

**California State Polytechnic University, Pomona****Office of Research and Sponsored Programs****Proposal Development and Submission Policy for External Funding**

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**Issued: July, 2019**

California State Polytechnic University is required to follow CSU Executive Order 890-“Administration of Grants and Contracts in Support of Sponsored Programs, which requires that proposals for Sponsored Programs shall not be submitted to the Sponsor without prior written approval of the president of the University or the president’s designee and the chief financial officer or the chief financial officer’s designee.

**POLICY****Authority to submit**

Proposals for externally sponsored projects (e.g., grants or contracts) must be submitted by Cal Poly Pomona Office of Research and Sponsored Programs (ORSP) on behalf of an eligible Principal Investigator. Neither individual PI’s nor other campus units may submit a proposal to an external sponsor. A proposal that is not submitted by ORSP cannot form the basis for an award, as it will lack the necessary approvals. In order to meet the submission deadline, if a proposal is submitted without full approval through Cayuse 424 routing process by appropriate university official, it must be approved by the Provost and the CFO after the fact. In such cases if the proposal is not fully approved by the university officials, then the university retains the right to withdraw the proposal or not accept the award.

**Required Lead-Times Prior to Sponsor’s Deadline**

Because ORSP has the sole authority to submit proposals for externally sponsored projects, PI’s must initiate the proposal development process sufficiently ahead of the sponsor’s deadline. In the proposal development process, there are three internal deadlines:

1. The online PI Intent-to-Submit must be submitted AT LEAST three (3) weeks before the agency submission deadline.
2. The final budget (including budgets for any subcontracts), budget justification, draft proposal narrative must be submitted to ORSP five (5) business days before the agency submission deadline, so that required approvals can be obtained prior to proposal submission.

Meeting this lead-time requirement enables ORSP and the PI to compile the documentation required for submission; to review the proposal for compliance with Cal Poly Pomona, CSU, and sponsor policies; and to obtain the required approvals. Proposals that do not meet the five (5) business day deadline may compromise the successful submission by the submission deadline. Under special circumstances, the PI will need to obtain approval from the AVP Research, Innovation & Economic Development before the proposal can be prepared and submitted.

**Online Intent-to-Submit Proposal Form**

The proposal development process is officially initiated when a faculty member completes the online intent to submit. The form is found on the ORSP website at:

<https://www.cpp.edu/~research/rsp/intent-to-submit-a-proposal.shtml>

Upon submission of the Intent-to-Submit PI will be notified within two (2) business days which ORSP Associate has been assigned to work with the PI for the submission of the proposal.

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### **PI Eligibility**

Faculty members who hold a Tenured, or a Tenure Track Position, emeritus professors, or employees who hold an MPP Position are eligible for Principal Investigator status. A new hire in a tenure-track position is considered eligible as soon as she/he has indicated acceptance of the letter of offer. Other individuals may attain PI eligibility by appropriate approval of the Dean, Divisional Vice President or the Provost. A change of the PI for any reason, will be accomplished through consultations between the Dean and the AVP for Research, Innovation and Economic Development.

Failure to follow the policies and procedures for the conduct of a sponsored project or its administration can result in the loss of PI eligibility.

### **Proposal Development**

During the three weeks between the completion of the PI Intent-to-Submit a proposal and the submission deadline, the PI and ORSP Associate will work collaboratively to finalize the administrative and financial sections of the proposal. The PI has sole responsibility for finalizing the technical components of the application and to acquire the necessary University approvals for the proposal.

The PI is responsible for completing the following during the development of a proposal:

1. Online notice of Intent-to-Submit a proposal (submitted three weeks prior to the submission deadline)
2. Completed proposal Check list provided by the ORSP Associate
3. Draft budget (in consultation with the ORSP Associate)
4. Final budget (submitted 5 business days prior to the submission deadline)
5. Budget justification narrative
6. Curriculum Vitae for personnel in the sponsor's format (e.g. NSF or other Bio-sketches), if required by the sponsor
7. Description of resources to support the project
8. Technical Sections – Abstract and Project Narrative
9. Conflict of interest form when needed
10. Obtaining Dean and Department Chair Approval for cost sharing (if required by the sponsor) on the form provided by ORSP Associate with an account number to be charged
11. Obtaining the Dean's and/or Provost's approval for additional space (if necessary)
12. Occasionally, other approvals may be necessary, such as when international travel is proposed, special requirements may be listed in the funding opportunity announcement, non-standard use of university facilities proposed. The PI needs to ensure that any such requirement is met when submitting a proposal.

