



SAINT LOUIS UNIVERSITY

Procedures and Timelines for Submission of Proposals for External Funding

Policy Number: RA-015

Version Number: 1.0

Classification: Research Administration

Effective Date: June 1, 2014

Responsible University Office: Vice President for Research

1.0 INTRODUCTION

The Division of Research Administration is committed to exceptional service in support of the investigators of Saint Louis University (SLU). The Office of Research Development and Services (ORDS) provides crucial services that insure that grant submissions from our investigators meet the requirements of the various funding entities that support sponsored projects. Such services enhance the likelihood that a grant submission will compete successfully for external funding. In providing such services, ORDS must coordinate with administrative support staff at the Department and School/College levels, as well as various Offices in the Division of Research Administration, in order to comply with federal and other sponsor regulations. All of the above activities require that grant submissions be submitted in a reasonable time frame if a submission is to be managed effectively.

2.0 PURPOSE

The purpose of this policy is to outline the procedures to be followed for submission of proposals for external funding, as well as the timelines necessary for complete review and the consequences of failure to comply with the timelines.

3.0 PERSONNEL AFFECTED

This policy applies to all Saint Louis University faculty, staff, students, and other personnel who intend to submit proposals to external agencies for grants or contracts in support of research, instruction, or other sponsored activities.

4.0 DEFINITIONS

Business Day: A day of the week, Monday through Friday, from 8:00 a.m. to 5:00 p.m. Central Time when the University is open for business. Does not include evenings (after 5 p.m.), weekends, holidays, or other days and times when the University is closed.

Complete Proposal: A proposal that includes all elements required by the sponsor and conforms to all University requirements (e.g., a complete and accurate eRS transmittal

form, Conflict of Interest disclosures, Export Controls). A complete proposal is substantially ready for submission to the funding entity. Any proposal lacking these elements will not be considered complete.

Conflict of Interest Office (COI): The office in the Division of Research Administration that is responsible for ensuring that all proposals submitted for external funding are in compliance with federal regulations and University policies and procedures related to financial conflicts of interest in research. No proposal can be submitted that fails compliance with Conflict of Interest regulations and policies.

eRS: The University's Electronic Research Services system:

<https://ers.slu.edu/ers/logon.aspx>

Export Controls Officer (ECO): The officer in the Office of the General Counsel/Research Compliance who ensures that proposals submitted for external funding are in compliance with federal regulations regarding export controls.

Office of Research Development and Services (ORDS): The University's pre-award office responsible for the approval of submissions or actual submission of packages of applications and related documents to external agencies for grants and contracts to fund research, instruction, or other activities.

Principal Investigator: The individual who takes full responsibility for the design, conduct and reporting of a research, instruction, or other activity project.

Sponsor Deadline: The last day on which a sponsor will accept submission of a proposal for support. Typically, the sponsor deadline also will specify the hour of the day by which a complete submission is expected. NOTE: See definition of "Business Day" above. ORDS is not required to make submissions to sponsors after the close of a business day (5:00 p.m. Central Time). (Please note that the risk of failure to meet sponsor deadlines because of technical difficulties escalates as the time between the attempted submission and the sponsor deadline narrows.)

5.0 POLICY

It is the policy of Saint Louis University that all proposals to external sponsors for funding of research, instruction or other activities will be submitted using the University's eRS system and will conform to the timelines provided herein. Awards for proposals not submitted through eRS may not be accepted by the University. Proposals not meeting the deadlines mentioned below will be reviewed solely for compliance with institutional policy and are not guaranteed for submission prior to the sponsor deadline. **Proposals submitted through eRS less than two full days in advance of a sponsor deadline will not be reviewed or submitted and will be returned to the investigator.**

6.0 RESPONSIBILITIES

Principal Investigator:

- Ensure that proposal conforms to sponsor guidelines and regulations and University policies and procedures.
- Complete Transmittal Form and upload complete, ready-to submit proposals (including budgets) in eRS Five (5) full business days prior to the sponsor's submission deadline, or ten (10) full business days prior to deadline if subcontracts or multi-institutional proposals are involved.
- Ensure that appropriate Facilities and Administrative (F&A)/Indirect Costs are included in budget.
- Ensure that budget is an accurate reflection of costs associated with the project.
- Ensure that all members of the research team have completed current conflict of interest in research disclosures and have completed the required conflict of interest training. Anyone involved in the design, conduct or reporting of research, or designated by the Principal Investigator as "Key Personnel" must have current conflict of interest disclosures on file or a proposal cannot be submitted (see Financial Conflict of Interest in Research Policy, RC-001).
- Ensure that the proposal has been reviewed and cleared for submission by the Export Controls Officer if applicable (see Export Controls Policy, RC003)
- When required, ensure that protocols to the Institutional Review Board (IRB) or the Institutional Animal Care and Use Committee (IACUC) are submitted or will be submitted and approved prior to start of sponsored research, instruction, or other activity. No work on the project can be conducted without these approvals if human subjects or animals are involved.
- Obtain approvals for items such as cost sharing, matching funds, percent effort and associated salary recovery prior to uploading in eRS.

