigator has a strong desire to submit as a single proposal in which a single award is being requested with subawards administered by UWM, then, if funded, the F&A generated from each subaward will be split evenly between the applicant College/School/Unit and OSP.

UWM as the Subawardee

If you will be key personnel on a proposal in which another institution is the primary award recipient, provide the following information to the Principal Investigator prior to proposal submission:

1. A **letter of commitment** from the UWM Office of Sponsored Programs (contact your Pre-Award Specialist for assistance).
2. A **statement of work**, for UWM's role in the project.
3. A **budget and budget justification, approved by the UWM Office of Sponsored Programs**, for UWM's share of the project costs.

The lead institution may require additional documents depending on its policies and the requirements of the grant program or sponsor.

Subaward requirements vary among sponsors and programs; carefully review the sponsor's guidelines and contact the Pre-Award Specialist assigned to your Division/School/College for assistance.

Other Costs

Consultants

A consultant is an individual who provides professional advice or services for a fee, but normally not as an employee of the lead institution. Consultants typically possess a unique skill, expertise, and/or education to participate in a particular project. Consultant charges

and use must be appropriately justified in the proposal. Proposed consultant rates must align with rates used from all sources of funding—both federal and non-federal.

Sponsors may have specific criteria for the inclusion of consultants in project budgets; please refer to the sponsor's guidelines for further information. Employees of the UW System may NOT be paid as consultants on any sponsored project; the inclusion of other UW System employees must be handled as a subaward for budgeting and payment purposes. For additional guidance, contact the Pre-Award Specialist assigned to your Division/School/College.

Maintenance

Typically refers to costs associated with equipment maintenance, such as software, technology, or vehicles used in the project. These costs must be appropriately documented to be allocated to the project.

Materials and Supplies

The cost for the materials and supplies for a project may be included in the budget if they are necessary, reasonable, and allocable. Materials and supplies usually cost less than \$5,000 to acquire; most computing devices are considered a “supply.” To include computing devices in a budget as a direct cost item, the budget justification should clearly state that the cost is essential and necessary for the project.

Publications

Many peer-reviewed journals charge authors for the publication of their scholarly products, and most sponsors allow PIs to include “page charges” in their project budgets. These expenses typically support the dissemination plan.

Other Direct Costs

Includes costs that may be directly allocated to a particular project but do not align with any of the other direct cost categories listed above. This may include tuition for graduate students and human subject payments.

Indirect Costs

Indirect Costs are actual costs incurred by UWM in support of extramural activities but cannot be charged to a specific grant or contract. Examples include pre-award services, post-award services, library services, utilities, building and equipment depreciation, and other administrative or support functions.

The federal government recognizes the cost of extramural research, including expenses that are shared across all sponsored programs and cannot be allocated to a specific project. To ensure these costs are captured in the project budget, Indirect Costs are included in the budget as a percentage of the project's direct costs.

UWM has three approved Indirect Cost rates for projects that occur on-campus. The chart below details the three rates and each of the characteristics of projects that fall under each. It is possible that one project may have research, public service, and/or instruction characteristics—applicants should use the categorical rate that aligns with most project activities.

Category	Characteristics of Project
Research	“Research” is defined as a systematic study directed toward fuller scientific knowledge or understanding of the subject studied. “Research” includes both basic and applied research projects. “Development” is the systematic use of knowledge and understanding gained from research directed toward the production of useful materials, devices, systems, or methods, including design and development of prototypes and processes. The term “research” also includes activities involving the training of individuals in research techniques where such activities utilize the same facilities as other research and development activities and where such activities are not included in the instruction definition.
Instruction	Projects designed to support the research, training, or enhancement of general instruction of students at UWM. Instruction awards also help professional schools to establish, expand, or improve programs of continuing professional education. Examples of instruction projects include those where the primary purpose is curriculum development or NIH training grant programs.
Public Service	Projects established primarily to provide non-instructional services beneficial to individuals and groups external to the institution. Such activities include community service programs (excluding instructional activities) and cooperative extension services. Included in this category are conferences, institutes, general advisory services, reference bureaus, radio and television, consulting, and similar non-instructional activities.

See the definition of ‘off-campus’ for the use of the off-campus rate.

UWM has established a policy for the inclusion of Indirect Costs in proposal budgets. Rates may vary based on the sponsor; see the table below for additional details. For assistance with calculating the appropriate Indirect costs, contact the Pre-Award Specialist assigned to your Division/School/College.

Proposal To:	Indirect Costs Rate:	Tuition Remission Required
I. Federal Entities		
A. Direct Federal (unless federal regulations stipulate an alternate rate).	Full*	Yes
B. Non-direct Federal (All sources except the State of Wisconsin and Wisconsin Governmental Units—See Below).	Full	Yes
II. Non-Federal Entities		
A. For-profit Entities	Full	No
Except:		
Clinical Trial	20%	No
Matching Funds for a Federal or Non-Profit Funded Grant/Contract.	Rate Applicable on Original Award	No
B. Non-Profit Entities	Full	No
Except:		
Agencies with University Approved Rate that Differs (See Indirect Cost Policy).	Stipulated Rate	No
Agencies without University Approved Rate but with Documentation to Establish an Acceptable Rate.	To Be Determined	No
Non-Wisconsin Governmental Units (e.g., foreign, or domestic states, counties, municipalities, etc.).	Full	No
Wisconsin Governmental Units (counties or local municipalities or government units).**	15%	Yes
C. State of Wisconsin Agencies***	15%	Yes
Except		
DPI, VTAE, and H&FS Training, Instructional, and Public Service Proposals.	8%	Yes

*"Full" indicates the entire Indirect Cost Rate appropriate for the project type (research, instruction, or public service).

**All proposals must include the following statement: "If funded with federal pass-through funds, Indirect Costs must be awarded at the highest allowable rate. If no federal funds are involved, tuition remission may be excluded from the award."

***All proposal budgets must include the following statement: "If funded from state GPR funds, tuition remission and Indirect may be excluded from the award."

Other Budget Considerations

Below are additional considerations for the development of sponsored program budgets at UWM. Please contact the Pre-Award Specialist assigned to your Division/School/College with questions related to any of these topics.

Budget Justifications

The budget justification is a vital part of the proposal. The budget justification serves as the basis for the figures included on the budget pages and is critical in the proposal review process. Below are a few items to remember when developing your budget justification:

- **Show your work.** Reviewers and sponsor administrators should be able to determine how you arrived at your budget figures.
- **The budget justification serves as the rationale for your costs.** Be certain to tie each cost to the overall project so that readers understand the importance of each cost/item to the overall project.
- **If portions of your budget include an escalation for costs, be sure to state this in the budget justification.** If you use the Budget Tool, salary may be escalated within the Budget Tool. Fringe benefits are automatically escalated by one percent each year within the Tool.
- **Be certain to keep your back-up documentation.** Sponsors may request estimates for equipment and other major purchases during a pre-award audit.
- **Present the budget justification in a format that allows a reader to easily assess the costs in relation to the budget.** For instance, if the budget uses headers such as "salaries," "fringe benefits," and "travel," be certain to use the same headers in your budget justification. It allows readers to quickly skim the budget and the budget narrative to find specific items of cost.
- **Take time to read the budget, budget justification, and narrative.** Do all the expenses in the budget appear in the budget justification? Do the budget, budget justification, and proposal narrative all align?

Primarily, remember that the reviewers and program officer are not the only individuals reading your budget justification. If a proposal is recommended for funding, many sponsors send the proposal for a pre-award audit. Many pre-award auditors do not have a scientific or technical background and may not understand vague budget items. It is recommended that you provide as much detail as possible in the budget justification during the submission phase—it may result in a faster pre-award audit and award processing.

National Science Foundation Budget Justifications

NSF policy requires proposing organizations to define and consistently apply the term “year” when requesting salary compensation for senior personnel, and to specify this definition in the budget justification. Sample language to satisfy this expectation follows:

Budget Justification

The following cost items are directly tied to project objectives and activities as described in the project description. Rates follow standard university travel, purchase, and expenditure policies. UW-Milwaukee’s definition of a “year” for budgeting and management of senior personnel compensation is the fiscal year (July 1 to June 30).

Cost-Sharing (Matching Funds)

If a project requires cost-sharing, or matching funds, contact your chair, dean, and/or division head to discuss the proposed cost-sharing commitment. All cost share commitments must be appropriately documented in the proposal and in the Record; failure to provide the appropriate documentation may result in the delay of proposal submission and/or award acceptance.

As a resource to campus, the Office of Sponsored Programs has assembled a list of Frequently Asked Questions as it relates to cost-share.

If the project includes a subrecipient that will provide cost-sharing for the project, the institutional commitment letter must include a reference to the proposed cost-sharing. See Subawards for additional information.

Space Renovations/Implications

All projects that involve the construction or modification of facilities at UWM will require additional review by the UW System Office of Capital Planning and Budget and/or the State of Wisconsin Building Commission. Contact the Pre-Award Specialist assigned to your Division/School/College to discuss whether the project will require additional institutional clearances or review.

Award Management

The Office of Sponsored Programs provides a host of services to support the management of grant and contract awards. Additionally, Grant Accountants are available to help faculty, staff, and administrators regarding sponsored program cost accounting and best practices; allowability and allocability of costs to sponsored program awards; guidance on navigating special award terms and conditions; and reporting requirements.

Below is the basic process for administering grant and contract awards at UWM. For more information, review our Post-Award Services or contact the Grant Accountant designated to assist your school, college, and/or department.

At the Time of Award

Step 1: Review the award materials

What should the Principal Investigator do?

Carefully review the award documentation materials from the sponsor. Your Pre-Award Specialist will work closely with you to finalize the appropriate agreements and secure institutional approvals to officially accept the award.

Contact:

Work closely with your Pre-Award Specialist to finalize and accept the award.

Step 2: Create the project account

What should the Principal Investigator do?

After the award is accepted and approved, it will be assigned to the designated Grant Accountant for your Division/School/College. An account will be established so that expenses will be allocated to the project. Monitor your e-mail for information related to your project account. Use the system to monitor financial transactions associated with the award.

Contact:

- Contact your Grant Accountant if you have questions or need information about your project account.
- Contact the Administrative Officer of your Division/School/College if you are unable to access the system.

Step 3: Review budget

Budget and Expenditure Monitoring: 2 CFR 200.302

Grant and Contract Accounts are monitored by a combination of the Principal Investigator, the department, the Dean's office, and the Office of Sponsored Programs. It is the PI's responsibility to assure that expenditures are appropriate, reasonable, and allowable. Supporting documentation must be kept establishing that the funds have been expended according to the terms and conditions of the award. The PI should manage the expenditures to match the awarded budget and not exceed the available balance. The Grant Accountant may initiate a request for cost transfers if an award is overspent or an unallowable expense has posted to the award. All cost transfers on extramural funded awards must be reviewed and approved by the Grant Accountant. Contact the Administrative Officer of your Division/School/College if you are unable to access the system.

Contact:

- Contact your Grant Accountant if you have questions or need information about your project account.
- Contact the Administrative Officer of your Division/School/College if you are unable to access your data.

During the Award Period

Step 4: Manage award

What should the Principal Investigator do?

You may now initiate the project and begin spending the funds. Expenses should align with the original project budget and scope of work.

Contact:

Contact your Grant Accountant immediately if you have changes to your project budget or scope of work. While many sponsors will permit minor changes without approval, all sponsors require approval for major changes. Your Grant Accountant is trained in the nuances of project and budget changes and can provide valuable assistance.

Step 5: Monitor compliance

What should the Principal Investigator do?

Principal Investigators, in collaboration with the Office of Sponsored Programs and your Division/School/College, are responsible for ensuring compliance with the myriad of federal,

state, and campus regulations governing sponsored projects. Principal Investigators must carefully monitor compliance in the following areas as applicable:

- All expenses match the original award terms and conditions, are allowable, and match the original award.
- All human subjects compliance requirements are satisfied.
- All animal compliance requirements are satisfied.
- All effort reporting requirements are satisfied.
- All conflicts of interest are reported within 30 days of the event.
- All biosafety and/or biohazard compliance requirements are satisfied.
- All export control applications and requirements are completed and satisfied.

All UWM faculty and staff are encouraged to report instances of fraud, waste, and abuse via the UW System anonymous hotline. Reports may be made via phone (855-827-4950) or online.

Contact for compliance questions:

- Allowability and allocability of your project expenses: Your Grant Accountant.
- Payroll confirmation reporting: Research Integrity Manager
- Conflict of interest reporting and/or export controls: Research Integrity Manager
- Human subjects: Human Research Protection Program (irbinfo@uwm.edu, 229-3173).
- Animal research: Animal Care Program (acp@uwm.edu, 229-6016).
- Biosafety or biohazard issues: Biological Safety Program office in University Safety & Assurances at 229-6339.

Step 6: Monitor project reporting

What should the Principal Investigator do?

Sponsors typically require progress reports on your project activities and expenditures. Carefully review the award materials to determine the appropriate reporting deadlines and to ensure that you have access to the appropriate sponsor systems to submit the reports.

Contact:

Contact your Grant Accountant if you have questions about project reports. For sponsors that request interim financial reports, contact your Grant Accountant at least 30 days before the due date to ensure all project expenses are reported correctly.

After the Award Period Ends

Step 7: Project Closeout

What should the Principal Investigator do?

Sponsors usually require a final project and financial report at the end of the project period. Principal investigators are responsible for developing the project report and should work closely with your Grant Accountant to develop the final financial report. Upon submission of the final report, the project account will be closed.

Contact:

Contact your Grant Accountant to discuss and develop the final financial report for the project.

Step 8: Record Retention

Record Retention: 2 CFR 200.333

It is the policy of the Office of Sponsored Programs to close an award after all final reports have been filed and all receivables have been satisfied. It is the department's responsibility to maintain the supporting documents for all expenses that have been posted to an award. All information and records for grants and contracts are retained for four years and three months after the award has been closed unless the sponsor requests other terms and conditions.

