Uniform Proposal Review Policy

POLICY STATEMENT
The purpose of this policy is to ensure a transparent, uniform, and consistent review of all proposals submitted by the University of Alaska Fairbanks to sponsors for potential funding, and ensures compliance with sponsor, state, federal, and university regulations and policies.

DEFINITIONS

**Authorized Organizational Representative (AOR):**
An AOR is an individual within UAF that has been delegated signature authority by the Chancellor to approve proposal submissions to external sponsors and/or sign and negotiate award agreements.

UAF currently has two AORs. The pre-award AOR is the Director of the Office of Sponsored Programs. The post-award AOR is the Director of the Office of Grants and Contracts Administration. The pre-award AOR or designee holds the sole responsibility of granting institutional approval to all proposal submissions.

**Co-Investigator (Co-I):**
A secondary investigator on a sponsored program.

**Principal Investigator (PI):**
The lead investigator on a sponsored program that is responsible for the overall conduct and completion of the project. At UAF only tenured or tenure-track faculty, research faculty, or emeritus faculty may serve as a PI unless granted an exemption per UAF policy. Please see UAF’s Principal Investigator Policy for more information.

**Proposal:**
A proposal is a request made of a sponsor to fund a project. Proposals may be submitted in response to a solicitation (e.g., a Request for Proposals, an Announcement of Opportunity, a Request for Applications, etc.) or can be unsolicited. Proposals for external funding are submitted on behalf of UAF, but composed and executed by the Principal Investigator (PI). The resulting awards are made to UAF’s post-award authority (Office of Grants and Contracts Administration). For the purpose of this policy, grant proposals, cooperative agreements*, memorandums of understanding/agreement*, reimbursable services agreements, and revisions to non-awarded proposals are all referred to as “proposals.” All proposals must receive Authorized Organizational Representative approval before submission.

(*Cooperative agreements and MOUs/MOAs executed within the scope of facilitating a sponsored program only.)
Sponsor:

Sponsors are external entities that award funding to the University. They include federal grant-making agencies, state and local governments, other universities/institutions, private foundations, businesses and corporations, and foreign organizations.

Sponsored Program:

A sponsored program is typically a research, educational, or outreach project that is funded by a source outside the University. Activities funded through grants, contracts, and cooperative agreements are sponsored programs. A sponsored program is initiated with a proposal to the sponsor and followed by an award with specific terms, objectives, rights, and reporting requirements. The sponsor, whether it is federal, state, or private holds the University accountable to meet designated terms in exchange for project funding.

Unit:

A high-level department, institute, college, or school at UAF. Examples are the Geophysical Institute, School of Education, or College of Natural Sciences and Mathematics.

REFERENCES RELIED UPON

- 2 CFR 220 (OMB Circular A-21)
- 2 CFR 215 (OMB Circular A-110)
- UAF CASB DS-2 Disclosure Statement
- UAF Principal Investigator Policy
- UAF Policy on Matching Funds/Cost Sharing/In-Kind Contributions on Sponsored Programs at UAF (M/CS)

RESPONSIBILITIES

Each person who signs a proposal certifies different responsibilities:

The Principal Investigator’s (PI) signature certifies:

- An agreement to do all work as proposed;
- That there are no significant conflicts of interest (financial or other);
- An agreement to be the overall project manager;
- An agreement to abide by all applicable regulations, policies and procedures related to the project; and
- An agreement to accept responsibility for the scientific and ethical conduct of the project.

The Co-Investigator’s (Co-I/Co-PI) signature certifies:

- An agreement to do all work as proposed;
- That there are no significant conflicts of interest (financial or other);
- An agreement to abide by all applicable regulations, policies and procedures related to the project; and
- An agreement to accept responsibility for the scientific and ethical conduct of his or her portion of the project.
The Dean’s/Director’s/Department Head’s signature certifies:
- That PI and Co-I/Co-PI workloads are within 100% of effort;
- That unit resources are available and allocated;
- That matching/cost share commitments are authorized and committed; and
- That all space considerations in the project have been accounted for.

The Unit Fiscal Officer’s signature certifies:
- That the Proposal budget is in compliance with sponsor/agency, state, federal, and university policies, regulations, and standards.

The Office of Sponsored Programs’ signature certifies:
- That the Proposal review was conducted in accordance with this policy; and
- That the Proposal passes that review sufficiently to receive institutional approval.

