

PreAward Services

.240 Lead Time Required to Process Proposals

I. Background

Through delegated authority issued by the Vice President for Research, PreAward Services is designated as the office responsible for supporting the development, review, final approval and submission of proposals requesting external funding for K-State research, education and public service activities; development, review and negotiation of grants, contracts and agreements with external sponsors; development, negotiation and approval of subcontracts, subawards, consultant and service agreements to be issued pursuant to the authorizations contained within sponsored grants, contracts and agreements; monitoring commitment of university funds, personnel and space; providing assurance to sponsors regarding compliance issues and mitigation of conflicts of interest; processing sponsored project modifications; and securing final K-State approval and signature for all proposals and agreements from K-State's Authorized Organizational Representative (AOR), currently the Associate Vice President for Research. AOR signature is a requirement for all proposals prior to submission and for the acceptance of all subsequent grants, contracts and awards. This clearance and approval process serves to establish these documents as legally binding commitments upon the university. Timely submission to PreAward Services ensures thoughtful consideration and review of the proposal in order to meet this obligation.

II. Purpose

The office of PreAward Services is committed to the quality and success of K-State's externally sponsored proposals and supports timely submission of proposals that are compliant, accurate, and complete. The AOR, the Principal Investigator and his/her department and college, share responsibility for the accuracy of the information contained in these proposals and its conformance with sponsor guidelines and directives, along with all applicable federal and state laws, and institutional policies and procedures. Therefore, sufficient time (i.e., lead time) must be provided to PreAward Services for an adequate and thorough review. This review will in turn allow investigators to act on recommendations made based on the review. Through this process, PreAward Services is able to perform its duty to confirm and provide assurance of compliance with federal and state laws, as well as policies and procedures of both the university and sponsor. This "Lead- Time" policy applies to all proposals, subaward proposals, and non-competing continuations for both paper-based and electronic applications. This policy also applies to pre-proposals or letters of intent presenting budgetary or cost information, including fixed-price or fully-burdened quotes, or specific personnel or facility commitments to a sponsor.

III. Definitions

Internal Due Date: The internal proposal deadline date determined by K-State in accordance with the policy outlined herein to provide units within the institution sufficient lead time for review of documentation prior to the Sponsor Due Date.

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Sponsor Due Date: The deadline (date and time) after which the sponsor will no longer accept proposals or corrections to recently submitted proposals for the targeted competition. This also includes due dates set by a pass through entity. For example, if the prime sponsor's due date is October 1, but the proposed funding is coming through another university and that university sets a due date of September 1, the September 1 date serves as the official Sponsor Due Date for K-State and is the date utilized to determine the Internal Due Date.

At-Risk Proposals: Proposals and/or proposal components routed through for university review and approval after the Internal Due Date, as more fully described in IV.3 below.

5-day Submissions - Proposal submissions where the normal development services provided by PreAward Services are assumed by departmental/college proposal support services and the proposal does not include an unresolved complicating feature more fully described in IV.2.a. below.

10-day Submissions - Proposal submissions where PreAward Services IS providing all of the proposal preparation support or the proposal includes one of the complicating features more fully described in IV.2.a. below that has not already been resolved.

IV. Policy

1. 5-Day Submissions

Internal Due Date: Five (5) Business Days in Advance of Sponsor Due Date

- a. When proposal development support is provided to principal investigators by departmental or college proposal support personnel, investigators must adhere to a 5 day advance Internal Due Date for the following documents to allow PreAward Services staff time to complete their internal review and collect necessary approvals:
 - i. Final budget and budget justification in sponsor form, including those for any subawardees certified by subawardee research office
 - ii. Draft K-State current and pending support
 - iii. Draft project summary, abstract, or scope of work
 - iv. Biosketches
 - v. Conflict of Interest forms/information, if applicable
- b. In order to support investigators in creating the most competitive proposal package for submission, when documents identified in IV.1.a. above are received by the Internal Due Date, PreAward Services will provide initial feedback regarding the documents submitted to PreAward Services no later than three business days after their receipt.
- c. All remaining final technical-based documents outside of those identified in IV.1.a. above, such as the final project description, project summary/abstract, references, etc., are due no later than 24 hours prior to the Sponsor Due Date. This later Internal Due Date for technical documents will allow investigators to continue to draft their project description and other technical sections of the proposal.

2. 10-day Submissions

Internal Due Date: Ten (10) Business Days in Advance of Sponsor Due Date

- a. When PreAward Services is providing all of the proposal development assistance or proposal submissions include complicating issues not previously resolved, investigators must adhere to a 10 day advance Internal Due Date. Complicating issues include but are not limited to research compliance committee concerns, intellectual property or other such prior contractual review or negotiation requirements, assisting with developing, obtaining and reviewing subawardee proposal documentation, securing commitments for additional space, interpretations requiring general counsel review, multi-entity collaborative submissions, budget development support, foreign sponsor guideline interpretation and review, obtaining and verifying commitment of internal and/or third party matching funds and new sponsor submission portals requiring a prior registration process.
- b. In order to support investigators in creating the most competitive proposal package for submission, PreAward Services will provide an initial status update regarding the documents submitted to PreAward Services no later than three business days after their receipt, when documents identified in IV.1.a. above are received by the Internal Due Date,.
- c. The PreAward Services staff member assigned to your unit will determine additional internal deadlines for documents and other information to keep the process on task to ensure an efficient and timely submission, including deadline requirements for subawardees to submit their documents.
- d. All remaining final technical-based documents outside those identified in IV.1.a. above, such as the final project description, project summary/abstract, references, etc., are due no later than 24 hours prior to the Sponsor Due Date. This later Internal Due Date for the technical documents will allow investigators to continue to draft their project description and other technical sections of the proposal.