Pre-Award Administration

Pre-Award Administration is dedicated to supporting UWM faculty and staff with the development and submission of quality proposals and contracts that are both technically and administratively compliant with sponsor and campus requirements. The goal of submitting the highest quality proposal is accomplished through strong collaboration between researchers and research administration staff.

Located in the Office of Sponsored Programs (OSP), Pre-Award Specialists are assigned to each UWM Division/School/College or unit to serve as a primary point of contact and to help facilitate the overall grant process while balancing the need for institutional and sponsor regulatory compliance. We are here to help you in the following areas:

- **Proposal Review and Approval:** OSP staff confirm the proposal has received all necessary internal approvals, review the proposal to ensure it meets sponsor and institutional technical guidelines and requirements, and conforms to all applicable regulations.
- **Proposal Authorization:** OSP staff serve as authorized institutional officials on behalf of the University and will sign/certify proposal submissions to sponsors.
- **Award Negotiation, Acceptance, and Set-up:** Review award terms and conditions prior to acceptance and set-up award accounts.
- **Establish, Amend, and Execute Outgoing Subawards:** Technical Preparation of subaward agreements between UWM and subrecipient institutions.
- **Review and Execute Non-Financial Agreements:** OSP is charged with the review and execution of research-related non-financial agreements such as Data Use Agreements, Material Transfer Agreements, and Non-Disclosure Agreements.

Proposal Preparation

Below is a general list of items that may be necessary to submit with a proposal. Each sponsor may have their own guidelines and require additional materials/information. Contact your Pre-Award Specialist to discuss the requirements for a specific funding opportunity.

Budget Development & Approval

OSP maintains a host of resources for [budget development and approval](#).

Cost-Sharing (Matching Funds)

If a project requires cost-sharing, or matching funds, contact your chair, dean, and/or division head to discuss the proposed cost-sharing commitment. The commitment must be

documented appropriately in the proposal and in the Record; failure to provide the appropriate documentation may delay proposal submission and/or award acceptance.

As a resource to campus, the Office of Sponsored Programs has assembled a list of [Frequently Asked Questions](#) as it relates to cost-share.

If the project includes a subrecipient that will provide cost-sharing, the subrecipient must provide an institutional commitment letter that describes the proposed cost-sharing. See Subawards for additional information or contact your Pre-Award Specialist.

Data Management Plans

Many federal sponsors require Principal Investigators to include with their proposal a plan that describes how the data generated from the funded project will be accessed, stored, managed, and shared. UWM Library Data Services offers comprehensive data management planning support and training. Guidance is also available from a host of online resources.

Frequently Requested Information

OSP maintains a list of Frequently Requested Information that is typically required for developing budgets, completing forms, and submitting proposals to various external sponsors.

Biographical Sketches

A biosketch is a streamlined version of your CV (curriculum vitae) requested by most funding agencies and institutions. NIH and NSF both use standard biosketch formats that are periodically updated. Foundation and industry sponsors may also have specific requirements when requesting your CV/Biosketches.

Use [SciENCv \(link is external\)](#) to help you develop your biosketch and automatically format it according to agency requirements.

Using My NCBI and SciENCv

To use SciENCv and My NCBI, researchers will need to create an account and create their Professional Profile. Basic instructions follow below.

1. Register with My NCBI. Applicants who seek only NSF funding must register with My NCBI to eventually access SciENCv.
2. After creating your account, you will want to update “My Bibliography,” which is used to generate the publications/products section for an NSF or NIH Biographical Sketch. Allow plenty of time to create the My Bibliography section; for researchers with

significant publication records, it may be a lengthy process to update their publication history in My NCBI.

3. SciENcv is accessible through My NCBI. Once logged into My NCBI, go to the SciENcv portlet, and click on the hyperlink “Click Here.”
4. You can use any of three methods to create your professional profile in SciENcv: by manually entering data using a template; from an automated feed through an external data source; or by making a duplicate of an existing profile.
5. SciENcv will prompt users through the process of creating an NSF or NIH biographical sketch.

Resources Available

My NCBI

Resource	Instructions/Notes
My NCBI Help	This is the complete instruction manual for the My NCBI tool. The link at right includes instructions to create an account as well as instructions for all components.
My NCBI Home Page Tutorial	This video provides a brief overview of the My NCBI home page and functions.
Saving Searches and Setting Email Alerts Tutorial	This video provides instructions on how to save searches and create email alerts in NCBI databases.
My Bibliography Help	The My Bibliography function in My NCBI allows users to save citations directly from PubMed or to manually enter citations using templates. My Bibliography also allows users to view whether if publications comply with the NIH Public Access Policy.
My Bibliography Tutorial	This video provides instructions on how to use the My Bibliography function of My NCBI.
My Bibliography Delegate Access	My NCBI account holders may delegate access to other individuals to view and edit your My Bibliography collection. The delegation feature also allows others to view, edit, and create profiles in SciENcv.
My Bibliography: Public Access Compliance Tutorial	This video provides information for NIH-funded scientists in linking funding to their citations and manage compliance with the NIH Public Access Policy.

Resource	Instructions/Notes
Saving Results in Collections in My NCBI Tutorial	This video includes instructions on how to save search results in Collections, including the Favorites Collections. Collections is a function of My NCBI.

SciENcv

Resource	Instructions/Notes
SciENcv Help	This is the complete instruction manual for the SciENcv tool. SciENcv allows users to document education, employment, research activities, publications, honors, grants, and other professional contributions.
SciENcv Tutorial	This tutorial provides an overview of the SciENcv tool and how to create, share, and maintain NIH Biographical Sketches.
SciENcv Frequently Asked Questions	Frequently Asked Questions regarding SciENcv are available; additional questions will be available in the future.

Subawards

Other Pre-Award Considerations

Principal Investigators must be cognizant of other institutional, state, and federal requirements that govern sponsored programs.

Material Transfer

When research involves the use of a biological material or other substances received from an outside entity, a Material Transfer Agreement may be required. UWM has a template for outgoing Material Transfers; incoming Material Transfer Agreements may be routed to OSP for institutional review.

Principal Investigator Status

Only faculty and 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/résumé.

Forms and Downloads

Forms and Downloads are available to support proposal development and award management at UWM.

Proposal Submission

OSP is responsible for maintaining all institutional registrations for extramural proposal submission systems. Pre-Award Specialists will help faculty and staff register to use proposal submission systems, if needed.

Principal Investigators should allow adequate time for the review and submission of a proposal through an electronic system. Although some sponsors may allow proposal submissions after normal business hours, technical support may not be available if issues arise during the submission process.

Proposal Submission Process

We are here to help you in the following areas:

- **Proposal Review and Approval:** OSP staff confirm the proposal has received all necessary internal approvals, review the proposal to ensure it meets sponsor and institutional technical guidelines and requirements, and conforms to all applicable regulations.
- **Proposal Authorization:** OSP staff serve as authorized institutional officials on behalf of the University and will sign/certify proposal submissions to sponsors.
- **Award Negotiation, Acceptance, and Set-up:** Review award terms and conditions prior to acceptance and set-up award accounts.
- **Establish, Amend, and Execute Outgoing Subawards:** Technical Preparation of subaward agreements between UWM and subrecipient institutions.
- **Review and Execute Non-Financial Agreements:** OSP is charged with the review and execution of research-related non-financial agreements such as Data Use Agreements, Material Transfer Agreements, and Non-Disclosure Agreements.

Following proposal submission, the sponsor will notify the Principal Investigator on the outcome of the review process. Often, the notification is sent directly to the Principal Investigator only; please inform your Pre-Award Specialist of the outcome.

Post-Submission

Following a proposal submission, OSP will facilitate the award negotiation and setup process or can assist with the revision and resubmission of a proposal.

Award Negotiation and Setup Process

Pre-Award Specialists support Principal Investigators during the initial award notification phase to ensure that:

- The original proposal has been reviewed and approved by the PI's department chair, dean/division head, and/or other campus officials.
- The award terms and conditions are agreeable to all parties.
- Information requested by the sponsor at the time of award has been submitted and approved.

OSP is responsible for ensuring that the terms and conditions of an award are acceptable to UWM. Most grant awards have relatively standard terms and conditions; however, some conditions may require review by the PI and/or other campus officials.

After the award terms and conditions have been approved by the sponsor and UWM, all requested information has been submitted to the sponsor, and compliance requirements have been met, the PI will receive an org/project code to manage the award. This information should be kept for reference during the award period. The PI will work closely with the Grant Accountant assigned during the award phase.

Revision and Resubmission

Sponsors may decline funding for a variety of reasons. PIs should carefully review declination letters and the reviewers' feedback (if available) to determine whether to revise and resubmit the proposal to a future or alternate competition. Contact Research Development Services to discuss a potential revision and resubmission plan.

Post-Award Administration

Post-Award Services provides support to Principal Investigators, deans, department chairs, administrators, and other campus officials in the administration of grants, contracts, and agreements. Located in the Office of Sponsored Programs (OSP), [Grant Accountants](#) are assigned to each UWM Division/School/College or department to serve as the primary point of contact and to help facilitate the overall post-award process while balancing the need for institutional and sponsor regulatory compliance.

Financial and Project Management

Award management is a shared responsibility between the Office of Sponsored Programs, the Principal Investigator (PI), and the PI's Division/School/College or unit. The process

shares responsibility for award management and ensures that, as a grant recipient, UWM is a responsible steward of the sponsor's resources.

Allowable Costs

Award Terms and Conditions Determine Costs if Costs are Allowable

The grant agreement or contract usually contains the terms and conditions for receiving reimbursement. During the award acceptance process, you will receive a copy of the agreement. Please contact the Grant Accountant assigned to your Division/School/College with any questions regarding financial management of the award.

For most federal and non-federal awards, your Grant Accountant will initiate electronic drawdowns for funds or invoice to reimburse the University for expenses posted to your project on a monthly or quarterly basis (as determined by the sponsor). In most cases, invoices are submitted with expenses by budget category. The account codes used when expenses are posted to the project will dictate which budget category an expense will appear. Please be certain to use the proper account codes. Certain sponsors also require a detailed listing of expenses to accompany each invoice (or if there is a question).

It may be essential that you obtain permission from the sponsor to deviate from the approved budget. Without the sponsor's prior approval, the sponsor may not be obligated to reimburse expenses that are not allowed. In the event of an audit or review of expenses by a sponsor, the division/school/college may be required to return funds to the sponsor if expenses are determined as unallowable. Your Grant Accountant will be contact with the PI, the division/school/college, and department if there are any audit or collection issues.

Fiscal Policies that Determine if Costs are Allowable

In addition to specific terms and conditions for fiscal management contained in an award document, most sponsors require that costs adhere to the guidelines provided by the Federal Office of Management and Budget (OMB).

Allowable costs **MUST:**

- **Be necessary:** A cost must be necessary to accomplish the scope of work, and the cost applied must be essential to achieve a certain result or results. Be certain that purchases near the end of a project period, especially those for supplies and equipment, are necessary to accomplish the scope of work for that project. The last expenses charged to a project are most likely to be reviewed by sponsors.
- **Be reasonable:** A cost is reasonable if the goods or services acquired reflect action that a "prudent person" would take acting in good judgement and the cost incurred is considered fair and does not deviate from established practice and policies of UWM.

- **Be allocable:** A cost is allocable if the goods or services are chargeable or assignable to an award in accordance with the benefit received. The cost must have been incurred specifically for the award, the cost must be necessary for the overall operation of UWM and can be distributed proportionally to the award using a reasonable method.
- **Conform to the limitation specified in the specific award:** It is critical for PIs and division/school/college administrators to review the award documents and other sponsor policies referenced in the award to fully understand which costs are allowed and which are not.
- **Be consistent with University policies and procedures:** Uniform Guidance requires that all project costs be treated consistently with policies and procedures applied to federal and non-federal projects. Pay close attention to procurement and travel policies. Links to relevant University policies follow below. Please contact your Unit Business Representative (UBR) with any questions regarding University policies and processes. For unique costs to your specific project, please verify the cost is allowable under University policy, the award terms, and conditions, and under the Uniform Guidance (2 CFR 200).
- **Not be included in the University's indirect cost calculations:** Any costs considered "overhead" included in UWM's Indirect Rate may not be charged ***directly*** to an award. Common examples include telephone charges, general office supplies, or administrative support staff.
- **May not be used as cost-share on another project:** Cost-share is not allowed to come from another award. Departments and PIs are responsible for ensuring cost-share commitments are met from University or third-party funds.

Relevant UWM/UW System policies governing financial transactions:

- UW System Administrative Policy 306: Accounting and Budget Control
- UW System Administrative Policy 308: Budget Transfers
- UWM Purchasing Guidelines
- General Travel Policy

Unallowable Costs: 2 CFR 200.402-410

The Uniform Guidance does list a few items of cost that are not allowed on federal projects. Detailed requirements of selected items of cost are included in Subpart E of the Uniform Guidance.

Costs not allowed will need to be transferred off the award. The division/school/college must initiate the cost transfer as soon as an unallowable expense has been identified. It is the responsibility of the division/school/college to provide the funding string for the unallowable expense that is consistent with University policies and procedures.

In some cases, a refund will need to be provided to the sponsor. Ultimately, it is the responsibility of the PI to monitor the expenses posted to projects and ensure costs are allowable. Your Grant Accountant is available to answer any cost-related questions.

Consultants and Professional Services

A consultant is an individual or entity providing professional advice or services for a fee, but normally is not an employee of the lead institution. Consultant charges must align with rates used from all sources of funding—both federal and non-federal. UW System employees may NOT be paid as consultants on any sponsored project.

Consultants and professional services will be in the “other” budget category and will usually be included in your budget justification to the sponsor.

Consultants and professional services must be procured through the UWM Purchasing Department. Prior to issuing a purchase order, the PI and/or their division or school or college or department is responsible for ensuring the vendor is not on the Federal Debarred list by checking the System for Award Management (SAM).

