

Revised Guidelines for Submitting Extramural Proposals to Sponsored Projects Administration for Institutional Review

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Why the Change?

- Guidelines initially implemented March 17, 2014
- Late fall, Vice Chancellor for Research charged the Office of Research with reviewing the effectiveness of the Guidelines
- The review was informed by input from:
 - Faculty and staff comments
 - Committee on Research, Computing and Libraries
 - SPA Staff
 - Analyses of proposal data from the Quali Coeus System

Overall Approach to Revisions

- Simplify and clarify key concepts
- Reduce burdens on faculty and unit staff where ever possible
- Seek ways to increase the number of proposals that qualify as Standard Proposals
- Seek ways to decrease the lead time for Non-standard Proposals
- Develop companion FAQs

Summary of Significant Changes

- Apply to all extramural proposals submitted to SPA for which there is a Sponsor Deadline
- Apply to letters of intent, white papers and other types of pre-proposal submissions if they contain or propose institutional commitments to which UCI will be expected to adhere (e.g., budgets, cost sharing, space renovations, acquisition of equipment/instruments, etc.)
- Clarification, not a new requirement

Summary of Significant Changes

- Requires that only the proposal face page, budget and budget justification be submitted in final form – all other proposal documents may be submitted in draft form
- Completed subrecipient proposal package includes the new Subrecipient v. Contractor Determination form
- PIs and departments should closely coordinate with SPA regarding changes between draft and final proposal documents that would trigger a second institutional review

Summary of Significant Changes

- Completed COI forms may be submitted to SPA with the Final Proposal (a new definition)
- The lead time for Non-standard Proposals has decreased from 10 to 7 business days
- Approximately 95% of all proposals will qualify as Standard Proposals (5 business day lead time)
 - Achieved by reducing the definition of Non-standard Proposal

Summary of Significant Changes

- LPARS should be submitted to vcrlateproposal@uci.edu as early as possible
 - Best interest of the PI and UCI
- LPARS submitted less than four (4) business days prior to a Sponsor Deadline are Late LPARS (new definition)
- The VCR will approve Late LPARS only in rare instances

Summary of Significant Changes

- Revised definition of Non-standard Proposal – now only includes proposals:
 - To foreign sponsors
 - For U.S. government contracts (not grants)
 - Requiring acceptance of terms and conditions at submission
 - That require submission of a subcontractor business plan or other plan that must be developed by a UCI central administration unit
 - Requesting more than \$5M direct costs per budget year
 - To establish a new UCI center or institute

Proposal Development, Routing, Review and Approval

ROLES & RESPONSIBILITIES

Principal Investigator

- Developing and preparing proposals for external funding in accordance with sponsor guidelines and University policies
 - Including ensuring proposals adhere to sponsor formatting requirements and that electronic proposal packages are error free
- Ensuring timely submission of proposals to SPA for institutional review

Department/Unit Administrators

- Assisting Principal Investigators with preparing and submitting proposals including, but not limited to:
 - Initiating and completing the KC proposal development document
 - Reviewing and interpreting proposal guidelines
 - Completing proposal forms (electronic and paper)
 - Preparing budgets and budget justifications
 - Preparing internal forms and documents (e.g. conflict of interest forms, subrecipient proposal packages etc.)
 - Ensuring proposals adhere to sponsor formatting requirements and that electronic proposal packages are error free



FREQUENTLY ASKED QUESTIONS

Purpose and Intent

- Addresses “the why” behind the Guidelines
- Intended as a first-use resource for answering Guideline-related questions
- Intended to increase UCI’s general knowledge and understanding of the Guidelines



FAQ's

Under the Guidelines, how are proposals prioritized for review?

As proposals arrive in the Kualu Coeus (KC) SPA approval node, they undergo a pre-review to determine if the proposal contains all of the information and documents needed for SPA to conduct an institutional review. For the pre-review stage, proposals are reviewed in the order that they are received.

