SECTION V - Proposal Submission Policies and Procedures

This section is designed to facilitate the submission of sponsored project proposals by informing Principal Investigators of university policies and procedures governing this activity. Sponsored Programs is available to assist the Principal Investigator during the planning phase of proposal preparation by reviewing sponsor guidelines, identifying any special sponsor requirements, including necessary forms, authorizations and assurances, and any budget provisions needed to be in compliance with the sponsor's and Colorado State University's requirements.

University Policy on Submission of Proposals for Institutional Support

Any official University proposal or application to a source outside the University for contractual-type financial support of projects to be conducted under University auspices, including requests for additional time and/or money after an award has been made, must be submitted through Sponsored Programs. This includes both assistance and procurement type proposals.

Who May Serve as a Principal Investigator

Any Colorado State University non-temporary, salaried, state classified or general faculty employee (including faculty on transitional appointment) may serve as a principal investigator. Individuals with other types of appointments (e.g., temporary, non-salaried, and/or retired) must be approved by the department and college, and then should be listed as the co-principal investigator with a non-temporary, salaried employee serving as the prime principal investigator. Graduate research assistants and post-doctorals are considered temporary, non-faculty appointments. Faculty affiliates are non-salaried appointments.

Federal employees holding faculty-affiliate positions may not serve as co-principal investigators without the written approval from the Federal agency's authorized business official in addition to the approvals required above. In the unusual circumstance that approval is obtained, a written agreement between the Federal agency and the University is required defining the relationship and responsibilities between the parties. Federal employees may not be assigned signature authority on a sponsored project.

Notice of Intent to Submit a Proposal

Investigators are responsible for notifying Sponsored Programs in advance, through the use of the Proposal Approval and Support System (PASS) available on the Sponsored Programs web page (http://web.research.colostate.edu/OSP/), when they intend to submit a proposal. This advance notice enables Sponsored Programs to verify that the most current proposal solicitation and agency forms are being used and allows the appropriate Research Administrator to fully review proposal guidelines and work with the Investigator during proposal preparation and submission. This is particularly important if the sponsored project is large, involves interdepartmental or intercollegiate activity, activities in a foreign country, subcontracts, cost sharing, conflicts of interest, or other unusual aspects. To determine the Research Administrator(s) responsible for your college, click here http://web.research.colostate.edu/osp/pdf/osporgchart.pdf.
PASS is also the mechanism used to automatically generate the electronic SP-1 and the SP-12 (Request for Split of F&A Costs) which can subsequently be routed electronically for signatures.

**Role of Research Associate Deans**

The Colleges’ Research Associate Deans provide assistance to principal investigators in their proposal preparation and serve as consistent points of contact with Sponsored Programs. Click http://web.research.colostate.edu/osp/deans.aspx for a list of the Research Associate Deans.

Principal Investigators are responsible for (1) working with their Research Associate Deans when mentoring and/or budget preparation assistance is desired, and (2) alerting the Research Associate Dean that the proposal is in progress in order to facilitate any compliance and/or technical submission issues.

**Internal Approval of Proposals**

Proposals are submitted on behalf of Colorado State University and must therefore be authorized by appropriate University administrators prior to submission. This is accomplished by obtaining signatures on the Sponsored Programs Form SP-1 and routed electronically through PASS. Approval signatures of the following Colorado State University administrators must appear on the form and are to be obtained by the Principal Investigator:

- Principal Investigator(s)
- College/Department pre-approver (when applicable)
- Department Head(s) or Director(s)
- College Dean(s) or Division Head(s)

When applicable, the proposed research must be reviewed and approved by the Animal Care and Use, Human Subjects, Drug Review, Bio-safety, and/or Radiation Safety Committees (see Section VI, Regulatory Approvals).

The department/division head is the person in the routing procedure responsible for evaluating:

- the academic soundness and propriety of the proposed project,
- whether the department budget and facilities will be able to accommodate the proposed project,
- whether commitment of University resources (cost share) on a project is appropriate, and
- whether there is a need for additional or renovated facilities. These needs must be coordinated with Facilities Management.

The signatures of the department head and college dean will demonstrate that the items above have been reviewed and approved.