Office of Research Development and Services (ORDS):**For Proposals Submitted at least Five (5) Full Days Prior to Sponsor Deadline or Ten (10) Full Days for Multi-Institutional Submissions:**

- Review proposals for completeness and compliance with sponsor guidelines and regulations.
- Review proposals for compliance with University policies and procedures.
- Review budget for accuracy and consistency with proposal approach.
- Assist Principal Investigator with corrections necessary prior to submission to sponsor.
- Submit proposals by sponsor deadline, or 5:00 p.m. Central Time on deadline day whichever is earlier. (Please note that the risk of failure to meet sponsor deadlines because of technical difficulties escalates as the time between the attempted submission and the sponsor deadline narrows.)

For Proposals Submitted 2 - 5 Full Days Prior to Sponsor Deadline or 4 Full Days for Multi-Institutional Submissions:

- Review of submission for compliance with SLU internal policies/guidelines
- Basic budget review

- Minor assistance in identifying and correcting errors that would prevent submissions
- Submit proposals by sponsor deadline or 5:00 p.m. Central Time on deadline day, whichever is earlier. (Please note that the risk of failure to meet sponsor deadlines because of technical difficulties escalates as the time between the attempted submission and the sponsor deadline narrows.)

Proposals submitted less than two full business days prior to a sponsor deadline will be returned to the PI without review and will not be submitted to the Sponsor unless arrangements have been made with the Director of ORDS well in advance of the deadline (i.e., more than 5 business days).

Office of Conflict of Interest (COI):

- Review proposal to ensure that all research team members have completed conflict of interest disclosures and training.
- Inform Principal Investigator of any non-compliance with COI policy.
- Approve submission of proposal when compliant with COI policy.

Export Controls Officer (ECO):

- Review proposals for necessary screening prior to submission.
- Inform Principal Investigator of export controls issues prior to submission.
- Clear proposal for submission if compliant with Export Controls policy.

7.0 PROCEDURES

Principal Investigators are encouraged to consult with their Grants Manager or Grant Administrator in ORDS well in advance of a proposal deadline. However, no submission will be reviewed until a full, substantially complete proposal is uploaded into eRS. Once uploaded into eRS, proposals may only be altered with the express consent or at the request of ORDS or other approvers (e.g., COI, IACUC). Only minor changes will be allowed, as determined by ORDS, unless expressly approved by ORDS. In general, more flexibility is associated with changes to background materials. **Changes to the approach, especially those that also involve budget changes, are strongly discouraged.**

To receive a full review from ORDS staff that includes the possibility of multiple iterations for revisions (i.e., active back and forth between the PI and ORDS personnel), a submission with SLU as the lone institution must include a substantially complete proposal that is uploaded into eRS at least five (5) full business days before the agency’s deadline. (See definitions for “Business Day.”) If the submission involves multiple institutions, the complete submission must be uploaded into eRS at least ten (10) full business days before the agency’s deadline. A full review will include:

- Review of changes needed for compliance with Sponsor/Prime guidelines. In order to optimize the feedback and change process, PI’s should make every effort

- to submit full and accurate descriptions of the project, especially the statement of work, the methodology, and the budget.
- Thorough review for compliance with SLU internal policies/guidelines.
 - Thorough review of proposed budget.
 - Assistance from ORDS in identifying and correcting errors following initial submission.
 - Review by Conflict of Interest (COI) office for compliance with COI policy.
 - Review by Export Controls Officer (ECO) for compliance with EC policy.

Complete submissions entered into eRS less than five (5) full business days but more than two (2) full business days before the agency deadline, or less than ten (10) but more than four (4) full business days for multi-institutional proposals prior to agency deadline, will receive only a single review as follows:

- One-time-only review of submission for compliance with SLU internal policies/guidelines
- Basic budget review
- Review by COI for compliance with COI policy.
- Review by Export Controls Officer for compliance with EC policy.

Proposals submitted according to these time frames will be reviewed only after review of proposals that meet the preferred (earlier) timeline.

NOTE: Proposals cannot be submitted if they are not compliant with Conflict of Interest Policy. If COI does not have sufficient time to ensure COI compliance, the proposal cannot be submitted.

Any submission entered into eRS less than two (2) full business days before the agency deadline or less than 4 business days for multi-institution proposals will not be reviewed, approved, or submitted and will be returned to the Principal Investigator.

8.0 REFERENCES

RC-001 Financial Conflicts of Interest in Research Policy

RC-003 Export Controls Policy (Research)

RA-001: Policy for Externally Sponsored Programs: Grants, Contracts, and Agreements

APPROVAL SIGNATURES

This policy has been approved by:

Signed by Raymond C. Tait, Ph.D.

04/25/2014

Date:

Vice President for Research
Saint Louis University

REVISION HISTORY

EFFECTIVE DATE	VERSION NUMBER	MODIFICATION
June 1, 2014	1.0	New Document