# SPA Review & Approval of PreAward Spending Requests

### **PURPOSE & BACKGROUND**

The purpose of this internal SPA procedure is to facilitate the efficient review and approval of PreAward spending requests.

Sponsored Programs Administration (SPA) within the office of Research & Economic Development (RED) is the campus unit with redelegated authority to solicit, accept, and execute extramural contracts and grants. In accordance with campus and system wide policies and procedures, SPA provides pre-award administration services to faculty, unit staff, and other central administrative offices. These services include but are not limited to reviewing and approving requests to incur expenditures related to a specific contract or grant, prior to receiving a fully executed award.

A PreAward should be considered when an official award has not been executed due to external delays or due to delays in negotiation of award terms, yet there is a firm project start date and award amount, and the project would be adversely affected by the delay.

### Authorization for a PreAward is contingent upon the following:

- Critical Need: A critical need to meet project objectives must exist to expend funds in advance of a new, renewal or continuation award (e.g., the need to order/purchase equipment or the need to continue paying salaries & benefits when the next increment of funding has been delayed beyond the next budget period start date of a continuation award);
- Research Integrity Review & Approval: Review and approval of human subjects, animal, biosafety, or other research protocols by the appropriate regulatory committee, as applicable;
- **Human Subjects Tutorial:** Successful completion of the human subject tutorial by the PI and all key personnel participating on the project, if human subjects are involved;
- **Financial Disclosures/Conflict of Interest:** Approval of required financial disclosures, as applicable;
- PI Eligibility: Approval of Exception to Principal Investigator Eligibility, as applicable;
- **Effort Certification:** Certification by the PI that the level of effort, scope, and objectives of the project, as proposed or negotiated will not change;
- Financial Liability Certification: Certification by the Chair/Director of the unit responsible for administering the anticipated award ("Departmental Approver"), that any monetary loss to the campus resulting from the Sponsor's failure to make the award, or from costs incurred but disallowed by the Sponsor, shall be the responsibility of that unit or school. If, however, the Department Approver is unable to authorize the use of an alternate FAU in the event losses are incurred because of the PreAward, then certification must be obtained by the appropriate Dean or Vice Chancellor whose office will provide the use of an alternate FAU ("Organizational Approver"); and
- **Sponsor's Firm Commitment**: Confirmation of a firm commitment from the Sponsor's authorized representative.
  - Note: A PreAward may proceed without the Sponsor's firm commitment if the Department Approver, or the Organizational Approver (as appropriate), has authorized the PreAward request despite the increased financial risk in doing so in the absence of the Sponsor's firm commitment.

Revised: 1/24/2022 Page **1** of **44** 

# SPA Review & Approval of PreAward Spending Requests

### Risks, Liabilities, and Limitations:

The risks, liabilities and limitations associated with PreAwards must be carefully considered prior to requesting authorization.

- Risks: Whenever the University approves a PreAward, it is risking monetary loss. Other
  funding must be available to cover the risk of a delayed start date, costs disallowed by the
  sponsor, or failure of the sponsor to make the anticipated award.
- **Liabilities:** Special care must be exercised in assessing the impact of PreAwards on the legal obligations of the University, especially in the areas of intellectual property rights and indemnification, as well as other special award terms.
- **Limitations:** A Sponsor's policies, the terms and conditions of the anticipated award, and campus policies and practices determine whether a PreAward will be authorized. Restrictions differ depending on the type of sponsor and the type of award anticipated (i.e., grant, cooperative agreement, or contract).

### Additional Background:

Please review the attached Exhibits A-F (also available online) for additional background. The following Exhibits may contain outdated information, therefore, please consult with a SPA supervisor, as necessary.

- Exhibit A: UC Contract and Grant Manual, Chapter 2-670: "Prior Approval Requirements," retrieved 1/31/2021, last revised unknown.
   <a href="https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter2/chapter-2-600.html#ch2-670">https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter2/chapter-2-600.html#ch2-670</a>
- Exhibit B: UC Contract and Grant Manual, Chapter 6-300: "Expenditure Advance Based on a Firm Commitment," retrieved 1/31/2021, last revised unknown. <a href="https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter6/chapter-6-300.html">https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter6/chapter-6-300.html</a>
- **Exhibit C: UCR Policy 550-80.** "PreAward Spending," retrieved 1/31/2021, last revised 1/12/16. https://fboapps.ucr.edu/policies/index.php?path=viewPolicies.php&policy=550-80
- Exhibit D: UCR Sponsored Programs Administration webpage. "PreAward Administration and PreAward Spending," retrieved 1/31/2021, last revised unknown. https://research.ucr.edu/spa/lifecycle/preaward
- Exhibit E: UCR Computing & Communications webpage (select pages). "Online PreAward Request System," retrieved 1/31/2021, last revised unknown. <a href="http://cnc.ucr.edu/preaward/">http://cnc.ucr.edu/preaward/</a>
- Exhibit F: Frequently Asked Questions

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Revised: 1/24/2022 Page 2 of 44

# SPA Review & Approval of PreAward Spending Requests

### <u>IMPLEMENTATION</u>

This procedure is effective as of the revised date noted in the footer below and will be reviewed annually or more frequently, as necessary. Modifications or changes to this procedure require the approval of the Associate Vice Chancellor for Research (AVCR) or designee.

### **IMPORTANT PROCEDURAL NOTES:**

Review PreAward request within 24-48 hours of receipt:

Upon receipt of a PreAward spending request, the CGO should promptly verify that the PreAward request received is for a PI within the CGO's complement of departments.

➡ While the On-Line PreAward Request System auto-routes the PreAward request to a CGO on basis of the CGO's complement of departments, such routing is established at the time the PreAward request is first created. In the event departmental re-assignments have occurred within SPA after a PreAward was created, then there is a possibility that a CGO could receive a PreAward request for a PI that is no longer within that CGO's complement of departments.

In the event a PreAward request is for a PI that is not within a CGO's current complement of departments, then the CGO shall promptly notify the PreAward Manager (or designee) so that the PreAward request may be promptly re-assigned to the appropriate CGO.

No later than 24 – 48 hours of receipt, a CGO is expected to review the PreAward request pursuant to this internal procedure (since the purpose of a PreAward is to meet a critical project need).

NOTE: The processing and approval of the PreAward request may be delayed in the event:

- (i) additional information and/or approvals are needed to meet all the contingencies required for PreAward authorization (as described on page 1 of this procedure); and/or
- (ii) the PreAward request needs to be returned to the Departmental Analyst for correction(s) for which there may be a delay before it is returned to the CGO.
- Use of UCR's Online PreAward Request System is required: PreAward spending requests
  are reviewed, approved, and processed via UCR's Online PreAward Request System, which
  is accessible through the PAMIS (Proposal and Award Management Information System)
  Portal from the Authorized Applications section in R'Space or through <a href="http://preaward.ucr.edu">http://preaward.ucr.edu</a>.
  - **Lexception (rare):** Although very rare, there may be unique circumstances where the use of an off-line PDF version of the PreAward Request form is necessary. Such circumstances include (i) technical issues with the Online PreAward Request System; (ii) a Change in PI (from the PI listed on the original eCAF); or (iii) a situation where a Sponsor issues more than one Award to multiple UCR PI/Co-PIs listed on one eCAF. **CGOs must promptly consult their SPA supervisor for authorization to proceed if: (i) use of the off-line PDF version of the request form is received by the CGO or (ii) an online PreAward request is not a viable option.**

Revised: 1/24/2022 Page 3 of 44

# SPA Review & Approval of PreAward Spending Requests

### **DEFINITIONS**

**Agency Specific Terms and Conditions** – Sponsor's award terms and conditions which specify such requirements as how the award is to be administered, situations requiring sponsor prior approval, reporting requirements, and closeout terms. The terms and conditions may differ based on the type of award received (i.e., grant, contract, or cooperative agreement).

**Award** – Documents generated by an authorized official of a Sponsor evidencing the award of extramural funds to UCR containing award terms and conditions. Such documents can include, but are not limited to, an award letter/notice, contract or other agreement, protocol, or scope of work/statement of work, budget, exhibits, amendments, or any documentation from a Sponsor providing funding or modifying a previous award notice or letter.

**CGO** – Contract and Grant Officer, regardless of level.

**COEUS** – UCR's primary database for managing information regarding UCR's proposals and awards.

**Continuation Award** – An award that conveys the next budget increment for a multi- year award as originally proposed to the sponsor and indicated in the eCAF. Continuation Awards are also known as Non-Competing Continuations, as the award does not result from a competitive peer review.

**eCAF** – The web-based electronic Campus Approval Form that is required to be generated for each proposal and routed through RED which captures the proposal and all required approvals for Proposal submissions to Sponsors.

**EMF** – Extramural Funds (the segment of Accounting Services responsible for contract and grant accounting functions).

**FDP** / Research Terms and Conditions (also referred to as the Federal Demonstration Partnership) – The simplified terms and conditions of an award which specify how the award is to be administered, situations requiring a Sponsor's prior approval and/or where a Sponsor's prior approval has been waived, reporting requirements, and closeout terms.

**Firm Commitment** – An official notice of award, agreement, or letter of commitment, from the sponsoring agency's authorized representative, confirming their commitment to award a specified amount of funds during a specified period of time.

**Grants Management Specialist** – The individual at the sponsoring agency that has award oversight and is authorized to provide necessary financial approvals on behalf of the Sponsor.

**iPortal** – RED's internal information system for querying and entering proposal, award, and compliance data into the Research Administration data warehouse.

Revised: 1/24/2022 Page **4** of **44** 

# SPA Review & Approval of PreAward Spending Requests

**New Award** – An award made by a Sponsor to fund a project where the Sponsor has not previously provided funding for the project or an award. In certain circumstances, a Sponsor may assign a 'new award number' to renewal or continuation awards, in which case "New Award" is the appropriate classification.

**PAMIS** – UCR's Proposal and Award Management Information System.

**Parent Award –** The PAMIS record that establishes the initial (or original) setup of an Award in PAMIS and consists of the six numerical digits which precede the dash and Child Record (e.g., 001234-002). In this example, 001234 is the Parent Award number.

**PreAward** – An official authorization from UCR to incur expenditures, related to a specific contract or grant, prior to the sponsoring agency's issuance of the fully executed award.

**Prime Sponsor** – The legal entity with the original source of funds from whom a Sponsor may receive its Award.

**Program Officer** (also referred to as a *Technical Officer*) – A Sponsor's point of contact who conducts merit reviews of proposals and recommends which projects should be supported by the Sponsor. Considered subject matter experts, they often provide technical and programmatic advice and guidance during the application period and throughout the term of any resulting Award. This individual is considered the Pl's point of contact for inquiries relating to his/her sponsored research.