If special circumstances exist, such as lower F&A rates (see Section VII, Facilities & Administrative Costs and Fringe) or central cost sharing by the University (see Section VIII,
Cost Sharing), the signature of the Vice President for Research (or designee) will also be required on the appropriate form. Regardless of the sponsor, one fully-signed, cumulative SP-1 covering the entire period of the proposed project must be received by Sponsored Programs prior to submission of the proposal. (Individual yearly SP-1’s are not required.) Without a fully-signed SP-1, Sponsored Programs will not approve the proposal for submission.

Restricted Proposal Solicitations

Some agencies restrict (or limit) the number of proposals which may be submitted by an institution to a particular program solicitation. In cases where this or other submission restrictions exist, Sponsored Programs will coordinate the selection of proposals to be submitted. This generally will include an electronic memorandum announcing the program to the Research Associate Deans (RAD’s), Directors of Development (DOD’s), etc. and calling for brief preliminary proposals to be submitted to Sponsored Programs. Review and selection of the proposal(s) to be submitted is made by the Vice President for Research with input from the Deans. It is the Principal Investigator's responsibility to notify their college/unit if submission to a restricted proposal solicitation is desired. Current Restricted Programs may be found on the Restricted Program Announcements webpage (http://web.research.colostate.edu/OSP/restricted.aspx).

Submission of Preliminary Proposals (Pre-Proposals)

Preliminary proposals, or pre-proposals, serve as tools for discussion of potential projects between Principal Investigators and Sponsors. A prospectus or concept paper should be from one to five pages long and usually contains the following:

- the problem,
- the methodology,
- the significance of the proposed project,
- a project work schedule,
- vitae of project personnel, and
- estimated (non-detailed) budget.

Preliminary proposals or pre-proposals may be submitted by the Principal Investigator without Sponsored Programs’ approval if all of the following exist:

- Sponsor does not require the signature of an authorized official of the University,
- The proposed budget is under $25,000,
- Full project costs (including F&A) will be recovered,
- No special facility and/or renovation needs are present,
- There are no conflict of interest issues,
- There are no subcontract arrangements,
- There are no cost share requirements, and
- The following statement is included in the pre-proposal.
This is a preliminary proposal, which has not been officially reviewed or approved by Colorado State University (CSU). CSU is not committed to preliminary agreements between the Principal Investigator and the Sponsor. For further information, please contact Sponsored Programs.

Although a preliminary proposal budget is only presented as an estimate, it frequently results in being the financial limit of the formal proposal. Mistakes made at this stage often lead to negotiation problems later. **Therefore, the department head or dean and Sponsored Programs should be involved in estimating the project costs so that they will be as realistic as possible.**

No grant or contract proposal, including any pre-proposal, is official unless it is approved and signed by a Research Administrator in Sponsored Programs. Acceptance of grants, contracts, or other agreements is binding only when reviewed and approved by Sponsored Programs and signed by the Vice President for Research or designee.

Principal Investigators should discuss with their department heads any aspects of the proposed project (space, personnel, equipment, relationship to teaching, etc.) that might affect departmental administration.

**Submission of Proposals to Business, Industry, and Private Foundations**

Proposal development activities proposed to private industry, foundations and other non-profit organizations with contractual aspects (including "scholarly activity") must be submitted through Sponsored Programs.

Donative requests to business, industry, and private foundations are handled through Advancement & Strategic Initiatives (ASI).

Colorado State University has identified a group of major donors and/or prospects of the university that have a major presence in Colorado and have been assigned a key contact in ASI. These are called “Managed Sponsors”. Because these managed sponsors have been selected for coordinated contact, clearance from the Director of Corporate Relations or the Director of Foundation Relations is required before a proposal can be submitted. This clearance is obtained by entering the proposal on the PASS system [https://pass.research.colostate.edu/](https://pass.research.colostate.edu/). When a “managed sponsor” is chosen, PASS will automatically present the PI with an additional screen regarding extra justifications needed for consideration to submit to a managed sponsor. The PI should be contacted with a decision by the Director of Corporate Relations or the Director of Foundation Relations within 3 working days. **A list of managed sponsors is available at:** [https://pass.research.colostate.edu/managedlist.asp](https://pass.research.colostate.edu/managedlist.asp)

