

# Compliance Responsibility Matrix - University of Chicago

Updated 02/2011

See: [Oversight of Sponsored Projects – Roles & Responsibilities](#)  
[Whistleblower Policy](#) [Points of Contact](#)

	Scientific and Programmatic	<a href="#">Financial Compliance</a>	<a href="#">Institutional Animal Care &amp; Use</a>	<a href="#">Human Subjects</a>	<a href="#">Institutional Biosafety</a>	<a href="#">Conflict of Interest</a>	<a href="#">Environmental Health &amp; Safety</a>	Other Regulatory Compliance
Principal Investigator	Conducts the research; completes and submits interim and final technical reports; discloses inventions to UChicago Tech; retains project data/materials as required; oversees scientific integrity of project; supervises project staff	Oversees budget management-responsible for all expenditures, cost transfers, rebudgeting; manages project personnel; oversees workscopes and authorizes payments to consultants and subrecipients. See <a href="#">UC Policy No. 2101</a> .	Prepares & submits <a href="#">IACUC</a> protocol; assures all project personnel listed on protocol are familiar with its content; updates protocol for approval; certifies that all individuals working with animals have been properly instructed in the humane care, handling & use of animals and reviews their qualifications; assures IACUC protocol is essentially identical to details in grant application	Prepares protocol and submits to appropriate IRB; certifies training requirements met for all key personnel; submits forms for renewal of protocol; submits modifications of protocol	Prepares and submits IBC protocols; updates protocol for approval; certifies that project personnel are properly trained to safely handle biohazardous materials	Submits & updates Assurance and prepares Disclosure Form; complies with COI management letter	Discloses use of hazardous or regulated materials; complies with guidance from Safety Office; assures staff training requirements	Prepares and submits protocol to appropriate committee for review and approval ( <a href="#">Radiation Safety</a> , <a href="#">RDRC</a> ); updates protocol for approval
Unit Administrator/ Faculty Service Rep (FSR)	Coordinates & communicates with PI to understand and help manage the relationship between project goals and resources; has general understanding of <a href="#">Federal Regulations &amp; Circulars</a> that govern sponsored research	Assists PI with pre- & post-award oversight of grants and contracts in compliance with regulations; assists with procurement decisions & obtains PI approval for subsequent expenditures; reconciles monthly ledgers; works with <a href="#">Sponsored Award Accounting</a> on account create, closeouts and reporting.	Assists with drafting protocol documents for review by appropriate committee; monitors continuing review requirements; facilitates submission of amendments and ensures costs are not incurred without current IACUC approval	Assists with drafting protocol documents for review by appropriate committee; monitors continuing review requirements; facilitates submission of amendments and ensures costs are not incurred without current IRB approval	Assists with drafting protocol documents for review by IBC; monitors continuing review requirements; facilitates submission of amendments and ensures costs are not incurred without current IBC approval	No formal responsibility	May have delegated responsibility for specific aspects of health and safety compliance: record keeping, health and safety committee support and participation, etc.	Assists with drafting protocol documents for review by appropriate committee; monitors continuing review requirements; facilitates submission of amendments and ensures costs are not incurred without current committee approval
Department Chair/ Director	Monitors invention disclosures by PIs; works with divisional and central administrative offices to assure compliance with all technical & financial reporting requirements; reviews space & other resource commitments; approves requests for <a href="#">PI Eligibility</a>	Provides local oversight for compliance with effort reporting, reporting of program income, and all other award terms & conditions; provides local oversight for record retention and data ownership				Signs all new applications attesting to scientific merit and investigator qualifications; makes recommendations regarding disclosed conflicts of interest	Has primary responsibility, along with Deans, for department health and safety compliance and for providing a safe and healthful work environment	
Dean	Approves requests to Office of the V.P. for Research & for National Labs for <a href="#">PI Eligibility</a> ; assists with compliance with technical and financial reporting, as necessary; approves space & other resource commitments; conducts initial inquiry under academic fraud policy	Verifies correctness of salary rates; interacts with <a href="#">Financial Services</a> and <a href="#">URA</a> in all areas of compliance with proposal and award terms and conditions, as necessary	Provides divisional/unit oversight for compliance with regulatory research requirements; BSD Dean serves as Institutional Animal Care and Use Official; appoints members to the committee	Provides divisional/unit oversight for compliance with regulatory research requirements	Provides divisional/unit oversight for compliance with regulatory research requirements; appoints members to the committee	Provides divisional/unit oversight for compliance with regulatory research requirements	Has primary responsibility, along with Dept. Chairs/Directors, for department health and safety compliance and for providing a safe and healthful work environment	Provides divisional/unit oversight for compliance with regulatory research requirements; appoints members to committee; conducts initial inquiry under <a href="#">academic fraud policy</a>