**Proposal Number** – The UCR proposal number assigned in COEUS once an eCAF has been finalized in the eCAF system.

**RED** – UCR's Office of Research & Economic Development.

**Renewal Award** – An Award that modifies a previous award by 1) providing additional funding, 2) extending the project beyond the originally approved project period, <u>and</u> 3) is issued under the same Sponsor Award Number.

**Research Integrity** – The department within RED that provides broad oversight, conducts reviews, and monitors compliance relating to the conduct of research at the UCR as it relates to conflicts of interest requirements, human subject research, animal care and use in research, as well as institutional biosafety, stem cell research, and ethical and responsible conduct in research.

**Sponsor** – The legal entity from whom UCR will receive an Award in response to a Proposal. For example, if a Proposal is being submitted to the National Science Foundation (NSF), then the Sponsor is the NSF. However, if a proposal is being submitted to the University of Texas, who will incorporate UCR's proposal in their proposal that is submitted to the NSF, then the Sponsor is the University of Texas. (In this latter example, NSF would be the Prime Sponsor.)

Revised: 1/24/2022 Page **5** of **44** 

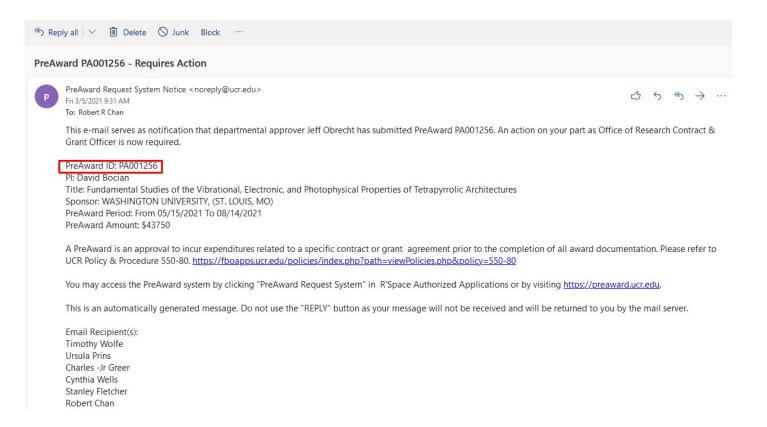
# SPA Review & Approval of PreAward Spending Requests

### NOTIFICATION OF A PREAWARD SPENDING REQUEST

### **Receipt of PreAward Spending Request**

When an online PreAward request is routed to a CGO, an automated system-generated email notification will be sent to the assigned CGO (along with a copy to SPA managers and RED's IT Director).

Example of an automated system-generated email notification sent to CGO.



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Revised: 1/24/2022 Page 6 of 44

# SPA Review & Approval of PreAward Spending Requests

### Accessing the Online PreAward Request System

Upon receiving a PreAward Request notification, the CGO should access the Online PreAward System by either clicking "**PreAward Request System**" through the PAMIS Portal from the R'Space Authorized Applications section or by visiting <a href="http://preaward.ucr.edu">http://preaward.ucr.edu</a>.

> Select "PreAward Request System" from the list of Authorized Applications.



Select "PreAward Request in Progress (WIP)" to access PreAward requests, in your queue, requiring action.



Revised: 1/24/2022 Page **7** of **44** 

# SPA Review & Approval of PreAward Spending Requests

- To view a PreAward request located <u>outside</u> of your queue:
  - Select "Search PreAward Requests (open or closed/submitted)," and the following screen should appear:

**UCRIVERSIDE** UNIVERSITY OF CALIFORNIA. RIVERSIDE Online PreAward Request System Welcome, Robert Chan View/Re-Assign PreAward Requests to CGOs PreAward Requests in Progress (WIP) (1) Search PreAward Requests (open or closed/submitted) **PreAward Summary Report PreAward Campus Summary Report Exit Application** Online PreAward Request System Search PreAward Requests by PreAward Request Number (contain PI Name (contains) wimpenny Project Title (contains) PreAward Request Queue PreAward Request Status (Select a queue first) OAII O Department O RED Approved Date (mm/dd/yyyy) Search Main Menu Search Results: PreAward Reque Sponsor DEPARTMENT OF ENERGY HIGH ENERGY PHYSICS PA000048 Stephen Withdrawn CHICAGO FIELD OFFICE High Energy Physics - Energy, Intensity, Theoretical Frontier PA000146 Stephen DEPARTMENT OF ENERGY Withdrawn CHICAGO FIELD OFFICE PA000220 DEPARTMENT OF ENERGY CHICAGO FIELD OFFICE High Energy Physics - Energy, Intensity, Theoretical Frontier Approved (005694-005) DEPARTMENT OF ENERGY CHICAGO FIELD OFFICE High Energy Physics - Energy, Intensity, Theoretical Frontier PA000221 Approved (005694-006) Wimpenny DEPARTMENT OF ENERGY High Energy Physics at the Energy and Approved (005694-009) PA000454 (Modified) Stephen Wimpenny CHICAGO FIELD OFFICE Theoretical Frontiers DEPARTMENT OF ENERGY High Energy Physics at the Energy and Theoretical Frontiers PA000455 (Modified) Stephen Approved (005694-010) CHICAGO FIELD OFFICE DEPARTMENT OF ENERGY Stephen High Energy Physics at the Energy and Theoretical Frontiers PA000459 DEPARTMENT OF ENERGY High Energy Physics at the Energy and Approved (005694-013) PA000704 Stephen Wimpenny CHICAGO FIELD OFFICE Theoretical Frontiers DEPARTMENT OF ENERGY PA000705 Stephen High Energy Physics at the Energy and Approved (005694-014) Wimpenny CHICAGO FIELD OFFICE Theoretical Frontiers PA000880 Stephen DEPARTMENT OF ENERGY High Energy Physics at the Energy and Approved (009793-002) Theoretical Frontiers Stephen Wimpenny DEPARTMENT OF ENERGY CHICAGO FIELD OFFICE High Energy Physics at the Energy and Theoretical Frontiers PA000881 Approved (009794-002) PA000887 DEPARTMENT OF ENERGY High Energy Physics at the Energy and Approved (005694-018) Stephen Wimpenny CHICAGO FIELD OFFICE DEPARTMENT OF ENERGY Approved (005694-017) PA000888 Stephen High Energy Physics at the Energy and CHICAGO FIELD OFFICE PA000977 Stephen DEPARTMENT OF ENERGY Task A-High Energy Physics at the Energy Submitted to Research and Task T-High Energy Physics at the Energy Submitted to Research and and Theoretical Frontiers Economic Development PA000979

In the above example, a search was conducted by PI Name ("Wimpenny") which returned 15 records, including PreAward ID/Request Number PA000979, and their respective status.

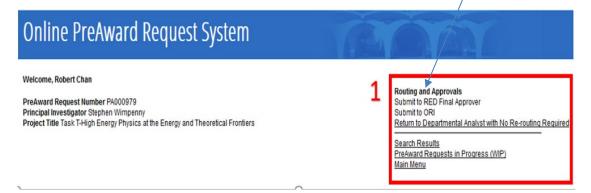
Revised: 1/24/2022 Page 8 of 44

# SPA Review & Approval of PreAward Spending Requests

### REVIEWING A PREAWARD SPENDING REQUEST

This section will go through each tab and screen in the Online PreAward Request System.

- 1. Under <u>each</u> tab, in the top right-hand corner, the CGO will find the **Routing and Approvals** menu with the following three options:
  - Submit to RED Final Approver;
  - Submit to ORI; or
  - Return to Departmental Analyst with No Re-routing Required.



- To route a PreAward 'forward' (i.e., Submit to RED Final Approver or Submit to ORI), the CGO need only click on the respective link and the system will auto-route the PreAward request to the applicable queue and send an automated system-generated email notification to such individual(s).
- ➡ To 'return' a PreAward request to the Departmental Analyst for correction(s) or withdrawal, the CGO must: (i) click "Return to Departmental Analyst with No-Re-routing Required"; (ii) insert a comment (under the Comment tab) as to why the request is being returned and click 'Save'; and (iii) click "Return to Departmental Analyst with No Re-routing Required" again, at which point the system will return it and send an automated system-generated email notifying the Departmental Analyst that the PreAward request has been returned.
- ♣ In the rare circumstance where a PreAward needs to be returned for correction(s)/change(s) and then re-routed for approval by the PI, Departmental Approver, and Organizational Approver (if applicable), prior to being returned to the CGO, then the CGO will need notify the RED Final Approver. To do so, insert a comment under the Comments tab, hit 'Save', and then click 'Submit to RED Final Approver' (since a RED Final Approver has the capability to choose a fourth option: 'Return to Departmental Analyst with Re-routing Required').
  - Example of rare circumstance. Re-routing required would be necessary to continue the PreAward review and approval process under the following scenario: (i) a Firm Commitment could not be obtained from the Sponsor; (ii) the Departmental Approver (or the Organizational Approver) had only authorized the use of the

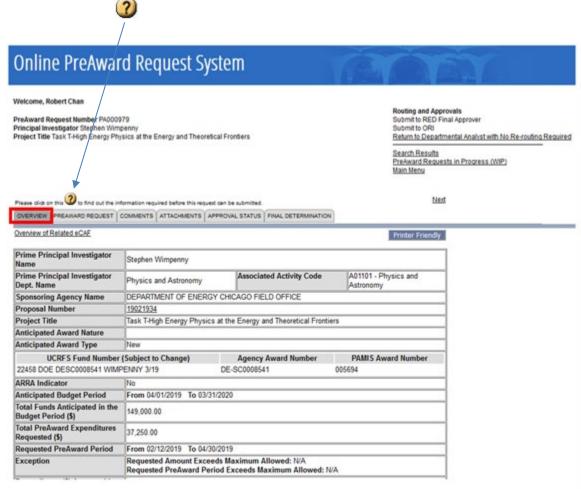
Revised: 1/24/2022 Page **9** of **44** 

# SPA Review & Approval of PreAward Spending Requests

Alternate FAU in the event a Firm Commitment could be obtained; <u>and</u> (iii) the Departmental Approver (or the Organizational Approver) will now need to authorize the use of the Alternate FAU **even if a Firm Commitment cannot be established**.

Before selecting one of the Routing and Approval menu actions, the CGO must complete all required fields under each tab (as applicable), and then click the "Overview" tab to conduct a final review.

> Click on the "OVERVIEW" tab anytime to view the entire request.



Note: The bottom portion of this screen shot has been intentionally cut-off, as such fields will be addressed under the other tabs.

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Revised: 1/24/2022 Page 10 of 44

# SPA Review & Approval of PreAward Spending Requests

> Click on the "PREAWARD REQUEST" tab and complete all required fields.

Please see screenshot below and corresponding guidance on next page.