Cost Transfers: 2 CFR 200.343(b)

It is the policy of UWM that all costs should be charged to the appropriate sponsored project when first incurred. Salary charges should be a reasonable reflection of the employee’s effort, and any salary transfers may have effort reporting consequences. Salary and Non-Salary cost transfers should be requested as soon as the error is identified. A cost transfer request must be submitted within 90 days of the accounting date of the initial cost allocation with the supporting documentation of the cost. An accompanying justification must be included. All cost transfers to funds 133 and 144 must be reviewed and approved by a Grant Accountant. Any late cost transfer requests may not be approved.

Cost-Sharing

Cost sharing is the portion of the total project costs not paid for by the sponsor but rather is covered by UWM and/or third parties. Common examples of cost-shared contributions include personnel, time, effort, travel, and facilities.

Example: If a PI has 30% effort on a grant and only 20% is funded by the grant; 10% is cost-shared. The 10% is typically paid by the PI’s department or discretionary account.

Cost-sharing has a significant financial impact on the department providing the funds and on the University as a whole; therefore, a decision to cost-share should be weighed carefully. All cost-sharing included in a proposal must be approved in advance by a representative authorized to make cost-sharing commitments on behalf of the source (e.g., PI's dean or department chair, Vice Provost for Research).

PIs are responsible for documenting all cost-sharing commitments. PIs should work closely with the Grant Accountant assigned to their Division/School/College to manage the cost-share commitment/documentation process.

The following are general statements regarding cost-share commitments:

- All cost-sharing must be provided during the performance period listed in the award documentation. Cost-sharing provided prior to or after the award period cannot be included in the official cost-sharing commitment.
- Proposals to federal agencies typically may not use federal sources of funds for cost-sharing (both mandatory and voluntary).
- All cost-sharing commitments must conform to the applicable federal principles (Uniform Guidance), and must be necessary, reasonable, and allocable to the project.
- Cost-sharing may be provided from a variety of sources, including campus funds, unrecoverable Indirect Costs, volunteer contributions, third-party contributions (such as a for-profit entity), or other non-federal sponsored programs.

Cost Overruns

Cost overruns may occur during award administration. Although post-award administration is shared between the PI, dean, department chair, and OSP, it is ultimately the Division or School or College's responsibility to oversee all sponsored program financial activity. To properly close accounts at the end of a project period (typically within 90 days of the project end date), the following procedure has been established to improve the fiscal management of sponsored programs at UWM and to reduce the risk of financial liability, fines, and/or disbarment:

1. For any account that is overspent for three months following the project end date, funds will be transferred to a non-sponsored Division/School/College account to close the project account.
2. Your Grant Accountant will work with the PI and his/her Division/School/College to develop a plan to cover the overages.

Equipment

Equipment must be included in UWM's inventory in accordance with UW System policy.

Indirect costs will not be applied to equipment. Equipment account codes include 4602-4604, 4620, 4630, and 4680. If your project includes constructing equipment, it is important that items used to create the equipment are charged to these account codes. Issues related to the sale or purchase of equipment purchased with federal funds may be directed to the UWM Purchasing Department or the Grant Accountant assigned to your division/school/college.

Materials and Supplies

The cost for materials and supplies may be charged to a sponsored program account so long as they are allocable, necessary, and reasonable. Computing devices may be charged to a sponsored program account if they are essential to the scope of work proposed.

No-Cost Extensions

Many sponsors allow no-cost extensions if a sponsored program cannot be completed in the original award period. No additional funds will be provided to UWM during this period; it is simply additional time for the PI to finalize remaining project tasks. No-cost extensions typically are available for an additional 12 months.

No-cost extensions may NOT be granted to simply expend funds. All no-cost extensions must be appropriately justified within the context of the original scope of work and require approval from the co-PI's dean and/or department chair. All no-cost extensions requests are reviewed by the Office of Sponsored Programs prior to submission to the sponsor.

To initiate the no-cost extension request, the PI should e-mail their Grant Accountant with a clear justification statement of the need for an extension, summary of progress to date, and the new project end date proposed. The PI should also indicate whether the effort of key personnel on the project will remain the same or will change during the extension paid and indicate the key personnel effort during the extension will be "sponsored paid" and/or "cost-shared."

The timeframe for submitting no-cost extensions may vary, but generally must be submitted at least 90 days prior to the original project end date. Under no circumstances should a request for an extension be sent to the sponsor after the original project end date. PIs should carefully review their award terms and conditions regarding no-cost extensions.

Participant Support

Participant support costs are direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects. Participants may include recipients of training (not the provider), persons that perform no work or services for the project, students, scholars, scientists from other institutions, representatives from private companies, and teachers. Participant support is/are NOT human subject incentives, honoraria paid to a guest speaker or lecturer, or conference support costs.

Participant support may include stipends and travel expenses. In most cases, Indirect costs are not allowed on participant support. As a result, participant support is tracked as a separate project within an award. Any decrease in the participant support budget requires sponsor approval; see your award documents for specific details. Contact your Grant Accountant with specific questions regarding participant support costs.

- See [Participant Support Costs Guidance \(PDF\)](#) (Updated February 2020)

Payments to Research Subjects

PIs are strongly encouraged to carefully weigh the impact of payments to research subjects in sponsored program activities. At UWM, payments to research subjects are governed by several policies and Wisconsin State Statutes:

- UWM Policy on Payments to Research Subjects
- UW System Administrative Policy 330: Prizes, Awards, and Gifts
- Wisconsin's Prize Notice Rules (Wisconsin Statute 100.171)
- Wisconsin's Gaming Statute (Wisconsin Statute 945.02)

PIs must carefully weigh all available options to promote participation in a research survey, and if necessary, consult with the UWM Office of Legal Affairs and/or the UWM Human Research Protection Program (HRPP). HRPP also provides guidance to PIs on challenges associated with various types of incentives.

Personnel

Changes to key personnel and effort during the project typically require sponsor review and approval. Consult your Grant Accountant to discuss modifications to the personnel on your project. Changes to non-key personnel, such as graduate and undergraduate students, typically do not require sponsor review and approval.

Purchasing Cards

Purchasing cards (P-Cards) have a default account code, which is often supplies. If the P-card is used for something other than supplies, the department or division/school/college must re-code the purchase. The PI or department must keep all receipts for purchases made on a P-card and all other University policies must be followed. At the end of the award, a P-card associated with a project must be re-assigned to another project to prevent charges outside of the project period.

Re-budgeting: 2 CFR 200.308

Occasionally there may be a need to re-budget award funds to compensate for changes in costs (e.g., higher than expected increase in fringe benefits or venue location change), or changes to a specific line item, (e.g., participant support, or outgoing subaward). Most sponsors have regulations governing this process.

Any deviations from the awarded budget may need ***prior approval*** from the awarding agency. When requesting budget revisions, the same budget format is used as in the application unless the awarding agency has indicated another format. See 2 CFR 200.308 of the Uniform Guidance.

As soon as the need for the revision arises, please contact your Grant Accountant. They will ensure the budget revision request is reviewed for compliance and the proper approvals are received, both internally from the university, and externally from the sponsor. Also see [Budget Development](#).

Reports

Annual (or Progress) Reports

Most multi-year projects require the PI to complete annual reports, which should describe the progress in all activities related to the project during each performance period.

- The annual reporting requirements are typically set forth in the award notification.
- PIs should carefully review the sponsor's reporting requirements at award set-up and consult with the Pre-Award Specialist assigned to your Division/School/College for further clarification.

Final Reports

All projects typically require a final report. All sponsors have different requirements regarding the content and format of the final reports; thus, PIs should carefully review award materials to determine the final reporting requirements.

- If annual or progress reports are required as a condition of the award, the final report typically covers only the period between the last annual report to the end of the project.
- If no progress or annual reports are required, the final report will cover the entire project period.
- Final reports may include both a programmatic/research outcome(s) summary and financial data. PIs should consult with the Grant Accountant assigned to their Division/School/College in advance of the report deadline to discuss what, if any, financial data is needed for the report.

Financial Reports

Most sponsors request financial reports during the award period. Financial reporting requirements may differ from sponsor to sponsor. PIs should consult with the Grant Accountant assigned to their Division/School/College for assistance with developing and submitting financial reports.

Subawards

A subaward allows a PI to support a project collaborator at another institution. Typically, a Pre-Award Specialist works closely with the PI to obtain the appropriate documentation for a subrecipient during the proposal development phase. At the time of award, OSP staff will contact the PI to confirm that a subrecipient will remain involved in the project.

OSP generates the subaward (and related documentation, if required) and provides a draft for the PI to review. Once the subaward is fully executed, the PI receives a final copy along with a Subcontract/Subaward Encumbrance Request. The request must be reviewed and approved by the PI and his/her Unit Business Representative.

Travel

Many sponsored programs include funds for travel for project personnel. Here is an overview of travel issues that are common on sponsored programs; go to UW portal for a complete list of all current travel policies and procedures.

Air Travel

Air travel is typically limited to the lowest available coach fare. All air travel must be booked via the UW portal using the Concur system or it will not be reimbursed. Concur uses an automated “lowest logical airfare” policy (which is a \$150 tolerance threshold above the lowest rate) that allows users some flexibility in determining airlines, departure dates and times, and routes. For more information on reimbursable and non-reimbursable expenses, as well as other policy considerations, please review UW System Administrative Policy 410: Purchase & Payment of Business Air Travel for more information.

Air Travel Using Federal Funds

If you are purchasing airfare with federal funds, the Fly America Act restricts your choice of airlines. Generally, researchers must use an airline owned by an American company (i.e., “flag carrier”), regardless of cost or convenience.

Foreign carriers may be used for flights if a U.S. carrier “code-shares” with a foreign airline. A “code-share” occurs when two or more airlines “code” the same flight as if it were their own. For example, Delta and Air France code-share a flight to Paris, France. If the researcher’s boarding pass or e-ticket identifies the flight as a Delta flight, even if “Air France” is shown on the airplane, the researcher has met the requirements of the Fly America Act. However, if the researcher’s boarding pass or e-ticket indicates an Air France flight, the traveler is not in compliance with the Fly America Act and the trip cannot be reimbursed with the federal grant funds.

The U.S. government has entered into several air transport agreements that allow researchers using federal funds to use certain airlines in the European Union, Australia, Switzerland, and Japan. These agreements allow researchers to arrange air travel on foreign carriers in certain circumstances. Researchers who will travel to, from, or within these areas/countries, should contact the [UWM Travel Office](#) to discuss travel within these regions. Please be certain to indicate that the travel is associated with a federal grant or contract.

Exceptions to the Fly America Act

Travelers are not required to use U.S. flag carriers in these circumstances:

- When there is no non-stop or direct service offered by a U.S. carrier.
- When travel outside the U.S. increases the number of plane changes to a destination by more than two.
- When the passenger’s total travel time is extended by at least six hours.
- When the connective time at an overseas interchange point is four hours or more.

Appropriate Modes of Transportation

The approving authority has the responsibility to determine the most appropriate and cost-effective means of transportation consistent with the authorized business purpose of the trip, and to consider all associated costs (e.g., employee work time, overnight lodging, meals, mileage).

Researchers with disabilities or who require reasonable accommodations should contact the UWM Travel Office to discuss their options. An accommodation request may be needed prior to departure.

Conference/Workshop/Symposium Fees

The cost of attending conferences, workshops, symposiums, or other dissemination venues is eligible for reimbursement. Researchers should keep the receipts or other materials that document the registration fee associated with attendance.

Lodging

The University's maximum lodging rates are based upon the General Service Administration, Departments of State and Defense rates for the location and dates of stay. The maximum rate is for a single/standard sleeping room per person or single occupancy.

For lodging associated with an externally-designated conference, the maximum lodging rate does not apply if the attendee stays at the venue location. For lodging associated with a UW System-designated conference, the cost may not exceed the maximum rate for the location.

Additional information regarding maximum lodging rates is available in UW System Administrative Policy 415: Purchase & Payment of Lodging. Additionally, faculty and staff may pre-plan their expenses using the new Lodging, Meals, and Incidental Expenses Calculator.

Meals

When the University traveler is expected to incur costs for meals and incidentals for overnight business travel, the University will reimburse meal and incidental expenses (M&IE) under a per diem allowance. The maximum M&IE per diem allowance will be at the rate established by the General Service Administration, Departments of State and Defense for the location of each full day's (24 hours) travel. The M&IE per diem allowance will only be paid when the traveler is expected to incur costs for meals and incidentals; business travel

requires an overnight stay outside the traveler's headquarters and when the travel is supported by a University business purpose.

For Continental U.S. locations, the incidental portion of the M&IE per diem allowance is \$5.00. For Non-Continental U.S. and foreign locations, the incidental portion of the M&IE per diem varies by the location.

Travel that does not include an overnight stay will be limited to a tax reportable day trip meal allowance of \$15 per day when the approving authority expects the traveler to incur meal expenses. No day trip meal allowance will be paid when the traveler receives a provided meal, regardless of amount.

For assistance with calculating maximum M&IE, please use the new Lodging, Meals, and Incidental Expenses Calculator. Additional information related to maximum M&IE rates is available in UW System Administrative Policy 420: Travel & Expense – Meal and Incidental Expense (M&IE) Per Diem Allowance Reimbursements.

Miscellaneous Expenses

Other expenses are permitted if they are necessary, reasonable, and allocable for the conduct of University business, such as photocopying, Internet, fax, or telephone services or charges. Keep receipts to verify charges; additional justification may be necessary for some expenses.

Personal Vehicles

Personal vehicles may be used for activities on your sponsored project. Reimbursement is provided at the University's standard mileage rate for personal vehicles (e.g., cars, trucks, vans). Business mileage will be reimbursed at the IRS authorized mileage rate in effect on the date of travel using the most direct route. For personal vehicles, this rate is \$0.575/mile; for motorcycles it is \$0.545/mile.

All individuals requesting mileage reimbursement must complete a Vehicle Use Agreement on the State of Wisconsin Enterprise Fleet Management System prior to travel (typically a one-time requirement). Reimbursement is typically limited to standard map mileage/calculations; a justification is required for mileage reimbursement requests that exceed the available map mileage/calculations.

