



**Research &  
Economic Development**

**Research Administrators Certificate Course  
Proposal Processes**

**MRAM**

**March 2022**

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# UPDATES

## Fringe & Benefit Rates

- Revised fringe and benefit rates for 2022-2023 fiscal year.

Employee Group	Pooled Fringe Benefit Rate
COM Faculty	27.50%
Admin/Faculty (excluding COM Faculty)	38.66%
Staff (including Law Enforcement Officers)	61.69%
Non Student OPS (other temporary)	5.31%
Graduate Student Assistants	11.90%

- The revised rates will become effective immediately for all proposals being routed via ePRAF for budget periods that fall within the new rates and will be charged to all active awards as of July 1<sup>st</sup>, 2022.

# UPDATES

## NIH Salary Cap

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- The NIH Salary Cap has been updated for Executive Pay Scale Level II to \$203,700 effective January 2, 2022.
- The NIH 12 month appointment salary cap will be \$203,700. The NIH salary cap for nine month appointments will be prorated to \$152,190.
- Additional information regarding the NIH salary cap increase for this federal fiscal year is available at <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-22-076.html>

# Sponsor Limit to Number of Proposal

- Some sponsors limit the number of proposals that may be submitted by an institution. Those sponsors will refuse to review any proposal if more than the allowed number was submitted.
- ORED website “Limited Submissions” section lists those limited submission programs
- PIs wishing to apply to a program with submission limits not listed on ORED website must notify ORED immediately. ORED will add it to limited submission list
- Where notification is given to ORED without sufficient time to meet the internal deadlines, VPR may allow alternate internal review procedures

# Internal Proposal Procedures for Limited Submission Opportunities

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- ORED website “Limited Submissions” section
  - Agency and program name with limited submissions
  - Deadlines for 1) FIU Notice of Intent to Apply and 2) Sponsor
  - Whether pre-proposal is required
  - Links to proposal materials and agency link
  - Other requirements for the internal competition as deemed required by announcement.

# Internal Proposal Selection Process

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- Two Stage Process:
  1. Notice of Intent to Apply (NIA) is required from each interested research team. If the number of NIA's that is received is less than or equal to the maximum permitted by the sponsor agency, research teams are advised by ORED that they may proceed with proposal preparation.
  2. Internal Proposal Application (IPA): If the number of NIA's received by ORED exceeds the number of applications accepted by the sponsor agency, each interested research team must prepare a full Internal Proposal Application.
- Templates for NIA's and Internal Proposal Application forms are available on the Limited Submission website.

# Internal Proposal Selection Process Cont'd

- IPA's are reviewed and ranked by impartial content experts and senior scientists, free of any actual or potential conflicts of interest, with extensive track records of external funding. The Office of the VPR reviews the ratings and comments to identify proposals approved for submission based on (1) proposal merit and feasibility, (2) alignment with FIU's current strategic plan, and (3) broader value to the university community.
- Additional considerations for final selection may include the research team's funding history with the sponsor agency, reviews from previous submissions to the same grant program, the extent of cross-college collaboration, and the degree to which collaborations have been fostered with outside agencies.
- ORED will contact research teams to advise of the outcome of the internal competition. Please note that reviewer's comments are not generally provided for those applications not selected to move forward.

# Proposal Review and Processing

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- All proposals to external sponsors for projects that will involve University faculty and/or staff must be reviewed and approved by ORED for compliance with federal and state statutes and regulations as well as sponsor and FIU guidelines, policies and procedures prior to forwarding the proposal to the prospective sponsor.
- ORED Policy - ORED Prior Approval of Sponsored Project Proposals  
[http://policies.fiu.edu/record\\_profile.php?id=526&s=prior approval sponsored](http://policies.fiu.edu/record_profile.php?id=526&s=prior%20approval%20sponsored)



# Proposals that do NOT Require Prior ORED Approval

- White paper or preliminary proposal if it does not contain any of the following:
  - Commitment of University cost sharing
  - Space other than what is already available to the PI
- All other proposals (including statement of qualifications) **MUST** be approved by ORED, Pre-Award, before they are submitted to the sponsor

