The Post-Submission Pre-Award Review Process

SRA Annual Meeting
San Francisco, CA
October 19 – 23, 2019
Wednesday 10:15 – 11:15 Session
Room: Imperial B
Dominic Esposito, CRA
Director of Sponsored Programs Administration
Farmingdale State College, SUNY
Farmingdale, New York
esposid@farmingdale.edu
631-794-6667
Description

Proposals are often prepared and submitted very close to the deadline. They are then filed away until the award is made even though there is a high probability that the budgets contain errors. This puts post-award administrators in the unenviable position of discovering these mistakes after the project start date which can lead to delays and unhappy Principal Investigators (PIs). This interactive session will examine the pre- to post-award progression and introduce attendees to a post-submission, pre-award review process.
Learning Objectives:

• Learn to bridge the gap between pre- and post-award processes.

• Understand a best practice that can be implemented at the institutional or departmental level.
TEXT
DOMINICESPOS663 TO 37607 once to join
<table>
<thead>
<tr>
<th>Option</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primarily/Predominantly Undergraduate Institution (PUI)</td>
</tr>
<tr>
<td>Institution of Higher Education (IHE) (Teaching Focused)</td>
</tr>
<tr>
<td>Research I Institution (RU/VH)</td>
</tr>
<tr>
<td>Medical/Professional School</td>
</tr>
<tr>
<td>Hospital</td>
</tr>
<tr>
<td>Non-Profit</td>
</tr>
<tr>
<td>Federal Agency</td>
</tr>
<tr>
<td>Undergraduate Focused</td>
</tr>
<tr>
<td>Non-PUI</td>
</tr>
<tr>
<td>Other</td>
</tr>
<tr>
<td>Position</td>
</tr>
<tr>
<td>--------------------------------------------</td>
</tr>
<tr>
<td>VP/Director</td>
</tr>
<tr>
<td>Pre-Award Research Administrator (non-compliance)</td>
</tr>
<tr>
<td>Post-Award Research Administrator (non-compliance)</td>
</tr>
<tr>
<td>Compliance Officer</td>
</tr>
<tr>
<td>Departmental/Institute Administrator (Pre-or Post-Award)</td>
</tr>
<tr>
<td>Faculty</td>
</tr>
<tr>
<td>Support/Professional Staff</td>
</tr>
<tr>
<td>Consultant</td>
</tr>
<tr>
<td>Pre- and Post-Administrator, Single Person Office, etc.</td>
</tr>
<tr>
<td>Program Official</td>
</tr>
<tr>
<td>Academic Administrator (Provost, Assistant/Associate Provost, Dean, etc.)</td>
</tr>
</tbody>
</table>
How many years have you been working in the field relevant to the content being presented at this session?

<table>
<thead>
<tr>
<th>Years</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Year or less</td>
</tr>
<tr>
<td>1-3 Years</td>
</tr>
<tr>
<td>4-5 Years</td>
</tr>
<tr>
<td>6-9 Years</td>
</tr>
<tr>
<td>10-15 Years</td>
</tr>
<tr>
<td>15-19 Years</td>
</tr>
<tr>
<td>20 or more</td>
</tr>
<tr>
<td>Sectional Affiliation</td>
</tr>
<tr>
<td>-----------------------</td>
</tr>
<tr>
<td>Northeast</td>
</tr>
<tr>
<td>Midwest</td>
</tr>
<tr>
<td>Western</td>
</tr>
<tr>
<td>Southern</td>
</tr>
<tr>
<td>Canada</td>
</tr>
<tr>
<td>International</td>
</tr>
</tbody>
</table>
Are you primarily:

- Pre-Award
- Post-Award
- Both
Overview

- Prevention and Background
- Identification of Need
- Post-Submission Review
- Post-Submission, Pre-Award Process
- Value Added
- Questions
Prevention

• A good post-award practice begins with a good pre-award practice

• Always try and prevent issues before they occur
Background
The Proposal Lifecycle

1. Identify funding needs (PI)
2. Find an opportunity (PI/SPO)
3. Read the guidelines (PI)
4. Meet with your sponsored program office (PI/SPO)
5. Contact the program officer (PI)
6. Identify and make contact with collaborators and subcontractors (PI)
7. Read the guidelines (PI)
8. Begin the proposal writing and budget (PI/SPO)
9. Address human, animal, biosafety, etc. issues with the appropriate compliance officer (PI/Compliance)
10. Request assistance as needed (PI/SPO)
11. Send a draft to the sponsored programs office and to successful PIs for review and request compliance approval if applicable (PI)
The Proposal Lifecycle