The Authorized Organizational Representative’s (AOR) signature certifies that:
- UAF has the appropriate facilities, resources, and systems in place to administer and monitor the award in compliance with sponsor/agency, state, federal, and university policies, regulations, and standards;
- UAF is committed to the project and agrees to complete the project as proposed if an award is made; and
- That all certifications and assurances in the Proposal are understood, are true statements, are agreed to, and will be abided by.

**NON-COMPLIANCE**

The University of Alaska Fairbanks only authorizes proposal submissions with AOR approval. If a proposal is submitted to the sponsor without AOR approval, the full proposal package must still be reviewed. The PI will attest to their understanding of the process of authorized proposal review and submission, and will agree to not submit an unauthorized proposal again, along with an explanation as to the nature of the unauthorized submission as it occurred. If this agreement is violated, disciplinary action may be taken. The PI, their dean/director, the AOR, the Vice Chancellor for Research and the Vice Chancellor for Administrative Services will sign this agreement and each be given a copy. AOR signature will only be granted if the proposal later passes OSP review as outlined in this policy. If the proposal does not pass OSP review, it will be withdrawn. Any award granted as a result of an unauthorized proposal submission may be rejected at UAF’s discretion as stated in the section “UAF Rights Regarding Proposals and Awards” below.

**EXCEPTIONS**

N/A

**PROCEDURES**

*The Proposal Review Process:*

OSP proposal review is conducted per the procedures specified in Appendix 1 “OSP Proposal Review Process”.

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Proposal Problems:

Problems that arise with a proposal during review will be addressed with the unit’s representative and/or PI in order to resolve them in a timely manner. If the problems are not solved sufficiently to pass OSP review, the proposal will be returned to the unit representative and/or PI with an explanation, a timeframe, and potential solution(s) to remedy the problems. Proposals that are not corrected within the deadline for submission will not be authorized or submitted.

Problems will be documented and kept with the copy of the proposal to be archived along with associated correspondence as a record that all problems have been resolved before AOR approval, proposal submission, or setup of award.

AOR Approval:

Once the proposal review has been completed and the proposal has passed the above review, it can be submitted to the AOR for institutional approval, provided the AOR finds no problems with the proposal. The proposal is then authorized for submission to the sponsor.

UAF Rights Regarding Proposals and Awards:

Proposals that are submitted that do not allow sufficient review time may be authorized and submitted solely at the AOR’s discretion, with the stipulation that a full review will take place after submission. UAF administration reserves the right to withdraw the proposal at any time and/or reject any award made on the proposal if any issues of non-compliance or other serious problems are discovered that place the University of Alaska Fairbanks at unnecessary financial or legal risk.

Archival of Proposals and Record Keeping:

An electronic copy of every proposal will reside on UAF Office of Sponsored Programs server space, where it will be archived for minimum of two (2) years. Proposals will be checked by the UAF Office of Sponsored Programs in the Banner Proposal Module (FRAPROP) to ensure that their status has been marked as submitted (S) and that other mandatory fields have been completed correctly.

Distribution of This Policy:

A copy of this policy will be distributed to all appropriate deans/directors/department heads and PIs. Confirmation of receipt, certification of understanding this policy, agreement to follow this policy, and agreement to integrate this policy into new faculty and staff orientation will be signed and returned to the UAF OSP and kept as record.

POLICY APPROVED BY:

Signed:
Brian D. Rogers, Chancellor
University of Alaska Fairbanks

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APPENDIX 1 – OSP Proposal Review Process

The following OSP proposal review process is mandatory for all proposals originating from UAF units before AOR approval will be granted. Note that every proposal must first be vetted and approved at the unit level, with authorization granted by each unit dean/director before OSP will review it. Units must provide OSP with a minimum of five (5) business days for proposal review and any necessary revisions before AOR approval is granted. Proposals submitted to OSP for review outside of this five day window are not guaranteed to be submitted on time to the sponsor, and are submitted at the discretion of the AOR.