### **Approvals Required on All Proposals**

Various components of a developing proposal need to be approved by a variety of individuals. At a minimum, all proposals require the following approvals in Cayuse 424 before they are submitted.

1. Cal Poly Pomona Foundation
2. Provost and Vice President for Academic Affairs
3. Budget: Chief Financial Officer

4. Budget, proposal narrative: Department Chair (or Director) and Dean
5. Complete proposal: PI, Director of ORSP and AVP for Research, Innovation and Economic Development

For the Cayuse approval all proposal documents must be provided to the ORSP Associate five (5) days before the sponsor submission deadline, so that they may upload files in Cayuse to route for review and institutional approvals and final submission to the sponsor.

### **Additional Approvals**

#### **1. If cost-sharing or matching costs are involved**

Any proposal that includes cost-sharing, requires additional approvals by each individual who provides a cost-shared resource. The most common sources of cost-sharing are the department chair (or director), Dean, or others. A cost-share form will be provided by the ORSP Associate to the PI to secure approvals. The approvals will include the fiscal agent for the cost center providing the funds and the next level supervisor. The cost-share form along with approvals must include an account number to be charged. Any cost-sharing must be reviewed by the ORSP Director for completeness. If institution support is committed as a cost-share or match in the proposal budget, then it is treated the same as required cost-sharing and requires the approvals specified above.

#### **2. If sponsor requires a 501(c) 3 organization**

If the sponsor requires the recipient of funds to be a 501(c) 3 organization, the award will be made to the Cal Poly Pomona Foundation. ORSP will work with the PI to develop the proposal, route in Cayuse for review and approval prior to submission. ORSP will submit the proposal to the sponsor only after gaining approval from the Chief Financial Officer of the Cal Poly Pomona Foundation.

#### **3. If additional space is required**

At the time of proposal development, a PI must declare the need for space, such as laboratory, office, interview, and any other space that is not already available to the PI. Most sponsored projects are conducted in the existing space of the academic department, responsible unit, and program. If either the Department Chair (or Director) or the Dean can provide the additional space, then the provider must approve the space request. If neither the Chair nor the Dean can provide the additional space, then the PI must submit a request to the AVP for Academic Planning; ultimately, the Provost must approve the request for space before the proposal is submitted. As many proposals do not lead to awards, it is not necessary for the AVP for Academic Planning to specify the location of the additional space at the time of submission. Rather, this approval commits Academic Planning to finding appropriate space if the proposal is funded.

#### **4. Applicable Indirect Cost (F&A) rate**

Cal Poly Pomona Foundation periodically negotiates an indirect cost agreement with the U. S. Department of Health & Human Services that covers the categories of organized research, instruction, and other sponsored activities. Each of these categories has two rates depending upon whether the project takes place on-campus or off-campus:

- the current rate for on-campus, organized research is 47%
- the current rate for on-campus, instructional activities is 50%
- the current rate for off-campus projects is 26%
- Other Sponsored Activity is 34%

Off-campus rate applies if the more than 50% of expenditures are based on off-campus efforts. However, it must be justified appropriately with documentation.

Beginning January 2016, associated with California Assembly Bill AB20, the CSU Chancellor's Office and the University of California Office of the President entered into a Memorandum of Understanding that all State of California contracts with the CSU or UC must utilize the following F&A rates:

30% MFDC, and for State agency contracts with F&A rate less than 30% will require the Chancellor's office approval.

All proposals must be approved for submission by the Associate Vice President for Research, Innovation & Economic Development with the exception that one or more of the following circumstances will require the signature of the Provost and the Vice President for Academic Affairs and the Vice President for Administrative Affairs before proposal submission:

- Grants and contracts with an annual direct cost budget greater than \$250,000 in any one year of funding;
- An effective indirect cost recovery rates less than 25% on grants with an annual direct cost budget greater than \$100,000 in any one year of funding ( $\%ICR=100 \times \text{indirect cost/direct cost}$ )
- Cost sharing of direct costs greater than \$20,000/year (other than CPP in-kind cost or matching assigned times and related fringe)

The signatures of the Executive Director of the Foundation, the Provost and Vice President for Academic Affairs and Vice President of Administrative Affairs are required prior to acceptance of any external funding on campus.

