**Purpose/Background**

As an applicant organization, Duke University has an institutional responsibility to verify the accuracy, validity, conformity, and eligibility of all applications submitted to sponsors on behalf of Duke’s schools, centers, and institutes. This responsibility is shared with several institutional stakeholders including the Principal Investigator (PI), the PI’s Chair or Director (or designee), business manager, grant administrators, and management center leaders.

As the authorized organizational representative (AOR) delegated by Duke University, the Office of Research Support (ORS) reviews all applications to make the necessary representations, certifications and assurances to external sponsors. The AOR is responsible for ensuring that the administrative, fiscal, and scientific information in the application are compliant and that institutional and sponsor policies and guidelines are met.

**Scope**

All applications from PAMC faculty, students or staff must be reviewed and approved by the ORS prior to submission. ORS is the only entity within the PAMC authorized by Duke University to approve applications for submission and accept awards on behalf of the University.

**Policy**

**The Office of the Provost requires that a complete and compliant application be received by ORS no later than five (5) business days prior to the sponsor’s deadline (the “internal deadline”).**

ORS reviews all applications for administrative compliance with sponsor requirements and alignment with Duke University policies and processes. Inconsistencies among the different components of a proposal can cause complications and processing delays with our sponsors. To facilitate a full and comprehensive review, ORS requests that all application components are included at the time of submission, including a mature draft of the technical/scientific section(s). Programmatic language is reviewed at a high level to ensure consistency between the work proposed and details included in the budget or elsewhere in the application. Note: ORS does not review proposals for scientific merit or reasonableness.

If the application is to be submitted via Grants.Duke, all components must be uploaded by the internal deadline. If an application is to be submitted using a sponsor’s electronic system (e.g., NSF Fastlane), ORS staff must also have access to review and submit the application using the sponsor’s system by the internal deadline. Failure of the Principal Investigator (PI) or his/her designee to grant ORS access to the final application may result in the application not being submitted timely or not being submitted at all.

**Late submission waiver or after-the-fact review**

If a proposal is not going to meet the internal deadline, the PI should submit a waiver request through the chair or dean to the Executive Director of the Office of Research Support, Keith Hurka-Owen. There is no required form for a waiver request. An email request and approval is sufficient to meet the requirements for this procedure. If the waiver is approved, ORS will make every effort to ensure a successful submission.
When possible, applications that must undergo expedited review will be reviewed after-the-fact and may be withdrawn if non-compliant with institutional or sponsor requirements.

Applications that are found to contain any of the following errors after submission will be withdrawn:

- Placeholders
- Non-compliance with institutional policy – e.g., publication restriction without exception letter, cost sharing, improper use of name/logo/trademark
- PIs no longer affiliated with or physically located at Duke
- PI/institution does not meet eligibility requirements
- PI not selected to submit the proposal (limited submission)
- Falsified information, data, signatures

Deliberate withholding of information, falsification, misrepresentation or carelessness in carrying out the processes, authorizations, notifications, or responsibilities required to review an application and make necessary assurances may result in administrative actions such as: withdrawal or rejection of an application; suspension and/or termination of an award; debarment of the PI, project personnel or Duke University; and/or the imposition of civil fines and criminal penalties.

### Applicability

The internal deadline applies to all types of applications/proposals—paper, electronic, new and non-competing—as well as to all sponsors.

All business units collaborating in the project must approve the SPS record and the record must be fully routed (in “pending central approval – PCA” status) to meet the internal deadline. *Note: many business units have established processing deadlines and may require additional time to review and approve.*

Incomplete applications/proposals will be returned for corrections or completion. These applications will require a grant application waiver if resubmitted after the internal deadline.

### Responsibilities

**The Principal Investigator (PI).** The PI ensures that the application is complete, accurate, and meets all programmatic, administrative, and compliance requirements. The PI may delegate certain components of application preparation to the PI’s research team, grant administrator, or others within the business unit, but the PI retains personal responsibility and accountability for the content of all portions of the application, including post-submission revisions. Multiple PIs on a single project or the inclusion of a Co-PI requires the assignment of responsibilities between the PIs in accordance with a written Multiple PI Plan or other documentation.

**The Business Unit.** The business unit reviews the application for consistency with specific unit-level policies and procedures as well as various institutional requirements. Business unit review includes an assessment and approval of the following: an accurate budget; costs are allowable, reasonable and allocable to the project; personnel listed are available and qualified to participate; facilities are available; any proposed cost-share is adequately documented and accurate; appointment information is accurate; Institutional Base Salary (IBS) is accurate; and any F&A waiver is approved by the business unit official (e.g., Chair or designee) before submission to ORS.

A full listing of roles and responsibilities can be found at: [https://finance.duke.edu/research/roles](https://finance.duke.edu/research/roles)
| **The Grant Administrator.** | The Grant Administrator compiles the components of the application and completes the SPS record data fields, as delegated by the PI. The Grant Administrator receives ORS review comments and suggestions and makes necessary revisions as delegated by the PI. |
| **Office of Research Support (ORS).** | ORS reviews applications for consistency and compliance using sponsor policy and program-specific guidelines, federal regulations, Duke University policies, internal review guidance, and information provided by the PI. ORS certifies to the sponsor that the institution will be accountable both for the appropriate use of any funds awarded and for the performance of the grant-supported activities to be undertaken, if funded. |
| **Other Resources** | https://ors.duke.edu/ https://sharepoint-2013.oit.duke.edu/sites.nihinfo/_layouts/15/start.aspx#/SitePages/Home.aspx |