Additional information related to mileage reimbursement is available in UW System Administrative Policy 425: Use of Personal Vehicles, Rental Cars, and Fleet for Business Transportation.

Rental Vehicles

Rental vehicles may be used for activities on your sponsored project. UW System has contracts which must be used if vehicles are available. All contracted rental car providers include the cost of insurance in the rates for UW System. If traveling domestically, rental car reservations must be made via UW travel portal.

Rentals are limited to compact/standard/intermediate vehicle classes. Claims for reimbursement beyond standard/intermediate vehicle classes (i.e., trucks, vans, etc.) for business reasons such as transporting extra passengers, carrying cargo or bulky equipment, etc., must be explained in the expense report.

Additional information related to mileage reimbursement is available in UW System Administrative Policy 425: Use of Personal Vehicles, Rental Cars, and Fleet for Business Transportation.

Taxi, Limousine, and Shuttle Services

Necessary, reasonable, and allocable charges for ground transportation are reimbursable. Whenever possible, use shuttle services offered by lodging facilities and/or conference sites, which are typically free. Receipts are required for all fares that exceed \$25.

Additional information related to taxi, limousine, and shuttle services is available in UW System Administrative Policy 430: Travel & Expense – Purchase & Payment Miscellaneous Travel Expenses.

Travel Calculator

UW System has developed a Lodging and Meal Per Diem Calculator to assist Principal Investigators with developing budget estimates for travel. Use of the Travel Calculator is highly encouraged for those Principal Investigators developing travel estimates for inclusion in federal grant and contract submissions. Under the Uniform Guidance, proposals must now include a detailed breakdown of travel costs (airfare, lodging, meals, registration/conference registration fees, taxi/shuttle services, rental cars, etc.). The Travel Calculator will provide lodging and meal estimates based on location and dates of travel.

Travel by Students, Participants, and Other Personnel

Travel on sponsored programs is typically permitted for students, participants, and other personnel, so long as the travel is necessary, reasonable, and allocable. Travel is usually incorporated into the budget at the proposal stage and approved during the initial award negotiation phase.

The allocation of travel across cost categories may vary across grant programs. For example:

- Travel for undergraduate, graduate, or doctoral students on a **research grant** will likely be charged to the “Travel” budget category; however,
- Travel for undergraduate, graduate, or doctoral students on a **training or education grant** will likely be charged to the “Participant Support” budget category.

In these instances, charges allocated incorrectly may have an impact on other cost categories (e.g., Indirect Costs). Consult with the Grant Accountant assigned to your Division/School/College to discuss modifications to travel expenses for students, participants, or other personnel.

FINANCIAL SYSTEM

Web-based financial data reporting that provides detailed information regarding grant award budgets and expenditures is available.

Access

Access is necessary to manage awards. PIs must contact the Unit Business Representative in their Division/School/College to request access.

Account Balances

Account balances available are likely the best estimate of available funds; however, due to timing and other limiting factors, it is typically not the actual account balance. Certain expenditures are processed monthly: for example, charges for fringe benefits and indirect costs typically occur in the first week of the month for the preceding month. Therefore, an account balance on the first of any month will not include last month’s fringe benefit and indirect cost charges. PIs are strongly encouraged to connect periodically with the Grant Accountant assigned to their Division/School/College to obtain a more detailed and accurate account balance projection.

Encumbrances

Encumbrances are expenses that have been charged to an account but have not yet been posted. The system should factor encumbrances into the calculation of the available project balance; however, in some instances, accounts may not display proper encumbrances (or none). PIs are strongly encouraged to connect periodically with their Unit Business Representative to obtain a more detailed and accurate account balance projection at any given time.

Cost Principles for Award Management

There are many regulations that govern federal sponsored programs at U.S. colleges and universities. Below is a list of the major requirements; federal and non-federal sponsors may have additional regulatory compliance requirements for award recipients.

U.S. Office of Management and Budget (OMB) Guidance

OMB is responsible for assisting the President of the United States with the preparation of the federal budget and supervising the administration of Executive Branch agencies. OMB also oversees and coordinates the Administration's procurement, financial management, information, and regulatory policies.

Uniform Guidance (2 CFR 200)

Cost Principles for Educational Institutions 2 CFR 220

Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations 2 CFR 215

Agency-Specific Guidance

National Science Foundation Award and Administration Guide (AAG)

Provides guidance on managing and monitoring the award and administration of NSF grants and cooperative agreements. Information includes an overview of the NSF award process, award administration, financial management and payment, grantee standards, allowability of costs, and other award-related administrative topics.

National Institutes of Health Grants Policy Statement (NIHGPS)

Serves as the general terms and conditions for most NIH awards on terms and conditions applicable to: the type of funding mechanism or grantee type; multiple project director/principal investigator awards; construction, modernization, or renovation grants; research training grants and fellowships; career development awards; modular applications/budgets and subsequent awards; and conference grants.

U.S. Education Department General Administrative Regulations (EDGAR)

Guide for administering funds from the U.S. Department of Education.

Award Close-Out

Award close-out begins once the appropriate final reporting requirements have been satisfied by the PI(s) and any subrecipients/collaborators/partners. Reporting requirements typically include a final technical and financial report; the sponsor may require additional documents such as patent/intellectual property disclosures, mentoring/education plans for post-doctoral positions, and equipment inventory. Once all requirements have been met, the Grant Accountant will initiate the close-out process.

Financial Data Review

It is strongly recommended that departments and divisions/schools/colleges reconcile grant accounts monthly utilizing data from the financial system of record. If the system does not reflect accurate data/transaction amounts, a correction to a source system is likely needed. The monthly reconciliation process serves as an excellent opportunity to ensure receipts are on file for all expenses posted to project accounts (other than payroll, subawards, and Indirect costs).

Close-out Considerations

PIs are strongly encouraged to consider the following questions before, during, and after the award close-out process:

- Are all accounts tied to the project at a \$0 balance? If not, what is the plan to expend or transfer funds?
- Have all project personnel satisfied their effort for the project?
- Have all subrecipients submitted their final invoices for reimbursement? Subrecipients have 45 days from the end of the award to submit their final invoice for payment.
- Has all cost-sharing been satisfied for the project (including subrecipient cost-sharing)?
- Has the data management plan and/or long-term data storage requirements been satisfied?
- Have the final technical and financial reports been submitted to the sponsor?
- Have all other reports/documentation requested by the sponsor been submitted?
- Has the UWM Institutional Review Board or Institutional Animal Care and Use Committee been notified that the project has ended? Have the final reports been submitted to the appropriate institutional research committee(s)?
- Have all biological safety and/or radiation safety compliance requirements been satisfied?
- Have all purchasing and/or travel cards associated with the award been destroyed?

Find Funding

The Office of Research Development Services (ORDS) is dedicated to helping UWM researchers in finding the right grant opportunities for their research and developing strong grant proposals with a competitive edge.

The key to successful proposals is knowing what makes them successful. We have extensive knowledge of federal agencies, national foundations, and collaborative research to help you best position your proposal, and our writing and editing expertise will ensure your documents are **clear and compelling**.

Looking for opportunities to fund your research? Research Development Services can help. As a unit of the Office of Sponsored Programs, Research Development Services can help you strategically identify the funding sources that you need to accomplish your research goals. In particular, the University provides access to numerous online funding resources (see below) for UWM researchers. These resources house a tremendous number of funding opportunities and provide powerful ways to search for them.

Research Development Services also can help you identify the right funding opportunities for your research project through customized funding searches and by identifying potential UWM resources (e.g., programs, collaborators, facilities).

UWM Research Updates

Each week Research Development Services compiles, summarizes, and distributes federal and non-federal grant opportunities to UWM researchers. Summaries include deadlines, contact information, and links to full solicitations. To receive updates, send an email to or-osp-propdev@uwm.edu.

Limited Submissions

Sponsored grant programs that limit the number of number of letters of intent, pre-proposals, and/or proposals from an institution are called “limited-submission” programs. Institutions that exceed the number of allowed submissions may have their applications returned without review or may be rendered ineligible to apply to future funding cycles. Internal processes have been developed to ensure that UWM does not submit more applications than the sponsor allows. ORDS coordinates an internal competition for selecting the most competitive applicants who may apply to this type of opportunity.

Limited submission opportunities are announced via the UWM Research Updates. Interested UWM applicants must submit a Notice of Intent to Apply (NOI) to ORDS as specified in the respective announcement. If the number of NOIs exceeds the allowable

number of submissions, ORDS will provide instructions for the internal competition to all prospective applicants.

Comprehensive Search Engines

PIVOT	A comprehensive database of funding opportunities from the government, philanthropic, and industrial sectors in all fields. Email notifications can be sent daily, weekly, or monthly. UWM Panther ID and password required for use.
Grants.gov	Official federal grants and contracts search site; provides weekly email service.
National Institutes of Health (NIH)	Funding Opportunities Upcoming Deadlines
National Science Foundation	Funding Opportunities Upcoming Deadlines

Funding Alert Services – Federal Grant Opportunities

Agency for Healthcare Research and Quality (AHRQ)	Periodic updates on grant announcements, contract solicitations, and special initiatives.
Advanced Research Projects Agency-Energy (ARPA-E)	Periodic funding opportunity announcements.
Grants and Fellowships in Global Health (Fogarty International Center)	Includes nearly 500 funding opportunities related to biomedical and behavioral sciences, with a special emphasis on researchers in the developing world and their collaborators. An addendum listing 100 grants specifically for short-term travel and externships.
Federal Register	Official daily publication for rules, proposed rules, and notices of Federal agencies and organizations, and executive orders and other presidential documents.
Grants.gov	Official federal grants and contracts search site; provides weekly email service.
Institute of Education Sciences (IES)	Periodic updates about IES and its four Centers and programs.
NASA	Subscription service available to obtain notification of the release of NASA research solicitation announcements.
National Endowment for the Humanities	Searchable list of all current NEH grant opportunities.

National Institutes of Health (NIH)	A weekly email compilation of new research opportunities from across the NIH.
National Science Foundation Update (NSF)	Daily email alert service with subscription options that include new research opportunities, upcoming deadlines, and other content categories.
U.S. Department of Defense: Congressionally Directed Medical Research Programs (CDMRP)	Subscribe to updates for specific CDMRP funding programs.
U.S. Department of Education (DofEd)	Recent Federal Register documents from the Education Department.
U.S. Department of Justice (DOJ)/Office of Justice Programs (OJP)	Periodic updates when new information or solicitations available from OJP and the OJP bureaus and offices.
U.S. Environmental Protection Agency (EPA)	A list of all open announcements, not an automated search site.

Funding Alert Services – Non-Federal Grant Opportunities

American Heart Association	Overview of AHA research programs. Sign up for Research Insider for e-newsletter alerts at the bottom of the page.
Bill & Melinda Gates Foundation	Updates on the latest grant opportunities and awards for Grand Challenges in Global Health, Grand Challenges Explorations, and more.
Philanthropy News Digest	Lists RFPs and notices of awards from grant-making organizations and nonprofits.
Robert Wood Johnson Foundation	Receive alerts when the Foundation posts a new funding opportunity.
Transportation Research Board	Select e-mail alerts for funding opportunities based on specific topics.

Internal Grant Programs

The Office of Research offers a suite of programs to support research and creative activities and the dissemination of results.

One of the goals of the internal grant programs is to strengthen and reinforce best practices in grant writing and submission. Therefore, applications are expected to follow the published program guidelines and proposal requirements. Proposals that do not meet these expectations will not be reviewed. Deadlines are enforced. Research Development staff, who are not part of the review process, are available for consultation about your application.

Research Assistance Fund

The Research Assistance Fund (RAF) supports a wide variety of activities, including conference travel for presenting your research. The awards are intended for faculty and career academic staff with immediate research needs that cannot be supported through other campus funding.

Discovery and Innovation Grant

The Discovery and Innovation Grant (DIG) program supports initial stages of research with the intent of making projects more competitive for completion or expansion through external funding. Applicants must demonstrate that the work is not just an incremental extension of their current or past projects or the field in general. Recipients are expected to submit external grant proposals within three years of the start of funding for at least three times the DIG budget. Proposals are externally reviewed.

Advancing Research and Creativity

The Advancing Research and Creativity (ARC) program supports meritorious research and creative projects across all disciplines at UWM. Proposed projects may be at various stages of development. Awards are expected to result in scholarly, scientific, and artistic products that will increase the national and international recognition of the awardees, their programs, and the institution.

Finish Line

The Finish Line is a pilot program intended to increase competitiveness of proposals being resubmitted to federal sponsors in the categories of Research and Public Service. Funding is provided for work that is needed to address written review concerns. Applicants are

required to share scores and comments from previous proposal submission(s). The performance period for most Finish Line awards is no more than 12 months in duration.

Comparison of internal awards

See full program descriptions for detail, especially eligibility requirements

<i>Program Name</i>	Discovery and Innovation Grant (DIG)	Advancing Research and Creativity (ARC)	Finish Line	Research Assistance Fund (RAF)
<i>Intent</i>	Project seed funding to strengthen external grant submission; priority given to early career researchers and those pursuing new lines of research	Project funding – various stages of completion	Strengthen proposals for grant resubmission by responding to issues raised in reviews	Specific, short-term research needs such as travel for conference presentations, participant incentives
<i>Deliverables</i>	External grants within 3 years of DIG award start date Scholarly and artistic products	Scholarly and artistic products External grants (optional)	Grant resubmission within a year of Finish Line award start date	Activities as described in the application Expenses must be posted within a year of the award start date
<i>Award frequency maximum</i>	One award as PI every four fiscal years	One award as PI every four fiscal years	One award per PI per fiscal year	One award every other fiscal year

Support for Undergraduate Research Fellows (SURF)

The Support for Undergraduate Research Fellows (SURF) program is designed to foster faculty-student research collaborations, and, as such, we are particularly eager to fund applications in which students have the opportunity to engage in thoughtful and progressively sophisticated work central to the overall research program of the principal investigator.

