Research Administration Training and Education (RATE)

Class #2

Proposal Development and Submission
Pre-Award – Proposal Routing

Principal Investigators (PI) are responsible for providing the following information to OSP for proposals to be processed and approved:

• Internal Approval Form (IAF)
• Proposal documents
  ✓ Scope of work
  ✓ Budget and budget justification
  ✓ Electronic application (if applicable)
• Consultant documents (if applicable)
• Subaward documents (if applicable)
Pre-Award –Proposal Preparation

Pre-Award Assistance from OSPA:

• Provide technical assistance on policies, procedures, laws and guidelines
• Approve draft budget and justification
• Assist with responding to sponsor requests for additional information: Just-In-Time Information, revised budgets, etc.
• Update proposal preparation information on OSPA’s website regularly: salaries, fringe rates, indirect cost rates, etc.
• Register and establish account access to NSF Fastlane, Research.gov, NIH Commons and other online proposal submission systems
Pre-Award – OSPA Review

- Reviews sponsor policies, laws, regulations
- Reviews budgets for accuracy and justification for completeness
- Confirms Conflict of Interest (COI) disclosures have been submitted for all investigators
- Reviews compliance with University and sponsor policies
- Makes determination of subaward, vendor or consultant
- Coordinates with Proposal Development Office (PDO) on Limited Submissions
- Verifies PI meets UK’s PI eligibility requirements
- Provides administrative information and forms, including certifications and assurances
- Submits proposals electronically through Cayuse (federal proposals) or other sponsor submission systems
- Provides institutional signature on proposals
Pre-Award – Proposal Preparation

Examples of PI and/or Department Responsibilities:

• Read and understand sponsor policies and procedures
• Prepare technical proposal
• Prepare budget and justification
• Prepare other required documentation
• Obtain institutional approval for human subjects and animal research
• Obtain internal approvals

Roles and Responsibilities Matrix includes more information.
https://www.research.uky.edu/office-sponsored-projects-administration/policies-procedures
How to get your proposal signed, sealed, delivered. . .

- Provide all required information in a timely manner
- Read and become familiar with the sponsor guidelines and policies
- Rules, Regulations and Sponsor Requirements are legal commitments and must be followed
- Use the OSPA Website for guidance
- Call the CGO or RA in OSPA for assistance
Successful Proposals

• Follow sponsor/program guidelines
  – Major matters are clearly addressed
  – Appropriate detail is provided as required
  – Length is consistent with the guidelines
• Highlight or consistently repeat most important ideas
• Include detailed schedule of activities for project
• Consistently represent budget and narrative
  – Use of funds is clearly explained
  – Budget justification supports budget
• Good overall presentation of need for proposed project and design/methodology
• Targeted at reviewers to persuade them to recommend award
Reasons for an Unsuccessful Proposal

• Chosen sponsor is not appropriate source of funds for proposed project
  – Sponsor has already funded substantially similar project
  – Sponsor’s priorities and interests have changed
  – Project would not be considered as best use of sponsor’s funds

• Methodology appears to be flawed and/or measurable outcomes are not included in proposal

• Proposed project appears to be beyond capacity of individual or institution to carry out

• Applicant failed to demonstrate fiscal accountability

• Proposal is unclear or incomplete
  – Could not easily be matched against evaluation criteria
  – Not fully responsive to what was asked for in proposal guidelines
Common Pre-award Pitfalls

• Insufficient lead time
  – Not enough time to completely route Internal Approval Form (IAF)
  – Missed OSPA 3-day proposal deadline

• Missing documentation
  – Subaward materials
  – Consultant letters
  – Insufficient budget justification

• Failure to read sponsor guidelines and follow them exactly

• Inadequate training of PI, college/department staff or research administration staff

