



CONTRACTS & GRANTS OFFICE

SANTA BARBARA, CALIFORNIA 93106-9490

April 20, 2015

Re: Good reference: Policy on the Submittal of Proposals, Acceptance of Awards, and Administration of Contracts and Grants
To: All-Faculty Listserv

Good morning,

Office of Research recently updated their policy on proposal submission and administration of contracts & grants (see attached). There were no major changes but I thought this would be a good opportunity to share the policy with you. Some key information on PI responsibilities is below.

Note that only individuals in the Office of Research are delegated the authority to submit proposals and accept awards on behalf of the Regents of the University of California at UCSB.

The Principal Investigator is the individual responsible for the technical and budgetary design of projects proposed for funding by extramural sponsors, for preparing the proposal in accordance with applicable policies, regulations and sponsor guidelines, for assuring that all required approvals are identified and secured, for adhering to all compliance regulations and procedures and for accurately completing any required Office of Research documentation. The principal investigator is also responsible for assuring the appropriate electronic file and hard copy of the final proposal are provided to the Office of Research. The assistance of departmental staff in carrying out this responsibility is recognized as being generally necessary; however, the principal investigator is ultimately responsible for the content of the proposal and the activities outlined in this paragraph.

The Principal Investigator has primary responsibility for the scientific integrity and management of the sponsored project, the financial management of project funds, adherence to all internal University policies, and adherence to externally imposed sponsor terms and conditions including reporting and record keeping requirements contained in the award document. This includes, but is not limited to: conducting all work under the award in a timely and professional manner; for adhering to all compliance regulations and procedures; assuring compliance with the terms and conditions of the award that affect project performance; assuring that the project's performance is consistent with relevant University policies on matters such as publication of research results, disclosure of inventions, and environmental health and safety; maintaining budgetary control through the use of appropriate departmental or ORU staff and resources; assuring that costs incurred are reasonable, allowable, and

allocable to the project; and complying with all progress and other technical reporting requirements specified by the award terms and conditions.

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Attached: Res Circular A1 revised 3-2-15 Final.pdf

UC Santa Barbara Policy and Procedure

Research Circular A.1. Policy on the Submittal of Proposals, Acceptance of Awards, and Administration of Contracts and Grants

Contact: **Office of Research, Sponsored Projects**

Issued: **March, 2015**

Supersedes: **Research Circular A.1. Policy on the Submittal of Proposals, Acceptance of Awards, and Administration of Contracts and Grants, September, 2004**

Pages: **5**

Research Circular A.1. Policy on the Submittal of Proposals, Acceptance of Awards, and Administration of Contracts and Grants

I. SCOPE

This policy governs the submittal of proposals, acceptance of awards, and administration of Contracts and Grants at the University of California Santa Barbara.

II. POLICY

In the pursuit of its academic mission, UCSB solicits and accepts funds from extramural sponsors, both federal and non-federal, for the conduct of research, training, and public service projects. All proposals for such sponsored projects are submitted in the name of and by The Regents of the University of California, and all resulting awards are likewise accepted or executed in the name of and by The Regents. Only the Chancellor, the Vice Chancellor for Research and certain staff members within the campus Office of Research, have the authority to submit proposals and accept awards of extramural grants and contracts for research, scholarly or professional training, or for public service programs relating either to research or to scholarly or professional training ("sponsored projects"). Under certain circumstances, Regental approval may also be required, such as when the funds requested in a proposal or provided through an award document exceed the campus' delegated threshold. The conduct and administration of sponsored research on campus are shared responsibilities and duties between Principal Investigators, academic administrators, departments, organized research units, and the Office of Research.