In order to distinguish between non-exchange (gifts/contributions) and exchange (sponsored activities) transactions, the following factors should be considered:

**Non-Exchange (Gift) Transaction:**
A gift is motivated by charitable intent and is defined as a voluntary and irrevocable transfer of funds or assets from a donor to the University, where no goods or services are expected, implied or forthcoming by or to the donor. In general, cash received as a grant from a private, non-government source is considered a gift if, unlike a sponsored research grant, it is donative in nature; i.e., it is bestowed voluntarily and without expectation of any tangible compensation or return of services rendered directly to the donor. The gift may be unrestricted or may support a specific project, academic area, research program, or other university programs. Generally, such gifts are processed and administered by the Foundation.

**Exchange (Sponsored Activity) Transaction:**

Transactions that have characteristics of a contract for sponsored research or that are from a government entity are processed and administered by the Sponsored Programs rather than the Foundation. The following eight attributes contained in the University’s FPI H-4 are indicators of a transaction requiring processing by Sponsored Programs:

- There is a contractual agreement to be signed and executed, even if it appears to be “boilerplate” terms and conditions. A contractual agreement is a bi-lateral legal instrument that imposes an undertaking on the part of the University. Contractual agreements do not include unilateral communications such as acknowledgements, receipts, recognition and letters of appreciation.
- There is either advanced limited distribution of research information or delayed publication of research information.
- There is patent, intellectual property, or other intangible rights involved in the transaction.
- There is either a technical or financial report involved in the transaction. Such reports go beyond the scope of a general statement of how the contribution was used in support of the resource provider’s interests.
- The resource provider has either explicit or implicit guidelines for performance that go beyond the scope of expending the funds to meet the intention of their contribution.
- There is a scope of work.
- There is a period of performance.
- The resources can be revoked.

Grants that do not have any of the above listed characteristics and are determined to be donative are processed by the Foundation. Grants that contain any one of the above listed characteristics are generally processed and administered by the Sponsored Programs.

**Submission of Applications for Awards to Individuals**

Applications for postdoctoral fellowships, scholarships, travel support or similar awards which result in direct payments to an individual may be submitted by the applicant directly to the sponsor. However, if the sponsor is a foundation, the faculty member should contact the Director of Foundation Relations so that such contact may be coordinated on a university-wide basis. Applicants are also strongly urged to coordinate their efforts through Sponsored Programs.
in non-foundation cases, both to take advantage of the services available and to avoid potential complications associated with an award.

**Acquisition and Submission Instructions for Requests for Proposals (RFPs)**

Faculty are strongly encouraged to register for SMARTS, a specialized funding locator tool that will send e-mails announcing new programs directly to PI’s based on individually defined key words.

Any faculty member who needs assistance in locating an RFP and/or wishes to submit an application in response to an RFP should contact Sponsored Programs by entering their proposal on the PASS system. Sponsored Programs can obtain the RFP and provide a copy (or the web site) to the Investigator, if needed.

Advance notice to Sponsored Programs via the PASS system (http://pass.research.colostate.edu) of the Principal Investigator's intent to submit a proposal in response to an RFP is important as the representations and certifications for all RFPs must be completed by Sponsored Programs staff before the application can be submitted. Sponsored Programs' prior review of the full RFP assures that CSU can legally comply with the contractual obligations.

All proposals submitted in response to a competitive solicitation must include full F&A in the proposed budget, unless explicitly limited in the RFP. CSU’s current rate agreement can be found at http://web.research.colostate.edu/OSP/rates.aspx. Principal Investigators are not authorized to negotiate special F&A rates.

**Early Planning**

Principal Investigators should communicate their intent to submit proposals at the earliest possible date to their Research Associate Dean and to Sponsored Programs. This is done by entering the required information on PASS. This initial contact can help identify any additional information which may be needed to correctly prepare the proposal.

Early planning should include the following steps:

*Note: Proposal preparation costs are unallowable on federally sponsored agreements. Proposal preparation costs (time and effort, copying, etc.) must be allocated/charged to a non-federal source of funding.*

- Record your intent to propose by entering key data on the PASS system and request guidelines, if needed.