Online PreAwar	d Request Syste	m		MA		
Malcoma Robert Chan						
VVelcome, Robert Chan  PreAward Request Number PA000979  Principal Investigator Stephen Wimpenny  Project Title Task T-High Energy Physics at the Energy and Theoretical Frontiers			Routing and Approvals Submit to RED Final Approver Submit to ORI Return to Departmental Analist with No Re-routing Required Save Save			
				s In Progress (WIP)		
	formation required before this request can		Previous Next			
Prime Principal Investigator	Stephen Wimpenny	<u>'</u>				
Name Prime Principal Investigator Dept. Name	Physics and Astronomy	Associated Activity Code	A01101 - Physics and Astronomy			
Sponsoring Agency Name	DEPARTMENT OF ENERGY C	HICAGO FIELD OFFICE	Astronomy			
Proposal Number	19021934					
Project Title		the Energy and Theoretical Fron	tiers			
Anticipated Award Nature	7					
Anticipated Award Type						
A	- 3					
<ul> <li>22458 DOE DESC000854</li> </ul>	nber (Subject to Change) 41 WIMPENNY 3/19	Agency Award Number DE-SC0008541	PAMIS Award Number 005694			
Generate a new PAMIS av	ward number and link to the follo	wing UCRFS fund number.				
Anticipated Budget Period	From 04/01/2019 To 03/31/20	20 5				
Total Funds Anticipated in the Budget Period (\$)	149,000.00 6					
Total PreAward Expenditures Requested (\$)	37,250.00 7					
Requested PreAward Period	From 02/12/2019 To 04/30/20	19 8				
Exception	Requested Amount Exceeds Maximum Allowed: N/A Requested Prehvard Period Exceeds Maximum Allowed: N/A					
Expenditures (\$) Approved by Research and Economic Development (RED)	10					
RED Comments on Approved Expenditures (Up to 4000 Characters)	11		.:1			
Justification of PreAward Expenditures 12	We are requesting authorization to begin pre-spending on Dr. Wimpenny's DOE fund# 22458 (TASK T), for the year 2 award. The same fund number is requested for this project. In an effort to avoid disrupting the project's progress and be able to meet current payroll commitments, we are requesting permission to continue grant spending and begin spending from the new, incoming award. There's a delay by the sponsor in processing the new award agreement but they have already released recommendation to fund and released the budget amounts—see attached DOE Award Recommendation letter dated 2/4/2019.					
Alternate FAU 13	Department FAU Activity A01101 - Physics and Fund 19900 - GENERAL FUND Function 40 - Instruction & Res	S				
PreAward costs in the event	approver Kenneth Barish cor the Sponsored Projects offic nitment cannot be established	e is unable to obtain a firm co				
Proceed even if a firm comr	nitment cannot be established	14				

Revised: 1/24/2022 Page 11 of 44

# SPA Review & Approval of PreAward Spending Requests

Click on the "PREAWARD REQUEST" tab and complete all required fields.

Please click on this 2 to find out the in	formation required before this request can be submitted.	Previous Next
OVERVIEW PREAWARD REQUEST	COMMENTS ATTACHMENTS APPROVAL STATUS FINAL DETERMINATION	

The numbered guidance listed below corresponds with the screenshot provided on the previous page.

- 1. Proposal Number. Verify the correct Proposal Number was selected (i.e., that it is the funding proposal associated with the anticipated award under the PreAward spending request). If incorrect, use the Comments tab to instruct the Department Analyst to correct the Proposal Number and to re-route the PreAward request back to the CGO thereafter.
- **2. Anticipated Award Nature.** Verify the correct Anticipated Award Nature was selected:
  - Grant: A type of financial assistance awarded to an organization for the conduct of research or other program as specified in an approved proposal. A grant, as opposed to a cooperative agreement, is used whenever the awarding office anticipates no substantial programmatic involvement with the recipient during the performance of the activities.
  - **Contract:** An award instrument normally signed by both parties to the agreement which contains definitive terms and conditions to be met in the conduct of a project.
  - **Cooperative Agreement:** An agreement in which all parties to the agreement have substantial programmatic involvement.
  - Look at the solicitation and/or the firm commitment for any indication of the Anticipated Award Nature.
- **3. Anticipated Award Type.** Verify the correct Anticipated Award Type is selected:
  - **New:** means an Award made by a sponsor to fund a project where the Sponsor has not previously provided funding.
    - In certain circumstances, a Sponsor will assign a new award number to a renewal or continuation award, thus 'New Award' is the appropriate classification.
  - Renewal: means an Award that modifies a previous award by providing additional funding, extending the project beyond the originally approved project period, <u>and</u> is issued under the same Sponsor Award Number.
  - **Continuation:** means an award that conveys the next budget increment for a multiyear award as originally proposed to the sponsor and indicated in the eCAF. Continuation Awards are also known as Non-Competing Continuations, as the award does not result from a competitive peer review.
  - **Supplement Award** An Award that provides additional funding to an existing project, but where such funding does not represent the next budget increment **and** does not extend the originally approved project period end date. Supplemental Awards typically result from proposals submitted separately from the original proposal and have its

Revised: 1/24/2022 Page 12 of 44

# SPA Review & Approval of PreAward Spending Requests

own eCAF (e.g., proposals to add new tasks and/or deliverables to be performed, for additional funding, during the term of an existing project).

- ♣ The Online PreAward Request System does not have "Supplement Award" as an Anticipated Award Type option. As a work-around:
  - > Select "Continuation," and
  - Use the comment field (on the Comment tab) to:
    - clarify the 'Anticipated Award Type' as being a 'Supplement' and
    - 2. indicate whether a new fund # needs to be established.
- ♣ In the event the Supplemental Funds require a separate fund number (other than the fund number that is associated with the Parent Award), then the CGO should also be sure to select the following option within the next field area of the form (and as described in item #4 below):

•	Link this pre-award to the following PAMIS award number.	
l		

Circumstances where a separate fund number may be warranted include: (i) supplemental funds for participant support costs; (ii) a supplement for COVID-related research; (iii) supplemental funds awarded at an indirect cost rate that differs from the Parent Award; or (iv) other supplemental funds that must be tracked separately and not commingled with other funds.

4. UCRFS Fund Number, Agency Award Number, and PAMIS Award Number. If this PreAward request is associated with an existing PAMIS Award, the Departmental Analyst may have selected (from a listing of one of more bulleted items appearing in the top portion of this field) the associated UCRFS Fund Number, Agency Award Number, and PAMIS Award Number. This occurs most often when the PreAward request is initiated due to a delay in the next increment of funding under a non-competing continuation award. The CGO should verify the PreAward request is, in fact, directly associated with the listed UCRFS Fund Number, Agency Award Number, and PAMIS Award Number.

Alternatively, if a listed UCRFS Fund Number, Agency Award Number, and PAMIS Award Number do not apply to this PreAward request, then one of the following three options should have been selected instead:

- Link this PreAward to the following PAMIS Award Number. This option should be selected if the PreAward is being requested for an existing PAMIS Award.
  - Note: If a new UCRFS fund number will need to be assigned (e.g., supplemental funding for participant support having a different indirect cost rate from the Parent Award), the CGO should insert a statement under the Comments tab <u>and</u> send an email to <a href="EMF@ucr.edu">EMF@ucr.edu</a> after the PreAward Request is approved, stating the reason why the anticipated PreAward funding may require a new UCRFS Fund Number (e.g. Supplemental funding that must be recorded and tracked separately from the Parent Award funds).

Revised: 1/24/2022 Page 13 of 44

# SPA Review & Approval of PreAward Spending Requests

- Generate a new PAMIS Award Number and a new UCRFS Fund Number.
   This option should be selected when the Anticipated Award Type is 'New'.
   This option should also be selected for Renewal Awards when the Sponsor will be issuing a new Sponsor Award Number (rather than issuing an amendment to an existing Award).
- Generate a new PAMIS award number and link to the following UCRFS Fund Number. This option should be selected for Renewal Awards where the PI is requesting to use an existing UCRFS Fund Number assigned to a previous PAMIS Award. This option may be appropriate when the anticipated funding is directly associated with a previous PAMIS Award and is viewed by the Sponsor as continuation funding under the same program, yet a new Sponsor Award number will be issued for various reasons. NOTE: Once the PreAward is approved, the request to use an existing UCRFS Fund Number on a new PAMIS Award Number will be subject to review and approval by EMF Accounting.
- 5. Anticipated Budget Period. CGO must confirm the anticipated Budget Period, listed in the PreAward Spending Request, is consistent with the Budget Period outlined in the Sponsor's official notice of award, agreement, letter of commitment, or email obtained from the sponsoring agency's authorized representative.
- 6. Total Funds Anticipated in the Budget Period. CGO must confirm the Total Funds Anticipated in the Budget Period is consistent with the amount listed in the Sponsor's official notice of award, agreement, letter of commitment, or email obtained from the sponsoring agency's authorized representative.
- 7. Total PreAward Expenditures Requested. CGO must confirm the PreAward Expenditure Request amount does not exceed 25% of the Total Funds Anticipated in the Budget Period. If the request amount exceeds 25% of the Total Funds Anticipated in the Budget Period, the PI/Department must substantiate the request by providing a strong justification explaining why more than 25% is required. If a justification is not provided, the CGO should return the PreAward Spending Request to the PI/Department Analyst, and request the amount be revised to not exceed 25% of the Total Funds Anticipated in the Budget Period.
  - Exception: CA Marketing Boards Awards. CGO must confirm the PreAward Expenditure Request amount does not exceed 50% of the Total Funds Anticipated in the Budget Period and a PreAward Period of up to 6 months (as opposed to 90 days).
- 8. Requested PreAward Period. The CGO must confirm the Requested PreAward Period is within the PreAward Period allowed by the Sponsor and does not exceed ninety (90) calendar days prior to the Anticipated start date of the Award.
  - **Exception:** CA Marketing Boards Awards (see above).
  - **★ Exception:** An exception to the 'Requested PreAward Period' limitation may be considered if written approval is obtained from the sponsoring agency's authorized representative, explicitly allowing PreAward expenditures exceeding ninety (90) calendar days prior to the official start date of the Award.

Revised: 1/24/2022 Page **14** of **44** 

# SPA Review & Approval of PreAward Spending Requests

The CGO must also confirm the duration of the requested PreAward Period does not exceed ninety (90) calendar days in total (or 6 months in the case of CA Marketing Boards). If the PreAward Spending request exceeds such PreAward Period limitation, the CGO must return the PreAward Spending Request back to the Department Analyst, and request the dates be revised accordingly and then route it back to RED for further review.

