UC IRVINE RESEARCH POLICIES, GUIDELINES & PROCEDURES

OFFICE OF RESEARCH

Section 483-6: Guidelines for Submitting Extramural Proposals to Sponsored Projects Administration for Institutional Review and Approval

Responsible Administrator: Vice Chancellor for Research - Office of Research

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References/Resources

- <u>UC Policy: Requirement to Submit Proposals and Receive Awards for Grants</u> and Contracts through the University
- <u>UC Irvine Research Policies, Guidelines & Procedures Section 483-3: Guidelines for the Requirement to Submit Proposals & Receive Awards through the University</u>
- <u>UC Contract and Grant Manual: Chapter 2: Proposal Submission and Award Acceptance/Administration</u>

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A. Background and Purpose

University of California policy requires proposals to be submitted to Sponsored Projects Administration (SPA) for institutional review and approval prior to being submitted to Extramural Sponsors. As part of its responsibilities, and on behalf of The Regents, SPA certifies that extramural proposals are consistent with University policy, sponsor policy and applicable federal regulations and applicable laws. This policy requirement applies to all extramural proposals, even when a sponsor does not require that a proposal be signed and/or submitted by an Authorized Official.

These guidelines are intended to clearly describe the documents and information that SPA needs to initiate the institutional review of a proposal, the submission lead times applicable to Standard and Non-Standard Proposals, the process for requesting an exception to the lead times, and SPA's methodology for prioritizing proposals for institutional review.

B. Applicability

These guidelines apply to all extramural proposals (including proposals for subawards) for which there is a Sponsor Deadline. They also apply to letters of intent, white papers, or other pre-proposal submissions that 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.).

C. Documents and Information Required for Institutional Review and Approval

Kuali Coeus (KC) is UCI's electronic system of record for all proposals to Extramural Sponsors. It is used to route proposals for review and approval by departments/units, their coordinating points and SPA.

To avoid proposal review delays, Principal Investigators and departments/units should submit a complete proposal to SPA. A complete proposal includes the proposal information and documents listed below:

- 1. A complete KC proposal document with all applicable approvals.
- 2. The Extramural Sponsor's Funding Opportunity Announcement (FOA) or the URL (web address) for the FOA.
- All proposal documents and information required by the Extramural Sponsor's FOA, which may be submitted in draft form – except for the following, which must be submitted to SPA in final form:
 - a. Application face page (sometimes referred to as the cover sheet)
 - b. Budget and budget justification
- 4. Complete subrecipient proposal package (if applicable), which consists of:
 - a. Subrecipient Commitment Form
 - b. Subrecipient v. Contractor Determination Form
 - c. Scope of work specific to the subrecipient site
 - d. Budget and budget justification specific to the subrecipient site; and
 - e. Other subrecipient documents as required by the Extramural Sponsor's FOA (for example, certifications, assurances and/or representations from the subrecipient)

Without the above documents/information (including a draft scope of work), SPA cannot start the institutional review. In such a case, the proposal will be returned to the department/unit so that they may include the missing documents/information and resubmit the proposal to SPA.

In addition, institutional review may be delayed and a proposal may be at risk for late submission if the Principal Investigator and/or department/unit make changes to draft documents/sections which then result in changes to the final documents/sections already submitted to SPA. Principal Investigators and departments/units should closely coordinate with the Contract and Grant Officer assigned to the proposal regarding any such changes. In the absence of such coordination, significant changes may necessitate re-review by SPA.

D. Lead Times for Submitting Proposals to Sponsored Projects Administration

To ensure the timely submission of proposals for Sponsor Deadlines, they should be submitted to SPA in accordance with the following:

- Standard Proposals (defined below) should be submitted to SPA no later than five (5) business days prior to a Sponsor Deadline.
- Non-standard Proposals (defined below) should be submitted to SPA no later than seven (7) business days prior to a Sponsor Deadline.
- If UCI is submitting a subaward proposal to a lead institution, the Sponsor Deadline is the day and time established by the lead institution for receiving the proposal.
- The Final Proposal (including applicable financial disclosure forms) should be submitted to SPA no later than eight (8) business hours before the Sponsor Deadline.

