



Policy Title	Review and Approval of Sponsored Project Documents
Policy Category	Ethics, Integrity, and Legal Compliance Policies
Policy Approval Date	April 12, 2017
Policies Superseded	None
Responsible Office	Provost
Related Policies	Principal Investigator Eligibility and Assurances Policy; Facilities and Administrative Costs Recovery and Distribution Policy
Frequency of Review	Every 3 years
Date of Last Revision	April 22, 2019

I. SCOPE

This Institutional Review and Approval of Sponsored Project Documents Policy (“Policy”) applies to all faculty, staff, and students of the University who plan to submit a Proposal for a Sponsored Project to a Sponsor. Please see Section IV below for the definitions of capitalized terms contained in this Policy.

II. POLICY STATEMENT

The purpose of this Policy is to require a comprehensive pre-submission review of all Proposals to ensure that they are complete and accurate and to establish a process in order to:

- Ensure that the Principal Investigator, acting on behalf of the University, is compliant with (i) all relevant federal and state regulations, (ii) the Principal Investigator Eligibility and Assurances Policy, (iii) the Facilities and Administrative Costs Recovery and Distribution Policy, and (iv) other relevant University policies;
- Avoid over-commitment of University resources and faculty and staff time;
- Ensure that Proposals, when awarded, will not create unforeseen financial burdens for the University;
- Avoid situations where an Award is declined because the University is unable to meet the commitments set forth in the Proposal;
- Ensure an appropriate match between a Sponsor and the Principal Investigator’s interests;
- Ensure that all Proposals receive appropriate review and Awards are accepted by the Authorized Organization Representative (AOR) who has the authority to sign on behalf of the University;
- Avoid potential criminal, civil, and administrative penalties that could be enforced against the Principal Investigator and/or the University; and
- Minimize the possibility of audit findings.

III. POLICY

It is the Policy of the University that all Proposals for external funding must be reviewed as outlined below prior to being submitted to a Sponsor. The University reserves the right to withdraw a Proposal that has been submitted or reject an Award that has been granted, if such Proposal was not presented in accordance with the terms of this Policy.

The OSRP is responsible for coordinating the institutional review of Proposals, submission of Proposals to Sponsors, and Award process. Only the AOR or a designee can submit a Proposal to a Sponsor on behalf of the University after the Proposal has been approved in accordance with this Policy.

A. Proposal Approval

The processing of Proposals has three stages: (i) preliminary review of the Proposal by OSRP, (ii) review of the Proposal by the University Routing Committee, and (iii) Proposal submission to the Sponsor with each stage requiring approximately 5 business days. Adequate lead-time is imperative to review Proposals in order to ensure that they conform to Sponsor guidelines, University policy, and federal and state regulations. Adequate lead-time is also necessary because many Proposals are submitted via electronic sponsor systems where electronic validation errors and technical difficulties can occur and cause delays. Without adequate review, Sponsors often reject proposals with missing or non-compliant components. It is recommended that all Principal Investigators consult with the OSRP as soon as they become aware of a Sponsored Project that they intend to pursue so that the OSRP can assist them with the Proposal preparation process.

If Proposal documents are received in accordance with this Policy, OSRP will work diligently to ensure that the Proposal is reviewed quickly and accurately. OSRP and the University Routing Committee are responsible to provide timely review feedback to the Principal Investigator to ensure that Proposals are submitted to the Sponsor in advance of the submission deadline.

(i) Preliminary Review by OSRP

Preliminary review is required for all Proposals regardless of amount. OSRP should receive required Proposal documents 15 business days in advance of the Sponsor submission deadline to allow sufficient time for preliminary review. This preliminary review ensures an administrative check of a Proposal as it relates to the requirements in the Sponsor guidelines, availability of University resources, and legal and other compliance related considerations. Budget preparation assistance is provided at this stage as well. OSRP is responsible for providing timely review feedback to ensure that Proposals will be submitted to the Sponsor ahead of the deadline.