- 9. Exception. As noted above, if the PI's Department is requesting approval for more than ninety (90) calendar days, or more than 25% of the Total Funds Anticipated in the Budget Period, then a justification must be entered in this field. (In the case of CA Marketing Boards, if the PI's Department is requesting approval for more than 6 months, or more than 50% of the Total Funds Anticipated in the Budget Period, then a justification must be entered in this field.)
- 10. Expenditures Approved by RED. In this field, the CGO must enter the approved amount (not to exceed 25% of the Total Funds Anticipated in the Budget Period, or not to exceed 50% in the case of CA Marketing Boards), rounded up to the nearest whole number.
- **11. RED Comments on Approved Expenditures.** In this field, the CGO shall notate any unusual circumstances regarding the requested amount or duration. At minimum, the CGO shall comment on whether the request complies with the UCR Campus Policy #550-80.
  - Sample comment: "PreAward period and expenditures requested complies with Campus Policy #550-80; not exceeding ninety (90) calendar days and not exceeding 25% of the anticipated Year 2 Budget. Please see attached, an email from DoE Program Manager stating, "assuming availability of funds, we [DoE] plan to support the UC-Riverside group at the following level: Energy Frontier CMS [Task A] = \$825,000." Although this is not a firm commitment, UCR departmental approver, Kenneth Barish, has provided approval to proceed with PreAward request even if a firm commitment cannot be established."
- 12. Justification of PreAward Expenditures. CGO shall review the justification provided by the PI/Department Analyst and determine if the PreAward Spending Request is allowable, allocable, reasonable, and consistently treated. Furthermore, CGO shall review the justification to assess if the associated risks, liabilities, and limitations have been adequately considered by the PI/Department. If further justification is warranted, use the Return to Departmental Analyst with No Re-routing Required function (as described on page 9) with applicable comment inserted on the Comment tab.
- 13. Alternate FAU. CGO must ensure the PreAward Spending Request includes an alternate FAU provided by the PI's Department/College. The alternate FAU will be charged to cover any monetary loss; that is any unfunded PreAward expenditures incurred resulting from the Sponsor's failure to make an award or in the event the PreAward period is not covered by the resulting award terms (i.e., costs incurred but disallowed by the Sponsor).

Revised: 1/24/2022 Page **15** of **44** 

# SPA Review & Approval of PreAward Spending Requests

**14. Important notes regarding FAU and Firm Commitment**. CGO must review this field to determine whether the Departmental Approver (or Organizational Approver, if applicable) has only given approval to proceed if a firm commitment is established.

If this is the case, yet a written firm commitment has not been established, then the PreAward Spending Request cannot proceed *unless the Departmental Approver or Organizational Approver is willing to proceed despite this heightened risk*.

- The CGO should contact (e.g., email or phone) the Departmental Analyst to determine whether the PreAward request:
  - (i) should be returned (via the Return to Departmental Analyst with No Rerouting Required) for withdrawal; or
  - (ii) should be returned to obtain the Financial Liability Certification to proceed even if a firm commitment cannot be established.
- ➤ If the Departmental Analyst advises to proceed with the latter, then the CGO will need to route the PreAward request to a RED Final Approver since RED Final Approvers have the ability to 'Return to Departmental Analyst with Re-Routing Required' (see page 9 for further instructions on this matter.)

NOTE: Upon return of the PreAward request, the PI's Departmental Approver (or Organizational Approver, if applicable) will need to change the prior Financial Liability Certification entry by selecting the radio button which reads, "Proceed even if a firm commitment cannot be established" prior to routing the PreAward forward. If this certification is selected, the CGO will be able to proceed with the review of the PreAward request; otherwise, it will need to be withdrawn.

15. Click 'Save' at the bottom of the "PREAWARD REQUEST" tab before continuing to the "COMMENTS" tab.

This section is left blank intentionally. Please continue to next page.

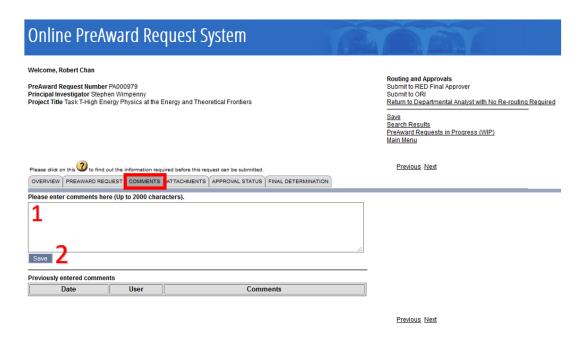
Revised: 1/24/2022 Page **16** of **44** 

# SPA Review & Approval of PreAward Spending Requests

Click on the "COMMENTS" tab to view and insert comments.



- 1. The Comments field may be used or viewed by anyone in the PreAward routing chain listed under the "Approval Status" tab to relay pertinent information not addressed elsewhere in the PreAward request or to seek clarification and/or any necessary changes. For instance, the CGO may return the PreAward request to the Departmental Analyst with No Re-routing Required and use this comment field to request any necessary revisions, or the CGO may submit the PreAward request to the RED Final Approver and use this comment field to request the RED Final Approver to return it to the Departmental Analyst with Re-routing Required along with the reason why.
- 2. After comments are inserted, click 'Save'.
  - ♣ NOTE: Comments inserted here may not be edited by CGO after 'Save' is clicked.



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Revised: 1/24/2022 Page 17 of 44

# SPA Review & Approval of PreAward Spending Requests

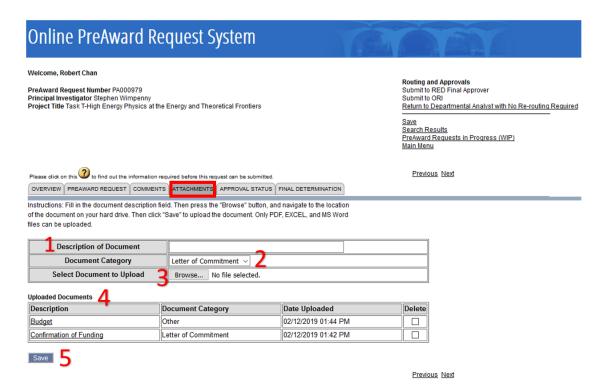
Click on the "ATTACHMENTS" tab to view and upload attachments.



The CGO should thoroughly view all documents which were uploaded by others (see field 4) to determine if there is a Firm Commitment from the Sponsor.

Fields 1, 2, 3, and 5 are used to upload and save any document(s) into the Online PreAward Request System.

- 1. Describe the document (e.g., Email from Sponsor Grants Specialist dated 2/19/2019)
- Select a document category from the drop down (i.e., Letter of Commitment, Other Justification, Other)
- 3. Browse, select, and upload file.
- 4. Review documents uploaded by other users.
- 5. Click 'Save' and then review "Approval Status" tab.



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Revised: 1/24/2022 Page 18 of 44

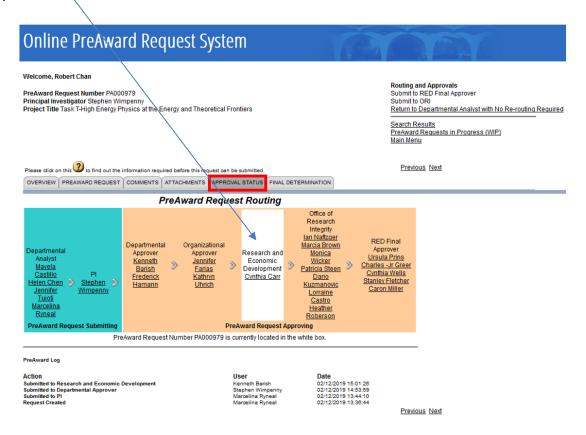
# SPA Review & Approval of PreAward Spending Requests

Click on the "APPROVAL STATUS" tab to view the routing and approval status.



The white box indicates the location of the PreAward request within the routing and approvals process. \

In the example below, the request is in Cynthia Carr's queue in Research and Economic Development.



The PreAward Log (located on the bottom of the APPROVAL STATUS tab) documents the actions taken, by whom, and when, beginning with the creation of the PreAward request and the subsequent routing which has occurred.

The Approval Status tab is also helpful to see who is listed in the routing chain. For instance, in the example above, if the Department Analyst who created the PreAward request (i.e., Marcelina Ryneal) is unavailable, the CGO may contact another Department Analyst identified on the list (i.e., Mayela Castillo, Helen Chen, or Jennifer Tuioti) with any necessary questions and/or corrections.

Revised: 1/24/2022 Page **19** of **44** 

# SPA Review & Approval of PreAward Spending Requests

> Click on the "FINAL DETERMINATIONS" tab and complete required fields.

Please see screenshot below and corresponding guidance on next page.

Online PreAwa	rd Red	quest S	ystem	- 5	(Cal		
Welcome, Robert Chan							
PreAward Request Number PA000979 Principal Investigator Stephen Wimpenny Project Title Task T-High Energy Physics at the Energy and Theoretical Frontiers				9	Routing and Appr Submit to RED Fir Submit to ORI Return to Departn		
Please click on this 20 to find out the	information	island before this say	quest can be submitted.			Save Search Results PreAward Reques Main Menu	sts in Progress (WIP)
OVERVIEW PREAWARD REQUEST			APPROVAL STATUS	FINAL DETERMINATION			
Overview of Related eCAF							
Sponsor	DEPART	MENT OF ENE	RGY CHICAGO FIE	ELD OFFICE			1
Prime Sponsor							1
CFDA Number		2					
Confirmation of Firm Commitment from Funding Agency	O Yes	⊃ <b>№ 3</b>					
PreAward Authorized under Agency Terms	O Yes	⊃ <b>№ 4</b>					
Notes: (Up to 4000 Characters)	5					.ii.	
All applicable financial di	sclosures ha	ve been receiv	red. 6				
Save							

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Revised: 1/24/2022 Page 20 of 44

# SPA Review & Approval of PreAward Spending Requests

Click on the "FINAL DETERMINATIONS" tab and complete required fields.

COMMENTS ATTACHMENTS
ACHMENTS

The numbered guidance listed below corresponds with the screenshot provided on the previous page.

- 1. Verify that the correct Sponsor (and if applicable, Prime Sponsor) is selected.
  - ↓ Verify that the miscellaneous sponsor code 009850 was not utilized. If the miscellaneous sponsor code was used, the CGO needs to change it to the correct sponsor code that is associated with the Sponsor (or Prime Sponsor, if applicable). Each Sponsor and Prime Sponsor has a unique sponsor code assigned to it via the Research Enterprise Management System (aka REMS). For instance, NSF's sponsor code is 005400. If a sponsor code does not exist for this Sponsor (or Prime Sponsor, if applicable), then a sponsor code will need to be requested through REMS prior to proceeding with the approval of the PreAward request. Also, please have the sponsor code corrected on the associated Proposal (if applicable).
- 2. Insert the Assistance Listing Number (formerly CFDA Number), if applicable. If none, then leave blank.
  - a. The CFDA (Catalog of Federal Domestic Assistance)/Assistance Listing Number must be entered if either the Sponsor or the Prime Sponsor (if applicable) is a Federal Agency, and the Award Type is a Grant or a Cooperative Agreement.
     Note: Federal Contracts will not include a CFDA/Assistance Listing number.
  - b. The CFDA/Assistance Listing Number should be located on the Award document or RFP/RFA/Solicitation. It is a unique five-digit number separated with a decimal point between the second and third number (e.g., xx.xxx). In the event the CFDA/Assistance Listing Number was not included in the Award, then the CGO should look up such number in the Assistance Listing located at <a href="https://beta.sam.gov/">https://beta.sam.gov/</a>.
- 3. Confirmation of a Firm Commitment from Funding Agency (Select Yes or No)
  - a. A Firm Commitment is the official award or written commitment from the Sponsor's authorized official confirming the anticipated award period and amount.
- 4. PreAward Authorized under Agency Terms (Select Yes or No)
  - a. Review the Sponsor's (and Prime Sponsor's, if applicable) terms and conditions to determine if Sponsor will cover expenses incurred prior to the effective date, or prior to a fully executed award.
    - ♣Careful: Some State of California agreements do not permit expenses to be incurred prior to receipt of a fully executed award despite having a retroactive period of performance start date. In such instances, a PreAward request should not be approved since any PreAward costs incurred would be disallowed.
- Insert comments and notes. The CGO should use this field to justify the final determination made, as the RED Final Approver will review such justification as part of the final approval process.