Research Recognition Awardees

The following awards recognize and encourage UWM faculty early in their careers whose research, scholarly, or creative activity have shown potential to achieve distinction in their

academic disciplines or honor veteran researchers who have a long history of significant contributions to their fields of research.

Office of Research/UWM Foundation Research Awards

First awarded in 1979, the annual Office of Research /UWM Foundation Research Awards recognize and encourage UWM assistant and associate professors who have shown the potential to achieve distinction in their academic disciplines through scholarship, creative activity, and the dissemination of knowledge.

Departments/programs are encouraged to nominate a faculty member for an award. In addition to providing a means of honoring outstanding researchers, these awards recognize our collective commitment to academic research and to the importance of UWM's research mission.

Eligibility

1. Open to assistant and associate professors.
2. Full professors and Distinguished Professors are ineligible.
3. Previous research awardees are ineligible.
4. One individual may be nominated from a single department or program.

Nomination

The nomination materials should include a letter of nomination from a dean, department chair, or multidisciplinary program director; two letters of support; and an up-to-date vita. You may secure letters of support from UWM faculty members or from colleagues outside UWM. If you wish to submit or quote from confidential letters written for another purpose, you must first secure the permission of the author(s).

A call for nominations is sent to campus each Spring from the Office of the Vice Provost for Research.

Selection

The Committee of UWM Distinguished Professors reviews the nominations and makes recommendations to the interim vice provost for research for the final selections. The individuals selected as recipients will be honored at the fall UWM Awards Ceremony.

Office of Research Senior Faculty Awards

The UWM Research Foundation, in collaboration with the Office of Research, has established the UWM Research Foundation Senior Faculty Awards, designed to recognize researchers who have a long history of significant contributions to their field of research.

We encourage you to consider nominating a member of your department/program for an award. In addition to providing a means of honoring outstanding researchers, these awards recognize our collective commitment to academic research and to the importance of UWM's research mission.

Eligibility

1. Open to full Professors.
2. UWM Distinguished Professors are ineligible.
3. Previous awardees are ineligible.
4. Only one individual may be nominated from a single department or multidisciplinary program.

Nomination

The nomination materials should include a letter of nomination from a dean, department chair, or multidisciplinary program director; two letters of support; and an up-to-date vita. You may secure letters of support from UWM faculty members or from colleagues outside UWM. Submission of or quotation from confidential letters written for another purpose requires permission of the author(s).

Selection

The Committee of UWM Distinguished Professors will review the nominations and make recommendations to the Vice Provost for Research for the final selections. The individuals selected as recipients will be honored at the fall UWM Awards Ceremony.

Research in the Humanities Award (Biennial)

The Office of Research offers the Research in the Humanities Award which recognizes outstanding scholarship and research in the Humanities within the past two years.

The award recipient will have demonstrated a comprehensive grasp of the subject(s) of inquiry and research and will have made a substantive contribution to humanistic thought through a monograph or other scholarly publication during the two years prior to the award year.

In each odd-numbered year, the Office of Research solicits award nominations of faculty members in the Humanities (see below for eligible departments). The faculty member selected for the award is honored at the Fall Awards Ceremony.

Eligibility

Humanities faculty members in the following departments: African and African Diaspora Studies; Ancient & Modern Languages, Literatures, and Cultures; Art History; Communication; English; Global Studies; History; Linguistics; Literatures, and Cultures; Philosophy; Spanish and Portuguese; Translation and Interpreting; Women's and Gender Studies.

Nomination

The nomination materials should include a letter of nomination; two letters of support; an up-to-date vita and a copy of the monograph or other scholarly publication. Calls for nomination are generally issued in February of each award year, with a March deadline.

Outstanding Creative Research Achievement Award (Biennial)

The Outstanding Creative Research Achievement Award recognizes a UWM faculty member for achieving significant artistic or creative contribution to their field or discipline within the past three years. The recipient will be honored at the Fall Awards ceremony. The award is offered biennially in rotation with the award that recognizes scholarly monographs in the humanities.

Eligibility

Any tenured or tenure-track faculty member of the University of Wisconsin – Milwaukee is eligible to be nominated for this award. Evidence of artistic or creative accomplishment (significant advancement of knowledge, technique, or creative expression) must be in a form that is appropriate to the nominee's professional field/discipline.

Selection

A **panel** composed of the Vice Provost for Research; Associate Deans in the College of Arts and Architecture, the College of Letters & Science (AD for Humanities), and the chair of the Arts and Humanities divisional committee will make the final selection.

Nominations

The nomination materials should include a letter of nomination and an up-to-date vita. Calls for nomination are generally issued in January of each award year, with a March deadline.

Internal grant programs provide funding for travel to present research and attend conferences, develop research initiatives, foster international collaboration, and develop public service projects. The Office of Research administers internal grant programs, and all applications are peer-reviewed by committees comprised of faculty members.

Research Travel Award

Provides travel support funding to UWM faculty, instructional and research academic staff for presenting scholarly and creative works at conferences, performances, or exhibitions, and for conducting research.

Discovery and Innovation Grant (DIG)

Seeding program that supports high-quality, innovative research projects by investing in projects selected through an independent and objective process.

Advancing Research and Creativity (ARC) program

Advancing Research and Creativity (ARC) is an internal research funding program for projects in all disciplines and at any stage of development. Funded work must be completed within a 12- to 18-month timeline. Awards are expected to result in scholarly, scientific, and artistic outcomes. The review process uses internal and external reviewers.

Support for Undergraduate Research Fellows (SURF)

Designed to foster faculty-student research collaborations, faculty and academic staff can apply for the awards to provide an hourly wage for undergraduate students working as research assistants. Students will be paid as hourly employees.

University of Wisconsin (UW) System Grants

The following grant programs are offered through the University Wisconsin System. Review the posted grant announcements carefully for eligibility restrictions.

Ideadvance

Ideadvance aims to empower new and experienced entrepreneurs to focus on key go-to-market activities.

WiSys Technology Foundation

- **Ignite Grants (Applied Research)**

A one-year program designed to encourage faculty and academic staff to apply their expertise and scholarship to the economic development of Wisconsin. Proposals are invited from faculty and staff in ALL academic disciplines, including the humanities, social sciences, and liberal arts.

- **Ignite Grants (Prototype Development)**

A one-year program in science and technology fields only. This program is NOT available for UW-Madison and UW-Milwaukee researchers; however, Madison and Milwaukee faculty may collaborate on AR-WiTAG grant proposals submitted by other UW institutions.

- **WiSys Launch Grant Program**

WiSys Launch Grants are intended to support the further development of technologies in the WiSys portfolio. Projects requesting support should be focused on advancing the technology readiness of the technology/innovation and should be able to be carried out in under six months.

Research Integrity and Compliance

Institutional Research Integrity

Integrity in scholarship, teaching, and research is a fundamental principle at UWM. In our research endeavors, we share a guiding value to engage in ethical behavior based on integrity, accountability, and responsibility. Our administration, faculty, staff, and students all share the responsibility for preserving the integrity of research conducted at UWM.

Responsible Conduct of Research (RCR) Training

Responsible conduct of research (RCR) is defined as “the practice of scientific investigation with integrity.” It involves the awareness and application of established professional norms and ethical principles in the performance of all activities related to research. In all research endeavors, we share a guiding value to engage in ethical behavior based on integrity, accountability, and responsibility. UWM encourages all faculty, staff, and students to complete RCR Training.

The purpose of RCR training is to:

- Develop, foster, and maintain a culture of integrity in research
- Discourage and prevent unethical conduct
- Empower researchers to hold themselves and others accountable to high ethical standards
- Increase knowledge of, and sensitivity to, ethical issues surrounding the conduct of research
- Increase knowledge about the regulations, policies, statutes, and guidelines that govern the responsible conduct of research

RCR training subject matter includes:

- Research ethics and integrity
- Disclosing and managing conflicts of interest and/or commitment
- Sound research design and methodology
- Reproducibility
- Conscientious data management
- Appropriate authorship
- Appropriate mentorship
- Appropriate use of grant funds

Mandatory RCR Training

UWM's Research Integrity Training Policy requires all faculty, and those academic staff who have been approved to serve as Principal Investigators, to complete Responsible Conduct of Research (RCR) training.

Additionally, some federal sponsors, such as the National Science Foundation (NSF), require all project personnel to receive training in the responsible conduct and ethical practice of research.

RCR Training at UWM

UWM uses the online CITI training system to satisfy Responsible Conduct of Research training requirements. For more information, see the instructions for accessing the CITI RCR training.

UWM RCR Training Contact: Research Integrity and Compliance Manager

Research Misconduct

UWM fosters a research environment that discourages misconduct in all research and deals forthrightly with allegations of research misconduct. The responsibility for preserving the integrity of research conducted at UWM is shared by administration, faculty, staff, and students. The UWM Policy on Research Misconduct defines research misconduct as fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results. The policy describes the steps in the determination of whether allegations of misconduct require further inquiry and investigation and includes the process for inquiry and investigation. The Research Misconduct Policy applies to anyone who, at the time of the alleged misconduct, was employed by, was an agent of, or was affiliated by contract or agreement with UWM. This includes faculty, staff, employees in training, students, contractors, volunteers, and guests.

For matters regarding research misconduct, contact the designated Research Integrity Officer for UWM, the Vice Provost for Research.

Fiscal Integrity

Fiscal integrity is a shared responsibility across UWM. Units, including the Division of Finance and Administrative Affairs; the Office of Research; Schools, Colleges, Divisions; and Principal Investigators work together to ensure that UWM is meeting its federal and state compliance obligations.

UWM Office of Research

Financial Award Management

Financial award management requirements ensure that UWM is a responsible steward of our sponsor's resources.

Contact:

Office of Sponsored Programs

UWM Division of Finance and Administrative Affairs

Extramural Support Administration Policy

Outlines parameters related to extramural support, which includes gifts, grants, sponsored contracts, and cooperative agreements.

Contact:

Business & Financial Services

Fiscal Misconduct

Fiscal misconduct is defined as “a deliberate act or failure to act that is contrary to established laws, regulations or policies and which results or was intended to result in either loss or other damage to the State or the UW System or improper personal gain.”

Contact:

Finance and Administrative Affairs

If you suspect someone is engaging in fiscal misconduct:

- Notify your supervisor, who is obligated to inform UWM's Vice Chancellor for Finance and Administrative Affairs.

Or

- Complete the UWM fraud reporting form. A representative from the Office of the Vice Chancellor for Finance and Administrative Affairs will contact you.

Sponsored Project Purchasing and Procurement

Guidance on procurement practices in accordance with State laws and UW System and UWM policies, procedures, guidelines, and best practices.

Contact:

Business & Financial Services

Institutional Research Compliance

All UWM researchers are subject to sponsor, state, and federal regulations. Research compliance functions including effort reporting, conflicts of interest, and export controls are overseen by UWM's Research Compliance Manager in the Office of Research.

Payroll Certification (Effort)

UW-Milwaukee recognizes the importance of providing good stewardship in managing extramural funds. The university's stewardship responsibilities include complying with federal requirements to certify faculty and staff compensation on federally sponsored projects.

To meet the requirements of 200.430 – Compensation for Personal Services, payroll must be certified for all individuals who expend committed effort on federal sponsored projects or are paid from a federal sponsored project. Payroll certification provides documentation that award salary charges are appropriate for the work performed.

UW-Milwaukee's procedures for proposing, charging, and certification of compensation on sponsored projects can be found in the guidance document titled "Guidelines for Effort Commitments and Payroll Certification Associated with Sponsored Projects."

Project-Based Payroll Certification

UWM uses Project-Based Payroll Certification to meet the requirements of 200.430 Compensation for Personal Services. Project-Based Payroll Certification occurs twice a year using ECC (the Employee Compensation Compliance tool).

For project-based payroll certification, the Principal Investigator, or their approved designee, is responsible for certifying project payroll.

Staff who serve as PI or approved designee on federal sponsored projects must complete a one-time training program on the principles of effort commitments and payroll certification. The Basics of Effort, Commitments and Payroll Certification training is managed through CITI. Please go to the CITI website and log in with your UWM credentials to access the training.

Policy

UWM Sponsored Programs Compensation Compliance Policy

Guidance Documents

Guidelines for Effort Commitments and Payroll Certification
ECC Quick-Start Guide for CCCs
ECC Quick-Start Guide for PI Certifiers

Intro Videos

ECC and Payroll Confirmation Online Training

CITI Training

The Basics of Effort, Commitments and Payroll Certification

Forms

Certification Delegation Request Form

Contact: UWM Research Compliance Manager

Export Control

Introduction

In the interest of national security, the U.S. government has enacted numerous laws and regulations which operate to restrict the use of, and access to controlled information, goods, and technology by persons and entities outside the U.S. and certain foreign persons inside the U.S. These laws and regulations are collectively referred to as “export control regulations.” As an Institution of Higher Education advancing fundamental research, most UWM research is excluded from export control regulations.

Fundamental Research

Openness in research and free dissemination of research results are core values at UWM, as institutionalized in our Openness in Research Policy. The policy supports the fact that research conducted by the faculty, staff, and students of UWM is Fundamental Research as that term is defined in [National Security Decision Directive 189](#).

As an Institution of Higher Education advancing fundamental research, most UWM research is excluded from export control regulations. However, where export controls are applicable to UWM’s research activities, UWM is committed to fully complying with all applicable export control regulations.

Allowability of Export Controlled Projects

Openness in Research

In order to sustain and strengthen its research and higher education mission, UWM policy promotes openness in research and academic freedom. UWM will not undertake research with restrictions on openness or academic freedom on its campus. Examples of unacceptable restrictions include classification, required external approval of research results before publication, or exclusion of members of the University's community from participation in research. In particular, foreign faculty, students, or scholars should not be singled out for restriction in access to the University's educational and research activities. Most research can be conducted in accord with this policy and the ideals of freedom of inquiry and open exchange of knowledge. As a result, Controlled/Restricted research may only be conducted at UWM with prior approval from the Vice Provost for Research.