# Deadline for Submission of Proposal to ORED for Review

- Generally 5 business days prior to sponsor's deadline BUT
- 8 business days prior to sponsor deadline if:
  - Center and large research team applications
- Proposals that do not adhere to these deadlines may receive a limited to no-review. ORED reserves the right to withdraw any proposal submitted under these conditions.
- Remember - route proposal to Department, Dean, Center Director with sufficient time to obtain their approval on the Electronic Internal Clearance Form (ePRAF) before routing proposal to ORED.
- If an award is received for a proposal not previously approved by ORED, the award will NOT be processed until all proposal paperwork is approved by ORED; the VP for Research or designee, may reject award if not in furtherance of University mission or project cannot be viably performed at FIU
- ORED policy – Deadlines for Proposal Submissions for ORED Review:  
[http://policies.fiu.edu/record\\_profile.php?id=267](http://policies.fiu.edu/record_profile.php?id=267)

# Deadline for Submission of Proposal to ORED for Review

<b>Risk Assessment for Proposal Review Time</b>			
<b>Risk Factors</b>	<b>FULL REVIEW</b>	<b>LIMITED REVIEW</b>	<b>NO REVIEW</b>
	Complete proposal and fully routed ePRAF provided to ORED at least 5 <sup>1</sup> full business days <sup>2</sup> before	Complete proposal and fully routed ePRAF provided to ORED 3 - 4 full business days <sup>2</sup> before sponsor's	Complete proposal and fully routed ePRAF provided to ORED 2 (or less) full business days <sup>2</sup> before sponsor's
1. Risk of proposal rejection due to non-compliance with sponsor guidelines	Low	Medium	High
2. Risk of proposal rejection due to electronic system validation issues	Low	Medium	High
3. Risk of department/unit incurring financial burden due to budget errors or omissions	Low	Medium	High
4. Risk of proposal withdrawal by ORED after submission and/or rejection of award	Low	Medium	High

# Who may submit proposal as PI?

- FIU faculty in tenure or non-tenure-accruing track positions
- Personnel in administrative/exempt position (subject to ORED approval)
- Not Eligible as PI (can be Co-Is with eligible PI):
  - Adjunct, courtesy or visiting faculty
  - Lecturers
  - research assistants and graduate students
  - temporary personnel
- Exceptions may be approved by ORED in consultation with the proposed PI's Dean, Department Chair, Center Director
- PI and Co-Is must hold the required FIU appointment at effective date of the award
- ORED policy – Investigators on Sponsored Project Proposals  
[http://policies.fiu.edu/record\\_profile.php?id=362](http://policies.fiu.edu/record_profile.php?id=362)

# Minimum PI Effort & Responsibilities

- Only one PI may be listed on proposal unless the sponsor allows additional principal investigators in which case the number of principal investigators permitted by the sponsor shall be allowed.
- If multiple PIs are permitted by the sponsor then the first PI listed on the application and electronic Proposal Routing Approval Form (ePRAF) will serve as the contact PI.
- The PI is the person who bears the primary responsibility for the scientific, technical and fiscal administration of the project
  - Cannot submit proposal in name of a “nominal” PI who then delegates the primary responsibility to another person
  - Effort must be commensurate with the work being proposed in both the academic year and summer (not simply state 1%)
  - Limited purpose grants like equipment, travel or student augmentation grants may be exempt.
- The VP for Research may permit nominal PI on a case-by-case basis in unusual circumstances such as where the sponsor requires that a specific University representative must be the PI

# Complete Proposal Required to ORED

- Following are required for every proposal submission
  - Electronic Proposal Routing Approval Form (ePRAF) with all required digital approvals
  - Technical proposal
  - Budget and budget justification
  - Direct Charge Exemption form, (if applicable)
  - Subawardee Commitment Form (with SOW, budget and budget narrative)
  - Cost sharing form (if applicable)
  - Any specific sponsor requirements/forms
  - FIU Forms are available at: <http://research.fiu.edu/forms/>

# ePRAF Submission and Routing

- The ePRAF is routed through PeopleSoft
- All proposal documents need to be uploaded into the ePRAF system for review and approval by Chair, Dean and Center Director
- ORED Proposal Team members are available to assist faculty with the ePRAF process including the drafting of the ePRAF, budget creation and development, completion of agency forms and ePRAF routing.