• Inconsistencies between budget and budget justification

• Incorrect fringe benefits or indirect costs in budget
Plan Ahead

• Check to see that PI has reported up-to-date other support
• Collect biosketches and current and pending support documents
• Contact subrecipients and obtain Subaward Commitment Form
• Check to be sure Conflict of Interest (COI) disclosures are up-to-date for all investigators in proposal
• Check to see if PI and UKRF have access to online proposal submission systems
  – OSPA’s eRA Administrator can assist with obtaining access and passwords
Key Information in Sponsor Guidelines

- Submission due date
- Anticipated start date and period of award
- Total budget allowed
- Budget restrictions, if any
- Allowed indirect cost rate
- Mandatory cost sharing, if required
- Requirement for institutional signature
- Checklist of required documents for application submission
- Method of proposal submission
Typical Components of a Proposal

- Abstract /Project Summary
- Animal or Human Subjects Plan
- Biosketches of all key personnel – With personal statement
- Bibliography
- Budget
- Budget or Personnel Justification
- Cover Letter
- Department or Mentor Letter
- Equipment
- Cover Page/Signature Page
- Facilities and Resources
- Key Personnel
- Letters of Support - Optional
- Other Support or Current and Pending Support
- Project Narrative or Research Plan
- Research Plan/Strategy
- Specific Aims and Project Outcomes
- Data Management Plan
- Evaluation Plan
- Other Required Documents per Sponsor Guidelines
Preparing the Proposal

Info needed to get started:

• Application guidelines
• Begin date & duration
• Budget estimates; personnel involved in project
• Submission deadline
• Institutional approvals
Required Documents for Proposals with Consortium/Subaward

- Documentation Required from Subrecipient:
  - Scope of Work
  - Biosketches of Consortium Key Personnel
  - Detailed Budget and Budget Justification of Consortium
  - Copy of subrecipient’s Indirect Cost (F&A) Agreement to verify rate
  - Letter of Intent (LOI) to set up Consortium Agreement signed by Consortium Institution’s authorized official or signed Cover Page (in lieu of Consortium Agreement).
  - Certifications such as IRB or IACUC if applicable
  - Subaward Commitment Form
Required Documents
when UK is Consortium/Subrecipient

Submit to Prime Institution:

• Detailed Budget and Budget Justification for work to be performed by UK
• Biosketches of Key Personnel
• Scope of Work
• Letter of Intent (LOI) to set up Consortium Agreement signed by UK official or signed Cover Page (in lieu of Consortium Agreement)
• Copy of UK’s Indirect Cost (F&A) Agreement
• Certifications such as IRB or IACUC if applicable
• FCOI of all Key UK Personnel – Federal Grants, AHA

Note: UK’s Sponsor is Pass-Through Entity (PTE)
Proposal Budget

- A proposal budget should include all costs needed to accomplish the objectives presented in proposal.
- Total cost of any project includes both direct costs (salaries, lab supplies, travel, other expenses, etc.) and indirect costs (aka F&A costs).
- Proposed costs should be allowable costs
  - Passes the “prudent person” test
  - Is allocable to specific project
  - Includes consistently applied costs
  - Follows any specific sponsor restrictions or conditions of award
For any cost to be allowable under a federal award, it must:

- Be necessary, allocable and reasonable for performance of project
- Conform to any limitations or exclusions set forth in applicable regulations (e.g., 2 CFR 200 Uniform Guidance), in sponsor guidelines, and subsequent award
- Be consistent with UK policies and procedures that apply uniformly to both federally-financed and other sponsored projects
- Be accorded consistent treatment across institution
A categorical list of anticipated project costs that represent Principal Investigator's best estimate of funds needed to support work described in proposal.
Proposal Budgets

• Proposal budgets should be as detailed as possible and include ALL costs required for project
  • Salary plus fringe benefits
  • Direct current expenses (supplies)
  • Travel
  • Equipment
  • Any items that are normally considered to be indirect costs but are being charged as direct costs require justification for federal or federal flow through projects
  • F&A costs
• Type of award and type of sponsor will determine specific level of budget detail required
• Contact College Grants Officer (CGO) for budget preparation assistance
Direct Costs