<a href="#"><u>Office of the Provost</u></a>	Provides direction & guidance for University's research mission; oversees University compliance with academic research policies					Oversees all issues related to <a href="#"><u>conflict of interest</u></a> ; reviews & signs off on management letters regarding disclosure of individual financial conflict of interest		Participates in University-wide Compliance Committee
<a href="#"><u>Vice President for Research &amp; for National Laboratories</u></a>	Oversees the operation and conduct of research; oversees <a href="#"><u>UChicago Tech</u></a> to ensure reasonable steps to protect & commercialize Intellectual Property; coordinates & assists with <a href="#"><u>ANL and Fermi Joint Appointments</u></a> and <a href="#"><u>Joint UC/ANL Centers</u></a> ; approves requests for <a href="#"><u>PI Eligibility</u></a>	Oversees the <a href="#"><u>Office of University Research Administration</u></a>		Oversees all issues related to <a href="#"><u>Human Subjects</u></a>				Oversees all issues related to <a href="#"><u>Bayh-Dole Act</u></a> compliance; assures compliance with all research admin. requirements for <a href="#"><u>ANL</u></a> and <a href="#"><u>Fermi</u></a>
<a href="#"><u>University Research Administration</u></a>	Reviews proposals for compliance with University policies and sponsor guidelines; provides institutional oversight for compliance with <a href="#"><u>export control regulations</u></a> ; provides institutional oversight for compliance with interim & final technical and patent report requirements	<a href="#"><u>Institutional authority</u></a> for negotiation & acceptance of financial support or other binding obligations (contract, grant, <a href="#"><u>MTA</u></a> , <a href="#"><u>clinical trial</u></a> ); coordinates with <a href="#"><u>Financial Services</u></a> in areas of compliance with award terms & conditions, as required; authorized institutional official for post-award actions needing agency or institutional approval	Confirms compliance with institutional policies and regulatory agency requirements; oversees IACUC	Confirms approval of regulatory compliance; Associate V.P. for Research Administration serves as Institutional Official for <a href="#"><u>Human Subjects</u></a> issues	Confirms compliance with institutional policies and regulatory agency requirements; oversees IBC	Confirms compliance with University <a href="#"><u>conflict of interest</u></a> policy		Coordinates Legal Counsel and Risk Management reviews and approvals, as necessary; compliance with <a href="#"><u>EO 13224</u></a>
<a href="#"><u>Risk Management, Audit &amp; Safety</u></a>	May provide assistance or guidance with regard to compliance with sponsor regulations, i.e., insurance certification	Internal Audit examines and evaluates the controls in place to safeguard University assets, evaluates the effective use of resources, reviews compliance with policies, procedures, laws and regulations					Oversees office of <a href="#"><u>Safety and Environmental Affairs</u></a> and Office of <a href="#"><u>Radiation Safety</u></a>	Advises units regarding methods to control the risk of fortuitous loss to the University; advises on regulatory compliance
<a href="#"><u>Office of Legal Counsel</u></a>	Provides guidance pertaining to compliance with applicable laws and regulations, including <a href="#"><u>export controls and trade sanctions</u></a>	May provide assistance or guidance with regard to compliance with sponsor requirements (e.g., must approve any University indemnification of sponsor)	Advisor on regulatory compliance	Member of IRB; advisor on regulatory compliance	Advisor on regulatory compliance		Advisor on regulatory compliance	Advisor on regulatory compliance
<a href="#"><u>Financial Services</u></a>		Enforces <a href="#"><u>University financial policies</u></a> and federal grant and contract financial regulations, and nonfederal terms & conditions; coordinates preparation and submission of financial reports to sponsoring agency; prepares and negotiates F&A cost proposal with DHHS; ensures compliance with <a href="#"><u>A-133</u></a> audit requirements						Advisor on regulatory compliance