Office of Sponsored Programs
Procedure 20002 Proposal Submission
Revision Date: 08/16/2016

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1. Introduction

Responsible Officials: Director Pre Award
Effective Date: August 22, 2011
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IMPORTANT: For federal awards/subawards issued to Virginia Tech with a start date prior to December 26, 2014, 2 CFR Part 215 (OMB Circular A-110) and 2 CFR, Part 220 (OMB Circular A-21) apply. For all new funds (new awards and new monies, such as continuation awards, supplements, etc. received for existing awards) with a start date on or after December 26, 2014, these new funds are subject to 2 CFR Part 200 (commonly referred to as Uniform Guidance—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) but hereinafter referred to as "2 CFR Part 200").

Due to the change in federal regulations the language in this procedure specific to the new regulations, 2 CFR Part 200, would be highlighted in red font.

2. Scope

This procedure outlines the university's position regarding the submission of proposals for external sponsor funded awards.

The procedure applies to all university principal investigators, departments and offices that are involved by any means in charging, administering, using or part of the planned implementation of sponsored award agreements or subawards issued, regardless of the primary source of funding.

These guidelines apply to all proposals (paper or electronic) submitted to external sponsoring agencies in which funds are requested and/or committing university resources (e.g., personnel, space, funds, equipment and facility use). This policy also applies whether Virginia Tech is submitting directly, or a subcontractor or collaborator under another entity's submission.

3. Procedure Statement

The Office of Sponsored Programs (OSP) functions as the steward of Virginia Tech's research portfolio and is responsible for ensuring that all research proposals and projects comply with university, federal, and sponsor regulations, policies, and procedures. This procedure establishes reasonable guidelines for timely proposal submission to OSP using Summit (the university's electronic proposal system).

4. Reason for the Procedure

Virginia Tech places high value upon its sponsored research activities and works to maintain full compliance with the components of its sponsored agreements and with federal, state, local and university laws, rules, regulations and policies.

These guidelines are established to assure adequate time to enable OSP to perform a basic quality control review of proposals submitted by Virginia Tech. As lead time allows, OSP will assist and make recommendations to PIs to assure that proposal submissions are responsive and in compliance with sponsor solicitations.

5. Definitions

Administrative documents – Budgets, and other required proposal documentation (such as Forms B, C, and sponsor required forms).

OSP office hours – Monday through Friday, 8:00 a.m. to 5:00 p.m., except for days the university is officially closed. Proposals cannot be submitted by OSP electronically nor signatures acquired on paper copies outside of OSP office hours or on days the university is officially closed.

Principal Investigator (PI) – The Principal Investigator (PI) is the primary individual in charge of an award, grant, contract, cooperative agreement, or other externally sponsored activity. The term project director is commonly used in relation to education and public service projects, while the term principal investigator is commonly used for research projects. Since the terms are generally used interchangeably by the OSP and sponsors, the term PI is used.

In many cases, there are multiple investigators included in applications for external funding. However, federal agencies and the university require that one individual be designated as the principal investigator since both the sponsor and the university must have one individual designated as ultimately responsible for the conduct of the project. If co-investigators are named on an application without identifying an individual as the PI, the person listed first is considered the PI by the university and the federal agency.

Proposal – A proposal is a request for external funding prepared in accordance with the sponsor's instructions. More than that, it is an official record of what is promised to a sponsor by the university in return for the funding requested in the proposal budget. It includes documentation

providing a proposed statement of work and a budget/cost breakdown to a potential external sponsor. Summit submissions must include final versions of all proposal documents as well as a completed and routed proposal in Summit and Forms B and C, as applicable.

Late Proposal or At-Risk Proposal – Proposal packages completed in Summit less than two working days before a sponsor deadline **and** partial proposal packages that have been uploaded into Summit but are incomplete (not ready to submit) two working days before a sponsor deadline. For electronic submissions, the technical narrative portion can be uploaded to Summit and/or the sponsor's electronic submission system as late as 9:00 a.m. on the sponsor deadline day without being considered at-risk.

Proposal Team Member – Sponsored award associates, grants administrators, business managers or other department, college, or institute support staff assisting in the development of a proposal.

Science and Technical documents – The statement of work, scope of work, project narrative/summary/description portion of the proposal package. These should be uploaded into the Science and Technical documents section of Summit and the sponsor's electronic submission system, if applicable.

Sponsor – refers to any third party that issues a grant, contract, or cooperative agreement directly to Virginia Tech. The award document is the agreement processed by the sponsor and accepted by Virginia Tech specifying the terms and conditions under which the program will be conducted.

Sponsor deadline – The date and time by which the sponsor must receive the proposal. This information is found in the Request for Proposal (RFP) or other official communication from sponsor.

Summit – The university's electronic proposal system for use by all university PIs, departments and offices that are involved by any means in sponsored award proposals issued, regardless of the primary source of funding.

