

## Frequently Asked Questions

### **Guidelines for Submitting Extramural Proposals to Sponsored Projects Administration (SPA)**

*Note: Capitalized terms used in these FAQs have the same meaning as those used in the Guidelines for Submitting Extramural Proposals to Sponsored Projects Administration.*

#### **What is the purpose of the Guidelines for Submitting Extramural Proposals to SPA?**

The purpose of the Guidelines is to:

- Facilitate the timely and efficient submission of UCI's proposals to extramural sponsors,
- Implement a fair and equitable method for prioritizing proposals for review,
- Ensure that faculty have fair and equitable access to SPA's services, and
- Facilitate campus compliance with the UCI/UC policies and external regulations.

#### **Under the Guidelines, how are proposals prioritized for review?**

When proposals are first received by SPA, they undergo a preliminary review, in the order that they were received, to determine if the proposal contains all of the information and documents needed for SPA to conduct an institutional review. After completing the preliminary review, each proposal is advanced to institutional review and assigned a reviewing officer. The officer then conducts an institutional review of each proposal in the order in which it was received in their queue.

The proposal review queues can be accessed by logging in to ZotPortal, navigating to the Research tab and clicking the applicable links in the Kuali Coeus Lookups portlet.

#### **Is SPA's proposal prioritization methodology applied to all extramural proposals?**

Yes, the methodology is applied to all extramural proposals, including Late Proposals, proposals with no Sponsor Deadline and after-the-fact proposals.

#### **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.

### **Why does SPA need to conduct an institutional review?**

[UC Presidential policy](#) requires that all proposals be submitted through the local sponsored projects/contracts and grant office. In addition, [UC Contract and Grant Manual, Section 2-120](#) requires SPA to review proposals for consistency with campus and University-wide policies and procedures. Likewise, the [Delegation of Authority to SPA](#) includes the responsibility to determine the necessity for legal review, legal sufficiency, and compliance with University policies with regard to proposals (and awards).

The reason that SPA is charged with these responsibilities and requirements stems from real and present (as well as historical) risks, liabilities and external requirements. For example, the federal government requires (as do most other governmental and non-governmental sponsors) that all funding applications/proposals be signed by an Authorized Official. Under federal regulations and other applicable laws, Authorized Officials are responsible for making certain institutional representations, certifications and warranties when signing funding applications/proposals. Included in these, is an institutional attestation that the information, statements and claims contained in the proposal (and the certifications) are true, accurate and complete to the best knowledge of the Authorized Official.

The institutional review is intended to provide the Authorized Officials in SPA the opportunity to gain an appropriate level of knowledge regarding proposals so that they may reasonably and appropriately make attestations, certifications, representations and assurances on behalf of The Regents. In addition, when SPA approves a proposal, it is acknowledging that any false, fictitious, or fraudulent statements or claims may result in criminal, civil or administrative penalties for the person(s) signing the proposal, as well as the institution. These potential penalties underscored the importance of an institution’s proposal review procedure and practices.

### **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.

### **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 Quali 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.

### **What expectations have been communicated to SPA staff regarding the conduct of institutional reviews?**

SPA staff are expected to add value to the proposal review and submission process by:

- Conducting institutional reviews in a facilitative manner – focusing on institutional issues, sponsor policy issues and issues related to federal regulations and applicable laws.
- Using reason when analyzing issues and determining the level of risk to the institution.
- Appropriately prioritizing issues by risk level and using reason when assessing which issues may be addressed and resolved after submitting the proposal to the sponsor.
- Communicating issues and concerns identified during the institutional review to the principal investigator and the department/unit administrator along with recommendations for resolving such issues.

**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.

**When a proposal is submitted to SPA for institutional review, does it need to be in final form?**

To enable SPA to conduct an institutional review and 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.
3. 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. A completed and signed [Subrecipient Commitment Form](#)
  - b. Scope of work specific to the subrecipient site
  - c. Budget and budget justification specific to the subrecipient site; and
  - d. Other subrecipient documents as required by the Extramural Sponsor's FOA (for example, certifications, assurances and/or representations from the subrecipient).

Please note that the above applies to all proposals including those being submitted via electronic proposal submission systems.

### **When should the Final Proposal be submitted to SPA for submission to the sponsor?**

The Final Proposal should be received in KC by SPA no less than eight business hours prior to the Sponsor Deadline. It is recommended that principal investigators take appropriate steps to ensure that their Final Proposals are submitted to SPA in accordance with this lead time to avoid the risk of the proposal being submitted after the Sponsor Deadline.