3. At-Risk Proposals

Proposals received after the Internal Due Dates identified above are considered At-Risk Proposals. These submissions cause inequities in proposal review and processing and jeopardize both the submission of the At-Risk Proposal and the submission of timely received proposals.

- a. In order to not be considered an At-Risk Proposal, PreAward Services must receive the documents outlined in IV.1.a by the Internal Due Dates outlined in IV.1 and IV.2 above (5 days or 10 days prior to the Sponsor Due Date, as applicable, except for the technical documents which can be received 24 hours prior to the Sponsor Due Date).
- b. At-Risk Proposals will be identified with special notations on the Transmittal Sheet within eProposals when the eSign created date is less than the required 5 or 10 business days prior to the Sponsor Due Date. A word of caution is warranted here. PreAward Services doesn't officially receive the eProposals documents until the last eSign signature, so even if the eSign record is created and routed 5 days or 10 days in advance (as required, depending on the Internal Due Date), the

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Internal Due Date can still be missed if the final eSign signature isn't applied 5 days or 10 days (as applicable) prior to the Sponsor Due Date. In these cases where the parties are waiting on the eSign signatures, the proposal documents must be emailed to the applicable PreAward Services staff member to officially submit the proposal documents to meet the Internal Due Date. When college/departmental proposal support services are being provided, the emailed documents should be provided by these personnel to avoid the submission of outdated documents.

- c. At-Risk Proposals will not be given priority status over proposals received on time. At-Risk Proposals will not receive the benefit of feedback within three business days of receipt as described in IV.1.b. and IV.2.b. above.
- d. Every effort will be made by PreAward Services to submit all proposals, even those designated as At-Risk Proposals. In many instances at least a partial review of the proposal, particularly the documents identified in IV.1.a. above, can be completed by PreAward Services in an effort to accommodate a reduced review period. However, submission of At-Risk Proposals cannot be guaranteed if such would jeopardize the timely submission of non-At-Risk Proposals.
- e. If an At-Risk Proposal is found to be in non-compliance with regulations or institutional policy via a post submission review, the university necessarily reserves the right to withdraw the proposal from consideration.

As noted in IV.3.b above, receipt of proposal documents is determined by full execution of the electronic Transmittal Sheet (all eSign signatures) or by email to the applicable PreAward Services staff member, or, if the staff member has posted an automatic out-of-office email reply notice, by email to research@ksu.edu. PreAward Services can only ensure the on-time, accurate, complete and compliant submission of applications to external sponsors when the above timelines and practices are followed. Proposal submission requests not adhering to the Internal Due Dates identified above are not guaranteed submission. Therefore, the principal investigator is making a conscious, deliberate, and controllable decision regarding submission of their proposal and has explicitly taken full responsibility for the outcome of all aspects of the submission or non-submission of their proposal.

Individual colleges, schools, departments or units may impose additional deadlines in advance of the Internal Due Dates dictated by this policy.

Any proposal will receive a much diminished review when documents identified in IV.1.a. above are received after the Internal Due Dates; thus, there is no guarantee that the proposal will be complete when submitted. The goal of PreAward Services will be to get the proposal submitted, with an understanding the proposal may be withdrawn if a post submission review finds that the submission was incomplete. If PreAward Services determines that insufficient lead time has been provided for even the most basic compliance and regulatory review, the proposal will not be submitted. Every effort will be made to notify the departmental/college support personnel or the investigator of this situation **prior** to the Sponsor Due Date.

V. PreAward Services Staff Availability

Regular hours for PreAward Services staff are 8 a.m. until 5 p.m. on days the university is open for business. Investigators should plan for their submissions to occur during regular business hours even if the submission deadline is after 5 p.m.. Investigators must also consider scheduled closings, holidays, and potential inclement weather when developing their submission timeline. For the avoidance of doubt, references to “days” throughout this policy in regard to Internal Due Dates and Sponsor Due Dates mean “business days” and references to 24 hours refer to the 24 hours on the last business day before the Sponsor Due Date.

As submission of proposal documents via email is an acceptable method, PreAward Services staff will use the automatic email reply feature within their email software to advise investigators and departmental staff of an absence. If an automatic reply is received, the proposal documents should then be emailed to research@ksu.edu.

VI. Unauthorized Proposal Submission

Proposals, including pre-proposals, letters of intent and concept papers that propose the commitment of personnel and facilities or other such financial consideration, including fixed-price and fully-burdened price quotes, cannot be submitted directly to the sponsor without the prior review of PreAward Services and authorization of K-State’s AOR. Any award granted as a result of an unauthorized proposal submission is subject to rejection by the institution.