POLICY STATEMENT, DESCRIPTION OF PROCESS, AND MANDATORY REQUIREMENTS

Policy Statement
The purpose of this policy is to ensure a uniform and consistent review of all proposals submitted by the University of Alaska Anchorage (UAA) to sponsors for funding, and ensures compliance with sponsor/agency, state, federal, and university regulations and policies. The review process is mandatory for all proposals originating from UAA departments, centers, and institutes before Authorized Organizational Representative (AOR) approval will be granted.

1. Definitions

Sponsored Programs: A research or educational project that is funded by a source outside the institution. 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.

Sponsors include federal agencies, state and local governments, private foundations, businesses and corporations, and foreign organizations. Federal agencies and many private foundations have detailed information on funding opportunities on their web sites.

Proposals: 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 unsolicited. Proposals for external funding are submitted on behalf of UAA, but composed and executed by the Principal Investigator (PI). The resulting awards are made to UAA Office of Sponsored Programs. For the purpose of this policy, grant proposals, cooperative agreements*, memorandums of understanding/agreement*, reimbursable services agreements, and revisions to non-awarded proposals are referred to as "proposals." Conversations with potential funders about scope and budget that happen before a proposal is sent through OSP are not proposals and must be labeled draft, not formal proposal. All proposals must receive Authorized Organizational Representative approval before submission.

Authorized Organizational Representative (AOR): The AOR is the individual within UAA who has been delegated signature authority by the Chancellor to approve proposal submissions to external sponsors. The AOR at UAA is the Office of Sponsored Programs Assistant Director, Pre-Award. The AOR holds the sole responsibility of granting institutional approval to Proposal submissions.

*Cooperative agreements and MOUs/MOAs executed within the scope of facilitating a sponsored program only.
2. Signatory Certifications

Each of the following required signatories is attesting to their indicated responsibilities:

The Principal Investigator’s (PI) signature certifies:
• An agreement to do all work as proposed;
• That there are no 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 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 mandatory matching/cost share (M/CS) commitments are authorized and committed;
• That no voluntary CS is included as UAA does not allow voluntary CS; 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 Pre-Award Research Administrator signature certifies:
• That the Proposal review was conducted in accordance with this policy; and
• That the Proposal passed that review and is ready for institutional approval.

The Authorized Organizational Representative's (AOR) signature certifies that:
• UAA 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;
• UAA 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.

3. The Proposal Review Process

UAA’s Pre-Award office conducts these reviews on behalf of UAA. A minimum of five business days is required for proposal review and any necessary revisions before AOR approval.

a. Proposal Submission

Proposal packets must be submitted electronically to the pre-award general email address: uaa_preaward@uaa.alaska.edu Submission using Docusign, with pre-award as the final carbon copy, is preferred. Paper copies will not be accepted for submission.

b. Proposal Transmittal Form Review

Each Proposal will include a Proposal Transmittal Form. This form ensures that uniform information about the Proposal will be tracked and readily identifiable as the Proposal moves through the pre-award and post-award phases. The Proposal Transmittal Form will be reviewed for accuracy, consistency, and special considerations as outlined:

- Ensure that the PI meets the criteria in the UAA PI Eligibility Policy, has an approved exemption, or has included a PI Exemption Form to the AOR to request exemption from the UAA PI Eligibility Policy.
- Ensure that the Conflict of Interest statement is signed by all PIs, Co-Is and Senior Researchers;
- Identify any Research Compliance issues (e.g. IACUC, IRB, Biohazards, or Chemical Hazards) and check with the Compliance Office to verify application/approval if required at time of initial application;
- Identify any Research Restrictions (e.g. Classified Research, ITAR/EAR, 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 mandatory match/cost share (M/CS), and that a memo to the AOR from the department dean/director, and the agency’s published terms showing that the M/CS is mandatory are included. All instances of M/CS must be allowable and conform to all provisions of OMB Uniform Guidance, 2 CFR 200. UA does not allow voluntary cost share.
- Identify any subawards, and ensure a budget, a statement of work, and a statement of institutional endorsement from each subrecipient’s AOR is included;
• Identify any reductions from full allowable F&A recovery, and ensure that the sponsor’s published terms showing mandatory reduction are included. Any fees for reduced F&A will be assessed to the unit, unless they complete a F&A Waiver Form which is approved by the OSP Assistant Director, Pre-Award;

