

**University of Michigan
Office of Research and Sponsored Projects**

Standard Operating Procedures & Policies

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| Category: | Proposals |
| Procedure No.: | 200.01 |
| Title: | Proposal Review and Internal Deadlines – DRAFT |

I. Purpose & Overview

To describe the role of the Office of Research and Sponsored Projects (ORSP) in reviewing proposals and “Proposal Approval Forms” (PAFs) and to prescribe the deadlines by which PAFs and proposals must be routed to ORSP to complete its review and proposals submitted to the sponsor.

II. Procedure / Policy

A. ORSP Proposal Submission Responsibilities

ORSP Project Representatives (PRs) are responsible for liaising with sponsors on behalf of the University of Michigan’s research community. This responsibility includes reviewing, approving, and formally submitting proposals on behalf of the University of Michigan, as well as negotiating contracts and ancillary research agreements (e.g., nondisclosure agreements, data use agreements, etc.) with sponsors. In the context of proposal submission, ORSP:

- Reviews and, when necessary, advises the Principal Investigator (PI) and his/her Project Team regarding budgets and budget justifications to ensure accuracy, completeness, and compliance with sponsor requirements and with applicable accounting and cost guidelines;
- Reviews and, when necessary, advises the PI and his/her Project Team regarding proposals and PAFs for compliance with University, sponsor and other requirements and guidelines, including federal and state laws and regulations;
- Reviews and, when necessary, advises the PI and his/her Project Team regarding University approvals, certifications, endorsements, and/or signatures.

B. Requirements

All proposals seeking externally-funded grants and contracts must be routed for institutional review and approval through the eResearch Proposal Management (eRPM) system *prior to* the submission of the proposal to the prospective sponsor.

ORSP requires the following items prior to reviewing and submitting a proposal:

1. A “Finalized” PAF that has been electronically approved by all the authorized individuals from the participating units.

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2. The final version of the proposal to be submitted to the sponsor. A proposal in its final form includes all sponsor-required documents and/or forms, and is ready to be signed by ORSP (when required) and submitted to the sponsor.
3. Access to review and authorization to submit the final proposal in the sponsor's electronic proposal submission system, when ORSP is responsible for proposal submission.

C. Internal Deadlines for Proposal Review and Submission

For the purposes of this policy "Internal Deadline" means a time relative to the Submission Deadline entered on a PAF. "Submission Deadline" means the last date by which a proposal must be submitted in order to be received by the sponsor's published deadline and thereby avoid being disqualified for consideration of funding. (In the case of electronic proposal submissions, the Submission Deadline is the same day as the sponsor's published deadline date.) The close of any given Submission Deadline is 5PM Eastern Time (ET) on the date entered in the PAF, even if the sponsor's deadline is later than 5PM ET.

Effective January 6, 2020 there are two possible internal deadlines for the submission of a proposal for external funding. ORSP will provide a different level of review depending on when the final proposal and "Finalized" PAF are routed through eRPM to ORSP, as described below (see Exhibit A as well):

1. Full Review

Final proposals and finalized PAFs routed through eRPM to ORSP thirty two (32) or more business hours in advance of the Submission Deadline (i.e., four business days) will receive a comprehensive "Full Review," to ensure they are compliant with both U-M's and the sponsor's requirements. Any known terms and conditions of the sponsor that would be binding upon the issuance of a resulting award will also be reviewed for acceptability under U-M policy.

Provided that any (and only) ORSP-identified changes are made in a timely fashion by the PI or his/her Project Team, final proposals and PAFs received in ORSP by the 32 business hour internal deadline will be submitted by the Submission Deadline and successfully received by the sponsor. In addition, ORSP guarantees that the proposal will not be administratively returned by the sponsor without review or declined for funding on the basis that an item on ORSP's "PAF/Proposal Full Review Checklist" is non-compliant.

2. Limited Review

Final proposals and finalized PAFs routed through eRPM to ORSP less than thirty two (32) business hours but at least fifteen (15) business hours in advance of the Submission Deadline (e.g., in the case of electronic submissions, by 9AM the day before the sponsor's deadline date) will receive a "Limited Review" to ensure they are compliant with U-M's requirements. They will not, however, be reviewed to ensure they are compliant with the sponsor's requirements.

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Proposals that qualify for a Limited Review will be submitted by the Submission Deadline, provided that any (and only) ORSP-identified changes are made in a timely fashion by the Project Team and ORSP staff have prior experience with the sponsor’s electronic proposal submission system (if applicable). ORSP cannot guarantee that submission of the proposal will be successful (e.g., submitted via Grants.gov without fatal errors) or that the proposal will comply with the sponsor’s requirements.

When a final proposal and finalized PAF are routed to ORSP less than thirty two (32) business hours but at least fifteen (15) business hours in advance of the Submission Deadline, the PI and his/her Project Team bears the responsibility if the proposal should be administratively returned by the sponsor without review or declined for funding on technical grounds. ORSP cannot guarantee U-M will be able to accept any resulting award if the award contains non-negotiable terms and conditions that are inconsistent with the University’s requirements.

D. “At Risk” Proposals

Final proposals and finalized PAFs routed through eRPM to ORSP less than fifteen (15) business hours in advance of the Submission Deadline are considered “At Risk.” ORSP will make reasonable efforts to submit the proposal by the Submission Deadline, but the proposal must first receive a Limited Review prior to submission. “At risk” proposals will not be submitted at the expense of more timely proposals.

ORSP cannot guarantee an “At Risk” proposal will be submitted by the Submission Deadline. Nor can ORSP guarantee submission of the proposal will be successful (e.g., submitted via Grants.gov without fatal errors) or that the proposal will comply with the sponsor’s requirements.

The PI and his/her Project Team bears the responsibility if an “At Risk” proposal should not be submitted by the Submission Deadline, or should be administratively returned by the sponsor without review or declined for funding by the sponsor on technical grounds. ORSP cannot guarantee U-M will be able to accept any resulting award if the award contains non-negotiable terms and conditions that are inconsistent with the University’s requirements.

D. Policy Review

U-M’s internal deadline policy is being implemented in phases. Following initial implementation of the policy and a period of data collection, the Vice President for Research will assess the impact of the policy and determine whether any adjustments are necessary, including the potential for a waiver process by which “At Risk” proposals must be granted an extension in order to be submitted to the sponsor.

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Exhibit A: ORSP Levels of Service

Under U-M's internal deadline policy, proposals will receive one of the following levels of service depending on when the final proposal and finalized Proposal Approval Form (PAF) are received in the Office of Research and Sponsored Projects (ORSP):

| ORSP Levels of Service | Business Hours Prior to the Submission Deadline that Completed Proposal and Finalized PAF are Received in ORSP | | |
|--|--|--|---------------------------------------|
| | 32 or More Business Hours (Full Review) | Less than 32 Business Hours; At Least 15 Business Hours (Limited Review) | Less than 15 Business Hours (At Risk) |
| Proposal Checked for Compliance with U-M Requirements | √ | √ | √ |
| Proposal Submitted by Submission Deadline | √ | √ | |
| Proposal Checked for Compliance with Sponsor Guidelines | √ | | |
| Terms & Conditions Binding Upon Award Reviewed for Acceptability | √ | | |
| Proposal Successfully Received by Sponsor | √ | | |

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