### **Why does SPA need the Final Proposal eight hours before the Sponsor Deadline?**

Certain aspects of the proposal review, approval and submission process are outside of SPA's control. Some examples include, but are not limited to:

- Excessive workload resulting from multiple sponsors scheduling their deadlines for the same day or the campus submitting a large number of proposals for a Sponsor Deadline (common occurrence around NIH deadline days).
- Technical glitches or system outages associated with sponsor submission portals which can jeopardize timely proposal submission.

### **If a Sponsor Deadline is 11:59pm local time; does this mean that the final version of the proposal may be submitted to SPA at 3:59pm local time?**

No. SPA reviews, approves and submits proposals during its normal business hours (8am – 5pm). When a Sponsor Deadline is after 5pm local time, SPA considers the deadline to be 5pm. This means that the Final Proposal should be submitted to SPA no later than 9am local time.

### **What happens when a proposal is submitted to SPA for institutional review, and then the principal investigator or department/unit makes changes to the parts of the proposal that are supposed to be submitted to SPA in final form?**

SPA needs certain proposals sections and documents in final form for institutional review (see Part C of the Guidelines). The review may be delayed and a proposal may be at risk for submission after the Sponsor Deadline 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 coordinate closely with the Contract and Grant Officer assigned to the proposal regarding any such changes. Doing so will help facilitate the institutional review and on-time submission to the sponsor.

**If an individual is not eligible to serve as a principal investigator (PI), does the proposal submitted to SPA for institutional review need to include a PI Exception Request?**

No; however, including a PI exception request with the proposal will help facilitate the institutional review. If a [PI Exception Request](#) is submitted with the proposal, it should be uploaded in the Internal Attachments panel of the Abstracts & Attachments tab in KC.

**If a proposal involves Vice Chancellor for Research (VCR) cost sharing, does the proposal submitted to SPA need to include the signed VCR cost share letter?**

No; however, to facilitate the institutional review, the cost shared amount should be included on the Cost Sharing tab in the KC budget. Please remember that principal investigators and/or department/unit administrators are responsible for securing the signed VCR cost sharing letter and including it with the Final Proposal. When the Final Proposal is submitted to SPA, the signed VCR cost sharing letter must be uploaded in the Internal Attachments panel of the Abstracts & Attachments tab. If the signed VCR cost sharing letter is not submitted with the Final Proposal, the proposal will likely be at risk for submission after the Sponsor Deadline.

**If a sponsor has a policy that prohibits Facilities & Administrative (F&A) costs or limits the applicable F&A rate, should the proposal submitted to SPA include an F&A rate reduction/waiver request?**

It is recommended that principal investigators and/or department/unit administrators contact the SPA team assigned to the department/unit to discuss the potential for securing an F&A rate reduction/waiver in advance of submitting the proposal to SPA for institutional review. Please refer to [Section 484-4 of the UCI Research Policies, Guidelines and Procedures](#) for additional information regarding F&A rate reductions/waivers.

**If a sponsor suggests or recommends the use of an F&A rate lower than UCI's federally-approved F&A rates, what additional information should be included when a proposal is submitted to SPA?**

When a sponsor suggests or recommends using a F&A rate lower than UCI's federally-approved F&A rates, it is recommended that principal investigators and/or department/unit administrators contact the SPA team assigned to the department/unit to discuss the potential for securing approval of an F&A rate reduction or waiver request in advance of submitting the proposal to SPA. After such consultation an F&A rate reduction/waiver request should be included with the proposal when it's submitted to SPA. This will help facilitate the institutional review.

Please refer to [Section 484-4 of the UCI Research Policies, Guidelines and Procedures](#) for additional information regarding F&A waivers or reductions.

**If a sponsor requires an institutional commitment letter from a high ranking official (e.g., Dean, Vice Chancellor, Executive Vice Chancellor/Provost, Chancellor) does the proposal submitted to SPA need to include the letter(s)?**

No; however, please remember that principal investigators and/or department/unit administrators are responsible for securing the letter(s) and including it/them with the Final Proposal. When the Final Proposal is submitted to SPA the letter(s) signed by the appropriate official must be uploaded in the Internal Attachments panel of the Abstracts & Attachments tab. If the letter(s) is/are not submitted with the Final Proposal, the proposal will likely be at risk for late submission to the sponsor.

**When should a subaward proposal be submitted to SPA for institutional review?**

For subaward proposals (i.e., UCI will be a subrecipient under a proposal being submitted by another entity), the Sponsor Deadline is the date and time set by the prime institution coordinating the collaborative project. For example, if UCLA is the prime institution and they establish March 15 at 5pm as the deadline to receive subaward proposals, then UCI's subaward proposal should be submitted to SPA in accordance with the appropriate time frame set forth in Part D of the Guidelines.