Controlled/Restricted Research

UWM recognizes that, in some instances, the best interests of society will mitigate against broad participation in research and the open exchange of information. As a result, the Vice Provost for Research (VPR) may grant project-based exceptions to the Openness in Research policy to the extent such exceptions are consistent with applicable laws and UW System policies. An exception to UWM's Openness in Research policy is required prior to the conduct of controlled research, the VPR opens UWM to the potential to carry out controlled research projects. In choosing to accept or decline projects that infringe upon open research, the VPR will weigh the potential of a project for generating and disseminating new knowledge supporting the mission of the University against the project's potential for adversely affecting the climate for research conducted in a free and open environment.

Policy and Guidelines

Export Controls in Research Policy

Openness in Research Policy

Export Controls in Research Program Announcement

Training Resources

UWM Guidelines for Export Controls in Research

UWM Export Controls Overview Training

UWM Export Controls Overview Training Slides

UW-Madison Export Control Training page

Bureau of Industry and Standards (BIS) trainings:

Export Controls Quick Start video

Export Control Classification video

Deemed Exports Training video

US National Archives Controlled Unclassified Information (CUI) trainings:

CUI Training page

CUI Training video

Topic Resources:

Export Control Overview

Export Control Glossary

Regulations

License Requirements

Deemed Export

Controlled Research – Foreign Staff/International Students

International Travel

International Shipping

Research Security Training

The U.S. National Science Foundation, in partnership with the National Institutes of Health, the Department of Energy and the Department of Defense, has provided online research security training for the broad research community.

Research Security Training provides recipients of federal research funding with information on risks and threats to the global research ecosystem — and the knowledge and tools necessary to protect against these risks.

The four-part series may be viewed at: *NSF Research Security Training*

Forms

Technology Control Plan Template

Export Control Screening Form

Export Control Assessment Form

Questions

Contact the Export Controls in Research Program, or the Research Compliance Manager with questions.

Research Conflict of Interest

UWM has an obligation to manage conflicts of interest as part of ensuring the integrity of research at the university. Conflict of Interest refers to a situation in which financial interests or other personal considerations may affect or have the appearance of affecting an Investigator's professional judgement or actions in the design, conduct, or reporting of Research and Other Sponsored Programs or that might interfere with the Investigator's duties or responsibilities to UWM. It includes actual conflicts/activities or potential conflicts/activities, real or perceived. Investigators engaging in, or proposing to engage in, Research or Other Sponsored Programs are required to report Conflicts of Interest that reasonably appear to be related to the Investigator's institutional responsibilities. These interests are to be reported annually in the Investigator's Outside Activities Reports. In addition, Investigators must update their Outside Activities Reports within 30 days of acquiring or discovering a new Conflict of Interest. Timely disclosures protect employees and the institution by identifying and preventing situations in which there is a conflict between an employee's personal interests and that employee's public responsibilities to UWM.

Policy and Guidelines

UWM COI in Research Policy

UWM COI Guidance

Outside Activities Reporting (OAR)

Research Conflict of Interest Committee (RCOIC)

Management Plans

UWM Management Plan Template

Public Health Services (PHS) Research

For PIs, co-investigators, and key personnel on PHS-funded awards (i.e., NIH, CDC, FDA), additional steps are required that focus specifically on Financial Conflict of Interest (FCOI).

UWM PHS COI Policy

FCOI Training

Significant Financial Interest Disclosure (SFID)

Foreign Collaboration

UWM Research Conflict of Interest Guidelines require disclosure of involvement with any Foreign Talent Programs.

Questions

The Office of Research is given the responsibility and authority to conduct an ongoing conflict of interest program for research and other sponsored programs at UWM. If you have questions about research-related conflicts, Management Plans, or FCOI/SFID, contact the Research Compliance Manager, or the UWM Research Conflict of Interest Committee.

For assistance with the annual outside activities disclosure process, please consult the OAR Toolkit and if you have questions, contact OAR Support.

Research Laboratory Compliance

UWM has various programs to promote safety, compliance, and environmental health to facilitate education and research for the faculty, staff, and students. The following laboratory research compliance functions are overseen by UWM's Office of University Safety & Assurance.

Animal Care Program

What is it?

Provides for the care, health, and well-being of animals used for research and education at UWM.

What do I need to do?

If you intend to work with vertebrate animals, you will need to complete Animal Care Training and submit the required Animal Care Training Forms.

Contact:

- Research Animal Veterinarian, University Safety and Assurances
- Animal Care Website

Biological Safety Program

What is it?

Protects the health of the UWM community by identifying and managing biohazardous materials and recombinant DNA used in campus activities.

What do I need to do?

- Biosafety Training
- Institutional Biosafety Committee

You must complete specific training programs and registration forms when working with certain biological materials. Click on each link above to identify the biological safety training program(s) and form(s) required for your research.

Contact:

- Biological Safety Program Website
- Biological Safety Officer, University Safety and Assurances

Human Subjects Protection

What is it?

The HRPP is the home of the Institutional Review Board (IRB) for the protection of human subjects. The IRB holds autonomous decision making when reviewing human subject research studies at UWM. The mission of the IRB is to ensure the adequacy of the research plan, to minimize risks, and to maximize the potential for benefit for human subjects who participate in research.

What do I need to do?

Sponsored projects that involve human subjects are required to be approved by the UWM Institution Review Board (IRB).

- To determine whether you need an IRB review for your project, complete the Determination of UWM IRB Submission Form.
- Investigators whose research involves human subjects must complete the required Human Subjects Training.

Contact: irbinfo@uwm.edu

Laboratory Safety

What is it?

Promotes safety, compliance, and environmental health in UWM laboratories, shops, and studios.

What do I need to do?

Principal investigators, lab supervisors, or individual departments must prepare a Chemical Hygiene Plan and standard operating procedures for their laboratories.

Contact:

For training and plan preparation support Chemical Hygiene Officer, University Safety and Assurances.

Radiation Safety

What is it?

The UWM Radiation Safety Program manages the safe use of radioactive material on campus through training, laboratory audits, laboratory surveys, radionuclide control and inventory, personal dosimetry, and waste disposal.

What do I need to do?

Principal investigators are responsible for ensuring their personnel are properly trained in radiation safety techniques as described in the UWM Radiation Safety Manual. Use of byproduct radioactive materials, accelerator produced radionuclides, naturally occurring radionuclides, and machine produced radiation requires authorization. To obtain authorization, you must complete and submit the required forms to the Radiation Safety Program.

Contact:

University Safety and Assurances

Intellectual Property

Principal investigators of sponsored projects must be cognizant of various federal, state, and campus regulations that govern intellectual property. As an institution that receives federal funds and as a publicly controlled institution of higher education, all individuals engaged in the research and development enterprise must understand their role in the intellectual property process.

Maintaining Records

Before the intellectual property process truly begins, researchers must first develop accurate, complete, and current records of the development of an idea from conceptualization through practice. Accurate records provide evidence of authorship/ownership. Researchers should maintain a laboratory notebook, which will assist later in the technology commercialization process.

The format of laboratory notebooks varies widely; researchers may decide the most appropriate format for cataloging their research.

Records should be witnessed or corroborated by a person with sufficient knowledge of the subject and the ability to understand the data and methods used in the research; however, this individual should not be a co-inventor. Researchers should have a witness sign and date records and explicitly state that the data were observed and understood.

UW System policy states the researcher owns the raw data associated with the research, including the laboratory notebooks and other records generated during the research. UW System policy does not permit the transfer of ownership of data to a third party, including a party that may have sponsored the research. Allowing a third party to own the data typically prohibits the researcher from further publication; however, access to the underlying data/records may be granted to a sponsor, as well as permit a sponsor to use such material freely. Researchers are strongly encouraged to discuss record access with the UWM Research Foundation prior to authorization or release.

Disclosure

Researchers are required to disclose their discoveries and inventions arising from research conducted at UWM. The UWM Research Foundation serves as the technology transfer office for our campus; researchers may submit their disclosures online through the Inventor Portal. Disclosure to the UWM Research Foundation should occur PRIOR to any public disclosure (e.g., oral presentation/slides, manuscript, conference abstract, poster presentation). In the U.S., patent law allows a researcher up to one year to protect their intellectual property; however, in other countries, patent rights are lost immediately upon public disclosure.

Researchers are highly encouraged to complete their UWM Research Foundation public disclosure prior to any public disclosure to ensure the appropriate domestic and international protections may be pursued.

Researchers must disclose the names of all individuals who have provided a significant or creative contribution to the concept, including those outside of UWM. Individuals who carried out work in the direction of inventors are not typically designated as inventors (e.g., student assistants); however, the inclusion of a name on a patent is a legal determination made with the assistance of legal counsel. If uncertain, provide all personnel names involved in the project to determine whether an individual could be considered an “inventor” for legal purposes.

Role of External Funding

The role of external sources of support on an invention varies by sponsor. Intellectual property ownership for inventions developed with the assistance of federal funds (e.g., grant award) are generally vested with the faculty and/or staff involved in the project. Researchers are expected to disclose intellectual property developed with federal funds to the appropriate agency in a timely manner. Most disclosures to federal agencies occur via the iEdison portal. The UWM Research Foundation is responsible for patenting and licensing all intellectual property that results from federally-sponsored research through an agreement with the Board of Regents for the University of Wisconsin System.

Federal Sponsors

Here is a general overview of federal intellectual property regulations for inventions/technologies generated with federal research dollars:

- UWM (or its designated patent management organization, the UWM Research Foundation) has first right of refusal to ownership of inventions made in performance of all federal grants and contracts unless otherwise stated in the award documentation.
- UWM must have written agreements with persons performing the research (excluding clerical and non-technical employees), requiring prompt invention disclosure.
- UWM must disclose any invention conceived or first actually reduced to practice in the performance of work funded all or in part with federal funds. This disclosure must be made to the funding agency within two months after the UWM inventor discloses it in writing to the appropriate UWM administrator. The UWM Research Foundation assists inventors with the disclosure process to the federal sponsor.

- UWM must elect or decline whether to retain the title to the invention. If UWM declines the title, the rights of the invention pass to the federal funding agency that supported the research.
- The federal agency that supported the research typically retains a nonexclusive, nontransferable, irrevocable, paid-up worldwide license to practice or have practiced the invention for governmental purposes. Individual funding agreements/award notices may grant additional rights to the federal government.

Non-Federal Sponsors

Non-federal sponsors may have different intellectual property expectations. Researchers should carefully review a sponsor's intellectual property guidelines prior to developing and submitting a proposal and at the award acceptance phase. There may be significant financial ramifications for both the individual researcher and UWM due to restrictive intellectual property expectations and clauses by non-federal sponsors. When in doubt, contact the UWM Research Foundation for guidance.

Types of Intellectual Property Protections

There are various types of intellectual property protections that enable the owner to receive various benefits related to the invention.

Inventions and Patents

The U.S. Patent and Trademark Office defines an invention as “any art or process (i.e., way of doing or making things), machine, manufacture, design, or composition of matter, or any new and useful improvement thereof, or any variety of plant, which is or may be patentable under the patent laws of the United States.” Inventions may be made by a sole inventor or several inventors. Whether the invention is created by one individual or a team, the US Patent and Trademark Office specifically states that an inventor “contributes to the conception of an invention.”

A patent secures its owner, who is not necessarily the inventor, the right to take legal action to prevent others from making, using, and selling the invention of a limited period. A patent is granted for 20 years from the date in which it is filed; the term may be extended for certain inventions subject to federal regulatory delays (pharmaceutical products, for example).

U.S. patent law requires that patents may be granted on a new and useful process, machine, article of manufacture, composition of matter, or any improvement on these. Patents may also be granted on a distinct and new variety of plant that is asexually reproduced and any new, original, and ornamental design for an article or manufacture.

Patents also require an invention to meet the following three criteria:

1. **It must be new or novel.** The invention must be demonstrably different from any existing prior art. “Prior art” consists of technology that is relevant to an invention and was publicly available at the time an invention was made. Inventors must be able to identify all prior art and distinguish how the claimed invention significantly differs.
2. **It must be useful.** The invention must be useful in ways that represent improvements over existing products and/or techniques.
3. **It must be non-obvious.** The invention cannot be obvious to an individual with “ordinary skills” in the art. “Ordinary skill” refers to the level of knowledge, experience, and expertise possessed by an ordinary engineer, scientist, or designer in the field relevant to the invention.

The UWM Research Foundation will conduct a review of the disclosure to determine the invention’s potential patentability and marketability, as well as to review the “prior art” to determine whether the invention may be classified as new or novel and non-obvious. The inventor(s) typically provide feedback on publications/sources that may be linked to the technology or clarify how the proposed technology substantially differs from existing art. The evaluation process is open to the judgment and interpretation of these three criteria by individual patent examiners.

Finally, patent law requires that all inventions undergo a “reduction to practice,” which is defined either as **(a)** constructive reduction to practice (i.e., completing a written, formal description of an invention in a patent application, even though physical embodiment of the invention may not have been realized) or **(b)** actual reduction to practice (i.e., making a physical embodiment of an invention and using it successfully for its intended purpose). The degree of physical verification required depends on the nature and complexity of the invention.

Copyrights

A copyright is a specific form of intellectual property protection that protects the expression of an idea, not the idea itself. A copyrightable work must be original, set down in a tangible or fixed form.

Works must fit into eight categories:

- Literary works.
- Musical works, including accompanying words.
- Dramatic works, including accompanying music.
- Pantomimes and choreographic works.

- Pictorial, graphic, and sculptural works.
- Sound recordings.
- Architectural works.

The Copyright Act of 1976 (*PDF*) states that an author has statutory copyright protection for a work from the time it is put in a fixed, tangible form. Authors obtain a number of exclusive rights under copyright protection:

- The right to reproduce the work.
- The right to prepare derivative works based on the original.
- The right to distribute copies to the public.
- The right to perform the work publicly.
- The right to display the work publicly.

For works owned by the original authors, copyright extends for the author's life plus 50 years. When the author is an employer rather than the individual(s) who prepared the work (a "work for hire"), copyright extends from the earlier of 75 years from the date of publication or 100 years from the time the work was created. Under the two major concepts of fair use and library reproduction rights, the 1976 Copyright Act gives the general public the right to make very specific limited use of copyrighted works, usually for educational purposes, at no cost and without permission of the authors.