Revised: 1/24/2022 Page **21** of **44** 

# SPA Review & Approval of PreAward Spending Requests

- 6. Check the box only if all applicable financial disclosures have been received (e.g., NSF Form 925, PHS Form 500, 700-U). Forms should be uploaded to the corresponding Proposal in iPortal.
- 7. Click 'Save'.
- 8. Check if any other fields need to be completed.
- **9.** Submit to RED Final Approver, or if necessary, return to Department Analyst (depending on Final Determination made by CGO).

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Revised: 1/24/2022 Page 22 of 44

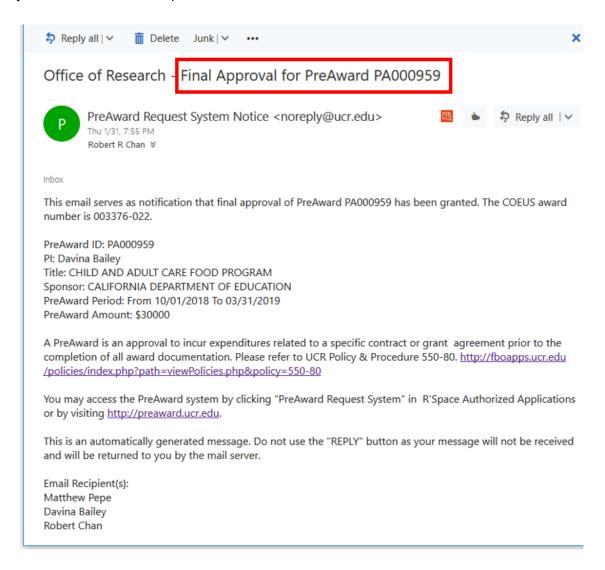
# SPA Review & Approval of PreAward Spending Requests

### PREAWARD APPROVAL

### Final Approval is granted by designated officials within RED.

PreAward expenditures cannot be incurred without official authorization by a RED Final Approver. Expenditures cannot exceed or go beyond the approved PreAward amount and period.

Upon final approval, the PreAward allows for the immediate establishment of a UCRFS Fund Number (FAU) and budget. An automated email is generated and sent to the PI, Department Analyst, and CGO. See sample email below.



Revised: 1/24/2022 Page 23 of 44

# SPA Review & Approval of PreAward Spending Requests

### REQUESTING MODIFICATION TO A PREVIOUSLY APPROVED PREAWARD

It may be necessary to increase the expenditure level and/or the PreAward performance period which was previously authorized via the Online PreAward Request System. To request such a modification (and provided the fully executed award associated with the initial PreAward request has not subsequently been received and processed through PAMIS), the Pl's Department Analyst must select and use the "Modify an Existing PreAward Request for Additional Funds and/or Time" function via the PreAward Request System menu.

Online PreAward Reque	st Syster
<i>N</i> ain Menu	
Velcome, Cynthia Wells	
Create a PreAward Request	
Modify an Existing PreAward Request for Additional Funds and/or Tir (0)	me
View/Re-Assign PreAward Requests to CGOs	
PreAward Requests in Progress (WIP) (2)	
View Open PreAwards (5)	
Search PreAward Requests (open or closed/submitted)	
PreAward Summary Report	
PreAward Campus Summary Report	
Help	79
Exit Application	

Revised: 1/24/2022 Page **24** of **44** 

# SPA Review & Approval of PreAward Spending Requests

### NOTIFICATION AND RECEIPT OF A MODIFIED PREAWARD SPENDING REQUEST

When a modified PreAward request is routed to a CGO, an automated system-generated email notification will be sent to the assigned CGO (along with a copy to SPA managers and RED's IT Director).

### Example of an automated system-generated email notification sent to CGO.



PreAward Request System Notice

Mon 11/8/2021 12:39 PM

To: Robert R Chan

This e-mail serves as notification that departmental approver Chia-En Chang has submitted PreAward PA001307 (modified) . An action on your part as Office of Research Contract & Grant Officer is now required.

 $\triangle$  5 %  $\rightarrow$  ...

PreAward ID: PA001307

PI: Leonard Mueller

Title: Structural and proton dynamics of pyridoxal-5?-phosphate dependent enzymes

Sponsor: UNIVERSITY OF GEORGIA (INCL SKIDAWAY INSTITUTE OF OCEANOGRAP

PreAward Period: From 09/01/2021 To 02/28/2022

PreAward Amount: \$66393.75

A PreAward is an approval to incur expenditures related to a specific contract or grant agreement prior to the completion of all award documentation. Please refer to UCR Policy & Procedure 550-80. <a href="https://fboapps.ucr.edu/policies/index.php?path=viewPolicies.php&policy=550-80">https://fboapps.ucr.edu/policies/index.php?path=viewPolicies.php&policy=550-80</a>

You may access the PreAward system by clicking "PreAward Request System" in R'Space Authorized Applications or by visiting <a href="https://preaward.ucr.edu">https://preaward.ucr.edu</a>.

This is an automatically generated message. Do not use the "REPLY" button as your message will not be received and will be returned to you by the mail server.

Email Recipient(s): Timothy Wolfe Ursula Prins Charles -Jr Greer Cynthia Wells Stanley Fletcher Robert Chan

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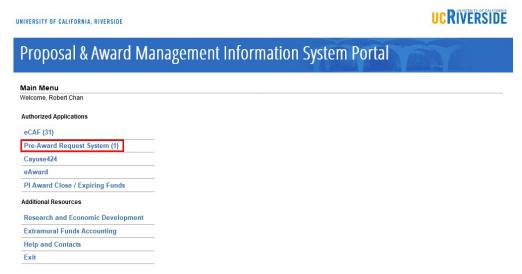
Revised: 1/24/2022 Page 25 of 44

# SPA Review & Approval of PreAward Spending Requests

### **Accessing the modified PreAward Request**

Upon receiving a modified PreAward Request notification, the CGO should access the Online PreAward System by either clicking "**PreAward Request System**" through the PAMIS Portal from the R'Space Authorized Applications section or by visiting <a href="http://preaward.ucr.edu">http://preaward.ucr.edu</a>.

Select "PreAward Request System" from the list of Authorized Applications.



> Select "**PreAward Request in Progress (WIP)**" to access PreAward requests, <u>in</u> your queue, requiring action.



> Select the "PreAward Request Number" you would like to review.



Revised: 1/24/2022 Page 26 of 44

# SPA Review & Approval of PreAward Spending Requests

### **REVIEW & APPROVAL OF MODIFIED PREAWARD REQUEST**

This section will cover the "PREAWARD REQUEST," "COMMENTS," "ATTACHMENTS," and "FINAL DETERMINATION" tabs only. For guidance on the "OVERVIEW," and "APPROVAL STATUS" tabs, please review the previous sections above since the procedure is the same.

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Revised: 1/24/2022 Page 27 of 44

# SPA Review & Approval of PreAward Spending Requests

> Click on the "PREAWARD REQUEST" tab and complete all required fields.



Please see screenshot below and corresponding guidance on next page.

PreAward Request Number PA001307 (Modified) Submit to RED Final Approver Principal Investigator Leonard Mueller Return to Departmental Analyst with No Re-routing Required Project Title Structural and proton dynamics of pyridoxal-5'-phosphate dependent enzymes Search Results PreAward Requests in Progress (WIP) Previous Next OVERVIEW PREAWARD REQUEST COMMENTS ATTACHMENTS APPROVAL STATUS FINAL DETERMINATION Prime Principal Investigator Leonard Mueller Prime Principal Investigator Associated Activity Code Chemistry A01096 - Chemistry Dept. Name Sponsoring Agency Name UNIVERSITY OF GEORGIA (INCL SKIDAWAY INSTITUTE OF OCEANOGRAP Prime Sponsor: NIH/MISCELLANEOUS AGENCIES & DEPARTMENTS Proposal Number 20081061 Structural and proton dynamics of pyridoxal-5'-phosphate dependent enzymes Project Title Anticipated Award Nature Grant Anticipated Award Type Continuation UCRFS Fund Number (Subject to Change) **PAMIS Award Number** Agency Award Number 86250 UG SUB-2439 PREAWARDMUEL11/21\* SUB00002439 012116 ARRA Indicator From 09/01/2021 To 08/31/2022 Anticipated Budget Period Total Funds Anticipated in the 144 575 00 Budget Period (\$) Total PreAward Expenditures 66,393.75 (Original Amount: 36,143.75, Additional 30,250.00 requested.) Requested (\$) (Revised) Requested PreAward Period From 09/01/2021 To 02/28/2022 (Original End Date: 11/30/2021) (Revised) Exception Requested Amount Exceeds Maximum Allowed: N/A Requested PreAward Period Exceeds Maximum Allowed: N/A Expenditures (\$) Approved by Additional Amount Requested: 30250 (Original Amount: 36,143.75) Development (RED) (Revised) RED Comments on Approved PreAward period and expenditures requested complies with Campus Policy Expenditures (Revised) \$550-80; not exceeding ninety (90) calendar days and not exceeding 25% (Up to 4000 Characters) of the anticipated Year 2 Budget. (Original Comments: "PreAward period and expenditures requested complies with Campus Policy (550-80; not exceeding ninety (90) calendar days and not exceeding 25% of the anticipated Year 2 Additional PreAward Fund for \$30,250.00 and 3 additional months are requested for the YR-2 Award Justification of PreAward Expenditures of this grant while awaiting for this subaward to be issued by the University of GA. PI would like to ensure the cotinuation and the success of this Structural and Proton Dynamics project and to provide support for students working on this project with no interruptions. Original Justification: PI would like to continue YR-2 without delay, to ensure the success of this Structural and Proton Dynamics project and to provide support for students working on this project. Alternate FAU Department FAU Activity A01096 - Chemistry Fund 19900 - GENERAL FUNDS Function 40 - Instruction & Research On 07/16/2021 departmental approver Jeff Obrecht committed the above-named FAU to cover unfunded PreAward costs in the event the Sponsored Projects office is unable to obtain a firm commitment from the sponsor. Proceed even if a firm commitment cannot be established.