- Check regulatory committee meeting schedule, if applicable. Although not required at time of proposal submission, it is recommended that regulatory committee approval forms be submitted as soon as possible after submission. Sponsors will not make an award until all approvals are in place. **Section VI, Regulatory Approvals** contains information on the amount of time required.
• Read the entire proposal solicitation/guidelines and review the required forms in the
sponsor packet. Confirm that you have current materials (agencies frequently update).
Note and complete special forms (electronic data input forms, for example) which may be
included in the submission requirements. Seek clarification from Sponsored Programs
if any aspect of the instructions is unclear. To contact your Research Administrator

• Provide a copy of the packet and solicitation information to clerical staff assisting you in
the preparation of the proposal as well as to your Sponsored Programs team

• Discuss special facility, personnel, budget, etc., considerations, with appropriate
University administrators (e.g., department head).

• Plan preparation time so that the “business section” (see definition at end of this section)
of the proposal will be submitted to Sponsored Programs as early as possible to allow
time for review.

• It is especially important to plan ahead for electronic proposal submissions. See
Addendum at the end of this chapter for procedures and current policy on electronic
submissions.

Preparing the Proposal Budget

Colorado State University is subject to Federal Cost Accounting Standards (CAS) and costs
presented in proposal budgets must adhere to the accounting practices disclosed to the federal
government in its formally approved Disclosure Statement. Section XIII, Cost Principles
provides information about the allowable cost items. If you have any questions after reading the
sponsor guidelines and this manual, please contact the appropriate Research Administrator.

Before preparing the budget, the Principal Investigator should read the sponsor guidelines or
solicitation instructions very carefully to determine if there are limitations on any cost categories,
e.g., some sponsors will not allow certain costs such as tuition or equipment. Most federal and
many larger private sponsoring agencies include budget forms as a part of their application
package. If the sponsor to which you are applying does not specify a format, or if you have
questions regarding the prescribed forms, contact the Sponsored Programs Research

Proposals must include all direct and F&A costs at the full rate in the proposed budget, except
where explicitly limited by federal statute or other written sponsor policy. Section VII,
Facilities & Administrative Costs and Fringe contains the University policy on F&A recovery
and more information about F&A.

Sponsored Programs encourages Principal Investigators to utilize the Proposal Budget
Spreadsheet (PBS), an Excel computer spreadsheet program, to prepare the budget. The Program
automatically calculates the University's current fringe and F&A rates, provides automatic inflationary increases, and generates the budget to prepare the Sponsored Programs Project Approval Form (SP-1). The PBS Program and Manual are available via the Internet at this web location:  https://pass.research.colostate.edu/.

Although PBS is an extremely useful tool, it does not meet all budget situations, such as budgets for more than five years, those with multiple sub-projects, incorporation of third party matching, or some of the training programs. If you are unsure whether or not PBS will accommodate your situation, please contact your Research Administrator.

If you are not using PBS, salary increases and other inflationary increases for subsequent project years should be included in the original budget if multi-year budgets are submitted. Upon completion of the proposal budget in accordance with sponsor guidelines, the information should be transferred to the Sponsored Programs Project Approval Form (Form SP-1, SP-1A, or SP-1B).

Commonly Requested Information http://web.research.colostate.edu/OSP/common.aspx contains useful information for developing your proposal budget, such as current fringe benefit rates, F&A rates, tuition rates, etc. In addition, tip sheets for major agencies have been developed for assistance in the proposal preparation. These tip sheets can be found at: https://pass.research.colostate.edu/pbsweb/TipSheets.asp

**Budgets for Non-Federal Sponsors (SP-1B)**

When submitting proposals to private sector sponsors, i.e., commercial and not-for-profit entities, the University generally has latitude in the detail and format in which the cost proposal is presented. In the absence of a sponsor-prescribed format, it is generally advantageous to use a simplified, fully burdened cost element approach, **provided there is no federal funding involved.**

Fully burdened cost elements are those basic line items of cost, e.g., personnel, travel, other direct costs, etc., to which the appropriate F&A costs have been added at the line item level. In this application, F&A costs are not listed as a separate line item, but rather calculated on and added to each line item of direct costs, to develop total project costs.

