PURPOSE

The purpose of this operating procedure is to clarify and define the roles of the Principal Investigator (PI), Department Administrator (DA), and the Research Administrator (RA), with regard to preparing outgoing proposal submission packages in the School of Medicine.

This SOP is applicable to proposals submitted for non-sponsor initiated, non-industry funded projects. Please refer to the SOM Clinical Research Administration website for guidance on budget development for sponsor initiated, industry funded projects.

INTRODUCTION

Applications for funding (also called proposals) from external sponsors should contain 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 can be considered an offer to do business, and requires the signature of an institution's authorized official. The authorized official is the only individual(s) formally authorized to bind the institution to grants, contracts, and other agreements. Prior to submission, proposals will be reviewed by the Office of Sponsored Programs (OSP) to help ensure compliance with internal and external policies, procedures and requirements, including a requirement for a report of expenditures or a provision for an audit (refer to VCU’s Policy Sponsored Program Proposals: Definitions, Solicitation, Review, Approval and Submission). In turn, the School of Medicine must ensure its investigators and personnel are in compliance with all VCU and sponsor requirements through an internal approval routing process at the time of the proposal submission.

Per VCU’s Policy Sponsored Programs Proposal Submission Deadlines, the draft proposal package is due to be routed to Office of Sponsored Programs at least 5 business days before the sponsor’s deadline, with the expectation that all final application documents will be supplied to OSP no less than 2 business days before the sponsor’s deadline. The RA will work with the PI to review sponsor guidelines and assist in compiling the proposal package. A separate SOP applies to the development of budgets that are often a required part of the proposal package. Oftentimes planning and initial preparation for budget development and proposal preparation involve the same steps as a starting point. Thus, these initial steps are included in both the budget development and proposal preparation SOPs.

PROCEDURE

Planning

1. The RA will communicate regularly with his/her assigned departments’ PIs and DAs to ask about upcoming proposal plans and provide at minimum monthly reminders of associated deadlines for both the internal RAMS-SPOT routing and completion of the proposal package.

2. The PI and DA must alert the RA of proposal plans in a timely manner, including letters of intent and pre-proposal submissions, and include information on the Funding Opportunity Announcements (FOA)/Program Announcements (PA)/Request for Proposals (RFP)/Solicitation information and associated deadlines, if any.
If the proposal will involve subawardees, particularly foreign subawardees, PI and DA should alert the RA of proposal plans and provide subawardee contact information at least 2 to 3 weeks prior to the internal deadline for routing the proposal to School and OSP review (28 days before sponsor deadline).

3. As soon as the RA becomes aware of a planned proposal submission, he/she will log the planned submission on any internal pre-award tracking database in use.

**Preparation**

1. The RA will review the FOA/PA/RFP, requirements, and guidelines as provided by the sponsoring agency and provide support and feedback to the PI. The PI and the RA must review agency guidelines as a first step in the proposal preparation process. The RA should consult with OSP and/or Office of Research & Innovation on any questions regarding:
   - PI Eligibility
   - Any special restrictions or potential conflicts of interest (financial and non-financial)
   - Specific items that need to be included in the proposal
   - F&A rate limitations, budget restrictions or other limitations
   - Whether or not subawards will be involved, particularly foreign subawardees
   - Cost share commitments
   - Participation of VCU Health employees

2. If proposal submission is contingent on gathering required PI eligibility, F&A rate exception, cost share approvals, or VCU Health employee approvals the RA will initiate the process for getting those approvals as soon as possible. See “SOP TBD: PI Eligibility Exception Requests.”

3. The RA will set up a preparation timeframe with the PI specific to the submission. For example, larger, more complicated submissions, such as an NIH Program Project, Center grant or Training grant, would require lead time of at least 8-12 weeks. Standard NIH R01s or R21s with modular budgets could be handled in a shorter timeframe. OSP’s and SOM’s review and internal approval deadlines should be accounted for, as well as the involvement of any external collaborators or subawardees. As part of the timeline discussion, the RA should confirm with the PI who will be completing each element of the proposal package. Most often the RA and PI will collaborate on assembling the different administrative and budgetary aspects of the proposal.

4. The RA will confirm with the PI that they and all other key personnel have completed all VCU required investigator trainings and updated their annual conflict of interest (COI) disclosure in AIRS.