If a Proposal is submitted to OSRP less than **five (5) business days** before the submission deadline to the Sponsor, OSRP and the University Routing Committee may not be able to review the Proposal despite their best efforts, and the Proposal may not be submitted to the Sponsor for funding consideration. The Principal Investigator will be notified immediately if due to time constraints the OSRP is unable to complete a timely review within that time period.

(ii) Review by University Routing Committee

Once it has completed its preliminary review, OSRP will send the Proposal to the University Routing Committee for its review. A Dean of the associated School, and a Chair or other immediate supervisor of the associated department must approve Proposals submitted to the University Routing Committee as indicated by their signatures affixed to the Proposal Routing and Approval Form accompanying the Proposal.

Proposals that are less than or equal to \$50,000.00 and that have no matching funds will be reviewed through an expedited review process of the University Routing Committee in order to ensure that the University can commit to providing the resources outlined in the Proposal. This process requires the approval of the OSRP Director.

Proposals over \$50,000.00 and/or Proposals that involve matching funds, regardless of the amount, will be reviewed by all members (OSRP Director, the Provost, and representative from Finance and Administrative Services) of the University Routing Committee.

At times, the OSRP or the University Routing Committee may request changes in order to bring the Proposal into compliance with Sponsor guidelines and/or suggest changes that will enhance a Proposal's competitiveness and will contact the Principal Investigator with this feedback.

(iii) Proposal submission to the Sponsor

When the Proposal is complete and all routing approvals have been secured, OSRP will provide institutional endorsement of the Proposal. Then, the AOR or a designee can submit the Proposal to the Sponsor. The AOR or a designee will submit Proposals to the Sponsor as early as possible, with the goal being no later than two (2) business days before the Sponsor deadline in order to avoid technical issues during submission. The Principal Investigator must ensure that a complete and final package is sent to OSRP in a timely fashion to allow sufficient time for final clearance before submission. Please keep in mind that Sponsors may require that Proposal documents be mailed which can add additional time for submission.

B. Award Acceptance

If a Sponsor issues an Award, it cannot be accepted until the written agreement accompanying the Award is reviewed and approved by the Office of General Counsel. After this review is concluded, the approved agreement will be delivered to the AOR for signature.

IV. DEFINITIONS

AOR - The authorized organization representative who has the authority to submit Proposals to the Sponsor and sign Sponsored Project Documents on behalf of the University.

Award - Funds that have been awarded to the University by a Sponsor for a particular Sponsored Project.

OSRP – The Arcadia University Office of Sponsored Research and Programs.

Principal Investigator - The individual designated by the University to have the appropriate level of authority and responsibility to direct the Sponsored Project.

Proposal - An application or letter of intent that outlines a proposed Sponsored Project and contains all information requested by a Sponsor for a Sponsored Project.

Sponsor - The organization or funding agency that funds a Proposed Project.

Sponsored Project Documents – The Proposal including all required documentation and the formal written agreement memorializing the Award, such as the grant agreement, sub-award agreement, cooperative agreement, contract, or fellowship, etc.

Sponsored Projects - Are externally funded activities in which a formal written agreement such as, a grant,

award, sub-award agreement, cooperative agreement, contract, or fellowship is executed between University and the Sponsor. Gifts are not included in this definition and are not covered by this Policy.

University - Arcadia University, its colleges, schools, affiliates, divisions and subsidiaries.

University Routing Committee consists of members nominated by the University. Currently the members are the Director of the OSRP, the senior administrator overseeing the OSRP, the Provost, and a representative from the Finance Department.

V. EFFECTIVE DATE

This Policy shall be effective on the date that it is approved.

VI. SIGNATURE, TITLE AND DATE OF APPROVAL

By: *N. Sevilla Cruz*
President, Arcadia University

Date: 12 April 2017

VII. DATE OF REVIEW

- Minor edits made April 22, 2019