# ePRAF Compliance Requirements

- PI must answer on the ePRAF all compliance requirements specific to project ensure adherence. These include:
- Safety Assurance/EH&S issues – e.g., Biohazards, radioactive materials, lasers
- Conflict of Interest
- Nepotism
- Human or Animal subjects
- Export Control issues
- Foreign Influence issues
- Controlled Unclassified Data Concerns
- Additional space needs
- Additional insurance needed
- ORED Policy - Identification of Special Handling Requirements for Proposal <https://policies.fiu.edu/files/268.pdf>



# Export Control

- Any proposal for a project that would subject FIU to export control regulations is subject to prior review and approval by the AVP for Research. The AVP has authority to refuse to accept an award that contains unacceptable export control provisions.
- ORED ePRAF captures information identifying potential export control issues. ORED Pre-Award, will contact PI if export control issues exist.

# Subcontractors/Subawardees

- If proposal includes programmatic work by a named entity a subawardee commitment form must be included in the proposal package to ORED detailing subawardee's
  - scope of work
  - budget
  - cost share pledged by collaborator (if any)
  - statement of the basis for any F&A charges
  - Subawardee Commitment Form signed by collaborator's authorized organizational representative, for any entity not part of the FDP Expanded Clearinghouse
- ORED policy – Subawardee Commitment Form Required for Sponsored Project Proposals: [http://policies.fiu.edu/record\\_profile.php?id=247](http://policies.fiu.edu/record_profile.php?id=247)

# Potential Issues with Subawarded Portion of Proposal

- If Pre-Award determines that proposal contains a disproportionately large portion of the project or the proposed budget to be subawarded to another entity or person, the proposal may be subject to further review by the AVP or designee in consultation with the PIs' Dean, to determine if:
  - work sought to be subawarded may be done at University
  - Work which is proposed to be done by University personnel in relation to work to be subawarded warrants approval of the proposal
  - ORED Policy: Office of Research and Economic Development Prior Approval of Sponsored Project Proposals:  
[http://policies.fiu.edu/record\\_profile.php?id=526](http://policies.fiu.edu/record_profile.php?id=526)

# After Submission of Proposal to ORED

- ORED representative will review proposal package to ensure compliance with federal, sponsor, state and institutional regulations and communicate with PI re: any changes needed or approval
- Electronic submission (NSF Fastlane, Grants.gov, ProposalCentral), then ORED will submit, by noon on the date the proposal is due.
- Submissions after Noon can encounter system issues which can jeopardize meeting sponsor's deadline.
- Sponsor confirmation for electronic submissions will be forwarded to the PI

# Transfer of Grant to FIU from another Institution

- Handled essentially the same as a proposal
- PI completes Electronic Proposal Routing Approval Form (ePRAF) and submits complete proposal packet to ORED Pre-Award
- ORED, Pre-Award, will negotiate transfer to FIU and will contact, as necessary:
  - FIU PI, Dean's Office, Center, Department, institution from which project is being transferred and sponsor
- Once all transfer documentation has been executed by ORED, Pre-Award, award in FIU will be set up

# Personnel Charges

- Salaries & wages for employees rendering technical and/or scientific services on sponsored project are allowable direct charges if:
  - the charge is only for that portion of the employee's salary or wages that corresponds to the employee's effort on the project;
  - during the period of performance under the sponsored agreement; and
  - the salary or wages paid is/are consistent with the employee's regular salary established pursuant to FIU's Human Resources policies and procedures
- Keep in mind that some sponsors have salary/wage caps, such as NIH
- ORED policy - Salary And Wage Charges On Sponsored Project Proposals  
[http://policies.fiu.edu/record\\_profile.php?id=265](http://policies.fiu.edu/record_profile.php?id=265)

# Personnel Effort

- Each PI , Co-I and key personnel salary position named in proposal budget must list the percentage of such person's total University professional effort pledged to be spent on the project
  - must be a realistic reflection of his/her planned effort on project
- If proposal is funded, effort expended by FIU personnel on the project must be documented through the University time and effort reporting system eCRT
- ORED policy - Personnel Effort Pledged On Proposal For Sponsored Projects: [http://policies.fiu.edu/record\\_profile.php?id=264](http://policies.fiu.edu/record_profile.php?id=264)

# Direct Charges on Federally Funded Projects

- Applies to federally sponsored projects and federal flow throughs
- 2 CFR 200 allow direct charges to project only when the costs are:
  - reasonable - if goods or services acquired, and the amount paid for them, are what a prudent person would purchase
  - allocable to the sponsored agreement; i.e., incurred solely to advance work on the project or benefits both the project and other work of FIU, in proportions that can be approximated through use of reasonable methods.
  - given consistent treatment through application of generally accepted accounting principles appropriate to the circumstances; i.e., expenses for similar purposes must be treated the same way (throughout the university) under like circumstances; and
  - conform to any limitations or exclusions set forth in 2 CFR 200 or in the sponsored agreement; i.e., the costs are allowable by federal regulations and by the sponsored research agreement.
- ORED policy - Only Allowable Direct Costs May Be Charged On Federally Sponsored Project Proposals:  
[http://policies.fiu.edu/record\\_profile.php?id=260](http://policies.fiu.edu/record_profile.php?id=260)