III. RESPONSIBILITIES

A. Delegation of Contract and Grant Authority

The individuals occupying the following positions at UCSB are authorized on behalf of The Regents to submit proposals and to accept and execute contracts and grants for sponsored projects up to a specified level of annual direct costs, including the signing of related documents as necessary:

Chancellor	Assistant Vice Chancellor for Research
Vice Chancellor for Research	Associate Vice Chancellor for Research
Director, Sponsored Projects	Director, Technology and Industry Alliances
Associate Director, Sponsored Projects	Associate Director, Technology and Industry Alliances
Sponsored Projects Contract and Grant Officers	
Sponsored Projects Analysts	

B. Responsibilities for Proposal Submission

The following responsibilities are listed in the order that generally reflects the process of proposal preparation and submission:

The Principal Investigator is the individual responsible for the technical and budgetary design of projects proposed for funding by extramural sponsors, for preparing the proposal in accordance with applicable policies, regulations and sponsor guidelines, for assuring that all required approvals are identified and secured, for adhering to all compliance regulations and procedures and for accurately completing any required Office of Research documentation. The principal investigator is also responsible for assuring the appropriate electronic file and hard copy of the final proposal are provided to the Office of Research. The assistance of departmental staff in carrying out this responsibility is recognized as being generally necessary; however, the principal investigator is ultimately responsible for the content of the proposal and the activities outlined in this paragraph.

Department Chairs and Organized Research Unit (ORU) Directors are responsible for reviewing proposals submitted by departmental and ORU faculty or staff to determine, and approve when necessary, such matters as the eligibility of individuals to serve as Principal Investigators, the appropriateness of time commitments made by faculty members, the availability of campus space and facilities necessary for the project, the appropriateness of departmental cost-sharing or matching fund commitments, and the appropriateness of the contemplated sponsored project activities with respect to the University's regulations and mission.

Deans of Colleges and Schools are accountable for all funds administered by departments under their control, as well as for the programmatic coordination of their colleges or schools. The Deans are responsible for establishing procedures and processes for managing this accountability.

The Office of Research (OR) is responsible for reviewing, approving, and submitting all proposals for sponsored projects to be performed by UCSB faculty and employees. OR assures compliance and consistency of proposals with sponsor and University guidelines and policies, provides all necessary institutional signatures and certifications through those members of its staff who have been delegated contract and grant authority, and officially transmits proposals to sponsor agencies on behalf of the University. OR assists principal investigators and administering units in the interpretation and implementation of relevant sponsor guidelines and policies. OR also coordinates the approval of project contributions and matching commitments included in proposals as set forth in the Project Contribution Guidance dated December 22, 2014, located <http://www.research.ucsb.edu/spo/proposal-preparation/project-contributions/>

C. Responsibilities for Award Acceptance and Administration

The following responsibilities are listed in the order that generally reflects the process of award acceptance and administration:

The Office of Research is responsible for accepting and processing all extramural contracts and grants awarded to UCSB for the conduct of sponsored projects, including modifications, amendments, continuations, renewals, and extensions of existing contracts and grants. Only OR staff who have been delegated contract and grant authority are authorized to conduct any necessary negotiation of award terms and conditions, and execute final award documents on behalf of the University. Upon acceptance of an award, OR is responsible for distributing the final award documents to Extramural Fund Accounting for account set-up and processing. Extramural Accounting is responsible for further distribution of the award documents to the Principal Investigator, the administering department or ORU, and other affected campus administrative offices. As general guidance, OR will also provide a general

summary of the award terms and conditions to assist the Principal Investigator and Department in the administration of the award; *however*, the award summary will not address every contract or grant term. The principal investigator and the department are responsible for reading, understanding and adhering to each term of the award document.

The Principal Investigator has primary responsibility for the scientific integrity and management of the sponsored project, the financial management of project funds, adherence to all internal University policies, and adherence to externally imposed sponsor terms and conditions including reporting and record keeping requirements contained in the award document. This includes, but is not limited to: conducting all work under the award in a timely and professional manner; for adhering to all compliance regulations and procedures; assuring compliance with the terms and conditions of the award that affect project performance; assuring that the project's performance is consistent with relevant University policies on matters such as publication of research results, disclosure of inventions, and environmental health and safety; maintaining budgetary control through the use of appropriate departmental or ORU staff and resources; assuring that costs incurred are reasonable, allowable, and allocable to the project; and complying with all progress and other technical reporting requirements specified by the award terms and conditions.