Once proposals clear the pre-review stage, they are queued for institutional review in the order they are received within the institutional review queue for the SPA team assigned to the department/unit submitting the proposal.



FAQ's

Why did UCI change its method for prioritizing proposals from the sponsor deadline method to the order of receipt method?

UCI changed its method for prioritizing proposals to ensure that all Principal investigators have fair and equitable access to SPA's services and to help facilitate the timely review, approval and submission of UCI's proposals.

The “sponsor deadline” methodology previously used by SPA regularly resulted in “last-minute” proposals being reviewed prior to those that were timely submitted to SPA and already in the review queue. As a result, the “sponsor deadline” methodology disadvantaged the principal investigators of the timely submitted proposals. It regularly created situations where these proposals would go without review for several days; thus, denying them valuable review time and inappropriately putting them at risk for unsuccessful submission to the sponsor.



FAQ's

What is institutional review?

SPA conducts an institutional review of each extramural proposal to ensure compliance with University policies and guidelines, as well as external regulations governing a variety of issues, for example:

- Certifications, assurances and representations required to be made by UCI;
- Proposed award terms and conditions contained in the funding opportunity announcement;
- Use of facilities and resources;
- Cost recovery;
- Research protections;
- Export controls and foreign national/citizenship restrictions;
- Eligibility/debarment screening of subrecipients, consultants and other participants;
- Intellectual property issues; and
- Many more institutional issues and concerns.



FAQ's

Does SPA conduct a scientific review of the proposed scope of work?

No. However, during the institutional review, SPA spends a small amount of time reviewing the proposed scope of work to identify potential institutional issues involving matters such as: export control, intellectual property, material transfers, use of animals and human subjects in research, human stem cell use, rDNA, use of potential environmental hazards, etc.

In addition, SPA also compares the information from the scope of work about such issues to the information provided in the completed Kuali Coeus (KC) proposal document. As the office of record for UCI's extramural proposals, SPA is responsible for ensuring that the information captured in the KC system accurately reflects the information contained in the proposal. The accuracy of this information is important as it is shared with other central administrative units on campus and the UC Office of the President for informational purposes, decision making, policy development and internal/external reporting purposes.



FAQ's

Will SPA be able to complete the institutional review if a proposal is submitted after the applicable lead time?

Yes, all proposals, including Late Proposals, are required to receive institutional review before being approved and submitted to a sponsor. Since a Late Proposal runs the risk of being submitted after the sponsor's deadline, it is recommended that principal investigators take appropriate steps to ensure that their proposals are submitted to SPA in accordance with the applicable lead times described in the Guidelines.



FAQ's

If an LPAR requests a new SPA submission date and time that is shortly before the Sponsor Deadline, will it be approved?

LPARs should be submitted as early as possible and it is recommend that principal investigators and/or department/unit administrators consult with the SPA management (Assistant Director, Associate Director, Director or Assistant Vice Chancellor for Research Administration) to determine an appropriate revised date and time for submission to SPA.

The closer a revised SPA submission date and time is to a Sponsor Deadline, the less likely it is that a request (if eligible) can be accommodated. SPA is required to conduct an institutional review of all proposals, even on those with approved LPARs. Because the review requires SPA resources and those resources need to be allocated in a way that promotes fair and equitable access to SPA services, principal investigators and departments/units should exercise reason when requesting a revised SPA submission date and time.



FAQ's

What are some examples of “circumstances beyond the control of the PI”?

Circumstances beyond the control of the principal investigator include, but are not limited to:

- Medical emergencies involving the PI or an immediate family member (e.g., spouse/partner, child, parent or sibling),
- Funding opportunities for large, complex programs with short response times,
- Unexpected invitations to participate as a subaward collaborator with a short response time imposed by the prime institution organizing the collaboration, and
- Unexpected funding (new or renewal) becomes available with a short response time imposed by the sponsor.



Questions?