**When should a proposal be submitted to SPA for institutional review if the sponsor grants an extension to its deadline?**

If a sponsor grants a deadline extension, then the proposal should be submitted to SPA for institutional review in accordance with the appropriate time frame set forth in Part D of the Guidelines using the new date and time approved by the sponsor.

**If a Sponsor Deadline falls on a weekend or a holiday observed by the sponsor, when should a proposal be submitted to SPA for institutional review?**

A proposal should be submitted to SPA for institutional review in accordance with the applicable timeframe set forth in Part D of the Guidelines prior to the Sponsor Deadline. In most cases when a Sponsor Deadline falls on a weekend or holiday, the deadline is automatically extended to the next business day. However, this is not always the case. Principal investigators and department/unit administrators should carefully review the funding opportunity announcement for guidance on this issue and when in doubt, verify the deadline with the sponsor.

**If a Sponsor Deadline falls on a UC holiday that is not observed by the sponsor, when should a proposal be submitted to SPA for institutional review?**

If a Sponsor Deadline falls on a UC holiday that is not observed by the sponsor, SPA considers the deadline to be 5pm on the UC business day immediately prior to the Sponsor Deadline.

**Are letters of intent, white papers and pre-proposals subject to the Guidelines for Submitting Extramural Proposals to SPA?**

Only 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.) are subject to the Guidelines.

**Do the Guidelines for Submitting Extramural Proposals to SPA apply to all proposals?**

The Guidelines apply to proposals for which there is Sponsor Deadline and 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.).

**Are most proposals Standard or Non-standard Proposals?**

The large majority of UCI's proposals qualify as Standard Proposals; however, a small portion are Non-standard Proposals, which involve any of the following uncommon circumstances:

- The 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 funding opportunity announcement.
- As part of the proposal, the sponsor requires the submission of a small business subcontracting plan, 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.

**Is there a process for requesting an exception to the lead times for submitting Standard and Non-standard Proposals?**

Yes, if circumstances beyond the control of the PI will prevent the submission of a proposal in accordance with the applicable lead time set forth in Part D of the Guidelines, an exception may

be requested by completing a [Late Proposal Approval Request \(LPA\) Form](#) as described in Part F of the Guidelines. If the LPA is approved, then SPA will review the proposal as soon as possible after its receipt.

### **When should an LPA be submitted?**

It is recommended that principal investigators complete and submit LPAs promptly after they become aware of circumstances beyond their control that will prevent the submission of a proposal in accordance with the applicable lead time set forth in Part D of the Guidelines. Doing so will enable SPA to make the necessary resource arrangements to facilitate the institutional review, approval and submission to the sponsor in light of the shorter lead time.

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

LPAs should be submitted as early as possible and it is recommended 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 LPAs. 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.

### **If an LPA is received by the Vice Chancellor for Research shortly before a Sponsor Deadline, will the request be approved?**

Late LPAs (those received through [vcrlateproposal@uci.edu](mailto:vcrlateproposal@uci.edu) less than four business days prior to a Sponsor Deadline) will be considered; however, they are only approved in rare situations where the circumstances were beyond the PI's control, SPA is able to reallocate resources to accommodate the request and there is sufficient time to conduct the institutional review, approve the proposal and timely submit it to the sponsor.

### **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.

### **Who is responsible for completing the LPAR form?**

In general, the LPAR may be completed by either the principal investigator or a department/unit administrator with input from the principal investigator. However, the person or persons responsible for completing the LPAR form may vary across UCI's schools and research units.

### **Why does the LPAR form require a Dean's or ORU Director's signature?**

Deans and ORU Directors sign LPAR forms to signify that they have read the form and they agree that the circumstances that will prevent the timely submission of a proposal to SPA are beyond the principal investigator's control. Deans and ORU Directors should only endorse and submit LPARs that describe circumstances beyond the PI's control.

### **How long will it take to secure approval for an LPAR after it's been submitted to [vcrlateproposal@uci.edu](mailto:vcrlateproposal@uci.edu)?**

LPARs are acknowledged as soon as possible (generally within 24 hours of receipt) and will be acted upon as expeditiously as possible under the prevailing circumstances. Approved requests will include a revised date and time for submitting the proposal to SPA for institutional review. Approved LPARs should be uploaded on the Internal Attachments panel on the Abstracts and Attachments tab in Quali Coeus and submitted with the proposal.