Copyright Notice

The copyright notice attached to a work intended for publication, includes the name of the copyright owner, the year in which the work is published and the copyright symbol:

© 2006 Lee G. AuthorOR

© 2006 University of Wisconsin-Milwaukee

The year given in the copyright notice should not be updated each time the work is printed, copied, or published.

Changes in the Copyright Statute

The copyright notice is no longer required for works published after 1 March 1989. All works published for the first time after that date may be assumed to be automatically copyright-protected, even though no copyright notice appears.

Computer Software

The term *computer software* is used to designate computer programs, in the broadest sense, and includes users' manuals and other explanatory material that accompany computer programs, and computerized databases. Also included are microcodes, subroutines, operating systems, high-level languages, application programs in whatever form expressed (machine or assembly language, source, or object code) or embodied (chip architecture, CD-ROM, disk or tape storage, program listings).

The primary goals in protecting and managing software are to promote the widest possible distribution for the benefit of the public, and to produce revenue for the author of the software and the department. There are two basic approaches to distribution:

- The author or the department can distribute directly to users for a fee or at cost.
- The author, or in some cases the University, can make a distribution agreement with a commercial entity.

Although some software can be copyrighted and/or patented, the statutory situation surrounding its protection is confusing and constantly changing. Authors should be especially careful in protecting and distributing software. Some starting points and tasks to consider in protecting and disseminating software are the determination of:

- Ownership.
- Best method for broad distribution of the software (for a fee or at cost directly by the author's laboratory, or through an agreement with a commercial organization).
- Disposition of income resulting from distribution.

Whether or not commercial distribution of software is anticipated, it is important to protect software so that the author or UWM will be able to control and facilitate distribution, ensure the integrity of the work, and protect the rights of the authors.

Under current U.S. law, not all computer software may be patentable; however, it is covered by the Copyright Act of 1976 (*PDF*), under which computer software (as well as all other copyrightable work) is protected by federal statute from the moment it is "fixed" in a tangible form.

Copyrighting Software

The steps for obtaining copyright protection for computer software are the same as those for other copyrightable works. However, the option to formally register the software is ordinarily not pursued. Registration requires deposit of copies of the work with the U.S. Copyright Office. Such deposit of unpublished software may serve to make the work more easily accessible to non-authorized users who, by making slight changes, may create a "new work."

Under the present law, it is possible that this “new work” will not be considered an infringement of the original. Copyright protection can be claimed without registration or the deposit of copies with the Copyright Office. Registration is primarily useful if litigation occurs. Works can be registered at the time a suit is brought. Although it is important to claim copyright protection, copyright alone is not always adequate protection for software. Copyright law protects the form in which ideas are expressed, not the ideas themselves. Therefore, elements of software can sometimes be utilized without infringing the copyright in the software. From a commercial point of view, copyright protection for software is frequently inadequate.

Software as Proprietary Information

The limited protection offered by copyright law can be enhanced by designating software as “proprietary information” and requiring users to treat it as such. This demonstrates the author’s view that intellectual property is valuable and should be protected against potential infringers. Establishing a proprietary position is crucial to attracting outside organizations capable of distributing the software. Generally, commercial distributors will not undertake marketing efforts unless software has been protected as fully as possible from the start both by copyright and by the requirement that users treat the software as proprietary information. The requirement that software be treated as proprietary information applies to the software and accompanying materials only (e.g., programs and manuals) that are readily usable by others and not on the basic scientific concepts upon which the software is based. In keeping with UWM’s educational and scholarly purposes, such basic concepts should be openly available through publication or other means.

Distributing Software

Authors should take these protective steps when distributing software:

1. Inform the UWM Research Foundation (UWMRF) if you wish to copyright the software in UWM’s name before distributing it to users.
2. Consult with UWMRF if the software results from an externally sponsored research agreement so that contractual obligations and regulations affecting ownership, disposition of rights, and distribution and use of the software can be determined.
3. Make certain that the appropriate copyright notice is prominently displayed on the work, that is, on all displays of the programs as well as on all tapes, disks, manuals, and associated materials (see samples below).
4. Do not release software for loan, review, sale, lease, in-house use, or other purposes without first having fixed one of the sample labels shown below to the tapes, disks, manuals, or to their components of the software.

Sample Software Copyright Notices

Proprietary Information Notice

This disk (tape) contains proprietary information that is the property of [*the owner/s*]. This disk (tape) is furnished to the authorized users of [*names of programs*] solely to facilitate the use of such programs as specified in written agreements, and except as provided in such written agreements shall not be reproduced or copied or used, in whole or in part, Without the written permission of [*the owner/s*].

Proprietary Information Notice

This manual contains proprietary information that is the property of [*the owner/s*]. This manual is furnished to the authorized users of [*names of programs*] solely to facilitate the use of such programs as specified in written agreements, and except as provided in such written agreements shall not be reproduced or copied or used, in whole or in part, without the written permission of [*the owner/s*].

When software has potential commercial value as well as academic or research value, the following additional steps can be taken:

- Use letter agreements for distribution to users, inside or outside of UWM, who want to use the software for research purposes only. Examples of such letters can be supplied upon request to the UWM Research Foundation.
- In general, do not make commitments to install, service, or maintain software in any licenses or other distribution agreements, whether formal or informal.
- When income is anticipated, consult with UWM Research Foundation for advice on its disposition.
- Document each release thoroughly by recording addresses of recipients, number of copies and date of release.

All letters or other agreements stating the terms of release must be retained. Thorough documentation will demonstrate that no unauthorized, undocumented release of the software was made, and that all possible efforts were made to protect it, in the event future commercial distribution is desired, or defense against infringement becomes necessary.

Technology Transfer

Technology transfer is the process of moving technologies from the lab bench into corporate product development. With federal grant programs placing greater emphasis on practical outcomes and “translational research,” and with corporate research funding growing in importance, tech transfer plays an increasingly vital role today.

The University of Wisconsin-Milwaukee Research Foundation supports research and innovation, and is the entry point for exploring corporate partnerships, intellectual property development or technology transfer.

The UWM Office of Sponsored Programs provides administrative support for contracts and technology transfer activities, including contract review, award negotiation and acceptance, and account setup.

Contact:

UWM Research Foundation: President

Office of Sponsored Programs: Director

Technology Transfer Activities

Technology transfer projects differ from publicly sponsored projects in that a contract is issued between a UWM researcher and a scientific counterpart in the private sector. The expectations set forth in the contract are usually presented in documents and approvals necessary throughout the grant process: the proposal, federal and University certifications and clearances, and award acceptance and negotiation.

The following sections describe the necessary policies and procedures for establishing technology transfer projects at UWM from conception to completion.

Proposal Preparation

As with other sponsored work, most technology transfer projects involve the development of proposals for work to be done. However, there are several differences between the standard research proposal and a proposal for more translational work:

Scope of Work

The scope of work sets out the goals, objectives, activities, and timelines of the proposed research. It is often the product of a collaboration between the UWM researcher and his/her scientific counterpart in the private sector, and it addresses a need that the parties have jointly identified. The scope of work for privately funded research tends to be narrow, aimed

at solving a practical problem in the context of a commercial product or service, as opposed to basic research, which addresses a more general scientific question.

The scope of work should clearly differentiate your corporate-funded research from all other concurrent scholarly activities. This will protect UWM from the possibility that multiple sponsors may have overlapping rights to the same invention.

Budget

Contact your Pre-Award Specialist with questions.

Use the **OSP Budget Development Tool** to generate an accurate estimate of project costs. Detailed information on costs and rates is available, but the Tool is the quickest way to generate an accurate cost estimate for your project. The output from the budget tool can be translated into a fully loaded budget, which is preferred by some corporate sponsors.

Compliance

Before the Office of Sponsored Programs can accept an award or contract from a sponsor, the project and/or the Principal Investigator, Co-investigators, and other project staff need to comply with relevant federal, state, and University policies:

Clearances

The following clearances, if applicable, must be in place and documented in the project record before a research project can begin:

- Human Subjects Protection
- Animal Care and Use
- Safety and Health

Conflict of Interest

The UWM COI Program protects employees and the institution by identifying and preventing situations in which there is a conflict between an employee's personal interests and that employee's public responsibilities to the UWM. In response to federal regulations, state laws, and UW System policy, individuals at UWM must disclose their outside financial interests annually and must update their disclosure throughout the year as their outside interests change. The Outside Activities Disclosure Report must be completed by all UWM PIs and co-investigators on federal grants, UWM faculty, academic staff, and limited appointees with appointments of 50% or greater, and all individuals with active management plans from the UWM Conflict of Interest Committee.

Export Controls

Export controls primarily refers to the federal International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR). The ITAR govern the export of “defense articles” and “defense services.” The term “export” means the transfer of items, information, or services overseas, or their provision to a foreign person inside the U.S. (including, for example, a student in a classroom or a colleague in a research lab).

The EAR govern the export of “dual-use” technologies—items that are used, or have the potential to be used, for military and non-military purposes if such export could adversely affect the national interests of the U.S. The definition of “export” under the EAR is very similar to the definition under the ITAR.

Both sets of regulations apply only to items and information that are not publicly available; therefore, the results of academic research are generally exempt from both the ITAR and the EAR **provided that** the results have been published (ITAR) or are intended for publication (EAR).

Export controls are most likely to apply in a university setting if:

- Research results cannot be published until approved by the sponsor, or
- Items or information have been received from an outside source under a confidentiality agreement.

In such circumstances, if the information is export-controlled it cannot be shared with certain “foreign persons” (i.e., a person who is not a U.S. citizen or a permanent resident) unless a license is first obtained from the U.S. government.

Award Negotiation/Acceptance

UWM is the legal recipient of research funding under a written agreement with the sponsor. Negotiation and acceptance of corporate-sponsored research funding agreements are the responsibility of the Contracts Specialist in the Office of Sponsored Programs.

Modifications to Original Proposal/Budget

It is not uncommon for a sponsor to fund a project at an amount less than requested and/or to request changes in the proposed work or in the scope of services. If you receive such a request, contact the Pre-Award Specialist assigned to your School/College/Division for assistance with satisfying the new requirements. Proposal and/or budget modifications require you to update the information in your project record. If the change in the budget is relatively significant, follow the instructions for submitting a revised budget for an existing

record. If the modified budget affects the scope of work or the proposal commitments, attach a revised project description to the existing record.

Accepting Awards for the Board of Regents of the University of Wisconsin System

Award notices may come into the University in a variety of ways. Notification may be sent to the Chancellor and/or to the Office of Sponsored Programs (OSP) with a copy to the PI/Project Director. In some cases, the sponsor may send a letter of notification and the award documents directly to the PI/Project Director with a request that it be signed and a copy returned accepting the terms and conditions of the award. **Only the UWM Office of Sponsored Programs is authorized to accept awards on behalf of the Board of Regents of the UW System.** If you receive such documents, forward all award documents to the Pre-Award Specialist assigned to your School/College/Division. The award document/agreement will be signed by an institutional official in OSP if it is acceptable to you and is not in conflict with federal or state statutes, University policies, and/or the mission of the University.

OSP is responsible for ensuring the terms and conditions of the award agreement are acceptable to the University and to the PI/Project Director. In most cases, the conditions of the award will not require significant negotiation. If the agreement contains unusual conditions, the Pre-Award Specialist assigned to your School/College/Division will work closely with you to protect your interests and those of the University.

Policies Related to the Acceptance of Awards

- Signature Authority
- Financial Administration of Extramural Support
- NIH Public Access Policy

Account Activation

After the award is accepted by OSP, you will receive a draft contract to review the terms and conditions. If you agree with the terms, sign the Record for the award and route it to your Division for signature. The Technology Transfer Manager will obtain the required signatures on the contract and then create a fund account to which your expenditures can be charged. For more information, contact the OSP Director.

Data from the Record flow through to the University grants accounting system. Those data must be correct to ensure trouble-free administration of your research grant or contract.

Cost-Sharing: Frequently Asked Questions

Cost-sharing (i.e., cost-share or matching funds) for grant proposals can be confusing, especially identifying sources for cost-sharing and accounting for it at the proposal stage. Sponsors may require cost-sharing on a grant program for a number of reasons, such as statutory requirements, demonstration of institutional buy-in, or to limit the number of proposal submissions.

Below are some of the most frequently asked questions that OSP receives from Principal Investigators about when and how to include cost-sharing in a proposal.

Q: What are the types of cost-share?

A: There are several types of cost share:

- **Mandatory Committed:** Cost-sharing that is required by a sponsor for your proposal to receive consideration and review. Without it, your proposal will be returned without review.
- **Voluntary Committed:** Cost-sharing that is not required by the sponsor for eligibility purposes but is included in a proposal and becomes required at the time of award.
- **Third Party:** Cost-sharing that is provided by an entity other than UWM, such as a company. This type of cost-share is usually provided only when required by the sponsor.

When UWM proposes or reports any type of cost-share, the cost-shared funds are expected to be available during a project and cannot be used for other purposes. For example, a PI proposing to cost-share 15% effort during the academic year towards a project cannot use that 15% for other research, service, or instructional commitments. Additionally, upon award, the cost-share commitment now becomes trackable for the PI in ECRT.

Q: What kinds of funds may be used for cost-sharing?

A: Sources for cost-sharing may include start-up packages, department/division research-related funds, indirect cost returns, or other campus funds accessible by the PI. The PI's department/division also can provide cost-sharing. Funds from other grants and contracts typically may not be used as cost-share.

Q: Should I include cost-share in a proposal if the sponsor/program does not require it (i.e., voluntary committed cost-share)?

A: No. OSP strongly recommends that PIs and their departments/divisions do not include cost-share on a project unless it is required by a sponsor/program. For federal programs,

the Uniform Guidance states that federal grant programs may no longer consider cost-sharing during the merit review process unless it is statutorily required. Thus, voluntary committed cost-share at the proposal stage will no longer have an impact on the proposal's review.