The fully burdened cost element budget presentation is compliant with University costing policies, varying only in presentation format. The same costing data would be available if requested by the sponsor. An illustration and instructions for this budget format is illustrated in the Addendum in Section VII, Facilities & Administrative Costs and Fringe Benefits.

**Other Important Considerations**

**Sub-Awards**

When it is anticipated that a part of the work to be performed under a proposed contract or grant
will be performed by an outside organization, the Principal Investigator should obtain and forward to Sponsored Programs the following information from each proposed sub-recipient:

- statement of work, detailing the sub-recipient's contribution to the project,
- detailed budget, in sponsor format, signed by an authorized business official of the sub-recipient,
- detailed budget justification of the sub-recipient's cost, and
- source selection justification detailing the unique expertise afforded by the sub-recipient.

After receipt of the sub-recipient’s proposal, the Principal Investigator should incorporate it into the application to the funding agency. Contact your Research Administrator if you need assistance with the sub-recipient’s portion of the proposal.

Upon receipt of an award, Sponsored Programs will prepare and negotiate the official sub-award. No verbal commitments should be given to the sub-recipient until an agreement has been fully executed.

Conflicts of Interest

When submitting a proposal, a Principal Investigator must disclose any potential conflict of interest situations. (See Section XII. Ethics in Sponsored Programs for details of that procedure.) When a potential conflict exists, proposals must include form SP-10. If it is determined that a conflict of interest exists, a Management Plan must be submitted through the department/college and approved by the Vice President for Research prior to execution of an award.

Classified Research

Colorado State University does not normally perform classified research but may decide to accept such projects, if requested, to the extent capable. Proposals to engage in classified research must be approved in advance of proposal submission by the department head, college dean, and Vice President for Research. For a complete statement of University policy on classified research, consult Section D.7.15 of the Academic Faculty and Administrative Professional Staff Manual.

Patents and Licenses

Any Principal Investigator who believes that the research being proposed may result in a patent or license should consult with the Colorado State University Patent Officer, Office of the Vice President for Research http://vpr.colostate.edu/. Detailed information on the University's Patent Policy is contained in Section XI, Patent/Copyright Policies and Procedures of this manual.

Use of Consultant Services
Use of project funds for the payment of consultant costs (including fees, travel and other supporting costs) is allowable when included in the proposal and approved in the award. The use of consultants is governed by the following federal government policies:

- There must be evidence that the services to be provided are essential and cannot be provided by persons receiving salary support under the grant.
- There must be evidence that a selection process has been employed to secure the most qualified person available.
- There must be evidence that the charge is appropriate considering the qualifications of the consultant, his/her normal charges, and the nature of the services rendered. Services of Colorado State University employees must be budgeted under the "Personnel" section. **CSU employees cannot be consultants** (Purchasing Manual, Section 12, III.C). Consulting fees are not generally paid to employees of the Federal Government. Most federal agencies cap the daily rate which may be paid to a consultant. Ask your Research Administrator if you are unsure of the sponsor’s policy.

**Need for New or Renovated Facilities**

University policy prohibits displacement of established academic programs by research activities in the academic core as defined in the Facilities Master Plan. In assessing the facilities needs for a project, the following questions should be asked:

- Will space be required for additional personnel?
- Will a rearrangement of spaces be required?
- Is the space currently occupied by another department?
- Is the space currently utilized by an academic program?
- Will the equipment being used change the electrical or mechanical needs for the area?
- Is the proposed use compatible with the rest of current facility use?
- Will hazardous waste be generated?

If you answered "yes" to any of these questions, you should contact Facilities Management for assistance in determining a project facilities plan and associated cost. **Section IV, Other University Service Units Available to the Researcher** provides more information about the services provided by Facilities Management.

**Certifications and Representations**

Many grant applications and Request for Proposals (RFPs) contain Certifications and Representations ("Certs and Reps"), which must be completed and signed by Sponsored Programs staff. "Certs and Reps" are assurances that the University complies with federal regulations regarding conflict of interest, hiring practices, drug-free workplace, and other such topics.

**Services Provided by Sponsored Programs**
Sponsored Programs requires only the “business section” (signed sponsor forms, budget request, budget narrative, and signed internal forms of the proposal) be submitted for review/approval prior to proposal submission. The PASS number must be included on proposal materials. In some instances, a full copy of the proposal may be requested prior to submission. For record retention, SP requires a final copy of the proposal from the Principal Investigator within five days of submission to the Sponsor.