Target submission date – The date by which the proposal is to be submitted to the sponsor in cases where there is no official sponsor deadline or when the PI would like it submitted earlier than the sponsor deadline. Automated notices from OSP will be based on this date in Summit.

Working day – Monday through Friday 8:00 a.m. – 5:00 p.m., except for days the university is officially closed.

6. Proposal Submission Timeliness

Timely proposal submission guidelines are critical to assure OSP has adequate time to review, approve, revise, and process proposals. Increasingly complex federal regulations have increased the complexity of the proposal submission process. OSP reviews proposals for conformity with sponsor guidelines, budget accuracy, omissions, cost sharing commitments, and completion of assurances, representations and certifications, where applicable. OSP also secures the authorized organizational signature, if applicable, prepares a cover letter, makes copies of the proposal, and

transmits the proposal along with all required supplementary forms and other information to the sponsor using their preferred submission method (paper or electronic).

Some sponsors' electronic submission systems are occasionally unstable and overloaded because of heavy access as deadlines approach. OSP strongly recommends that PIs allow additional time to process electronic proposals to assure sufficient time to resolve technical issues. This procedure is designed and intended to allow sufficient time in which to verify all regulations are fulfilled and minimalize the risk of proposal rejection due to procedural issues. PIs or their designated Proposal Team Members should use Summit to alert OSP of their upcoming proposal and request a budget as soon as they decide to pursue funding from a sponsor. This initial notification should be made at least two weeks prior to a proposal's due date.

7. Proposal Prioritization

Often, multiple PIs submit proposals in response to the same agency's solicitation. In these cases, OSP will follow a first come, first served process, such that proposals submitted to OSP sufficiently in advance of a sponsor's deadline will be processed first. Proposals submitted after the deadlines listed below in Section 9, Timely submission of proposals to OSP, will be processed as time and resources allow. PI's will be notified when proposals are "at risk" and when proposals will not be submitted to the sponsor by the target date, such that they might be able to renegotiate the deadline, if possible.

8. PI availability

Once a proposal has been initiated in Summit, the PI and/or assigned staff must be readily available to respond to questions routed via Summit from OSP and to correct proposal errors. The more lead time provided for proposal review means more time is available where OSP can make any necessary proposal corrections and still submit the proposal on time. Therefore, the PI or assigned staff, should plan to complete information in Summit and be available for consultation during development of the proposal and its successful transmittal to the sponsor. If the office email/phone as published in the university directory is not the best method to contact proposal team members during proposal review, the team member is responsible for clearly communicating an alternative means of contact to the assigned Pre Award Associate.

9. Timely Submission of Proposals to OSP

To **assure** proposals are submitted to sponsors by the deadline, all **administrative documents** (budgets, and other required documentation, excluding Science and Technical documents) **must** be completed and approved in Summit in final format (ready to submit) at least **two** working days before the sponsor deadline or the PIs chosen target submission date. PIs are given an extra day after the above deadline to finalize the Science and Technical documents of the proposal, but any changes on that last day should not significantly impact the administrative documents already under review, particularly the budget. For the PIs convenience, two working days is defined as 9:00 a.m. on the day before a 5:00 p.m. (or later) deadline, not 48 hours before the deadline. For any deadline prior to 5:00 p.m., the deadline is 48 hours prior to that deadline. For example:

Sponsor deadline (Eastern Time)	Timely Submission of Administrative documents	Timely Submission of Technical documents.
5:00 p.m. Monday	9:00 a.m. Friday	9:00 a.m. Monday
5:00 p.m. Tuesday	9:00 a.m. Monday	9:00 a.m. Tuesday
5:00 p.m. Wednesday	9:00 a.m. Tuesday	9:00 a.m. Wednesday
5:00 p.m. Thursday	9:00 a.m. Wednesday	9:00 a.m. Thursday
5:00 p.m. Friday	9:00 a.m. Thursday	9:00 a.m. Friday
7:00 p.m. Friday	9:00 a.m. Thursday	9:00 a.m. Friday
12:00 midnight Friday	9:00 a.m. Thursday	9:00 a.m. Friday
12:00 noon Friday	12:00 noon Wednesday	12:00 noon Thursday

All documents related to proposals submitted outside of normal electronic submission processes must adhere to the Administrative document deadlines in the table above to assure the documents can be shipped in time to arrive at a sponsor's designated location before the specified deadline. These lead times allow OSP adequate time to:

- review proposal packages for completeness, budget accuracy, and sponsor conformity;
- provide assurances, representations, and certifications; and
- review any required forms.

The PI shall assure that proper documentation is included for significant third party commitments for matching or cost sharing and assure proper documentation has been obtained from all subrecipients or consultants. OSP will assist PIs with questions about completing sponsor forms and review the proposal for these required documents. Two days is the minimum time period required for OSP to identify, and for PIs to correct, any items that could prevent proposal submission and acceptance by a sponsor.