12. Gather required documents from collaborators and subcontractors – CVs, scopes of work, etc. (PI)
13. Adjust the proposal and budget as necessary (PI)
14. Ensure the proposal meets the criteria specified in the guidelines (PI)
15. Route a final draft for institutional approval (PI)
16. Download the application package if necessary (PI)
17. Insert/upload the proposal parts (PI)
18. Send the completed package for final institutional review and approval (PI)
19. Correct errors if needed and send to institutional official (PI)
20. Submit the grant (Institutional Official)
21. Ensure the grant passes sponsor validation – correct and resubmit if required (PI/SPO)
The Proposal Lifecycle

• 21 steps
• The PI is involved in 20
• 20 steps + course load + institutional service + other duties =
Reasonable Timeline

20. Submit the grant (Institutional Official) – 5 minutes prior to deadline
Reasonable Timeline

21. Ensure the grant passes sponsor validation – correct and resubmit if required (PI/SPO) – Day before the deadline
20. Submit the complete grant (Institutional Official) – 2 days prior to deadline
19. Correct errors if needed and send to institutional official (PI) – 5 days prior to deadline
18. Send the completed package for final institutional review and approval (PI) – 1 week prior to deadline
17. Insert/upload the proposal parts (PI) – 8 days prior to deadline
16. Download the application package if necessary (PI) – 10 days prior to deadline
15. Route a final draft for institutional approval (PI) – 10 days prior to deadline
14. Ensure the proposal meets the criteria specified in the guidelines (PI) – 10 days prior to deadline
13. Adjust the proposal and budget as necessary (PI) – 2 weeks prior to deadline
12. Gather required documents from collaborators and subcontractors – CVs, scopes of work, etc. (PI) – 1 month prior to deadline
Reasonable Timeline

11. Send a draft to the sponsored programs office and to successful PIs for review and request compliance approval if applicable (PI) – 1 ½ months prior to deadline
10. Request assistance as needed (PI/SPO) – 2 months prior to deadline
9. Address human, animal, biosafety, etc. issues with the appropriate compliance officer (PI/Compliance) – 2 ½ months prior to deadline
8. Begin the proposal writing and budget (PI/SPO) – 3 months prior to deadline
7. Read the guidelines (PI) – 3 ½ months prior to deadline
6. Identify and make contact with collaborators and subcontractors (PI) – 3 ½ months prior to deadline
5. Contact the program officer (PI) – 3 ½ months prior to deadline
4. Meet with your sponsored program office (PI/SPO) – 3 ½ months prior to deadline
3. Read the guidelines (PI) – 4 months prior to deadline
2. Find an opportunity (PI/SPO) – 4 months prior to deadline
1. Identify funding needs (PI) – 5 months prior to deadline
Reasonable Timeline

• May or may not be practiced
• Does your institutional policy dictate a hard or soft timeline for:
  – The entire proposal?
  – Part of the proposal? E.g. budget
• Is there institutional guidance regarding proposals that require only a modular budget or a lump sum request?
• If there is no institutional policy, have you considered creating one?
• Is there a review process included with the policy?
  – What does that look like?
  – What gets reviewed?
  – Who reviews it?
The Life Cycle of an NSF Proposal

1. PI has an idea!
2. Proposal Receipt at NSF
3. NSF
4. Admin. Review
5. Proposal Review
   - Mail
   - Panel
   - Both
6. Award/Decline?
7. DGA
8. DD Concur
9. Notification
10. Return Without Review

Timeline:
- 90 Days: Proposal Preparation
- 6 Months: Proposal Review and Recommendation
- 30 Days: Processing and Notification
NIH Proposal Lifecycle

• Review happens four or five months after the due date, and Council around seven months after the due date.
• If your application is expedited, you could be funded as early as six months after the due date.
• After Council, we continue funding based on paylines and in score order.
• Some must wait until near the end of the fiscal year to get a grant, which may be as long as 20 months after your original due date.

https://www.niaid.nih.gov/grants-contracts/timelines-applying
Proposal Lifecycle

• Some agencies have a longer or shorter process
• Local, state or private funders may quickly make a funding decision
  – Be ready!
Identification of Need

• Activity
Identification of Need
Post-Submission Review

• Identify issues and then develop a process
Budgetary Post-Submission Review Items

• Modular Budgets
  – Discuss issues
  – Detailed budget on file?

• What should be reviewed in the budget and what are the potential issues for different line items?
Budget Line Items and Issues

• Personnel
  – Academic year effort
  – Summer effort
  – Full-time
  – Part-time
  – Students

• Fringe Benefits
  – Different rates for different personnel categories
Budget Line Items and Issues

• Equipment
  – Equipment v. supplies
  – Impact on indirect costs

• Travel
  – Changes in plans
  – Vague justification
Budget Line Items and Issues

• Participant Support
  – Are they really participants or should they be employees?
  – Fringe benefit AND indirect cost implications

• Materials and Supplies

• Publication and Dissemination

• Computer Services

• Other
Budget Line Items and Issues

• Consultant Services
  – Consultant v. Employee
  – “The budget cannot afford fringe” is not a good justification

