

University Policy: Proposal Submission Policy for Sponsored Projects

Policy Category: Research Policies

Subject: Policy and Process for Submission of Proposals for Sponsored Projects

Responsible Executive: Provost

Offices Responsible for Review of this Policy: Office of Sponsored Programs

Procedures: Included in document.

Related University Policies: Distinguishing between Gifts and Sponsored Projects; Facilities and Administrative Costs on Sponsored Projects; Principal Investigator Eligibility on Sponsored Research Projects; Principal Investigator's Handbook (PDF)

I. SCOPE

This policy applies to the routing and submission of applications to external funders for funds in support of sponsored research, service, educational and scholarly projects by faculty, staff and administrators at the university. This policy governing proposal routing and submission is designed to enhance collaborative working relations among AU units that support faculty members' efforts to obtain sponsored research funds from external sponsors. This policy supersedes previous portions of the PI Handbook, as well as the proposal submission policy and process memo authored by Dr. Jonathan Tubman, dated November 21, 2011.

II. INTRODUCTION

American University encourages its faculty and administrative staff to obtain funding from external sources in support of research, service, educational and scholarly activities. In accordance with applicable laws, as well as national best practices in research administration, and external funder guidelines for proposal development, sufficient time for conducting compliance checks on applications for sponsored awards to the university is essential to assess and manage enterprise risk prior to the stages of award negotiation and acceptance.

The technologies supporting proposal submission to external funders change regularly, although electronic proposal submission systems have existed for nearly twenty years. While U.S. Government proposal submission systems (e.g., Grants.gov, NSF Fastlane) largely operate problem-free, individual proposal submission systems for non-federal funders have proliferated. These newer foundation-based proposal submission systems are not 100% reliable all the time, are unique in their requirements, and require special attention to the timing of proposal development, routing and submission. Thus, in addition to the need to conduct compliance checks, the potential for

unreliability and uniqueness in some electronic proposal submission systems supports the use of internal proposal submission deadlines to ensure that proposals for external funding are complete, meet the sponsor's requirements and are submitted correctly via electronic proposal submission systems.

III. DEFINITIONS

Cayuse: The internal university routing and submission software system that academic units and the Office of Sponsored Programs (OSP) utilize to complete the pre-award proposal process.

External Funder: An outside entity or individual who provides sponsored project funding in support of research and development, service, educational and scholarly activities.

Funding Instrument: An award or other funding mechanism provided by an external funder. These instruments include, but are not limited to, grants, contracts, and cooperative agreements.

Principal Investigator (PI): The primary individual responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service project, contract, or other sponsored project in compliance with applicable laws and regulations and institutional policies governing the conduct of sponsored research.

Sponsored Project: A sponsored project is an activity that is externally funded and which includes a formal funding instrument such as a grant, contract, or a cooperative agreement between the university and the sponsor. A sponsored project involves a transaction that includes a specified statement of work and a related, reciprocal transfer of something of value.

IV. POLICY

Internal University Proposal Deadlines

It is American University's policy that all proposals must be routed via Cayuse to OSP following approval by the academic or administrative units to which the PI belongs. Approval by the appropriate unit(s) leadership prior to OSP submission is a critical and required component of our university proposal submission process and is a best practice in the profession of research administration. These steps must be done *before* submission to the external sponsor. If a proposal is not submitted through OSP prior to submission to the sponsor, the university retains the right to withdraw the proposal or decline an award.

In order to ensure that proposals meet sponsor criteria and all other university and regulatory requirements, and to allow time for proposal submission, the following standard internal deadlines have been established for electronic and paper application submissions. *These deadlines do not include additional time required by the relevant academic or business unit(s) for their review and approval of specific proposals.*

Five working days prior to the proposal submission deadline: The final complete budget, additional administrative materials, and the nearly final narrative are due to OSP. This includes all required sub-recipient documentation.

Two work days prior to submission deadline: The final complete proposal is due at OSP, including the final proposal narrative, 48 work hours in advance of the published deadline. Final changes between the two deadlines are limited to editing of the narrative that has no impact upon the budget and other administrative documents.

These internal deadlines may be qualified by other factors, depending on the proposal and solicitation requirements:

1. Proposals going to foreign sponsors/entities often have documents that require institutional signature. As per the policy of the university Board of Trustees, all international proposals and agreements must be signed by the President. Therefore, additional time must be allotted for the routing and approval process.
2. Proposals that require any of the following: the use of additional space; anticipate facility renovation, rehabilitation, or construction; require the use of highly hazardous materials, or create an unusual safety hazard, require notice at the earliest time, **but at least 30 days prior to the proposal submission deadline**, must be given to the office that would approve the relevant project requirement (e.g., Facilities Management, the Office of the University Architect, Environmental Health and Safety, the head of the academic or administrative unit). This requirement is in addition to the standard internal deadlines. Documentation of these approvals by the responsible university offices is required by OSP prior to submission of the proposal to the sponsor.
3. Multidisciplinary proposals, or other proposals that involve university faculty or staff from two or more academic or administrative units, will require additional time for proposal development and internal routing through Cayuse.
4. If entities outside the university are expected to be subcontractors on a proposal where American University is the lead institution, OSP needs a complete Scope of Work (SOW), budget/budget justification, institutional letter of approval, and completed Subrecipient Commitment Form from the subcontractor *prior* to including the outside entity on the proposal.

V. PROCEDURES

OSP will make all reasonable efforts to assist university faculty and staff submitting sponsored project proposals if faculty, staff and the units to which they belong cannot meet these deadlines. For example, faculty or staff may not be able to meet these deadlines because they have become aware of a funding opportunity only after the university's internal deadlines. However, OSP does not guarantee that proposals undertaken without consideration of these deadlines will be submitted in a timely manner. Similarly, OSP does not guarantee that proposals due outside of normal office hours will be submitted in a timely manner, if internal university proposal deadlines are not observed. Communication between faculty or staff member(s), their research development units and OSP is critical to the success of the proposal submission process. Proposals will be prioritized for processing in the order that they are received by OSP staff. Late-arriving proposals will not affect the review and submission of on-time proposals.

OSP reserves the right, at the discretion of the Vice Provost for Research, not to submit a proposal if there is insufficient lead time to prepare a complete and competitive proposal package that meets the sponsor's guidelines and other relevant regulatory requirements. The university reserves the right to withdraw a proposal after submission if it is found to be not compliant with university, sponsor, regulatory or other applicable policies. Proposals sent to external sponsors by individual faculty or staff members without the required routing in Cayuse and institutional approvals will be withdrawn upon notification to the sponsor.

VI. EFFECTIVE DATE AND REVISIONS:

This Policy is effective as of May 1, 2016.