FLORIDA A&M UNIVERSITY
FLORIDA AGRICULTURAL AND MECHANICAL UNIVERSITY
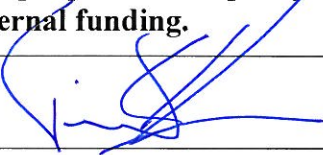
Division of Research
Office of Sponsored Programs

INTERNAL OPERATING MEMORANDUM

Memorandum No. 16A.015

Subject:	Review and Approval of Proposals, White Papers, Letters of Intents	
Authority:	Sections 1004.22, Florida Statutes, FAMU Policy entitled, "Principal Investigator Eligibility"	Date: 07-19-10 Revised: 02-15-16
Related References	FAMU Office of Sponsored Programs (OSP) Pre-Award Manual	
Purpose	The purpose of this policy is to provide guidance to University faculty seeking external funding.	
Signature of Approving Authority		

1.0 GENERAL INFORMATION

The procedure is to ensure compliance and responsibility for establishing the direction of research at Florida Agricultural and Mechanical University (FAMU) that rests with the faculty, who are primarily responsible for the quality of the research and reputation of the University. Research directions are charted by University Faculty with a view towards the impact on the education of undergraduate and graduate students. To maintain a careful balance between scholarship and education, the responsibilities of being Principal Investigators/Program Directors (PIs/PDs) must be primarily reserved to the University Faculty.

- Full-time tenured or tenure-earning faculty may serve as PIs/PDs on sponsored programs.
- Individuals with certain other titles may serve under special circumstances with the approval of the Vice President for Research (VPR). Requests for such approval should be made to the VPR. The request must be made in writing and received by the Division of Research five working days prior to any required submission date for the affected proposal. The Office of Sponsored Programs (OSP) will notify the administering Department/Center regarding the approval or denial of the request.

2.0 DEFINITIONS

Approval and Review Process for Collaborative Proposals when FAMU is the Lead Applicant of a collaborative proposal where one or more institutions or organizations will receive subaward funds. FAMU PIs/PDs must obtain an approval to participate in the proposal and project from each organization's Authorized Organizational Representative (AOR) or a designee, an office such as a the Division of Research. The approval may come as a signed letter of endorsement and should include a measure of the organization's employee time and effort, and the amount of any sub-award funds. Documentation should include institution approval, negotiated rate agreement, budget, justification and scope of work.

Collaborative/Joint Proposals and Subcontracts are submitted for projects that will involve investigators from multiple institutions. In general, one institution will be designated as prime (the lead) at the time of proposal submission. The prime institution accepts full funding and responsibility for the performance of the project from the sponsor. Sub-award/Sub recipient agreements are negotiated to transfer part of the work and appropriate funds to the other participating institutions. Generally, all conditions imposed by the sponsor on the prime institution are also imposed on the subcontractor(s)/sub recipient(s). All subcontracts are negotiated by FAMU OSP. If FAMU is the prime institution, OSP requires a statement from each participating organization that includes a budget, justification, statement of work, certification, assessment, negotiated rate agreement and signed approval are by an authorized institutional official. If FAMU is the subcontractor, the information (budget, justification, statement of work, certification, assessment, negotiated rate agreement and signed by the VPR) will be sent to the prime institution. All external funding requests must be processed as a proposal through OSP.

Continuation proposals are non-competing progress reports required to continue support for a subsequent budget period within an approved competitive segment.

FAMU's Proposal Submission Deadline is an internal process to ensure application review and compliance with agency deadlines. Proposal application and supporting documentation are due five (5) business days in advance for single budget and ten (10) days for multi-year budgets and if there is cost share/match involved). If the proposals are not received within the above time-frame of the submission date for review and approval by the VPR, could result in the application not being submitted to the agency by the required deadline. In addition, technical issues or errors could arise which could lead to the proposal being rejected for late submission or agency compliance check failure. Please check agency unique submission requirements and processes.

Institutional Proposals for Limited Submission Competitions are when a sponsor(s) restricts the number of proposals allowed to be submitted to a specific funding opportunity by the university or by the PI/PD. These are referred to as "Limited submission or Institutional" opportunities. The Division of Research (DoR) monitors Requests for Applications (RFAs) to limited submission opportunities in order to ensure equitable and quality proposals are selected on behalf of the university, and to prevent potential disqualification of FAMU's proposals due to more than one application being submitted. PIs/PDs are responsible for notifying OSP pre-award staff as early as possible if they intend to submit a proposal for a limited submission competition. In some instances, internal competitions will be held to select the FAMU's proposal(s) to be submitted. Faculty and staff should refer to the OSP call for white paper requests and further guidance.

Letters of Intent (LoI) are used by sponsors to facilitate the review process of potential proposal applications. LoIs allows the sponsor to: project the potential number of applications generated by a funding opportunity or solicitation; identify areas of expertise needed for the review process; and avoid conflicts of interest during review. The information requested generally includes the following: PI/PD, other key personnel and institutional affiliations, project title, summary, and estimated total cost requested funds.