Sponsored Programs review of the proposal includes the following:

- Review PASS. Respond to comments and/or requests for information.
- Review special proposal solicitations for requirements and/or restrictions. Communicate these to the Principal Investigator or designee.
- Coordinate electronic submission procedures with the Principal Investigator. Procedures related to electronic submissions are found in an Addendum at the end of this chapter.
- Complete applicable assurances, representations and certification pages. Provide to the Principal Investigator.
- Prepare cover letter to Sponsor. Provide to the Principal Investigator.
- Prepare printing and mailing instructions. Provide to the Principal Investigator.
- Assure that Internal and sponsor forms are accurate and complete.
  - Information on the face/cover page is accurate and complete.
  - Assurances, representations and certifications, and checklist pages are correct and complete.
  - Confirm regulatory compliance status, if applicable.
- Confirm authorizing signatures are present.

(Please note: Sponsored Programs considers it the responsibility of the PI to ensure that page limitations, margins, font, etc. have been observed and that all required information is complete and included within the proposal).

- Review and approve budgets. SP’s review of the proposal budget is limited to the following compliance items:
  - the correct F&A rate has been included (actual calculation not checked)
  - sponsor-specific guidelines followed (e.g. unallowable items not included)
  - authorization has been obtained for cost sharing (voluntary cost sharing is strongly discouraged by the University)
  - narrative budget justifications do not include unallowable costs and/or unauthorized cost sharing.
  - sub-recipient costs are properly categorized as a sub-award or procurement. The “business proposal” also includes the sub-recipient’s budget and justification signed by the authorized institutional representative.
- Need for additional/remodeled or upgraded space.
- Conflict of Interest.

Please note: Principal Investigators are encouraged to use the Proposal Budget Spreadsheet (PBS) to ensure correct application of fringe and F&A rates and to reduce
mathematical errors. Draft versions of budgets should be reviewed in the department and/or college prior to submission to Sponsored Programs.

Printing and Mailing Instructions

PI’s may use CSU CopyRite Services located in the Lory Student Center to copy, package and mail their proposals. Additional information may be obtained from CSU Fast Print at http://ccs.colostate.edu/copy_services.aspx. The Office of the Vice President for Research has established accounts with CopyRite and FastPrint sites to cover the costs of printing the camera-ready proposal (Sponsor’s required number of copies, one copy for the Principal Investigator, and one copy for Sponsored Programs), and the cost for first class (certified) mailing. Costs for appendices, additional or color copies of the proposal and overnight/express mailing charges are the responsibility of the Principal Investigator. Copies reproduced at sites other than CopyRite or FastPrint are also the responsibility of the Principal Investigator.

Prior to delivery of the proposal for printing the following points should be checked:

- The proposal is camera ready, i.e., complete and ready to be copied with no special handling needed.
- All pages are consecutively numbered on the bottom of the page. This is important for proper printing as well as for the Sponsor’s ease in reviewing. Double check for special Sponsor rules on pagination. (For example, most sponsors do not allow suffixes such as 5a, 5b, etc.)
- Sponsor-specified formatting regulations (characters per inch, margins, total number of words, etc.) have been followed.

Sponsor Review of Proposals

Peer review criteria vary with different sponsoring agencies. Guidelines often provide these criteria. Reviewers' comments on submitted proposals are provided by most federal agencies. If you do not receive reviewer comments, they may be requested in writing by the Principal Investigator after receipt of a rejection notice. Check with your Research Administrator for additional information.

ADDENDUM

ELECTRONIC SUBMISSIONS ON GRANTS.GOV

It is especially important to plan ahead for electronic proposal submissions. Be sure that the proposal is formatted and uploaded according to agency specifications. It is the responsibility of the PI to allow Sponsored Programs electronic access to the proposal as soon as possible to allow SP time to check for compliance with all Sponsor and University requirements, as well as time for corrections and any Internet slow time or downtime associated with major deadlines. This early access assures a timely submission. A final publishable formatted copy of a Grants.gov proposal is required at Sponsored Programs three