The administering department or ORU is responsible for assuring that all financial transactions related to an award are reviewed, approved, and processed according to University policies and procedures. The administering department or ORU also assists Principal Investigators in determining that financial transactions are consistent with major cost principles for contracts and grants adhered to by the University such as those costs occurring in accordance with the federal OMB "*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal awards (Uniform Guidance)*." In the event that costs incurred under an award exceed the award's allocated funds, nonpayment issues are experienced, or costs are subsequently disallowed, the *Department Chair or ORU Director*, with all necessary assistance from the Principal Investigator, is responsible for identifying appropriate fund sources to cover such overdrafts, nonpayments or disallowances. If the Chair or Director is unable to identify such funds, this responsibility falls to the *Dean* of the administering College or School.

D. Obtaining Prior Approvals

Certain financial or other administrative changes during the conduct of a sponsored project may require the prior approval of either the *Office of Research* or the sponsor, as specified in the award terms and conditions. In these cases, the *Principal Investigator* is responsible for initiating the request for prior approval, and submitting it to *OR* for review and approval. *OR* is responsible for reviewing such requests and, when it has the authority under University policies or sponsor guidelines, granting approval as may be appropriate. When prior approval by the sponsor is required, *OR* is responsible for reviewing the request for accuracy and completeness, and assuring its prompt transmittal to the sponsor on behalf of the University.

IV. PROCEDURES

Procedures for carrying out responsibilities under this policy are issued by the Office of Research in the form of additional Research Circulars and memoranda addressed to the appropriate campus points of contact.

Proposal Submission.

Principal Investigators are required to submit proposals to *OR* for review five (5) business days prior to the 48 hour window required for notice of errors/warnings (See below). This amount of time is needed to allow *OR* to review the proposal and communicate review comments to the department, and allow the department and PI(s) enough time to address needed changes prior to the UCSB Proposal Deadline.

Principal Investigators are required to allow submission of proposals, regardless of sponsor or submission method, to the sponsor (i.e. push the button) at least 48 hours prior to the sponsor deadline.

Since Requests for Proposals (“RFPSs”) often require the University to object to problematic contract terms at the time of proposal submission, Principal Investigators are required to submit proposals in response to RFPs to *OR* at least **ten (10) business days** prior to the submission deadline. *OR* request that the guidelines to the RFP be forwarded to *OR* at time the PI is aware of the submission (aka, as soon as possible). This time period allows *OR* to give each proposal an appropriate review to assure that it conforms to the sponsor guidelines for submitting proposals, verify that the proposal adheres to applicable policies and regulations, and identify deviations from guidelines that, if uncorrected, would create risk of proposal rejection. *OR* will use reasonable efforts to thoroughly review proposals under the circumstances surrounding submission. However, as outlined above, it remains the primary responsibility of the Principal Investigator to assure that proposals adhere to UC policy and sponsor guidelines.

In the event that a proposal is not submitted to *OR* in the timeframe noted above, the proposal may not receive review. With respect to such proposal, *OR* reserves the right to refuse to submit the proposal or to withdraw the proposal after submission if a later review of the proposal reveals a deviation from policy or procedure. Additionally, if, at the time of submission, *OR* does not have sufficient information to assure compliance with any required representations or certifications, *OR* reserves the right not to sign the certification document, regardless of proposal deadlines.

Award Processing

It is *OR*'s policy to prioritize the review and submission of proposals over award processing. Generally, *OR* strives to process all awards within two (2) weeks of receipt. However, many factors may cause a delay in processing the award including, but not limited to, complex negotiations over award terms, unusually heavy proposal submissions, and the failure of agencies to respond to *OR* communications.

V. REFERENCES

- A. By-Laws and Standing Orders of the Regents 100.4 (dd)
- B. University of California Contract and Grant Manual, Chapter 2-200: Solicitation Authority
- C. Memorandum dated March 10, 1995 to Chancellors from President Peltason
- D. Office of Research/Extramural Accounting Contributions Guidance dated December, 22, 2014



Michael Witherell
Vice Chancellor, Research

Issued: September 2004
Revised: March 2015

CC: Tessa Mendez, Administrative Services

Please direct questions about this policy to the **Office of Research, Sponsored Projects**. For general policy questions or comments about this website, please contact policy@ucsb.edu.