10 Save

Revised: 1/24/2022 Page 28 of 44

# SPA Review & Approval of PreAward Spending Requests

- 1. The fields in the red box above are completed by the PI and Department Analyst and cannot be changed by the CGO. CGO shall review each field for accuracy and, if a revision is necessary, CGO should insert comments under the "Comments" tab (describing the revisions needed) and return to the Department Analyst for revision(s). For example, if the request indicates: "Generate a new PAMIS award number and a new UCRFS fund number" for a modified PreAward request; then CGO should first check with PI and Department Analyst to ensure this is correct. Typically, a modified PreAward should be associated with the PAMIS Award Number and UCRFS Fund number assigned to the previously approved PreAward request.
- 2. Total PreAward Expenditures Requested (\$) (Revised): This field will show the original PreAward expenditure amount authorized, and the additional amount requested. If there is a critical need to continue performing work, the PI may request up to an additional 25% of the anticipated Budget Period.
- **3. Requested PreAward Period (Revised):** This field will show the original PreAward Period authorized, and the additional duration requested. If there is a critical need to continue performing work, the PI may request up to an additional 90 calendar days. If additional funds are not required, the PI may request an extension of time only, with no additional funds.
- **4. Exception:** Even if this field indicates "N/A," if the original and modified request combined exceeds 90 calendar days or 25% of the anticipated budget, the PI must include a strong justification describing the vital need to continue working on critical tasks.
- **5. Expenditures Approved by RED (Revised):** This field will show the original PreAward spending amount authorized and the additional amount approved by RED. The amount is entered by the CGO.
- **6. RED Comments on Approved Expenditures (Revised):** This field will show comments from the CGO who approved the previous PreAward request prior to the modification request. CGO shall enter comments, including any new circumstances regarding the revised amount or duration requested, such as documented communication with the sponsor regarding the anticipated award execution date.
- **7. Justification of PreAward Expenditures:** This field will show the original justification provided for the previous PreAward request, and the justification for this PreAward modification request. CGO shall review the additional justification provided by the PI and/or Department Analyst to determine if the request is justified and meets Campus Policy #550-80. If further justification is warranted, CGO should use the *Return to Departmental Analyst with No Rerouting Required* function, with applicable comments inserted on the Comments tab.
- **8. Alternate FAU:** The Departmental Approver's approval (or Organizational Approver's approval, if applicable) of the PreAward modification will reauthorize the continued use of the FAU provided on the original PreAward request.
- **9.** CGO must review this field to determine whether the Departmental Approver (or Organizational Approver, if applicable) has only given approval to proceed if a firm commitment is established.

If this is the case, yet a written firm commitment has not been established, then the Modified PreAward Spending Request cannot proceed *unless the Departmental Approver or Organizational Approver is willing to proceed despite this heightened risk*. For additional guidance, please refer to page 16 of this document.

Click "SAVE" at the bottom of the PreAward Request before continuing to next tab.

Revised: 1/24/2022 Page 29 of 44

# SPA Review & Approval of PreAward Spending Requests

Click on the "COMMENTS" tab and review and insert comments.



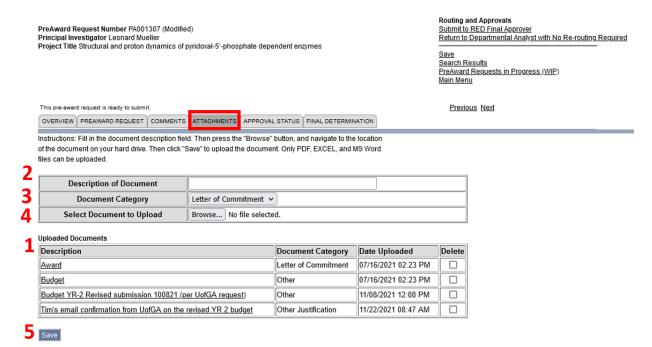
- **1.** Review comments including any previous comments from CGO, Department Analyst, Chair or Dean.
- 2. CGO may enter comments, including any new circumstances regarding the requested amount or duration, such as communication with the sponsor regarding the anticipated award execution date. (Alternatively, written documentation addressing such circumstances may be uploaded under the Attachments tab.)

If CGO is sending the request back for revisions, CGO must use this field to describe what revisions are needed and a reason for the revision. For example, if the PI and Department Analyst inadvertently chose 'new PAMIS Award and new UCRFS Fund Number' to be generated when it should be allocated under an 'existing' PAMIS Award number and UCRFS Fund Number.

Revised: 1/24/2022 Page **30** of **44** 

# SPA Review & Approval of PreAward Spending Requests

- 3. Click "SAVE" before continuing to next tab.
- Click on the "ATTACHMENTS" tab to view and upload attachments.



1. The CGO should thoroughly view all documents which were uploaded by others (see field 1) to determine if there is a Firm Commitment from the Sponsor and a written letter or email from the Sponsor, providing an updated estimate of when UCR can expect to receive the fully executed Award. The attachments should also include a written confirmation from the Sponsor that there have been no changes to the anticipated award duration and budget since the previous approval.

Note: If the Award is undergoing negotiations, a copy of the draft/redline agreement should also be uploaded under the Attachments tab.

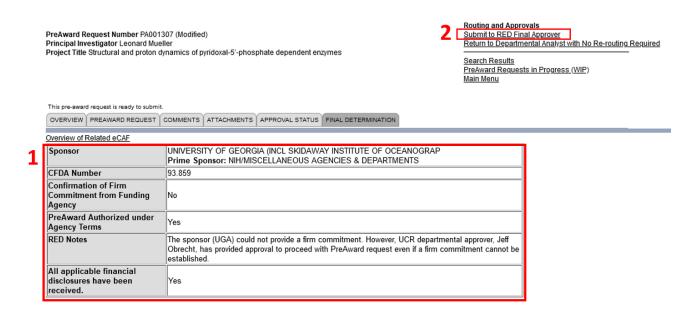
# Field 2, 3, and 4 are used to upload and save any document(s) into the Online PreAward Request System.

- 2. Describe the document (e.g., Email confirmation from Sponsor on revised Year 2 Budget)
- **3.** Select a document category from the drop down (i.e., Letter of Commitment, Other Justification, Other)
- 4. Browse, select, and upload file.
- 5. Click "SAVE" before continuing to next tab.

Revised: 1/24/2022 Page **31** of **44** 

# SPA Review & Approval of PreAward Spending Requests

- > Click on the "FINAL DETERMINATIONS" tab to review and approve.
  - ♣ The information on this tab is prepopulated from the previously approved PreAward Request and cannot be edited by CGO.



1. CGO shall review information in field 1 for accuracy.

In the unlikely situation where the information is inaccurate, CGO shall inform supervisor and provide an explanation under the "COMMENTS" tab. For example, if the Prime Sponsor should have been "National Institute of Allergy and Infectious Diseases" instead of "NIH/Miscellaneous Agencies & Departments," if this correction cannot be made on the modified PreAward request, supervisor may be able to make the correction in COEUS.

- **2.** Submit to RED Final Approver, or if necessary, return to Department Analyst (depending on Final Determination made by CGO).
  - Do NOT submit to RED Final Approver unless and until the CGO has reached out to the Sponsor (following the approval of the previous PreAward Request) to obtain:
    - (i) a status update on the ETA of the award (if not under active negotiation); and
    - (ii) re-confirmation as to the start date of the anticipated award.

Note: PreAward periods exceeding a total of 90 days may fall outside of a sponsor's authorized PreAward spending period, so a written confirmation that the start date of the award will be retroactive to the date when initial PreAward spending began may be prudent to obtain.

Revised: 1/24/2022 Page **32** of **44** 

# SPA Review & Approval of PreAward Spending Requests

The CGO shall document the above by either inserting a comment on the Comments tab or uploading an evidentiary document/communication on the Attachment tab.

### PREAWARD APPROVAL

### Final Approval is granted by designated officials within RED.

PreAward expenditures cannot be incurred without official authorization by a RED Final Approver. Expenditures cannot exceed or go beyond the approved PreAward amount and period.

When the CGO submits the Online PreAward to RED Final Approver, an automated email is generated and sent to the RED Final Approvers.

Upon RED final approval, the PreAward modification allows for the immediate establishment of a UCRFS Fund Number (FAU) and budget. An automated email is generated and sent to the PI, Department Analyst, and CGO. See sample emails below.

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Revised: 1/24/2022 Page 33 of 44

# SPA Review & Approval of PreAward Spending Requests

### Sample Email Notification Sent when CGO submits to RED Final Approver

PreAward PA001302 (modified) - Requires Action



PreAward Request System Notice <noreply@ucr.edu> Wed 11/24/2021 11:34 AM

This e-mail serves as notification that Office of Research Contract & Grant Officer Ursula Prins has submitted PreAward PA001302 (modified). An action on your part as Office of Research super user is now required.

PreAward ID: PA001302

PI: Subramanian Ramakrishnan

Title: Economic Advisor specializing in Economic Equity Sponsor: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

PreAward Period: From 07/01/2021 To 12/27/2021

PreAward Amount: \$26286

A PreAward is an approval to incur expenditures related to a specific contract or grant agreement prior to the completion of all award documentation. Please refer to UCR Policy & Procedure 550-80. https://fboapps.ucr.edu/policies/index.php?path=viewPolicies.php&policy=550-80

You may access the PreAward system by clicking "PreAward Request System" in R'Space Authorized Applications or by visiting https://preaward.ucr.edu.

This is an automatically generated message. Do not use the "REPLY" button as your message will not be received and will be returned to you by the mail server

Email Recipient(s): Ursula Prins Charles -Jr Green Cvnthia Wells Stanley Fletcher Robert Chan

### Sample Email Notification Sent When PreAward Modification is Approved

Office of Research - Final Approval for PreAward PA001302 (modified)



PreAward Request System Notice <noreply@ucr.edu>

Wed 11/24/2021 3:53 PM

To: Ursula N Prins

This email serves as notification that final approval of PreAward PA001302 (modified) has been granted. The COEUS award number is 012342-003.

PreAward ID: PA001302 PI: Subramanian Ramakrishnan Title: Economic Advisor specializing in Economic Equity Sponsor: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS PreAward Period: From 07/01/2021 To 12/27/2021 PreAward Amount: \$26286

A PreAward is an approval to incur expenditures related to a specific contract or grant agreement prior to the completion of all award documentation. Please refer to UCR Policy & Procedure 550-80. https://fboapps.ucr.edu/policies/index.php?path=viewPolicies.php&policy=550-80

You may access the PreAward system by clicking "PreAward Request System" in R'Space Authorized Applications or by visiting https://preaward.ucr.edu.