Proposal Routing Form Review:

Each proposal must include a Proposal Routing Form (Form OSP-001). This form ensures that uniform information about the proposal will be tracked and readily identifiable as the proposal moves through the various pre-award and post-award processes. The Proposal Routing Form will be reviewed for accuracy, consistency, and these considerations as outlined:

- Ensure the PI is a faculty member, has an approved exemption, or has included a waiver request to the AOR (Form OSP-004) to request exemption from the UAF PI Policy.
- Ensure that the Conflict of Interest statement is signed by all PIs and Co-Is;
- Ensure that the lead unit’s and each collaborating unit’s dean/director has signed the Routing Form when any unit resources are being committed in the proposal budget (personnel, space, or otherwise);
- Identify any Research Compliance issues (e.g. IACUC, IRB, Biohazards, or Chemical Hazards) and check with the Office of Research Integrity (ORI) to verify application/approval;
- Identify any Research Restrictions (e.g. Classified Research, ITAR/EAR export controls, Restriction on Publications, or Restrictions on Non-Resident Employment);
- Identify any Intellectual Property/Technology Transfer (IP/TT) issues (e.g. Potential for Intellectual Property Disclosure or Potential for Program Income);
- Identify any matching/cost share (M/CS), verify it is mandatory, ensure an Authorization for Matching Funds/Cost Sharing Form (Form OSP-002) is included, and that the agency’s published M/CS terms are included. All instances of M/CS must be allowable per 2 CFR 220 (OMB Circular A-21) and conform to all provisions of 2 CFR 215 (OMB Circular A-110). UAF’s Match/Cost Share Policy does not allow voluntary cost share;
- Identify any subawards, and ensure a budget, a statement of work, and a Subrecipient Commitment Form (Form OSP-007) is included, signed by the subawardee’s PI and AOR;
- Identify any deviations from full allowable F&A recovery, and, if applicable, ensure that the sponsor’s published terms showing that is a mandatory reduction are included. Any fees for reduced F&A will be assessed to the unit, unless they complete an F&A Policy Exemption Request Form (Form OSP-003), which is reviewed and approved by the Vice Chancellor for Administrative Services or their designee;
- Identify any considerations to treat a vendor service as a subaward in the proposal budget. The unit must complete a Request for Waiver to Treat Vendor as a Subaward Form (Form OSP-005), which is reviewed and approved by the Vice Chancellor for Administrative Services or their designee;
- Identify all project space and any space requirements (renovation, modification, or installation of new equipment), including completion of the UAF Space Request Form; and
- Check the unit cover page, if applicable, for consistency with the Proposal Routing Form.

Proposal Abstract and Body Review:
The Proposal abstract and body will be reviewed as outlined:
- Ensure completeness of the proposal package per the sponsor’s general guidelines (if applicable);
- Ensure the format of the proposal package follows the sponsor’s program-specific guidelines (if applicable);
- Identify/address any potential Research Compliance, Research Restriction, or IP/TT issues in the abstract/project narrative as outlined in the section “Proposal Routing Form Review” above.

Budget Review:
The Proposal budget will be reviewed as outlined:
- Ensure correct addition of the budget totals;
- Ensure dollar amounts are consistent throughout the proposal text, Routing Form, cover page, budget, and current and pending support form (if applicable);
- Ensure items are listed in the correct budget categories and correctly identified as direct or indirect costs;
- Ensure that only allowable costs are listed as per 2 CFR 220 (OMB Circular A-21) and that these costs are consistent with the UAF Cost Accounting Standards Board Disclosure Statement for Educational Institutions (UAF CASB DS-2);
- Ensure that salaries have been verified in Banner and calculated correctly for faculty, staff, and students;
- Ensure that appropriate leave and benefit rates have been used per UAF’s current negotiated agreement, or that the use of projected rates has been disclosed in the budget narrative/justification;
- Ensure that tuition remission has been included for graduate student research assistants employed during the academic school year, if allowed by the sponsor;
- Ensure that graduate student health insurance costs have been budgeted for each graduate student research assistant;
- Ensure that travel categories have been identified (domestic/international), that trips are listed separately, and that the correct per diem rates are applied per GSA regulations or Board of Regents policies;
- Ensure that a budget narrative/justification based on the UAF OSP model has been included with the proposal package, regardless of sponsor requirements;
- Ensure that the budget narrative/justification corresponds to the budget and supports the scope of work;
- Ensure that any applicable UAF Recharge Center rates are correct;
- Ensure that MTDC (when applicable) has been properly calculated per UAF’s negotiated agreement;
- Ensure that F&A recovery is calculated properly;
- Ensure that the correct F&A rate is being used depending on the project type, UAF's negotiated agreement and/or the sponsor's guidelines;

- Ensure any instances of M/CS, subawards, or reduced F&A are identified and addressed as outlined in the section “Proposal Routing Form Review” above.