The PI should have the completed technical portion of a proposal uploaded into the Science and Technical Documents section of Summit and uploaded into the sponsor's electronic system (If applicable) by 9:00 a.m. on a sponsor's deadline day or the Target Submission Date to assure a successful submission and resolve any unanticipated technical problems that may be associated with electronic submissions. Any proposal corrections or additions received after 9:00 a.m. on a sponsor's deadline day are at risk of being too late for inclusion and place a proposal's timely submission **at risk**. This is particularly true when electronic submission is required and any resulting document formatting issues or error conditions in a sponsor's submission system must be corrected.

10. Proposals NOT Submitted in a Timely Fashion (At-Risk Proposals)

Proposals received less than two working days before a sponsor's deadline, as outlined in the deadline table above, receive a minimal quality control review, if time permits by OSP. Late proposals must be complete, approved, and accurate, as there will not be sufficient time for corrections and additions.

Late submissions to OSP incorporating complex issues such as cost-sharing, subcontracts, or special indirect cost rates are unlikely to be successfully submitted. Insufficient time may be available to correct errors, analyze budgets, and review the required documentation in time to meet a sponsor's

deadline. OSP will track late submissions to document reasons for those proposals not successfully submitted by the sponsor's deadline.

If paper copies of late (at risk) proposals are to be transmitted to a sponsor, the PI and/or department are responsible for duplicating and mailing them after OSP has reviewed, approved, and obtained any necessary authorized signatures.

OSP cannot assure the quality of content or responsiveness to and compliance with a sponsor's solicitation for late proposals. OSP will review solicitations for a late proposal **only** if time and OSP workload allow. OSP will not submit any late proposal if content is found to be non-compliant with the solicitation. OSP's review of at-risk proposals will be limited to:

- assuring compliance with applicable laws, regulations, and university policies;
- checking budget accuracy; and
- correcting administrative errors associated with electronic submissions.

11. Unauthorized Proposal Submissions

Proposals may not be submitted directly to any external sponsor without the prior authorization of OSP.

Any award granted as a result of an unauthorized proposal submission is subject to rejection.

Before acceptance of an award resulting from an unauthorized submission is considered, the PI must submit an explanation to the Assistant Vice President for Sponsored Programs describing the nature of and reasons for the unauthorized submission. Awards will not be accepted until the explanation has been received/approved by the Assistant Vice President for Sponsored Programs, the proposal details have been entered in Summit, an OSP budget has been approved, and the complete set of proposal documents is uploaded and approved in Summit.   The package must include an exact copy of the proposal that was submitted to the sponsor, and Forms B, and C as appropriate.

12. OSP Staff Availability

Regular office or working hours for OSP staff are 8:00 a.m. until 5:00 p.m. on days the university is open for business. For sponsor deadlines that occur on days when inclement weather forces the university to close or on scheduled university holidays or closings, the last day before the closing or holiday will become the effective sponsor submission deadline. PIs should take scheduled closings or potential weather related closings into consideration when planning their submission timeline.

13. Proposal Costs

As a reminder, 2 CFR 200.460 clearly states that the costs of preparing bids, proposals, or applications on potential federal and non-federal awards or projects, including the development of data necessary to support the non-federal entity's bids or proposals, is not allowable as a direct cost.

14. References

- **2 CFR Part 200**, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)

15. Contacts

- **Director of Pre Award**
  Office of Sponsored Programs
  North End Center, Suite 4200
  300 Turner Street NW
  Blacksburg, VA 24061
  540.231.8054

- **Assistant Vice President for Sponsored Programs**
  540.231.5281

16. Roles and Responsibilities

- **Dean's, Department Head's, Organizational Unit Leaders or other Official:** Approve the routed proposal in Summit, or return it for corrections.
- **Principal Investigators (PIs):** have the primary responsibility for development of the statement of work, developing staffing/subcontracting plans, and assuring timely and complete documents submission to OSP through **Summit** to allow for a timely review of the proposal.
- **Department Administrator/Business Support Center (DA):** serve in a support role to the PIs in discharging their proposal submission responsibilities and serve as a liaison to OSP.
- **Office of Sponsored Programs:** monitors and administers proposal and award activity in accordance with university contractual obligations; specific compliance with 2 CFR Part 200; associated federal laws, rules and regulations; and university policies and procedures. The Pre Award Associate processes accurate, timely and complete proposal submissions in accordance with this procedure.

17. Dissemination

This procedure may be posted on a Virginia Tech internet accessible site. Open public dissemination of this procedure is allowable.

18. Approval and Revisions

Revised to reflect current working processes. This revision was approved by the Assistant Vice President for Sponsored Programs Administration, August 22, 2011.

Revised to conform to formatting standards, update titles and procedure title, include 2 CFR Part 200 references and other editorial or working process updates. Approved by Assistant Vice President for Sponsored Programs on August 16, 2016.