**Compile Proposal**

1. The RA will create the Funding Proposal in RAMS-SPOT.
   - Follow instructions posted on OSP’s website: [https://research.vcu.edu/osp/rams-spot.htm](https://research.vcu.edu/osp/rams-spot.htm)
   - RA will enter information into the Funding Proposal as provided by the PI and DA, to include:
     i. Units that require view access to the proposal in RAMS-SPOT – all departments with personnel or space involvement
     ii. All VCU and non-VCU (including VCUHS) personnel involved
     iii. Sponsor name and contact information, whether it is flow-through funding or not
     iv. Collaborating institutions
     v. Information regarding the use of human subjects, use of animal subjects, use of biohazards, use of radioactive material, use of select agents or controlled substances, use of embryonic stem cells, additional space needs, or any alterations or renovations needed
vi. Sponsor program announcement – if Grants.gov submission (must be verified)

vii. Sponsor submission deadline – note whether PI has continuous submission status or if this is a resubmission or renewal application

viii. Project dates and proposed budget periods

ix. Sponsor requested proposal package documents

2. If there will be any subawards to other institutions, see section below on including subawards in proposal submissions.

3. A draft budget and budget justification will be developed by the PI, RA, and DA according to the process in “SOP 102: Budget Development.”

4. Any required Cost Share Authorization forms are completed, signed, and uploaded to the Cost Share Budget Grid in RAMS-SPOT.

SOM requires Cost Share Authorization forms be completed, signed, and uploaded to RAMS-SPOT at the proposal stage in all instances EXCEPT:

- M.D. Clinical Faculty that have over-the-cap salary cost share, regardless of what School of Medicine department the faculty member resides in.
- Non-M.D. Clinical and T&R Faculty that have over-the-cap salary cost share AND reside in the same department as the FAU on the proposal being submitted.

5. For non-Grants.gov submissions, if the sponsor’s online submission system allows, the PI may delegate appropriate access to the RA for review and/or entry of administrative and financial items within the sponsor’s system. If direct access isn’t possible and/or the submission system requires manual entry of items, then the PI must provide screenshots, PDFs, or other viewing options of the administrative and financial information sections of the proposal for RA review. These screenshots should also be uploaded to the Funding Proposal in RAMS-SPOT for SOM and OSP review.

6. For Grants.gov submissions, the SF-424 application package will be generated and completed by the RA directly in RAMS-SPOT. The RA will review all information that pre-populates on the SF-424 to make sure it is correct. The RA will fill out all of the required SF-424 forms using information gathered from the PI.

7. The PI will write and review all administrative and technical aspects of the proposal according to the sponsor’s guidelines and provide both draft and final versions of these documents to the RA for inclusion in the application package. These can be provided by the PI to the RA in Word format and the RA will convert to PDF or as PDF files and attach/upload to the package. For Grants.gov submissions in RAMS-SPOT, the documents must be uploaded to the SF-424 as PDFs prior to routing for internal approvals. The RA will ensure all attachments are named using the appropriate file naming conventions and adhere to sponsor’s guidelines to avoid errors with electronic submissions. Should any uploads fall outside of what sponsor guidelines allow, the RA will work with the PI to obtain compliant attachments. For SF-424 applications, the RA will run a validation error check and work with the PI to correct any errors prior to routing the proposal for internal review.

8. The RA will provide a PDF copy of the draft application package to the PI for review prior to routing the proposal for internal review and approval in RAMS-SPOT.

Proposal Submission

1. The proposal will be routed in RAMS-SPOT for internal review, approval, and submission to the sponsor. See “SOP 103: Internal Routing of Proposals.”
2. Departments are responsible for ensuring basic scientific review of proposals to be submitted by their faculty has occurred. PIs should work in conjunction with their Departments to ensure that submissions are complete in technical content, adhere to the norms of proper scholarship and responsible conduct of research, and that both sponsor and internal requirements are met. **It is expected that all items identified on the SOM Department Submission Checklist (available for download on the SOM Office of Research Administration website) have been reviewed or completed prior to routing the proposal for internal review in RAMS-SPOT.**

3. For SF-424 electronic submissions, the RA will provide the PI with a PDF copy of the final application package to review prior to giving OSP the “OK” to submit the proposal to the sponsor. It is recommended that the PI confirm to the RA via email or public comment in RAMS-SPOT that the application is ready to electronically submit to the sponsor.

4. The RA will work with OSP to ensure successful submission to the sponsor and will assist OSP in addressing any errors generated in the sponsor’s electronic submission system. The RA will contact the PI if any of the errors require his or her input to correct. The RA and OSP will remain in contact throughout the submission process and will inform the PI and DA of the successful submission as applicable.

5. Proposals that will be submitted directly by the PI to a sponsor must first complete the internal SOM and OSP review and approval process. OSP will issue approval for the PI to submit the proposal to the sponsor.

6. The PI will alert the RA of the need to submit supplemental information to NIH or other sponsors, as requested. The PI will draft this information and forward to the RA for review. The RA will ensure compliance with sponsor guidelines and work with the PI to finalize the information. With the PI’s concurrence, the RA will provide the information to OSP for institutional submission and, if needed, will inform the PI of the successful submission to the sponsor.