New proposals are submitted for initial funding of a project. New proposals are either unsolicited or solicited by the sponsoring agency. Each agency has unique requirements based on announcements and guidelines.

Preliminary proposals, also known as pre-proposals, white papers, or letters of intent, may be requested by a sponsor to ascertain interest in a project. If the preliminary proposal or white paper makes a financial, space, or cost-sharing commitment, the proposal must be submitted through OSP.

Renewal proposals are requests for additional funding for a period subsequent to that provided by a current award. Renewal applications are subject to the same sponsor review criteria as new proposals.

Request for Proposal (RFO), Request for Quotation (RFQ), Request for Application (RFA), Funding Opportunity Announcement (FOA), or a Program Announcement (PA). Proposals submitted in response to these specific statements may contain specific terms and conditions and formatting requirements. PIs/PDs should ensure compliance with all requirements as indicated in the announcements.

Revised proposals are resubmitted in response to an indication by the sponsor that a project may be funded, but with the stipulation that specific changes in the proposal must be made. The revised proposal should carefully follow the sponsor instructions with respect to the identification of changes made in response to the reviews of the original proposal.

Supplemental proposals request additional support of a funded project (e.g., equipment, support of undergraduate or minority investigators, programmatic modifications).

Unsolicited proposals are investigator-initiated projects submitted to a sponsor but not in response to a specific solicitation. The area of activity should be of interest to the sponsor. Some new proposals are submitted for competitive review by the sponsor and peer review and may be announced through various announcements.

White Paper is used to identify potential applications of high interest based on a relatively brief submission. FAMU utilizes the call for white paper for limited proposal submission opportunities. White paper should include at a minimum: PIs/PDs and team expertise and qualification; track record in securing and managing awards; institutional costs; project benefit to FAMU; goals and objectives as applicable to the request; and project collaborative plan. Sponsoring agency may also require a white paper of interest to quickly identify projects whose outcomes will advance their agenda. White papers requested from a funding agency are non-binding and should be routed through OSP if budget or total project costs information is required. White papers or pre-proposals of interest may result in an invitation to submit a full proposal according to the sponsor's guidelines.

3.0 RESPONSIBILITIES

3.1 Principal Investigator/Program Director (PI/PD) is responsible for full compliance with institutional policies and procedures, Florida Statutes Regulations, Uniform Guidance, federal, state and private funding agencies guidelines, and award terms and conditions. This includes determining the need for goods, equipment and service costs to meet the requirements of the sponsored project. He/she is also responsible for submitting and approving the request to encumber funds; monthly review and reconciliation of expenditures; identifying any unallowable costs; ensuring that all requests are in compliance; and routed through the appropriate institutional financial systems for processing by the OSP for review. The PI is responsible for ensuring that the reporting requirements are fulfilled and will be held accountable for any reporting lapses.

3.2   **Departments/Division/Colleges/Schools (DDCS)** chair or director is responsible for initiating the PI's/PD's eligibility request to the Dean for approval. The DDCS dean and/or designee are responsible for the reviewing and approving of faculty/staff members to serve as a PI/PD for sponsored projects. The departmental administrator(s) is/are also responsible for the oversight of sponsored projects' submission and awards within their respective units to ensure compliance with the sponsoring agency's guidelines, state and university rules, regulations and laws.

3.3   **Office of Sponsored Programs (OSP)** is responsible for reviewing the request and documentation for PI/PD eligibility requirements. The VPR is responsible for the final approval of the PI/PD eligibility request. OSP pre-award staff provides support to faculty and staff by providing support service to facilitate application submissions for federal, private and state external funding. The OSP reviews application to ensure compliance with the sponsoring agency's guidelines, state and university rules, regulations and laws. The OSP is also responsible for ensuring proper management and retention of proposal and award documents.

3.4   **Organizational Development and Training (ODT)** is responsible for the development and coordination of training on regulatory requirements for all individuals with responsibilities in the review and approval of costs charged to sponsored projects, including but not limited to PIs, OSP, C&G and grant administrators staff.

4.0   GENERAL PROCEDURES

4.1   PRINCIPAL INVESTIGATOR/PROGRAM DIRECTOR (PI/PD)

The PI/PD is responsible for proposal development and submission to the OSP to meet agency deadline requirements. Responsibilities include but are not limited to managing sponsored program, project expenditures, objectives, and reporting requirements upon receipt of award. The PI/PD is held accountable for the proposal fiscal management and conduct of the project. FAMU is legally and financially responsible and accountable to the sponsor for the performance of sponsored activity funded by federal, private and state and the proper use of funds. PIs/PDs must cooperate, provide oversight and fulfill his/her stewardship role in managing and monitoring sponsored projects to ensure compliance.