This is an automatically generated message. Do not use the "REPLY" button as your message will not be received and will be returned to you by the mail server.

Email Recipient(s): Beth Tamayose Luke Hoepfner Shayna Conaway Subramanian Ramakrishnan Ursula Prins

Page 34 of 44 Revised: 1/24/2022

# SPA Review & Approval of PreAward Spending Requests

# **EXHIBIT A**

**Exhibit A: UC Contract and Grant Manual, Chapter 2-670:** "Prior Approval Requirements," retrieved 1/31/2021, last revised unknown. <a href="https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter2/chapter-2-600.html#ch2-670">https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter2/chapter-2-600.html#ch2-670</a>

### 2-670 Prior Approval Requirements

When a sponsor or the University requires prior approval of actions related to the administration of an award, the campus or Laboratory must have administrative procedures in place which meet prior approval requirements. The terms and conditions of the award should provide specific guidance on the sponsor's requirements for prior approvals. Examples of actions often requiring prior approval at the campus level or by the sponsor, depending on sponsor requirements, are pre-award costs, no-cost extensions, and rebudgeting above a line-item amount restricted by the sponsor.

A change in the scope of work, objectives of the research, or level of effort of the Principal Investigator generally must be approved in writing by the sponsor. Replacing the Principal Investigator generally requires sponsor approval in addition to any required University approvals.

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Revised: 1/24/2022 Page **35** of **44** 

# SPA Review & Approval of PreAward Spending Requests

# **EXHIBIT B**

**Exhibit B: UC Contract and Grant Manual, Chapter 6-300:** "Expenditure Advance Based on a Firm Commitment," retrieved 1/31/2021, last revised unknown. <a href="https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter6/chapter-6-300.html">https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter6/chapter-6-300.html</a>

# 6-300 Expenditure Advance Based on Firm Commitment

### 6-310 Delegation of Authority

The President has delegated to Chancellors authority to approve expenditures for projects for which documentation of the award has not been received:

....when (a) the contract or grant is within the solicitation authority previously delegated to you and you have satisfied yourself that a firm commitment exists to reimburse the University for the amount of its own funds advanced,

and (b) there is an essential need to advance or commit funds (which normally means to pay salaries or meet other expenses of a continuing project).

For projects which are beyond the solicitation authority of the Chancellor (e.g., actions requiring Office of the President approval), the President retains the authority to make the "firm commitment." (See Chapter 13 for discussion of the contract and grant solicitation authority of the Chancellor.)

### 6-320 Firm Commitment Requirement

General Counsel has provided the following guidance in interpreting what constitutes a "firm commitment" which is incorporated in the April 14, 1980 delegation:

While firm commitment has no legal definition, it is obviously something less than a contract. The phrase is applicable to situations where University personnel are advised by representatives of Government agencies that a contract or grant will be forthcoming, and the only delay is a ministerial one of document processing. An agency representative making such a representation must be one who can be relied on for such representation.

### 6-330 Responsibility for Loss

The University has no provisions to cover losses resulting when an award is denied by the sponsor and the campus has incurred costs in advance of receiving the denial. Campuses have established policies for determining where to charge such losses.

Revised: 1/24/2022 Page **36** of **44** 

# SPA Review & Approval of PreAward Spending Requests

# **EXHIBIT C**

Exhibit C: UCR Policy 550-80. "PreAward Spending," retrieved 1/31/2021, last revised 1/12/16.

https://fboapps.ucr.edu/policies/index.php?path=viewPolicies.php&policy=550-80

Policy Title: Pre-Award Spending

Policy Number: 550-80

Responsible Officer: Vice Chancellor of Research and Economic Development

Responsible Office: Office of Research and Economic Development

Effective Date: 04/01/2005 Revision Date: 01/12/2016

### Purpose and Background

This policy is intended to identify the circumstances in which Pre-Award spending is encouraged. It also provides guidance for requesting Pre-Award approval.

A Pre-Award is the internal approval to incur expenditures, related to a specific contract or grant, prior to the sponsoring agency's issuance of the fully executed award.

A Pre-Award should be considered when, for instance, an official award has not been executed due to external delays or due to delays in negotiation of award terms, yet there is a firm project start date and award amount, and the project would be adversely affected by the delay.

### Pre-Award Guidelines

A critical need to meet project objectives should exist to expend funds prior to the receipt of a fully executed award or continuation award (e.g., the need to order/purchase equipment or the need to continue paying salaries & benefits when the next increment of funding has been delayed beyond the next budget period start date of a continuation award).

Pre-Awards may be authorized for an expenditure of funds (i) incurred during a certain time period prior to the official start date of the award and (ii) in an amount up to a certain percentage of the anticipated award amount, contingent upon the sponsoring agency's Pre-Award spending guidelines.

- (i) The Pre-Award period (i.e., the period of time prior to the official award start date) must not exceed ninety (90) calendar days (contingent upon sponsoring agency guidelines). In the event the sponsoring agency is a Marketing Board, the Pre-Award period must not exceed the six (6) month period preceding the official award start date. Exceptional circumstances requiring additional time must be justified/explained within the Pre-Award request.
- (ii) The amount of Pre-Award spending authorized must be for a specified dollar amount. Requests should not exceed estimated expenditure levels for the Pre-Award period. Thus, a 90-day Pre-Award associated with a one-year award should not exceed 25% of the annual budget. Exceptional circumstances requiring additional amounts must be justified/explained within the Pre-Award request.

Authorization to incur Pre-Award spending are processed via UCR's online Pre-Award Request System, which is accessible through the PAMIS (Proposal and Award Management Information System) Portal from the Authorized Applications section in R'Space or through http://pamis.ucr.edu.

Pre-Award expenditures cannot be incurred without authorization and a Pre-Award budget in place. Expenditures cannot exceed the approved Pre-Award amount.

All Pre-Award requests must include an alternate FAU. The alternate FAU will be charged, to cover unfunded Pre-Award expenditures incurred, in the event the funding is not received or in the event the Pre-Award period does not coincide with the project period of the funded award.

Pre-Award requests should be supported by a letter of commitment or other confirmation from the sponsoring agency, which identifies their intent to award a specified amount of funds during a specified period of time. In the event a letter of commitment or other confirmation cannot be obtained, the Pre-Award request may, nonetheless, be approved if the Department Approver (or the Organizational Approver, when appropriate) providing the alternate FAU indicates the desire to proceed despite the increased financial risk in doing so in the absence of the sponsor's firm commitment.

Note: If the Department is unable to provide an alternate FAU, it may seek an alternate FAU from within Research and Economic Development's accountability structure ("RED FAU"). RED will then have the final option as to whether to proceed, with or without a firm commitment, from the sponsor.

Pre-Awards are processed in the same way as awards are processed within PAMIS. Upon final approval of the Pre-Award request, the Pre-Award allows for the immediate establishment of a fund number and budget.

### References

- UC Contract and Grant Manual, Chapters 2-670 and 6-300: http://www.ucop.edu/raohome/cgmanual/
- UCR Computing & Communications, Application of the Pre-Award Request System: <a href="http://cnc.ucr.edu/Pre-Award/">http://cnc.ucr.edu/Pre-Award/</a>
- UCR Sponsored Programs Administration, Pre-Award Administration and Spending: <a href="https://research.ucr.edu/spa/lifecycle/pre-award-administration.aspx">https://research.ucr.edu/spa/lifecycle/pre-award-administration.aspx</a>

### Contacts

Please direct any questions regarding this policy to the Office of Research and Economic Development.

Revised: 1/24/2022 Page **37** of **44** 

# SPA Review & Approval of PreAward Spending Requests

# **EXHIBIT D**

**Exhibit D: UCR Sponsored Programs Administration webpage.** "PreAward Administration and PreAward Spending," retrieved 1/31/2021, last revised unknown. <a href="https://research.ucr.edu/spa/lifecycle/preaward">https://research.ucr.edu/spa/lifecycle/preaward</a>

### Page 1 of 2

# **PreAward Spending**

# **Background and Contingencies**

Principal Investigators (PIs) may request authorization to spend funds in support of a sponsored project in advance of receiving a notice of an award from a sponsor (PreAward).

PreAwards may be authorized for an expenditure of funds (i) in an amount up to a certain percentage of the anticipated award amount and (ii) incurred during a certain time period prior to the official start date of the award, contingent upon the sponsoring agency's PreAward spending guidelines. A PreAward should be considered when, for instance, an official award has not been executed due to external delays or due to delays in contract negotiation, yet there is a firm project start date and award amount, and the project would be adversely affected by the delay.

Authorization for a PreAward is contingent upon the following:

- A critical need to meet project objectives must exist to expend funds in advance of a new, renewal or continuation award (e.g., the need to order/purchase equipment or the need to continue paying salaries & benefits when the next increment of funding has been delayed beyond the next budget period start date of a continuation award);
- Approval of human subjects, animal, biosafety or other research protocols by the appropriate regulatory committee, as applicable;
- Successful completion of the human subject tutorial by the PI and all key personnel participating on the project, if human subjects are involved:
- · Approval of required financial disclosures, as applicable;
- · Approval of Exception to Principal Investigator Eligibility, as applicable;
- Certification by the PI that the level of effort, scope, and objectives of the project, as proposed or negotiated, will not change;
- Certification by the chair/director of the unit responsible for administering the anticipated award ("Departmental
  Approver"), that any monetary loss to the campus resulting from the sponsor's failure to make the award, or from
  costs incurred but disallowed by the sponsor, shall be the responsibility of that unit or school. If, however, the
  Department Approver is unable to authorize the use of an alternate FAU in the event losses are incurred as a
  consequence of the PreAward, then certification must be obtained by the appropriate dean or vice chancellor who's
  office will provide the use of an alternate FAU ("Organizational Approver"); and
- Confirmation of the sponsor's firm commitment from an authorized representative of the sponsor by SPA; however,
   PreAward may proceed without the sponsor's firm commitment in the event that the Department Approver, or the
   Organizational Approver (as appropriate), has authorized the PreAward request despite the increased financial risk in
   doing so in the absence of the sponsor's firm commitment.

Revised: 1/24/2022 Page 38 of 44

# SPA Review & Approval of PreAward Spending Requests

### Page 2 of 2

## PreAward Spending - Risks, Liabilities and Limitations

The risks, liabilities and limitations associated with PreAwards must be carefully considered prior to requesting authorization.

Risks: Whenever the University approves a PreAward, it is risking monetary loss. Other funding must be available to cover the risk of a delayed start date, costs disallowed by the sponsor, or failure of the sponsor to make the anticipated award.

Liabilities: Special care must be exercised in assessing the impact of PreAwards on the legal obligations of the University, especially in the areas of intellectual property rights and indemnification, as well as other special award terms.

Limitations: A sponsor's policies, the terms and conditions of the anticipated award, and campus policies and practices determine whether or not a PreAward will be authorized. Restrictions differ depending on the type of sponsor and the type of award anticipated (i.e., grant, cooperative agreement, or contract).