**Including Subawards in Proposal Submissions**

1. The PI and RA identify the appropriate contacts (PI, Research Administrator, sponsored programs office) at the subrecipient organization and determine what the proposal requires with regards to subawardees. Allow as much time as possible to receive the signed proposal paperwork from the subrecipient. It can often take a week or more to receive these documents from the subawardee. The recommended lead time for involvement of any subawardee – particularly foreign subawardees – is 2 to 3 weeks prior to the internal deadline for PI routing in RAMS-SPOT.

2. The RA evaluates whether the subawardee is participating in the FDP Expanded Clearinghouse project and follows OSP procedures as appropriate.

3. The RA gathers materials for the internal VCU subaward “mini package” and uploads the combined PDF to the Budget Grid in RAMS-SPOT:
   - Signed letter of intent (LOI) or PHS 398 Face Page if sponsor is Federal – subrecipient’s Authorized Organizational Representative (AOR) must sign
   - If subawardee is not participating in the FDP Expanded Clearinghouse project, include the “VCU Entity Form for non-FDP Expanded Clearinghouse Subrecipients” form
   - Budget and budget justification – make sure you have all the information that is required by the sponsor
   - Brief statement of work (SOW)
   - Copy of indirect cost rate agreement (if sponsor is Federal and subrecipient is not participating in FDP Expanded Clearinghouse project)
   - Biosketch or CV of subrecipient PI
Any other documents required by the Sponsor for Subaward Recipients (such as a Facilities and Resources document)

4. On the Funding Proposal record in RAMS-SPOT, list all key personnel at the subaward site under the “Non-VCU Senior and Key Personnel” section. Answer “Yes” to the question “Will this project include collaborating organizations external to VCU or VCUHS?”

5. The RA and PI prepare proposal according to sponsor’s guidelines and include subrecipient materials.

FOR NIH APPLICATIONS WITH A MODULAR BUDGET

a) Enter the subaward site’s information on the R&R Project/Performance Site Locations form.
b) List all Key Personnel at the subaward site on the R&R Senior/Key Person Profile form, upload biosketches and enter eRA Commons IDs.
d) On the PHS 398 Research Plan form, upload the “Consortium/Contractual Arrangements” document – typically includes the signed PHS 398 Face Page and the subaward site’s Indirect Cost Rate Agreement (if applicable). Do not include the budget justification, biosketches, or internal VCU required documents in this upload. See section G.400 of the SF-424 Forms D General Application Guide for guidance on this document.

FOR NIH APPLICATIONS WITH A DETAILED BUDGET

a) Perform steps a) and b) above.
b) Upload the subaward site’s completed R&R Subaward Budget Attachment form and ensure it populates correctly in RAMS-SPOT. Upload the subaward site’s budget justification document to this form.
c) Perform step d) above.

RESPONSIBILITY

Principal Investigator (PI) The PI is primarily responsible for:

- Notifying the RA of plans for proposal submissions
- Familiarizing him/herself with the FOA/PA/RFP and any sponsor guidelines
- Adhering to all VCU and School of Medicine internal deadlines
- Providing the RA with research-related project details for the proposal
- Ensuring collaborators and subawardees provide timely responses and documentation to the RA prior to PI routing the proposal in RAMS-SPOT
- Preparing and providing administrative and technical documents for the proposal including any required biosketches
- Routing the Funding Proposal for internal review and approval in RAMS-SPOT
- Approving the final proposal before OSP’s submission to sponsor
- Providing OSP with a hard copy of the proposal as required for submission to the sponsor
- Providing OSP with a scan or hard copy of any electronic proposals submitted by the PI directly to the sponsor
- Preparing supplemental information for submission following the original proposal submission
- Verifying access to RAMS-SPOT and AIRS via VPN if away from campus

Research Administrator (RA) The RA is primarily responsible for:
• Communicating reminders to PIs/DAs regarding plans for submission of proposals
• Reviewing FOA/PA/RFP and sponsor guidelines
• Creating the Funding Proposal in RAMS-SPOT and completing the SF-424 forms (as applicable)
• Reviewing all application documents and biosketches provided by the PI for inclusion of sponsor-required information and correct formatting
• Completing budget form section (as applicable)
• Coordinating proposal submission with OSP, whether paper or electronic, through close monitoring of the Funding Proposal in RAMS-SPOT and responding to SOM and OSP reviewer requested changes in a timely manner
• Informing PI and DA of successful submission of proposal (if not provided by OSP)
• Formatting supplemental information for submission (as applicable)

Office of Sponsored Programs (OSP) OSP is responsible for assisting the PI and RA with obtaining and interpreting sponsor guidelines, providing all administration data such as rates and assurance dates, and reviewing the completed proposal for accuracy and compliance with sponsor guidelines. OSP will provide Authorized Official sign-off when needed and will submit proposals electronically when required (i.e. Grants.gov, Grants@Heart, Proposal Central, etc).