**Indirect Cost (F&A) rates lower than the Cal Poly Pomona Foundation negotiated rate**  
Consistent with the agreement and various OMB circulars, and the CSU Chancellor's Office Executive Order 890, it is the policy of Cal Poly Pomona to charge the appropriate negotiated rate to all external sponsors. Reductions are typically approved if the sponsor's request for applications/proposals includes a publically viewable written statement that indirect costs are capped at a specified level.

#### **5. Use of Animal Subjects or Human Participants in research**

Some sponsors require that the PI obtain approval for the protocol to use animal subjects or human participants at the time of proposal submission. Other sponsors require an approved protocol prior to the granting of an award or the award's start date. It is the PI's responsibility to submit the protocol to the Office of Research Compliance for the Protection of Human and Animal Subjects sufficiently in advance of the sponsor's deadline for protocol approval. The ORSP Associate can assist the PI in determining the sponsor's requirement.

## **ROLES AND RESPONSIBILITIES**

### **Academic Department or Responsible Unit**

- **Principal Investigator (PI)**
  - Submits the proposal by the two internal deadlines described above in the section on "Required Lead-Times Prior to Sponsor's Deadline."
  - Submits the technical sections of the proposal.
  - Assists the ORSP Associate, as needed, with the completion of the administrative and

financial sections.

- Acquires the appropriate approval signatures if there are cost sharing, salary overload, release time and/or the proposal requires additional physical space. Submits protocol to IRB and IACUC and fulfills training requirements if the proposal includes human or animal subjects, if prior approval is required.
- **Department Chair**
  - Reviews the abstract and final budget and approves the proposed effort of the PI and other department personnel.
  - Approves cost sharing, if providing funds (otherwise the fiscal agent of the account) in the proposal and identifies the accounts from which the cost sharing will be expensed.
  - Approves any request for additional space by faculty in the department.
- **Dean**
  - Approves the abstract and final budget, proposed effort, and the use of department or college funds for cost sharing or matching funds in the proposal.
  - Approves any request for additional space made in a proposal by faculty in the college.

#### **Office of Research and Sponsored Programs (ORSP)**

##### **Associate**

- Meets with the PI to develop a budget for the proposal.
- In collaboration with the PI, ensures that all necessary financial, administrative, and technical information is included in the proposal.
- Verifies the proposal and the budget and ensures that it meets the sponsor and university policies, verifies that formatting and other requirements outlined in the submission guidelines. Ensures that the budget justification is aligned with the proposed budget.
- Coordinates with the Director of ORSP for the proposal generation and with a representative from the Cal Poly Pomona Foundation if a 501(c) 3 status is required.
- ORSP Associate will then route all electronic proposal documents and the RFP through Cayuse 424 for review and approval and ensure submission of the proposal to the sponsor by the submission deadline.
- Cayuse routing documents will include the final pdf file of the proposal submitted to the sponsor.
- **Director**
  - Performs the final review of the proposal in Cayuse and approves the proposal on behalf of the university.
- **Associate Vice President for Research, Innovation & Economic Development**
  - Performs the final review of the proposal and approves the proposal on behalf of the university.
  - Approves any proposed cost sharing and any indirect cost rate (F&A) that is less than Cal Poly Pomona Foundation's negotiated rate in the appropriate category (e.g., research, instructional, other).

##### **Fiscal Affairs**

- **VP for Administration and Finance**
  - Approves the final budget before a proposal is submitted.

### **Academic Resources**

- **Associate Vice President for Academic Planning**
  - If necessary, the PI makes a formal request to the Academic Planning for additional space after the Department Chair and Dean have given their approvals. The AVP for Academic Planning obtains the Provost's approval for the requested space. The approval documentation is uploaded in Cayuse.

### **Cal Poly Pomona Foundation**

If a sponsor requires the recipient of its funds to be a 501 (c) 3 entity, Cal Poly Pomona Foundation will review and approve the proposal. When a PI submits such a proposal, the ORSP Associate provides a copy of the proposal for review by Cal Poly Pomona Foundation and requests their review and approval. Cal Poly Pomona Foundation checks the proposal budget for accuracy and verifies that appropriate fringe benefit and Indirect Cost rates are used. Upon full approval including the Provost and the Chief Financial Officer of the University, ORSP submits the proposal to the funding agency.

### **RELATED DOCUMENTS**

- ORSP Policies: <https://www.cpp.edu/~research/rsp/policies-and-regulations.shtml>
- Post-award administration: <https://www.foundation.cpp.edu/grants-contracts/>