- Names of key & non-key personnel and their roles
- Effort (% or months)
- Use Institutional Base Salary and appropriate fringe benefit rate(s)
- Use current NIH salary cap, if applicable
- Salary inflated by 3% each year including personnel at salary cap
- Find out if any personnel have multiple appointments at UF or VA (multiple employee records) and obtain copy of MOU
- Consultant costs, Lab/Other supplies
- Travel, Other Expenses
- Equipment, Patient care costs, Rental cost of offsite facility, Tuition, Scholarships,
- Subcontract/Consortium costs (direct + indirect cost)
Indirect Costs (IDC or F&A)

- UK negotiates full indirect cost rate with Federal government
  - [https://www.research.uky.edu/office-sponsored-projects-administration/budget-preparation#indirect-total-cost-sharing](https://www.research.uky.edu/office-sponsored-projects-administration/budget-preparation#indirect-total-cost-sharing)
- UK will accept indirect costs of nonprofit sponsors with clearly stated policy*

- Types of indirect cost base for calculation of indirect costs
  - TDC – Total Direct Cost (all costs) x IDC rate
  - MTDC – Total Direct Cost minus equipment, tuition, scholarships, fellowships, patient care, rental cost of offsite facility, subcontract in excess of $25,000 x IDC rate (calculation is defined in UK’s negotiated rate agreement)
  - Other – Sponsor’s unique policy with regards to IDC per sponsor guidelines (e.g., TDC minus equipment or TDC minus consortium) x IDC rate

*If IDC rate is not clearly stipulated in sponsor guidelines, current federal rates will apply
Budget Justification

OSPA requires full budget and budget justification for all applications including NIH modular budgets.

All items listed in budget must be included in budget justification and explained in detail.

- Explains why each cost is essential to performing project
- Explains how project costs were estimated
- Explains any special circumstances applicable to project
Budgeting Tips

• Reviewers will use budget request to gauge PI’s understanding of how much project will cost and what it takes to accomplish proposed research.

• A poorly prepared budget request can influence reviewer scores.

• Provide detailed description of expenses as well as justification for why those expenses are needed for each project period.

• Deliberately under budgeting or padding budget reflects will be negatively noticed by reviewers.
  – A request that misses its mark will undermine the reviewers’ confidence in PI’s ability to manage project.
Features of a good budget

- Demonstrates PI’s expertise as manager of sponsor’s funds
  - Budget is financial expression of scope of work

- Covers cost of project and includes future year adjustments

- Fits within sponsor’s funding level

- Follows sponsor guidelines

- Corresponds to technical narrative

- Is justified clearly and well
How to develop a GOOD budget

• Prepare budget after scope of work and project needs are determined

• Carefully review personnel proposed effort to ensure appropriate coverage for all project members is accurate

• Consider any available carry forward funds and incorporate for spending as necessary

• Consider budgetary compliance, cost principals and other requirements and policies applicable to type of anticipated award
  – Know your limits for budget criteria, types of expenses, spending caps on certain expenses (e.g., travel limited to $10,000), overall funding limits (e.g., total costs cannot exceed $300,000 per year), and cost share or matching requirements

• Identify all costs necessary and reasonable to complete work described in proposal
  – All costs charged to award must be allowable, allocable, reasonable, necessary, and constantly applied regardless of source of funds
Percent of Effort to Person Months Conversion

Appointment (Calendar Year = 12 months)
Effort = 10% x 12 months = 1.2 months
Effort = 1.2 months/12 months = 10%

Appointment (Academic Year = 9 months)
Effort = 10% x 9.0 months = .90 months
Effort = .90 months/9.0 months = 10%

Appointment (Summer Term = 3 months)
Effort = 10% x 3.0 months = .30 months
Effort = .30 months/3.0 months = 10%
Cost Share

• Mandatory Cost Share – cost share is required by sponsor in specific solicitation or program announcement.
  – Expenditures are tracked and reported back to agency in financial reports
  – Cost share will become condition of award