# Direct Charges on Privately Funded Projects

- All costs, technical and administrative, required for completing a project funded solely by a private, non-governmental, sponsor (i.e., not a “federal flow through”) may be charged to that sponsor, subject to sponsor guidelines.
- Privately-sponsored projects are those that are funded by private companies or foundations only and are not funded by those companies or foundations with ANY federal funds.
- If the ultimate source of funds coming to FIU through the private companies or foundations is federal, then the requirements of 2 CFR 200 for what may be direct charged must be followed
- ORED policy - Direct Costs on Privately Funded Sponsored Projects:

[http://policies.fiu.edu/record\\_profile.php?id=253](http://policies.fiu.edu/record_profile.php?id=253)

# Cost Sharing

- Generally cost sharing from FIU is permitted only when sponsor RFP mandates cost sharing
- AVP for Research may determine otherwise on case-by-case basis
- Voluntary Cost Sharing is generally NOT permitted
- ORED policy – Cost Sharing in Sponsored Projects

[http://policies.fiu.edu/record\\_profile.php?id=250](http://policies.fiu.edu/record_profile.php?id=250)

# Cost Sharing Form

- Required when any cost sharing (match) from FIU is pledged, whether in budget or proposal text
- List all cost sharing pledged by FIU, per year, and with a cumulative amount, and include
- FIU Dept IDs from which the cost sharing will be drawn.
- FIU representative authorized to sign on the department ID(s) pledged must sign the Cost Sharing Form and upload into the ePRAF package as evidence that
- cost sharing is approved and
- the Dept ID pledged has funding to cover the cost sharing proposed for at least one year.
- If cost sharing funds are not available at time of award, the sponsor budget for the project will not be released

# What Funds may be Pledged as Cost Sharing?

- Can pledge funds from a state or privately funded project towards a federal project if the state or private project is not itself federally funded & the sponsor approves such pledging in writing
- Cannot pledge funds from another federal project as cost sharing
- Cost sharing funds must be necessary and reasonable for proper and efficient accomplishment of project
- Cost sharing pledged must be allowable under the principles of 2 CFR 200 (i.e., it must qualify as an allowable direct cost).
- Any cost that would be unallowable as a direct cost is unallowable as cost share.  
Ex. - administrative support is normally not allowed as a direct charge to a federal award; therefore normally unallowable as cost sharing
- Costs sharing must be described in the approved proposal budget and/or terms of the sponsored agreement – i.e., is required by the award

# Nepotism in Research

- The PI must state on the Electronic Internal Clearance Form (ePRAF) if any personnel to be working on the sponsored project is/are related to the PI or to each other or to any other University employee(s), as defined in the Human Resources Nepotism Policy. **This also applies to personnel listed under a proposed Subaward or Consulting Agreement.**
- The Human Resources Nepotism Policy provides that “related persons” should not be employed in a department or unit, which will result in a subordinate-supervisor relationship between such individuals through any “line of authority.” “Line of authority” and “Related Persons” are defined above.
- Because the PI of a project is the “supervisor” of all project personnel for purposes of that project, the University’s nepotism policy must be followed to ensure the propriety of project staffing.
- Accordingly, prior to ORED’s award of any sponsored project in which a nepotism relationship exists between or among any project staff or between any project staff and other University employee(s), the Nepotism Disclosure Form found on the Human Resources Forms Library must be completed explaining the nepotism relationship as it pertains to the sponsored project, and the project staffing must be approved by ORED and Division of Human Resources.

# Nepotism in Research

- Accordingly, prior to ORED's award of any sponsored project in which a nepotism relationship exists between or among any project staff or between any project staff and other University employee(s), the Nepotism Disclosure Form must be completed explaining the nepotism relationship as it pertains to the sponsored project, and the project staffing must be approved by ORED and Division of Human Resources.
- The Nepotism Form will be provided by ORED if required.

## **Closing Remarks**

- Questions
- Adjournment