PROPOSAL SUBMISSION



02/01/2022
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POLICY AND PROCEDURE

PURPOSE:

The purpose of this policy is to ensure compliance with the standards set forth in the Federal Office of Management and Budget 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), Federal and State regulations, and sponsor-specific requirements. This policy provides guidance, which will assist University of Georgia (UGA) personnel proposing, performing and managing sponsored activities. Direct costs on sponsored projects must be allowable, allocable, and reasonable.

Failure to comply with UGA policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded activities.

SCOPE:

All UGA personnel must be aware of the complex and detailed rules provided under Federal/State regulations, as well as the terms and conditions of individual sponsored activities.

POLICY:

Sponsored projects will comply with all applicable Federal, State and/or sponsor-specific costing policies. This is applicable to building proposal budgets, negotiating sponsored projects, setting up sponsored projects, as well as initiating, approving, invoicing and reporting costs.

In addition to the above policies, sponsored proposals must be built in conformance with the sponsor's funding opportunity, as well as Sponsored Projects Administration (SPA) policies and procedures. On rare occasions, PIs may need to request exceptional approval from UGA. This can occur when:

- PIs, Co-PIs or Co-Investigators do not meet UGA eligibility criteria.
- PI proposes voluntary committed cost share not mandated by the sponsor or is above and beyond sponsor's mandate.
- PI proposes whole or partial of Indirect Cost Rate waiver not mandated by the sponsor.

Sponsored Projects Administration provides:

A <u>4-Day Promise</u> for proposals fully built consistent with all sponsor, funding opportunity and UGA policies/procedures and not requiring any exceptional approvals. SPA will ensure the successful submission of all proposals received in complete form at least four business days prior to the due date assigned by the sponsor. To qualify, the proposals must be in the UGA Grants Portal in "ready to submit" form.

Proposal Submission Page 1 of 3

A <u>10-Day Promise</u> for proposals fully built consistent with all sponsor, funding opportunity and UGA policies/procedures and requiring one or more exceptional approvals. SPA will ensure the successful submission of the proposals received in complete form at least ten business days prior to the due date assigned by the sponsor. To qualify, the proposals must be in the UGA Grants Portal in "ready to submit" form. SPA will attempt to obtain exceptional approvals. If any exceptional approvals are not granted, SPA will work with PI/unit to revise the proposal submission prior to the sponsor's due date.

DEFINITIONS:

<u>Indirect Cost Waivers</u> occur when the sponsor does not have a requirement limiting an Indirect Cost Rate, yet the PI/Unit request utilization of a lower Indirect Cost Rate than applicable pursuant to our Federally Negotiated Indirect Cost Rate Agreement. The "waiver" is the difference between our entitled rate less the rate requested by the PI/unit.

<u>Principal Investigator, Co-PI, Co-Investigator eligibility</u> is a UGA privilege limited to full-time faculty. PIs, Co-PIs, or Co-Is are designated by UGA and approved by the sponsor to direct a project.

<u>Sponsored Projects</u> are externally funded activities that must be separately budgeted and accounted for according to terms of the sponsoring organization, Federal/State regulations, and UGA policy. Sponsored Activities are provided through grants, contracts, and agreements with any Federal Agency, State Agency, or non-Governmental Organization that supports research, training, instruction, public service and other activities.

<u>Sponsor-specific Requirements</u> include requirements stated within the sponsor rules/regulations, funding opportunity announcement, award/grant or contract/agreement and amendments.

<u>Voluntary Committed Cost Share</u> will not be allowed unless required by published policies of the sponsor. Note that, according to federal guidelines, cost share cannot be used as a factor during the merit review of applications or proposals unless it is both in accordance with the sponsor's regulations and specific in a notice of funding opportunity.

PROCEDURE:

When preparing a proposal, negotiating and setting up a sponsored project, incurring and approving expenses, and invoicing and reporting, UGA personnel must be aware of and conform to the sponsor and UGA's complex and detailed rules surrounding the funding opportunity and proposal development.

- 1. PI/unit should prepare proposal budgets after thoroughly reviewing 2 CFR 200, State regulations, sponsor-specific requirements and UGA policies based upon a best faith estimate of costs needed to perform the scope of work.
- 2. To determine whether the PIs, Co-PIs or Co-Is are eligible, they must first meet the sponsor's requirements. If so, they must also meet UGA's PI, Co-PI and Co-I Eligibility criteria. For each PI, Co-PI or Co-I who does not meet the eligibility criteria, PI/unit must follow the process outlined in the PI, Co-PI and Co-I Eligibility Policy to obtain approval.

Proposal Submission Page 2 of 3

- 3. To determine the appropriate Direct Costs, PI/unit must consider and follow the Direct Cost Policy.
- 4. If voluntary cost share is deemed necessary, PI/unit must follow the Cost Share Policy and process to obtain approval.
- 5. To determine the appropriate Indirect Cost Rate for each project, the PI must consider the Indirect Cost Policy. If a waiver is deemed necessary, PI/unit must follow the process outlined within the policy to obtain approval.
- 6. SPA will review the proposal submission in its entirety and solicit required institutional approvals.
- 7. SPA will review and update PI/unit on the disposition of their request.
- 8. If approval is not obtained, SPA will work with PI/unit to revise the proposal as needed prior to submission to the sponsor.
- 9. If there are any questions regarding conflicting regulations/requirements, please contact Sponsored Projects Administration for clarification on which regulation/requirement applies.

RESOURCES:

2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards



Sponsored Projects Administration | 706-542-5939 | http://spa.uga.edu

Proposal Submission Page 3 of 3