• Voluntary Committed Cost Share – cost share is not required by specific solicitation or program announcement however PI requests to cost share effort or other expenses
  – Prior approval from OSPA is required for inclusion of any voluntary cost share
  – If funded, PI and UK are committed to provide project with indicated support. Not reported to agency but expenditures are tracked and documented
Cost share

• Includes appropriate costs (i.e., allowable, allocable, and reasonable), direct costs or indirect costs, associated with project that are not being funded by sponsor
• Is strongly discouraged and if included in proposal should always be kept to minimum (e.g., unrecovered costs, F&A rate for institution, administrative burden)
• All cost share and sources of funding for cost share should be listed on Internal Approval Form (IAF) when routed for signatures
  – Appropriate documentation and backup for all cost share should also be attached to IAF when routed
How is cost share approved?


- Salary – If faculty, staff, or student salary is being cost shared, then Department is bearing those costs and Chair approves cost share when certifying IAF

- Sponsor limitations – If sponsor policy limits F&A or some other cost, copy of sponsor’s policy should be attached to IAF

- If sponsor does not limit F&A but PI would like to voluntarily waive or reduce indirect costs, a request with explanation as to the need for a waiver must be sent to OSPA [https://www.research.uky.edu/office-sponsored-projects-administration/facilities-and-administrative-fa-costs](https://www.research.uky.edu/office-sponsored-projects-administration/facilities-and-administrative-fa-costs)
  - Request must be received by OSPA at least 10 business days prior to sponsor deadline.
  - Request will be reviewed by Director of OSPA, with consultation with Associate Dean for Research, who determines if waiver request is approved

- 3rd Party – At a minimum, this requires documentation at the time of proposal and account set-up, and at the end of project
Additional information about proposal budgets is included in another CATSPro Course
Internal Approval Form (IAF)

Purposes:

• Contains information needed by OSPA to set up WBS element as well as information required for university and/or sponsor reporting

• Provides approval of faculty, Chair(s), and Dean(s) to commit University resources to project

• An IAF is required for the following:
  – New or competing proposals
  – Any time the project changes PI, responsible unit, Enrichments, scope of work is changing or if budget from previous IAF changes by 25% or more

• Created via MyUK using PI’s linkblue ID
Who should be listed on Internal Approval Form (IAF)?

• Any faculty listed as PI or Co-I in proposal
• Any faculty committing effort to project, whether direct charged or cost shared
• Faculty not committing any measurable effort (ex. NIH Other Significant Contributors)
• Any staff if they are the PI, Co-I or acting as Project Director or other similar management role
• Post-Doctoral Fellows and Scholars
• Students (undergrads, graduate, pre-docs, etc.) should be listed if they are considered PI on fellowship application
Routing of Internal Approval Form (IAF)

• The PI, Co-Investigators and corresponding Department Chair, Dean or Delegate (e.g., Associate Dean for Research) indicate their review and approval of proposal, agreement with Enrichment split and agreement with submitting proposal.

• Their review includes, but is not limited to the following:
  – Substance and merit of the proposal
  – Commitments of faculty and staff time
    • Including creation of new positions if applicable
  – Requirements for additional space/facilities
  – Budget
    • Verification that all costs are realistically estimated and stated
  – Availability and commitment of matching funds

• IAF is considered fully executed when PI, all co-Investigators, and applicable chairs, directors and deans or associate deans have certified electronically through workflow in MyUK
Things to remember on Internal Approval Form (IAF)

• Include required documentation – budget and justification, abstract, guidelines (including F&A limitations) – *it will be held by CGO if these pieces are missing*

• The COI for all key personnel must have been completed prior to proposal submission

• Required to be fully routed and received by OSPA Research Administrator (RA) by 3 business days prior to sponsor deadline
  – College may have established additional internal deadlines prior to OSPA’s deadline for receipt of proposal and IAF
    
    https://www.research.uky.edu/office-sponsored-projects-administration/policies-procedures