• Subawards
  – Indirect on the first $25k of the subcontract for the prime
  – The sub-awardee receives indirect on their budget
Case Study

B College, is 9 months in to the first year of an NSF grant. The proposal was submitted at 4:45 on deadline day. 4 consultants, who have completed their portion of the work, are on the budget and they are requesting payment. The 4 consultants are full-time faculty members at the University of C.
Case Study

• What are the issues that arise in this case?
• How do you mitigate the problems?
• How could this have been prevented?
Non-Budgetary Issues

• Technology/Facilities
• Pre-qualification documentation
  – Certificate of Incorporation
  – 501(c) Determination Letter
  – 990
  – Audit/Reviews and Findings
  – Charitable Organization Proof
  – Board of Directors/Trustees
  – Senior Leadership Resumes
  – Bylaws
  – Organizational Charts
  – Etc.
• Requirements on where to spend a portion of the funds
  – E.g. New York State Minority/Women-owned Businesses
Non-Budgetary Issues

• Compliance
  – IRB
  – IACUC
  – IBC
  – Export Controls
  – Etc.

• Other Support (Just in Time)

• Can the institution support this project?
Post-Submission, Pre-Award Review Process

– Professional development activities for faculty and administration
  • Prevention is best
  • Implement an institutional peer review process
  • “Tout” success rates for proposals that are submitted in a timely manner
Post-Submission, Pre-Award Review Process

• Workflow
  – Different methods for different types of institutions
    • Single person office
    • Pre- and post- combined central offices
    • Institute and departmental
    • Larger, separate pre- and post-award offices
Post-Submission, Pre-Award Review Process

• Workflow
  – Fact: The proposal comes in late on deadline day and is submitted
  – Who initiates the process?
  – What steps should be taken?
Post-Submission, Pre-Award Review Process

• Constants for all office configurations
  – Create a post-submission, pre-award process that is documented
    • Start: All proposals are re-reviewed x days after submission
      – This avoids “permission” for last-minute submissions
    • The review includes: Budget, compliance, etc.
    • Include timeline for contacting key stakeholders before the award is made (e.g. PI, Chair, Dean, Provost)
    • The document can be sent and re-sent to PIs when an issue arises
    • Address acceptance of award if there is non-compliance
      – A last resort
    • Requires institutional support
Post-Submission, Pre-Award Review Process

• Constants for all office configurations
  – Implement a tracking system
    • Flag files and put in a separate location from other pending files that are “cleared”
      – This could be in a physical or electronic location
        » If electronic, preferably a shared resource that is accessible by administrators who would gain value in easily viewing the information
    • Set an electronic reminder
      – Month(s) before expected funding date
  • Do a manual, periodic review
    – Open the file cabinet
Post-Submission, Pre-Award Review Process

• Single person office
  – Follow the timeline that is in the documented process
  – Communicate openly
    • Be visible and friendly
  – Read self-help books
    • Stoic philosophy
Post-Submission, Pre-Award Review Process

- Pre- and Post- combined central offices
  - COMMUNICATE!
  - The pre-award administrator takes the lead initiating the process, revisiting pending items and following-up before the award is issued.
  - Regular periodic meetings with the post-award team initiated by the pre-award administrator:
    - Weekly
    - Monthly
    - Quarterly
    - Etc.
    - “Here is what was submitted, and here is what I found”
Post-Submission, Pre-Award Review Process

• Institute and Departmental Administrators
  – Try to avoid being “caught in the middle”
    • Could be difficult
  – Be proactive in communicating with the central office (pre- or post-award)
    • Configure a system that works
      – Formal or informal meetings
      – Phone calls
      – Check ins
  – Communicate even when there is not a problem
  – Appreciation of efforts should be acknowledged by all administrators!
Post-Submission, Pre-Award Review Process

• Larger, separate pre- and post-award offices
  – Pre-award should identify post-award points of contact who work in parallel with certain PIs, schools, departments, institutes, etc.
  – Develop effective communication techniques
  – Implement an electronic sharing of information
    • On a network resource
    • Not email
    • Offices could be physically far from each other
Value Added

• What is the value added for this process when most proposals are unfunded?
Value Added

• Creates a proactive process that can provide answers to questions an agency or program official may have prior to issuing the award
• Increases efficiency and success
• Builds synergy
• Breaks down “silos”
• Fosters effective communication
• Develops camaraderie
• Avoids project start-up delays
• Mitigates the risk of possibly losing funding after the award is made
Value Added

• It is not easy to implement but the return on investment is worthwhile
  – Processing and closure
  – Alleviates stress
  – Makes friends
Questions?
Dominic Esposito, CRA
Director of Sponsored Programs Administration
Farmingdale State College, SUNY
Farmingdale, New York
esposid@farmingdale.edu
631-794-6667