

Sponsored Program Proposals: Definitions, Solicitation, Review, Approval and Submission

Policy Type: Administrative

Responsible Office: Office of Sponsored Programs, Office of Research and Innovation

Initial Policy Approved: 10/22/2012 Current Revision Approved: 05/31/2017

Policy Statement and Purpose

This policy describes the solicitation, review, approval, submission, and the definition of sponsored programs.

Solicitation of Sponsored Programs

The university is legally responsible for the program and for fulfilling the sponsoring agency requirements. Therefore all proposals for sponsored programs must be made in the name of:

Virginia Commonwealth University

In accordance with the university policy entitled, "Resolution Authorizing Certain University Officers and Employees to Execute Contracts and Other Documents," only the following officials are authorized to sign sponsored program solicitation documents in the name of Virginia Commonwealth University:

- President
- Vice President for Finance and Administration
- Associate Vice President for Business Services and Treasurer
- Associate Vice President for Finance and Administration
- Vice President for Research
- Associate Vice President for Research Administration and Compliance

All signatories have delegated primary signatory authority to the Associate Vice President for Research Administration and Compliance (or designee). The primary signatory is often referred to as the "Authorized Official" in sponsor-related documents.

Submission of Sponsored Program Proposals

An Authorized Official must approve sponsored program proposals submitted on behalf of Virginia Commonwealth University. Prior to submission, proposals will be reviewed by the Office of Sponsored Programs to help ensure compliance with internal and external policies, procedures and requirements.

Noncompliance with this policy may result in disciplinary action up to and including termination. VCU does not tolerate any form of retaliation against an employee who brings forth a good faith concern, asks a clarifying question, or participates in an investigation.

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Who Should Know This Policy

All individuals involved in sponsored programs are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

Definitions

Authorized Official

The individual(s) formally authorized to bind the institution to grants, contracts and other agreements; the official "signer" for the institution.

Proposal

An application for funding that contains all information necessary to describe project plans, staff capabilities, and funds requested. Formal proposals are officially approved and submitted by an organization in the name of a principal investigator. A proposal (application) can be considered an offer to do business, and requires the signature of an institution's authorized official.

Review

Read and analyze provided documents to ensure compliance with Federal, State, University, and Sponsor policies, procedures and regulations.

Sponsored Program

A grant, contract or other agreement awarded to accomplish a specific goal or project.

Principal Investigator (PI)

a) The individual with final responsibility for the conduct of research or other activity described in a proposal or an award; b) the individual with fiduciary responsibility for an award's management. Usually these are the same individual. However, VCU has a requirement that the fiduciary responsibility vest in an employee, so on occasion they may be different; a common example is that the recipient of a research fellowship is explicitly not an employee, so that person's major professor manages the award's account.

Contacts -

The Office of Sponsored Programs officially interprets this policy. The Office of Sponsored Programs is responsible for obtaining approval for any revisions as required by the policy Creating and Maintaining Policies and Procedures through the appropriate governance structures. Please direct policy questions to the Office of Sponsored Programs.

Policy Specifics and Procedures —

Review and Approval of Sponsored Program Proposals

All sponsored program proposals must be approved through university administrative channels prior to submission to a potential funding agency. Review for and endorsement is required by the following:

- Each Principal Investigator(s) must sign to certify that:
 - He/she has identified all compliance items
 - He/she will abide by all obligations applicable under VCU policies or other legal requirements
 - The proposal is complete in technical content, adheres to the norms of proper scholarship and responsible conduct of research, including proper citation and attribution in all text and graphics, complies with federal guidance on research integrity and is in accordance with all specifications from the sponsoring agency
 - If awarded, he/she will conduct in the project in accordance with all terms and conditions stipulated by the sponsoring agency and all applicable VCU policies and procedures.
 - If awarded, he/she will be responsible for meeting all requirements of the award, including but not limited to: proper and ethical stewardship of funds, timely submission of all required technical reports and deliverables, proper disclosure of all inventions to VCU's Technology Transfer Office, and adherence to all federal compliance requirements.
 - He/she acknowledges that any false, fictitious, or fraudulent statements or claims may be subject to criminal, civil, or administrative penalties.
 - He/she will provide a copy of this proposal to his/her chair and the chair(s) of other faculty involved in this proposal prior to submission to the School Dean(s).
- School Dean(s) or designee must sign to certify:
 - Designated faculty are qualified to perform the project proposed
 - Designated faculty will be released for the effort indicated
 - Personnel costs are correctly estimated

- Adequate and suitable space will be provided for completion of the project
- No named participant is debarred from this application
- The project is consistent with the educational and research objectives of the university.
- If applicable, all joint VCU/VA appointees have a current Memorandum of Understanding (MOU) on file in their Dean's Office
- Costs proposed are reasonable for the scope of work
- Clinical Research Services Office (clinical trial proposals only) must sign to certify:
 - Proposed work meets definition of clinical trial
 - Appropriate costs are included for the required procedures
 - Regulatory compliance requirements have been met
- Office of Sponsored Programs signs following determination that:
 - Appropriate required approvals have been obtained
 - Proposal is prepared in accordance with all University, State, Federal, and Sponsor requirements

The above endorsements and approvals are documented by processing the proposal under the cover of an Internal Approval Form (whether hard copy or electronic).

Forms ———

- 1. Internal Approval Form http://www.research.vcu.edu/forms/osp.htm
- 2. Cost Sharing Authorization Form http://www.research.vcu.edu/forms/osp.htm

 Resolution Authorizing Certain University Officers and Employees to Execute Contracts and Other Documents

Revision History ——

This policy supersedes the following archived policies:

10/22/2012 Sponsored Program Proposals: Definitions, Solicitation, Review, Approval and Submission

FAQ -

1. When do I need to prepare a proposal if another organization wants to include me as a subaward?

A subaward "mini-package" should be prepared and submitted to the organization submitting the primary proposal. A "mini-package" consists of a cover sheet, scope of work, budget, budget justification, and biosketches (if required by the sponsor), NIH Checklist (if applicable) or organization's negotiated rate agreement. The "mini-package" should be sent through the normal

proposal routing process prior to submission.

2. Some funding agencies allow electronic submissions of proposals by the PI. How does VCU handle these types of submissions?

In these situations, Pl's can submit their proposal electronically; however, VCU's Office of Sponsored Programs must have reviewed and approved the proposal prior to the submission to be considered an official VCU proposal.

3. I'm the Principal Investigator on a project. Isn't the money mine?

No. All awards are made to Virginia Commonwealth University. As Principal Investigator, you are responsible for oversight of all technical, financial, and compliance aspects of the project in accordance with federal, state and university requirements.