• Check the departmental cover page (if applicable) for consistency with the Proposal Routing Form.

c. 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 guidelines (if applicable);
• Ensure the format of the Proposal package follows the sponsor’s program announcement (if applicable);
• Read the abstract/text and identify/address any potential Research Compliance, Research Restrictions or IP/TI issues as outlined in Section 3.b.

d. Budget Review

The Proposal budget will be reviewed as outlined:

• Ensure that OSP Budget Template is completed and included. If sponsor requires a different form, ensure that form is also complete and consistent with the OSP form.
• Ensure correct addition of the budget totals;
• Ensure dollar amounts are consistent throughout the Proposal text, Transmittal Form, cover page, budget, and current and pending support (if applicable);
• Ensure items are in the correct budget categories and are direct or indirect costs;
• Ensure that only allowable costs are listed as per OMB 2 CFR 200;
• Ensure that salaries have been calculated correctly for faculty, staff, and students;
• Ensure that appropriate leave and benefit rates have been used per UAA’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 travel categories have been identified (domestic/international), that trips are listed separately, and that the correct per diem rates are applied;
• Ensure that a budget narrative/justification is consistent with sponsor requirements and has been included with the Proposal package;
• Ensure that the budget narrative/justification corresponds to the budget and supports the scope of work;
• Ensure that MTDC has been calculated per UAA's negotiated agreement;
• Ensure that the correct F&A rate is being used per UAA's negotiated agreement and/or the sponsor's guidelines;
• Ensure that F&A recovery is calculated properly;
• Ensure any instances of M/CS, subawards, or reduced F&A are identified and addressed as outlined in Section 3.b.

**e. Proposal Problems**

Most issues in proposals (e.g., inconsistencies between narrative and budget; unallowable costs in budget) are resolved informally between the Pre-Award research administrator and the PI. If those informal efforts are not successful, then the issues will be documented on a review worksheet and kept with the copy of the Proposal. Pre-Award will work constructively, in a timely manner, with the unit's representative, PI, and funding agency (as appropriate) to resolve such problems prior to the submission deadline. If major problems (e.g. proposal is incomplete or includes terms that the university cannot accept) are not resolved sufficiently to pass review prior to the submission deadline, the proposal cannot be authorized or submitted. Proposals not approved for submission will be returned to the department's representative and/or PI with a written explanation for the failure to pass review and recommendations for remediating the problem.

**f. AOR Approval**

Once the proposal review has been completed and the proposal has passed review, it is submitted to the AOR for institutional approval. Once the proposal is approved by the AOR, the proposal may be submitted to the sponsor.

**4. UAA Rights Regarding Proposals and Awards**

UAA retains the following rights regarding Proposals and Awards:

• Proposals that are provided to Pre-Award with less than five business days for review prior to the submission due date will be subject to a late fee;
• Full proposal review will take place after submission for those proposals submitted at the AOR's discretion without prior review;
• UAA reserves the right to withdraw a proposal at any time and/or reject any award made on a proposal if issues of non-compliance or other serious problems are discovered following submission or awarding that place UAA at unnecessary financial or legal risk.

5. Unauthorized Proposal Submissions

UAA only authorizes proposal submission with AOR approval. No proposal will be submitted to the sponsor without AOR approval. As indicated in section 4, UAA reserves the right to withdraw a Proposal following submission, whether authorized or not, through Pre-Award and/or the AOR unless a convincing case, in writing, can be made by the PI. If the case is accepted, AOR signature will be granted only if the proposal passes review as outlined in this policy.

In cases of unauthorized proposal submission, the PI will attest, in writing, to their understanding of the process of authorized proposal review and submission, and will agree to not submit an unauthorized proposal again. The PI, their Dean/Director, the AOR, and the Vice Provost for Research and Graduate Studies will sign this agreement and each will be provided a fully signed copy. If this agreement is violated, disciplinary action may be taken.

6. Archival of Proposals and Record Keeping

A copy of every proposal will reside in the Office of Sponsored Programs, where it will be archived for the time required of the University of Alaska Records Retention Policy.

Proposals will be checked by the Post-Award Office in the Banner Proposal Module (FRAPROP) to ensure that their status has been marked as submitted (S).

7. 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 Pre-Award and kept as record.