  – Submission of proposals received in OSPA after 3-day deadline require approval of Associate Dean for Research prior to submission
UK Proposal Deadline Policies

https://www.research.uky.edu/office-sponsored-projects-administration/policies-procedures

OSPA is committed to timely submission of complete, accurate and fully compliant proposals

• Proposals are required to be received by OSPA 3 business days before sponsor’s due date
  – A complete and final proposal, accompanied by fully approved Internal Approval Form (IAF) is required prior to deadline
  – OSPA assists with proposal submissions until 5:00 PM EST
  – Server issues and problems with sponsor online systems can kill proposal
  – VOLUME - OSPA submits more than 2,000 proposals each fiscal year

• Fully routed IAF must be received by OSPA no later than 3 business days prior to sponsor deadline
  – Allows CGO and RA time to review guidelines, budget, other required attachments
  – Provides sufficient time for corrections if needed

• Colleges may impose additional internal proposal deadlines
Proposal Submission

• Most proposals are submitted electronically via online systems
• Cayuse Proposals (424), system-to-system web-based tool, is available for most submissions to federal sponsors
• Ask your College Grant Officer (CGO) for more information about using Cayuse Proposals (424)
• In Cayuse and other online proposal submission systems, OSPA provides official institutional signature by submitting proposal
• Some sponsors require wet institutional signatures which are provided by OSPA
• For sponsors that require a hard copy of proposals, PI sends proposal to sponsor
Managing Compliance Issues at Pre-Award: Beyond Request for Proposal

The proposal is not even funded – so does compliance matter at this point?

- Compliance begins at proposal stage
- By managing these issues at forefront, funding process will proceed more smoothly, and safeguard faculty and University from being non-compliant

What compliance issues would one see at proposal stage?

- Almost everything!
Managing Compliance Issues at Pre-award

• Subawards
• Human and animal subjects
• Conflict of Interest
• Facilities and space
• Other Support
• Uniform Guidance 2CFR 200

This is not an exhaustive list; therefore, is it key to understand scope of research project and proposal guidelines to identify other compliance issues.
Conflict of Interest

Financial Conflict of Interest (FCOI) disclosure is required for any UK personnel responsible for the design, reporting or conduct of the research (aka Investigators)

- [https://www.research.uky.edu/office-sponsored-projects-administration/policies-procedures](https://www.research.uky.edu/office-sponsored-projects-administration/policies-procedures)
- Electronic COI disclosure process done via COI Smart – training and disclosure
- Updated annually in March or anytime a conflict arises
- Must be completed prior to proposal submission and updated, if necessary, prior to account setup
Additional information about compliance is included in another CATSPro Course
Other Information Requested in Proposals

• Representations and Certifications – completed by OSPA, contact your RA asap if proposal requires Reps and Certs

• UKRF Signature Authority
  – All Sponsored Projects are submitted, accepted and managed through UKRF
  – OSPA is only entity that can legally bind University to a sponsored project award, thus UKRF signs proposals and formally accepts awards for sponsored projects (Note: PI is not authorized to sign as authorized institutional official)
  – OSPA is also signature authority anytime sponsor needs an Institutional Official signature

• Frequently Needed Information on OSPA website includes general information frequently requested by sponsors in proposals
  https://www.research.uky.edu/office-sponsored-projects-administration/about-ospa
Contact OSPA

• Principal Investigator (PI) should contact their College Grants Officer (CGO) or Research Administrator (RA) in OSPA as soon as they decide to submit proposal
  – PI will provide name of sponsor, application due date, and copy of or link to Program Announcement or appropriate proposal guidelines
  – OSPA’s website provides identification of assigned CGO or RA
    https://www.research.uky.edu/office-sponsored-projects-administration/ospa-staff

– OSPA is in Kinkead Hall (1st and 2nds floors)
  – Main Phone Line: 859-257-9420
    research.uky.edu/office-sponsored-projects-administration