# Requesting PreAwards

To get started, the on-line PreAward request system can be accessed by clicking 'PreAward Request System' accessible via the PAMIS (Proposal and Award Management Information System) Portal from the Authorized Applications section in R'Space.

For further details on utilizing the PreAward Request System, please visit http://cnc.ucr.edu/preaward/

# Requesting Modifications to Previously Approved PreAwards

It may be necessary to increase the expenditure level and/or PreAward performance period previously authorized via the on-line PreAward Request System. To seek such a modification (provided the fully executed award associated with the initial PreAward request has not subsequently been received and processed through PAMIS), please select the "Modify an Existing PreAward Request for Additional Funds and/or Time" function via the PreAward Request System menu

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Revised: 1/24/2022 Page **39** of **44** 

# SPA Review & Approval of PreAward Spending Requests

# **EXHIBIT E**

**Exhibit E: UCR Computing & Communications webpage (select pages).** "Online PreAward Request System," retrieved 1/31/2021, last revised unknown. <a href="https://cnc.ucr.edu/preaward/">http://cnc.ucr.edu/preaward/</a>

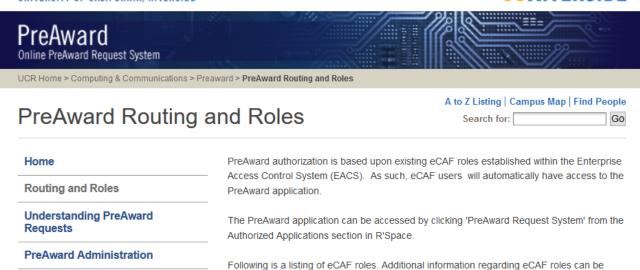
Page 1 of 2

UNIVERSITY OF CALIFORNIA, RIVERSIDE

**Announcements** 

Contacts





> Pl/Submitter

> Contract & Grant Analyst

found at the eCAF support site.

> PI/Approver

> Co-Pl

Chair

Dean

> Office of Research and Economic Development Officer

### **PreAward Routing**

PreAward transactions are electronically routed to everyone who needs to provide review or approval.

The "Approvals" tab provides a graphical representation of the potential PreAward routing system, with a white box highlighting its current location on the path.

Revised: 1/24/2022 Page **40** of **44** 

# SPA Review & Approval of PreAward Spending Requests

### Page 2 of 2

# Understanding PreAward Requests

A to Z Listing	Campus Map	Find Peopl
Search fo	r:	Go

# Routing and Roles Understanding PreAward Requests PreAward Administration Announcements Contacts

### **PreAward Requests**

The On-Line PreAward Request System provides the electronic means to request PreAward expenditures. The PreAward request is routed through the department for necessary approvals and then submitted to the Office of Research and Economic Development (RED) for processing and final approval.

### PAMIS and PreAward

When RED approves and processes a PreAward request, it is activated in PAMIS. An e-mail is generated notifying the appropriate parties similar to the regular PAMIS award process. The fund number is assigned using the same criteria and the same method as a regular PAMIS award. Processing a PreAward through PAMIS allows for the establishment of a PAMIS PreAward BEA (an actual budget reflecting the approved PreAward budget versus \$1 holding budget that is currently utilized). The PreAward budget is offset to BC99 (BC-PreAward) rather than a revenue account. The approved PreAward authorizes expenditures up to the dollar limit and time period.

By processing the PreAward through PAMIS, various email notifications will automatically be generated in the following circumstances:

- > When there is a revision after the PreAward has been established
- > When a PreAward is nearing expiration (approximately two weeks)
- > When a PreAward has expired (NO additional expenditures can be incurred against the PreAward)
- > When a PreAward will not be funded by the Sponsor

Note: When a Sponsor does not fund the anticipated contract or grant, ALL PreAward expenditures MUST be immediately transferred to the unrestricted funding source identified on the PreAward request, and the PreAward budget will be automatically reversed

### **Tracking PreAward Information**

PAMIS enables the tracking of PreAwards throughout their life via the grid that can be viewed through Award Information by clicking on the award number, searched for using various criteria through the search engine in Award Information, and the history of the award.

### Receipt of PAMIS Award

When the "actual" award is received and fully executed, it will be treated as a new or continuing award in PAMIS. The Pre-award budget will be automatically reversed and the Department will complete the BEA form in PAMIS for the actual awarded amount.

Revised: 1/24/2022 Page **41** of **44** 

# SPA Review & Approval of PreAward Spending Requests

# **EXHIBIT F**

# Frequently Asked Questions

### 1. Q: What is a PreAward Spending Approval?

**A:** Approval to incur expenditures in support of a specific sponsored project (contract/grant) prior to the receipt and acceptance of a fully executed award.

### 2. Q: When is it appropriate to request a PreAward?

**A:** A request for PreAward spending is appropriate when it is essential and critical to meet project objectives. Here are a few examples: 1) Purchasing equipment or supplies with long-lead times or to secure a time-limited discount, 2) Supporting essential and critical employment commitments, and 3) Attending an essential and critical project meeting.

### 3. Q: What are the required elements?

**A:** The PI must have: 1) an approved eCAF proposal; 2) approval of all required COI disclosures, and approval/completion of Research Integrity protocols; 3) Departmental Approver (or Organizational Approver, if applicable) certification regarding responsibility of monetary loss; (4) Alternate Department FAU (or Alternative ORG FAU, if applicable); and 5) Written Firm Commitment from the sponsor agency's authorized representative or, alternatively, a statement from the PI's Departmental Approver (or Organizational Approver, if applicable) providing approval to proceed even if a firm commitment cannot be established.

### 4. Q: Why is a completed eCAF required?

**A:** Incomplete or incorrect eCAF information can cause delays. The Online PreAward Request System automatically pulls information from the eCAF that was finalized at the proposal stage. Information, such as the name of the Prime Sponsor, Anticipated Award Nature (e.g., Grant vs. Contract), Anticipated Award Type (e.g., New vs. Renewal), if incorrectly completed and finalized, will continually prepopulate incorrect information from the eCAF, into any PreAward requests made throughout the life of the Award and can cause the incorrect fund attribute to be issued to the PreAward in error.

Revised: 1/24/2022 Page **42** of **44** 

# SPA Review & Approval of PreAward Spending Requests

### 5. Q: Why is approval of all required COI disclosures and Research Integrity protocols essential?

**A:** The PreAward Spending Request may be delayed if the Conflict of Interest Disclosures (if applicable) are not received and approved by the Office of Research Integrity (ORI) for all needed personnel. ORI will not release the PreAward for approval until all applicable disclosures are received and approved. Please be sure all such approvals (700 U, PHS Form 500, etc.) are attached to the PAMIS record before forwarding the PreAward to ORI for review.

Further, if the project contains research requiring regulatory committee approval (IRB, IACUC, biosafety, etc.), ORI will not release the PreAward for approval until all regulatory approvals are in place and any required human subjects training/tutorial has been completed.

### 6. Q: What constitutes a Sponsor's Firm Commitment?

**A:** UCR must obtain written confirmation from the sponsoring agency's authorized representative, indicating that the Award is forthcoming and that the requested PreAward costs are allowable. Additionally, the CGO must confirm that the sponsor's written commitment includes, at minimum: 1) the project period start date and end date; 2) the anticipated award amount; and 3) the anticipated date UCR should expect to receive the fully executed Award.

### 7. Q: Why is the start date important for a Firm Commitment?

**A:** The start date is critical, as this will determine whether the costs you intend to incur will be allowable within the 90-day PreAward spending period afforded by the majority of our federal sponsors. Federal sponsors will not approve expenses that occurred more the 90 days prior to the start of the award unless exceptional prior approval is granted by the federal contract and grant officer.

### 8. Q: Is a Firm Commitment given by a Program Officer or Technical Officer acceptable?

**A:** No. Commitment to fund the project must be provided by the sponsoring agency's authorized representative (an individual who has legal and financial authority to bind agreements on behalf of the sponsoring agency).

# 9. Q: Should the CGO attempt to obtain a Firm Commitment even if the Departmental or Organizational Approver indicates their willingness to proceed even without a firm commitment?

**A:** Yes. Even if the Departmental Approver (or Organization Approver, if applicable) indicates their willingness to proceed without a Firm Commitment, the CGO should still make an initial attempt to obtain a firm commitment, and at minimum inquire with the sponsor and ask when UCR should expect to receive the official Award and its anticipated start date.

Revised: 1/24/2022 Page **43** of **44** 

# SPA Review & Approval of PreAward Spending Requests

### 10. Q: What if a Firm Commitment cannot be obtained?

**A:** If UCR cannot obtain a firm commitment from the sponsor, the PreAward may proceed without receiving the firm commitment provided the Departmental Approver (or Organizational Approver, if applicable) has authorized the PreAward to proceed despite the increased financial risk and provided PreAwards are not disallowed by a Sponsor (e.g., State of California). Such certification to proceed in the absence of a firm commitment must be indicated in the Online PreAward Request System along with the appropriate Alternate FAU.

### 11. Q: Are Renewal Awards handled differently?

**A:** Yes. If the anticipated award is a "Renewal," further confirmation is needed to determine if the project will be issued with a new sponsor award number or whether an amendment will be issued to the existing award.

### 12. Q: Who assists the PI in determining if a PreAward should be requested?

**A:** The Department Analyst assists the PI in determining if a PreAward can be requested, pursuant to UCR Policy and Procedure 550-80 (PreAward Spending), and, if appropriate, a PreAward request can be initiated online by the PI's Department Analyst, and then routed for required campus approvals.

### 13. Q: What is the typical timeline for review within SPA?

A: SPA CGOs shall review Online PreAward Spending Requests within 24-48 hours of receipt.

### 14. Q: What could delay the PreAward approval process?

A: There are several factors that can delay the approval of the request for PreAward spending.

- All regulatory approvals must be in place. If Conflict of Interest Disclosures (if applicable) are not received and approved by the Office of Research Integrity (ORI), then ORI will not release the PreAward for approval until all applicable disclosures are received and approved. If the project contains research requiring regulatory committee approval (IRB, IACUC, biosafety, etc.), then ORI will not release the PreAward for approval until receipt of all regulatory committee approval(s), including verification of human subjects training/tutorial completion (if required).
- O PreAward Spending Requests without a firm commitment from the sponsor. If a firm commitment cannot be obtained from the sponsor yet the Departmental Approver (or Organizational Approver, if applicable) has indicated only to proceed in the event that a firm commitment can be obtained, then the PreAward will need to go through the entire routing process again should the Departmental Approver (or Organizational Approver, if applicable) be willing to take the increased financial risk and change the certification to proceed even in the event that a firm commitment cannot be established. (Otherwise, the PreAward Spending Request will need to be withdrawn.)

Revised: 1/24/2022 Page **44** of **44**