Additionally, the Uniform Guidance requires UWM to treat both federal and non-federal funds consistently. Thus, for non-federal projects, OSP recommends that PIs and their departments/divisions do not include cost-share unless it is required by the sponsor.

Q: If I cost-share a portion of my salary, do I also include the corresponding fringe benefits as cost-share?

A: Yes. Include fringe benefits on any cost-shared salaries. Additionally, use the same fringe benefit rate on cost-share salaries and wages as those salaries and wages budgeted with the sponsor's dollars. See the current UWM fringe benefit rates on the [Frequently Requested Information](#) page.

Q: Can I include costs incurred outside of the proposed project start and end dates as cost-sharing?

A: No. Just as award expenses must be incurred during the project start and end dates, so does cost-sharing. Do not include expenses that will be incurred outside of these dates as cost-share.

Q: I am applying to a program that requires 1:1 cost-sharing (i.e., UWM must provide \$1 for every \$1 of sponsor funds). I want to provide 2:1 cost-sharing. Is this acceptable?

A: It is up to the PI and the department/division to decide how much cost-sharing is acceptable. However, OSP recommends meeting the minimum 1:1 cost-share requirement. Most sponsors require applicants to meet only the minimum match requirements, and they usually do not award "competitive preference" points during the review process for exceeding the required match amount.

Q: If the project is funded, do I need to track the cost-sharing?

A: Yes. The cost-share pledged to the sponsor and approved in an award notice now becomes auditable. PIs are required to keep detailed records on the amount of cost-sharing on their award.

Q: I am proposing a multi-institutional project and UWM is the lead applicant. The project partners will provide cost-sharing. Do I need to document their cost-share in the proposal?

A: Yes. Each partner must provide an institutional letter of commitment that documents their approved cost-share towards the project. If the proposal is funded, each partner will be required to contribute their cost-share and provide documentation showing that it was used for the project.

Q: I am developing a proposal that requires 50% cost-sharing. I plan to work with collaborators at other institutions. Will my collaborators be required to commit cost-sharing too?

A: PIs typically work with their collaborators to determine how each institution will provide resources towards the 50% cost-share commitment. PIs should carefully review the program guidelines to determine how the cost-share can be met by all partners.

Q: Does both my department and my division need to approve the cost-share for my proposal?

A: Yes. The PI's department and division must approve any proposed cost-sharing via the routing system prior to proposal submission. Failure to obtain approval may result in the proposal being withdrawn or UWM declining the award.

Q: My grant award is less than my original budget request. Is the difference between the award and original proposal budget now considered cost-share?

A: No. If a sponsor awards less than requested in the budget, OSP will work with the PI and the sponsor to negotiate an appropriate reduction in the scope of work and/or develop a revised budget. If the original proposal included cost-sharing, the cost-share amount also should be reduced proportionally to align with the smaller award total and revised scope of work.

Q: Can I use award funds from one sponsored project to cost-share on another sponsored project?

A: No. Most federal and non-federal sponsors do not allow PIs to use their awards as cost-sharing towards another sponsored project. However, there are a few exceptions to this rule – please contact your Pre-Award Specialist.

Q: If a cost is an unallowable expense for budgeting purposes, could it then be used for cost-share purposes?

A: No. If a cost is unallowable for sponsor budgeting purposes, it cannot be counted towards cost-share commitments either. For example, alcoholic beverages are not allowed on federal grants. Since alcoholic beverages are not permitted on federal funds, a PI could not use cost-share funds to cover these costs and meet cost-share requirements.

Q: I am submitting a proposal to an agency that requires cost-share and allows indirect costs at the fully negotiated indirect cost rate. Do I calculate the indirect costs on both my project budget and the cost-share funds?

A: Yes. Indirect costs are real costs that UWM incurs in the administration of grants and contracts such as OSP services, library services, utilities, building depreciation, and other administrative functions. Thus, indirect costs must be calculated on cost-shared funds at the fully negotiated indirect cost rate.

Q: I am submitting a proposal to an agency that requires cost-share but does NOT allow indirect costs at the fully negotiated indirect cost rate (or does not allow indirect costs on the budget altogether). How should I include indirect costs in the project budget?

A: OSP typically recommends first calculating the “forgone indirect costs” as a method to meet the cost-share requirements – these are indirect costs that UWM is entitled to receive through its federally negotiated indirect cost rate agreement but cannot as a result of the sponsor’s limitation on (or prohibition of) indirect costs. Since sponsor and program requirements vary, PIs should contact their Pre-Award Specialist to discuss whether forgone indirect costs may be included in the cost-share budget.

After determining the amount of forgone indirect costs on the cost-sharing, PIs and their department/division should determine how that amount can be used to meet the cost-share requirements and if additional cost-sharing is necessary.

Q: Who do I contact if I have questions related to cost-sharing on a proposal?

A: Contact your Pre-Award Specialist to discuss cost-sharing in a proposal and for expert guidance.

Participant Support Costs Guidance

This guidance addresses fundamental concepts related to participant support costs and offers some examples. Please contact OSP with questions. Participant support costs are allowed by a number of Federal agencies and other sponsors. Participant support costs are defined by the Uniform Guidance in §200.75:

Participant support costs mean direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects

Participant support costs are typically incurred for projects that include an education or outreach component. These types of costs are most commonly included in National Science Foundation (NSF) grants, such as the Research Experience for Undergraduates (REU) or Research Experiences for Teachers (RET) program. NIH indicates that participant support costs are allowable only if specified in the Funding Opportunity Announcement.

Funds provided for participant support costs that are not spent cannot be rebudgeted for use in other categories unless prior written approval has been obtained from the sponsor.

Participant support costs are budgeted in a separate category in the application budget and must be accounted for separately. Participant support costs are excluded from the MTDC base when calculating F&A costs. OSP sets up a separate project under the award to isolate participant support costs and to ensure that F&A is not applied against these costs.

1. What are participant support costs?

Participant support costs are costs to support individuals who are receiving a training opportunity as part of a workshop, conference, seminar, symposium or other short-term instructional or information sharing activity funded by a sponsored award. Costs may include stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants (not employees). Also see #3 and #4 below. A participant does not perform work or service for the project or program. The participant is not required to deliver anything or provide any service to the university in return for these support costs.

2. What types of sponsored projects may include participant support costs?

Projects with an educational or outreach component may include participant support costs. For example, a project may be in support of professional development and continuing education activities for secondary school teachers/educational professionals.

Participant support costs for this project may include registration fees for the event, transportation to/from and lodging during the event, as well as a per diem allowance to cover meals and incidental expenses. 1 This does not include NIH Kirschstein-NRSA programs.

3. What costs can be included in participant support costs?

- Stipend: A stipend is a set amount of money to be paid by UW-Milwaukee directly to the participant.
- Travel: Travel includes the costs of transportation and associated travel-related expenses and must follow sponsor guidelines as well as UW-Milwaukee policies and guidelines. The sole purpose of the trip must be to participate in the project activity.
- Subsistence Allowance: The cost of a participant's housing and per diem expenses necessary for the individual to participate in the project are generally allowed, provided these costs are reasonable and limited to the days of attendance. Participants who live in the local area are not entitled to subsistence payments, although they may participate in meals and breaks provided at the meeting or conference.
- Other: Certain other costs in support of the participant's involvement may be allowable, including training materials or laboratory supplies. See Fees example below. Check the funding solicitation for guidance and contact OSP with questions.
- Fees: The fees paid by or on behalf of a participant in connection with meetings, conferences, symposia, or training projects are generally allowable costs. Additionally, these fees may include laboratory fees, passport or visa fees for foreign participants, and registration fees.

4. What costs cannot be included as participant support costs?

Participant support costs do NOT include the following types of payments:

- Travel for project PI or staff
- Travel for a consultant providing services to the University, project, or program
- Honoraria paid to a guest speaker or lecturer
- Conference support costs such as facility rental or media equipment rental
- Agreement with a provider for multiple training events (i.e., an ongoing contract with specific terms and conditions)
- Travel to bring collaborators together to meet and discuss the project

- Incentive payments to an individual who agrees to participate as a human subject in a research project

5. What are some examples of what might or might not be considered participant support costs?

Some examples that would be considered participant support costs:

- An NSF project has been awarded an REU supplement. The REU supplement will enable 5 undergraduate students from around the country to participate in a summer research project with a UW-Milwaukee PI. The students will be paid a stipend and provided room and board over an 8-week period. The stipends and room/board would be considered participant support costs.
- The UW-Milwaukee is awarded a grant from a Federal agency to host an educational workshop in Washington, DC. Individuals (the audience is primarily postdoctoral fellows from around the country) will apply for financial support to attend the conference. The financial support will cover the costs of travelling to and attending the workshop. Travel costs, as well as lodging/meals during the event, would be considered participant support costs.
- The UW-Milwaukee receives an award from the NSF that includes an REU component. The REU component allows the PI's lab to support undergraduate student positions during the academic year over the course of the three-year grant. The students will be mentored and will assist with various research projects, e.g., media preparation, plant tissue culture, cloning, and mutant analysis. The student support would be considered participant support costs.
- NSF provides an award to UW-Milwaukee that includes an RET activity. The PI will host a teacher over the course of the summer who will gain research experience, and then use that knowledge to develop educational materials and activities. The teacher will pilot the activities with students and present the materials at regional conferences with fellow teachers. The teacher's summer stipend supplies for the activities, and travel to regional conferences would be considered participant support costs.

Some examples that would not be considered participant support costs:

- The UW-Milwaukee is part of a scientific collaboration involving PIs from five different institutions. The UW-Milwaukee PI hosts a meeting with her Co-PIs and other scientists to discuss project progress. Collaborators must travel to

Milwaukee to attend the meeting. The costs for this meeting of scientific collaborators to discuss the project would not be considered participant support costs.

- As part of a conference grant, a UW-Milwaukee PI invites an expert in the field to talk about her recent discoveries that were featured in a prominent scientific journal. To support the expert's attendance, the grant provides an honorarium of \$2,000. The honorarium for the speaker would not be considered a participant support cost.

6. When are participant support costs allowed?

Participant support costs are allowable with prior sponsor approval, per the Uniform Guidance. In addition, individual agencies may have specific policies restricting the use and allowability of participant support costs. NSF has historically allowed participant support costs, for instance, in the REU and RET programs. NIH only allows participant support costs if they are explicitly identified in the Funding Opportunity Announcement. Other Federal and non-Federal sponsors may allow participant support costs under some circumstances. Review the funding solicitation for specific instructions and contact OSP with any questions prior to proposal submission.

7. Should participant support costs be identified in the budget/budget justification?

Yes, participant support costs must be explicitly identified in the budget and budget justification. For instance, the NSF budget form has a section specifically for participant support costs. If the budget form you are using does not have such a section, but you plan to include participant support costs, please explicitly identify any participant support costs in the budget and budget justification. Participant support costs are excluded from the MTDC base when calculating F&A costs. Identifying participant support costs will help ensure prior sponsor approval is requested and, if awarded, that OSP sets up a separate project with appropriate F&A.

8. Can I rebudget participant support costs into another budget category after an award has been received?

Maybe. Generally, it is not allowable to rebudget from the participant support costs category into other budget categories unless prior written approval has been obtained from the sponsor. If approval is obtained from the sponsor and funds are moved from participant support costs into other budget categories, F&A costs will be applied to the rebudgeted funds as appropriate.

9. If participant support costs were not included in the original award, can I add a participant support component to my project?

Maybe. Adding a participant support component to the project will need prior approval from the sponsor. With the sponsor's approval, one option to fund this new component would be to rebudget unused funds into participant support costs. OSP can assist with submitting a prior approval request to rebudget funds for this purpose. The other option would be for the PI to request a supplement for participant support costs. A supplemental proposal would need to be submitted. If approval were obtained for participant support costs, OSP would set up a new project under the award to separately account for these costs and apply a 0% F&A rate as required by the Uniform Guidance.

10. What kind of documentation should a department keep on file for participant support costs?

Like other award-related expenses, a department must maintain back-up documentation for all participant support costs. This would include a list of program participants and evidence of attendance of participants, such as a daily log or similar documentation.

11. Are participant support costs treated differently in the Uniform Guidance?

Yes. Previously, the definition of MTDC did not address participant support costs. In the Uniform Guidance, the definition of Modified Total Direct Costs addresses participant support costs. This means, for awards from any agency that are made under the Uniform Guidance, participant support costs (like equipment) should be excluded from the base used to calculate F&A costs.

12. How should stipends be paid to participants?

Stipend payments to participants should be made on a Payment to Individual Report (PIR). The account code used will be either 5709 or 5710, depending on whether the individual is a non-student or student and, if a student, whether s/he is attending a UW System institution. See diagram below.

13. Are payments to research subjects/participants considered participant support costs?

No. A payment to an individual who agrees to participate as a human subject in a research project is not a participant support cost and should be budgeted as Other Direct Costs in the project proposal. Information on payments to research subjects/participants is available at this site: <https://uwm.edu/officeofresearch/osp/compliance/> See Human Subjects Protection

14. Are costs to support pre- or post-doc trainees in a training grant considered to be participant support costs?

The answer depends on the sponsor. Generally, costs for training grant programs are not considered participant support costs. Training grant programs are not typically short-term experiences and are not consistent with the types of experiences considered to be participant support activities. Trainees are also actively engaged in the scope of work, where participants do not perform work or service for the project or program.

15. What if a sponsoring agency representative requests that I move student hourly employee costs to the participant support costs budget section?

It depends. If UW-Milwaukee has determined that student hourly employee is the appropriate role, then a compelling justification should be sent to the sponsoring agency representative about why that determination was made. Guidance from the National Science Foundation is that the institution determines whether a student hourly employee or participant is appropriate for the project. However, for the NSF REU program, any student involved would be considered a participant. The NSF REU program is intended to provide a practical educational experience for undergraduate students, to develop their research skills while being mentored. Given the goals of the NSF REU program, it is not possible to have both student hourly employees and participants – all students on an NSF REU project should be considered participants.