- The PI/PD is responsible to the University and to the sponsor for assuring that the scope of work for which the award was made is completed, that University policies and procedures are adhered to, and that funds are expended in accordance with the awarded budget and sponsor terms and conditions.
- While the PI/PD may delegate some responsibility for day-to-day management of finances or other tasks to departmental and colleges/school staff, the PI/PD remains accountable for compliance with University policy and sponsor requirements.
- During the Pre-Award Process the PI should:
  o Identify funding opportunities related to area of expertise.
  o Submit Intent to Submit form with agency guidelines to OSP.
  o Understand sponsor(s) solicitation guidelines.
  o Prepare all internal forms for submission to the OSP.
  o Submit required registration form(s) to OSP for NSF, NIH and any other agency as required, timely.
  o Complete all required training (FCOI, EXPORT, RCR, etc.).
  o Complete required assurances for proposal submission (IACUC, IRB, Biohazards, etc.).
  o Develop proposal budget and justification according to agency guidelines.

- Prepare proposals for submission and routing through College/School utilizing the Proposal Review Transmittal Form (PRTF).
- Identify cost share requirements, provide supporting documentation, and obtain departmental and Provost Approvals on the PRTF.
- Develop proposal to ensure institutional policies and procedures are followed.
- Review proposal for assurance, accuracy, and compliance prior to submission.
- Identify consultants, collaborators, and subcontracts; provide required documentation and FCOI Sub-award Disclosure Form(s).
- Identify equipment needs and provide required quotes. PI should refer to Procurement procedures regarding the number of quotes required based on dollar amount requested.
- Obtain required departmental/institutional approvals prior to submission to the OSP.
- Ensure timely proposal submission to the OSP for electronic or paper submission to meet agency deadlines.
- The PI/PD should be available by phone or email during the submission process in case questions arise or revisions are necessary.

4.2   DEPARTMENTS/DIVISION/COLLEGES/SCHOOLS (DDCS)

Departmental administrator(s) are responsible for the following but not limited to:
- Reviewing proposal so that institutional policies and procedures are followed.
- Understanding sponsor(s) solicitation guidelines.
- Assisting with the submission of required registration form(s) to OSP for NSF, NIH and any other agency as required.
- Assisting with the development of the proposal budget and justification.
- Assisting with the preparation of proposals for submission.
- Reviewing and obtaining required departmental/institutional approvals.
- Reviewing budget and proposal for cost share requirements.
- Reviewing proposal for assurance, accuracy, and compliance.
- Assisting with the submission of proposal to the OSP for electronic or paper submission.
- Maintaining proposal and sponsored project documents according to record retention.

4.3.   OFFICE OF SPONSORED PROGRAMS (OSP)

The OSP provides oversight and assistance to PIs/PDs in the acquisition and management of external funds. OSP requires a comprehensive pre-submission review of all proposals to ensure complete and accurate applications and compliance with sponsor and university policies and procedures. During the Pre-Award stage the proposal review process includes the following but is not limited to:
- Providing administrative review of proposals prior to submission to funding agencies;
- Assisting in the development of proposals budget and justification to potential sponsoring agencies.
- Serving as a liaison between faculty and other administrative units within the University and between faculty and funding agencies.
- Identify funding opportunities and disseminate same via email to colleges and schools.
- Understanding sponsor(s) solicitation guidelines.
- Review applications for compliance with sponsoring agency's guidelines, state and university rules, regulations and laws.

- Receipt of PIs/PDs intent to submit form with agency guidelines to an external sponsor.
- Proposal review and processing consists of:
  - Review of all internal routing and approval documents for submission.
  - Review grant announcement and sponsor guidelines.
  - Review applicant and PI's/PD's eligibility.
  - Register PIs/PDs for NSF, NIH and any other agency as required.
  - Review of submission method and system, and any registration needs.
  - Verify completion of required training (FCOI, EXPORT, RCR, etc.).
  - Verify assurances for proposal submission (IACUC, IRB, Biohazards, etc.).
  - Review budget and justification to avoid unnecessary under- or over-budgeting, and to lay the groundwork for efficient and effective grants and contracts management.
  - Review project details such as, participants and project dates.
  - Review of draft narrative (when possible).
  - Review of special circumstances such as subawards, hiring, collaborations, consultants, cost share commitment, etc.
    - Ensure appropriate supporting documentations are obtained: SAM, Visual Compliance, FCOI, Letters of Supports, Consortium Agreement, Risk Assessment, and Subrecipient Certification.
    - Ensure equipment request and quotes' documentation are provided.
  - Review for applicable Facilities and Administrative costs and certifications requirements.
- Ensure timely proposal submission to agency for electronic or paper submission.
- Once all files, documents, and approvals are in order without errors, VPR, Division of Research or designee authorizes the proposal submission. OSP submits the final, approved proposal to the funding agency by mail, e-mail or through an electronic submission system, unless other arrangements have been made.
- Ensuring proper management and retention of proposal and award documents.

4.4 ORGANIZATIONAL DEVELOPMENT AND TRAINING (ODT)
- Advancement and coordination of training on regulatory requirements for all individuals with responsibilities in the review and approval of cost charged to sponsored projects, including but not limited to PIs, OSP staff, C&G staff and grant administrators.

5 RECORDS
- The appropriate record retention guidelines should be followed for the retention and disposition of documents. Generally, documentation should be maintained for three years following the submission of the final financial report unless sponsoring agency requires it to be maintained for a longer time period.