A Late Proposal (defined below) must still be reviewed and approved by SPA before it is submitted to the Extramural Sponsor. Although SPA will endeavor to review, approve and submit a Late Proposal in time to meet the Sponsor Deadline, such proposals run the risk of being submitted after the Sponsor Deadline.

E. Proposal Review Priority

When proposals are first received by SPA, they undergo a preliminary review – in the order received – to determine if they are complete (in accordance with Part C, above). After completing the preliminary review, proposals are advanced to institutional review and assigned a reviewing officer who conducts the review in the order in which proposals are received in their queue.

The intent of the above methodology is to ensure fair and equitable access to SPA's services. This methodology is applied to all proposals, including Late Proposals and proposals with no Sponsor Deadline.

F. Requesting an Exception to SPA Lead Times

If circumstances beyond a Principal Investigator's control will prevent the submission of a proposal in accordance with Part D above, an exception may be requested by:

- Completing a Late Proposal Approval Request (LPAR) form.
- Submitting the LPAR form to the Dean/ORU Director (responsible for the department/unit submitting the proposal) for review and signature.
- The Dean/ORU Director submitting the signed form to <u>vcrlateproposal@uci.edu</u>.
 - o Incomplete forms will be returned to the department/unit for completion.
 - LPARs submitted to SPA or the VCR outside of <u>vcrlateproposal@uci.edu</u> will be returned to the department/unit with instructions to submit the request in accordance with this Part.

LPARs should be submitted as early as possible (for example, promptly after a Principal Investigator becomes aware of circumstances beyond his/her control that will prevent the submission of a proposal to SPA in accordance with Part D above). Late LPARs (defined below) will be approved only in rare instances.

After a LPAR is reviewed, the approval decision will be made by the Vice Chancellor for Research (VCR) or the VCR's designee. The approval decision will be e-mailed to the Principal Investigator, Dean/ORU Director and department/unit. If approved, the e-mail will include the revised date and time for submitting the proposal to SPA. The approval e-mail and the LPAR should be uploaded in KC as part of the complete proposal package. The proposal will be reviewed by SPA as soon as possible after its receipt.

Please note that if a proposal is approved for late submission, but is subsequently received by SPA after the revised submission date and time, the proposal is a Late Proposal and will be reviewed as described in Part E above.

G. Definitions

Authorized Official - An individual authorized by the University to act on behalf of The Regents to assume the obligations imposed by the laws, regulations, requirements, sponsor policies and conditions that apply to extramural awards, including signing extramural proposals and the required certifications and/or assurances necessary to fulfill the requirements of the application process.

Extramural Sponsor - An entity external to UCI (including other UC campuses, locations and units) to which UCI submits a proposal, or from which it receives an award.

Final Proposal – The final version of a proposal that includes all documents required to be submitted to the Extramural Sponsor in accordance with the FOA.

Funding Opportunity Announcement (FOA) - A published description of an extramural funding program.

Late LPAR – A LPAR form received through <u>vcrlateproposal@uci.edu</u> less than four (4) business days prior to a Sponsor Deadline.

Late Proposal - A Standard or Non-standard Proposal received by Sponsored Projects Administration after the applicable lead time noted in Part D, above or in the case of an approved exception (Part F, above) the date and time approved by the Vice Chancellor for Research.

Non-standard Proposal - A proposal or funding application that involves any of the following uncommon circumstances:

- The sponsor or prime sponsor is a foreign entity.
- The proposal is for a U.S. federal government contract not a grant or cooperative agreement.
- By virtue of submitting the proposal to the Extramural Sponsor, UCI is accepting award terms and conditions contained in the FOA.
- As part of the proposal, the sponsor requires the submission of a <u>small business</u> <u>subcontracting plan</u>, an intellectual property management plan, a laboratory safety plan, or any other plan(s) that must be developed by one or more UCI central administration office.
- The proposal requests funding in excess of \$5 million of direct costs per budget year.
- A purpose of the proposal is to establish a new UCI center or institute.

Sponsor Deadline - The date and time established by an Extramural Sponsor by which proposals must be received to be considered on-time.

Standard Proposal - A proposal or funding application to a domestic entity that will result in the award of a grant, cooperative agreement or subaward (under a prime grant or prime cooperative agreement) and that does not involve any of the elements of a Non-standard Proposal.